FINAL Initial Study/Mitigated Negative Declaration (IS/MND)

Permanent Sealing of Orphan Wells in Canoga Park, Los Angeles County

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LIST OF ACRONYMS

AB	Assembly Bill
AQMP	Air Quality Management Plan
BLM	Bureau of Land Management
BMPs	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalGEM	California Department of Conservation, Geologic Energy Management Division
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
CHRIS	California Historical Resources Information System
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CTR	California Toxics Rule
CWA	Clean Water Act
dB	Decibels
DOC	California Department of Conservation
DPM	Diesel Particulate Matter
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources

EPA	United States Environmental Protection Agency
ES	Endangered Species
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
GHG	Greenhouse Gas
GSP	Groundwater Sustainability Plan
GWP	Global Warming Potential
IPCC	Intergovernmental Panel on Climate Change
IS/MND	Initial Study-Mitigated Negative Declaration
Lmax	Maximum Sound Level
LST	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MMs	Mitigation Measures
NAAQS	National Ambient Air Quality Standards
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	Ozone
P&A	Plugging and Abandoning
PM_{10}	Particulate Matter of 10 Microns or Less
$PM_{2.5}$	Particulate Matter of 2.5 Microns or Less
PRC	California Public Resources Code
PTO	Potential to Occur
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation Recovery Act
RMP	Risk Management Plan
ROGs	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board

SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SDWA	Federal Safe Drinking Water Act
SEA	Significant Ecological Area
SSC	Species of Special Concern
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
UIC	Underground Injection Control
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VCAPCD	Ventura County Air Pollution Control District
VMT	Vehicle Miles Traveled
WEAP	Worker Environmental Awareness Program

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

1.0 INTRODUCTION

The Permanent Sealing of Orphan Wells in Canoga Park Project (proposed Project, Project) consists of the State of California's plugging and abandoning (P&A) of six (6) orphan wells in the inactive CalGEM-designated Canoga Park oil field (private land, no longer an active oil field), within unincorporated Los Angeles County. A portion of the Project site (where access road improvements would occur) is located within the City of Los Angeles.

P&A refers to the permanent closure and sealing of a well by placing cement and other approved materials in the former well. The Project will result in the permanent sealing of the six (6) orphan wells in the Canoga Park oil field and removal of associated facilities.

All six wells have had past instances of gas leaks, as indicated in the gas detection results from the September 8, 2015, inspection (shown in Table 1.0-1). These wells have been regularly monitored since then, with recent inspections in 2022 and 2023 suggesting consistent hydrocarbon liquid leak on two wells (Knapp 1 and Knapp 3). However, some similarities in 2015 gas leak measurements and the close proximity of these six wells suggest possible connection between them underground as they penetrate the same reservoir area and modifications to one well could cause changes in adjacent wells. Therefore, to prevent further gas leaks from other wells, it is essential for the P&A of all wells at once. Considering their locations and past gas leak incidents, these wells pose a significant public risk and require immediate P&A.

Table 1.0-1. Gas Leak Tests

#	API	Well Name	Measurement Result
1	0403701160	Knapp 4-1	Leak detected, near 500 ppm
2	0403701161	Knapp 1	Leak detected, > 2000 ppm
3	0403701162	Knapp 1-A	Leak detected, > 2000 ppm
4	0403701166	Knapp 6	Leak detected, near 69 ppm
5	0403700494	Knapp 3	Leak detected, $\leq$ 50 ppm
6	0403701167	Lucky Star 1	Leak detected, > 2000 ppm

Notes: Gas test leaks prepared on 09/08/2015. The maximum reading on gas detector is 2000 ppm and set to read for CH_4.
API refers to the well identification number established by CalGEM.
ppm = parts per million.

Figure 1-1 depicts the well locations from a regional context and Figures 1-2 and 1-3 depict the well locations in local context.

1.1 PROJECT NAME

Permanent Sealing of Orphan Wells in Canoga Park

1.2 LEAD AGENCY NAME AND ADDRESS

California Department of Conservation
California Geologic Energy Management Division
715 P Street, MS 1803
Sacramento, California 95814

1.3 CONTACT PERSON, PHONE NUMBER, AND EMAIL ADDRESS

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1.4 PROJECT PROPONENT NAME AND ADDRESS

California Department of Conservation
California Geologic Energy Management Division
715 P Street, MS 1803
Sacramento, California 95814

1.5 PROJECT DESCRIPTION AND PURPOSE

The proposed work involves the P&A of six wells, removal of tanks, above-ground pipelines, debris, and other Project-related facilities and equipment. For well permanent sealing, each well would be cleaned out and then plugged with cement and inert mud to surface. Then the well casing would be cut down to approximately five to ten feet below ground level, and the site would be backfilled with soil up to ground level.

All P&A and construction activities would utilize existing roads and previously disturbed areas to the maximum extent feasible. Based on the conditions at the well locations, the P&A work would require road construction, slope grading, and some vegetation clearance to facilitate access to the well sites and set up equipment. Additionally, the vegetation around the wells needs to be cleared to prevent fire hazards during the P&A work.

Wells Knapp 1, 1-A, 3, and Knapp 6 are situated in a relatively flat plain area, as shown in Appendix A. Being located in a relatively flat area means that no substantial grading would be necessary. Establishing road access to these three nearby wells (Knapp 1, 1-A, and 3) would require a 20-foot-wide path, extending

125 feet from the existing El Escorpion Trail to the north. A 0.25-acre staging area for equipment for these three wells would be required. Road access to well Knapp 6 would also be approximately 20 feet wide and 150 feet long from the trail, with a staging area for equipment occupying about a quarter acre.

Wells Knapp 4-1 and Lucky Star 1 are situated on a hillside, as shown in Appendix A. Grading would be necessary to access these well sites, with Knapp 4-1 surface location approximately five to 10 feet above the foot of the hill and Lucky Star 1 approximately 20 feet above. Road access would need to be approximately 20 feet wide and 400 feet long from the existing trail. The adjacent hillside area to the west has undergone grading or disturbance to accommodate the installation of erosion control barriers. Up to 0.5-acre of surface area may be affected by the disturbance. Additionally, the area disturbed by the P&A process of the other three nearby wells may also be available for re-use to stage some equipment.

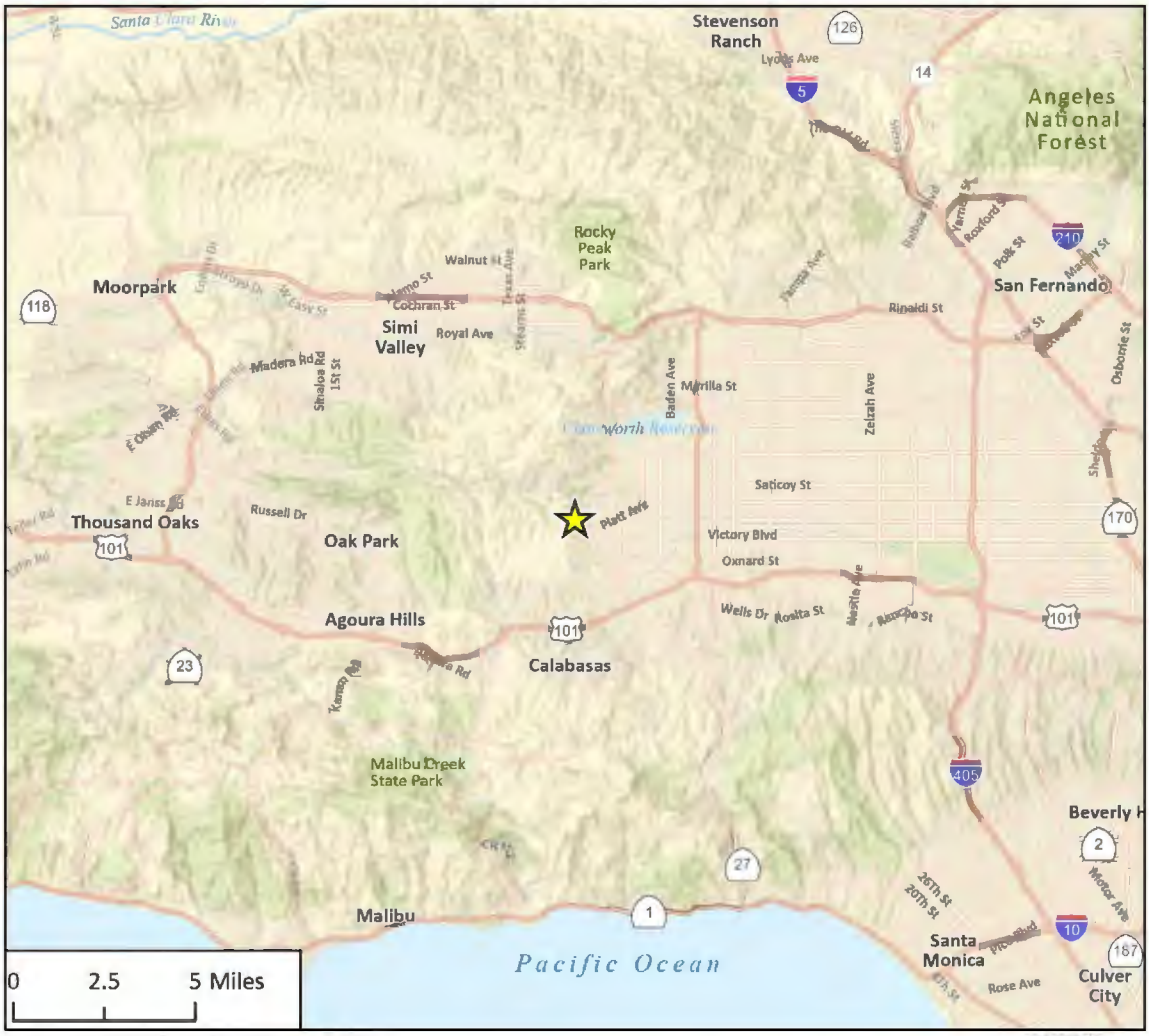
Access to the site would be along the Victory Trail, which follows the Hunter Allen Trail (former dirt road) north from the Victory entrance to the intersection with El Escorpion Trail 0.75 mi (3,950 feet) then east on El Escorpion Trail 750 feet to the site. This access would require leveling and regrading 500 feet of El Escorpion Trail and additional minor leveling for access to the well sites from El Escorpion Trail, as shown in Figure 1-3. Grading associated with access roads to the individual wells and the widening of El Escorpion Trail is assumed to reach 6–12 inches below the surface.

A detailed Project description describing the P&A and decommissioning process is provided in Section 2.0 below.

1.6 PROJECT LOCATION

The well sites are located in the Canoga Park oil field, within unincorporated Los Angeles County. A portion of the Project site used for access to the wells is located within the City of Los Angeles in El Escorpion Park. Photos of the wells and equipment utilized for P&A are included in Appendix A.

Figure 1-1. Regional Location



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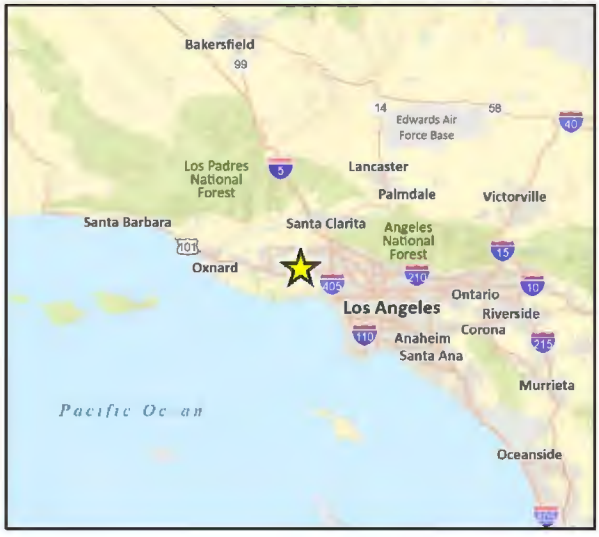

Well Locations

N

Figure 1-2. Project Location – Full Map Extent



Figure 1-3. Project Location – Well Sites Map Extent



2.0 PROJECT DESCRIPTION

The proposed Project (P&A of six wells in the Canoga Park oil field) is generally comprised of three components: permanent sealing, decommissioning of facilities and decommissioning of pipelines. Each are discussed below along with best management practices and applicable agency requirements.

2.1 WELL PERMANENT SEALING

A workover rig and cement truck are required to P&A a well and temporary equipment such as pumps and return bins may be needed. There would not be any permanent facilities constructed, and no expansion of associated facilities would be required. Various mobile temporary equipment would be used, as well as vehicles to transport personnel and materials to and from the site on established access roads. Table 2.1-1 provides a list of the standard equipment and operating time required to P&A a single well, when complex well permanent sealing is not anticipated.

Table 2.1-1. Typical Equipment Required for Plugging and Abandoning a Single Well[1]

Equipment	No. of Units	Brake Horsepower	No. Days Use per Well	No. of Hour Operated per Day	Total Hours Operated to Complete Well Permanent Sealing
Workover rig (or coiled-tubing unit)	1	450	5	12	60
Rig Generator	1	415	5	12	60
Cement Truck	1	400	4	3	12
Cement Pump Trailer	1	500	4	3	12
Truck Mobilization	1	450	2	5	10
Bulk Truck (water)	2	400	2	3	12
Vacuum Truck	1	400	2	5	10
Truck (wire-line)	1	300	2	3	6
Crane	1	425	3	2	6
Backhoe	1	100	1	6	6
Utility Tractor	1	100	1	6	6
Compactor - optional	1	75	1	6	6

[1] Includes equipment anticipated for extended usage when accessing and P&A wells requiring intensive clearing and grading.

The wells are on previously constructed well pads composed of compressed soil. Some of the wells are within cemented cellars and there is often a concrete pad for the pumping unit (see Appendix A for pictures). The permanent sealing rig and all associated equipment would be staged on the well pad or on the lease roads. 0.25- to 0.5-acre area is needed to contain all P&A equipment within a pad; based on the overlapping buffer distances, approximately one acre of disturbance is required. Each well would take approximately one week to P&A.

The rig is conveyed to the site on a heavy truck and is stationed at the wellsite to perform well permanent sealing. While the rig is on location until the abandoning work is complete, there would be periodic light vehicle traffic on the lease roads to and from the site to transport workers and equipment. The well casing would be cut off five to 10 feet from surface after it is plugged. Then, the site would be backfilled. Some road repairs may be necessary to safely move the rig to a location.

All P&A and decommissioning activities would occur only between the hours of 7:00 a.m. and 7:00 p.m. No nighttime activities would be conducted, and all activities and deliveries would occur within this time frame, unless in rare circumstances, the activity is for operational safety purposes to prevent well failure during permanent sealing or in an emergency situation. No road closures are proposed as a part of the proposed Project; however, some public trails may be closed to prevent recreational user access.

2.2 DECOMMISSIONING FACILITIES

After P&A, the next step is decommissioning of associated facilities. This decommissioning process might require temporary equipment like return bins and roll-off bins. The work involves removing deserted tanks, vessels and containers, and backfilling sumps. These activities would be facilitated using mobile temporary equipment (see Table 2.3-1) to address oil and gas facility-associated components. Most of this work would be conducted using a backhoe and includes removal of concrete pads that the tanks or vessels sat on. The facilities are mostly set on a pad of compressed soil or gravel that have been maintained in fair condition until they were orphaned. All equipment would be staged on the facility pad.

2.3 DECOMMISSIONING PIPELINES

Sites with pipelines would also have the above-ground pipelines removed in addition to the decommissioned facilities discussed above.[1] Below-ground pipelines would be cleaned and capped in place. Temporary equipment, such as a backhoe, return bins, and roll-off bins, may be needed. Work would consist of first flushing the pipelines attendant to the oil and gas wells/facilities with water and then pulling the above-ground pipelines, cutting them into pieces, and then removing them from the site. Pipelines would be depressurized and drained prior to removal. Below-ground pipelines would be capped and then left in place after they are flushed of oil. The flushed and purged oil and fluid that have exited the pipeline would be properly collected and disposed of in baker tanks, vacuum trucks, or equivalent and removed from the site, in compliance with local, state, and federal requirements.

Table 2.3-1. Site Restoration and Decommissioning Equipment Required for Each Well Site

Equipment	No. of Units	No. Days Use per Well	No. of Hour Used per Day	Total Hours Used for Site Restoration
Scraper	1	1	5	5
Backhoe	1	1	5	5
Truck (soil, concrete, tank, pipeline removal)	2	2	5	20
Crane	1	1	5	5

California Code of Regulations (CCR), Title 14, Section 1776 requires auxiliary holes, such as rat holes, to be filled with earth and compacted properly; all construction materials, cellars, production pads, and piers to be removed and the resulting excavations filled with earth and compacted properly to prevent settling; well locations within pads would be graded and cleared of equipment, trash, or other waste materials.

All waste, including sanitary items, rubbish, debris, and other discarded materials, would be carefully managed and regularly removed in accordance with federal, state, and local regulations for proper handling, storage, and disposal to prevent spills or contamination. Fuels and lubricants would only be

[1] Subsurface pipelines would be cleaned to remove any hydrocarbons. The subsurface piping would be filled with an inert substance (water or nitrogen), and a cap would then be welded on its end(s). The pipelines would have very little to no gas inside of them since they would be depressurized.

stored in designated areas. Refueling would take place within bermed and designated areas. Oil spill response kit and spill response equipment would be located on-site and on-vehicle. Enough supply of sorbent and barrier materials would be available to contain any runoff from contaminated areas. Hot work would be performed on designated areas under a hot work program that would ensure proper training, monitoring, and water is available to reduce the potential for fires and other hot-work related issues.

Additionally, any excess concrete at well locations would be broken down and taken to a recycling facility. The amount of concrete and other facilities to be removed are estimated to vary by site but would be generally less than five truckloads.

Hazardous materials would be removed and disposed of in accordance with both state and federal guidelines. There would be sampling and running fluid analysis on unknown fluids remaining in tanks, sumps, and other containers, as directed, to categorize their contents as hazardous or nonhazardous as defined in Section 25117, Division 20, Chapter 6.5, of the California Health and Safety Code and state regulations found in the CCR, Title 22, Division 4.5. A state-licensed transporter would be responsible for safely moving and disposing of waste in designated areas, ensuring compliance with all waste disposal regulations at the federal, state, and local levels.

2.4 BEST MANAGEMENT PRACTICES

CalGEM is committed to preventing or minimizing any potential impact(s) on the environment arising from the proposed Project. This commitment includes implementing protective measures and mitigation measures (MMs), such as conducting biological surveys for presence of endangered species, applying protective measures, and developing contingency plans to safeguard the safety and well-being of the public and the environment throughout the Project's lifespan.

a. Pre-disturbance Biological Survey. These wells are located in oil fields that fall within state or federal endangered species (ES) areas, identified through the California Natural Diversity Database search by oil field, conducted in April 2024. A five-mile radius was used for areas with small field boundaries.

To address potential biological disturbances, a comprehensive biological survey would be conducted on-site to ascertain the presence of any ES. The survey would assess the expected work area, including the structural debris field,

areas proximate to the Project site, access routes, expected parking areas, and expected water crossings. The biological survey would determine:

I. If any specific biological concerns exist on the site;

II. If any Best Management Practices (BMPs) are applicable to the site, or whether any BMPs are needed;

III. Whether biological monitoring is needed during P&A and site restoration activities.

b. Protective Measures. Following biological survey of the area, CalGEM and its contractor will collaborate with California Department of Fish and Wildlife (CDFW) trustees to prepare avoidance measures if an ES is observed in the area. These measures aim to reduce adverse effects on existing endangered species. CalGEM will require strict adherence to these practices during the Project:

1. P&A operations will use existing pads, lease roads, or areas already disturbed. The work would focus on the previously built well and facility pads. Staging areas would be set up on these pads, roads, or other pre-disturbed locations. After the well and facility are removed, the footprints on existing disturbed areas (pads, roads, etc.) will be leveled.
2. No more than three months prior to moving a rig, excavator, bins, and other heavy equipment to a well or facility location, a Qualified Biologist will conduct a biological survey for ES to examine the portions of the Project area to be disturbed. The survey will provide 100 percent coverage of the well pad or facility pad that is being used. The biologist will flag all potential ES areas. Where feasible, an avoidance buffer of 50 feet or greater around this flagged area would be maintained.
3. Before starting any work in the Project areas, all individuals involved or working there will undergo an awareness education program. This program will include a presentation by a biologist who is knowledgeable about the life cycles and habitats of potential ES within the Project area.
4. Work is scheduled for daylight hours, from sunrise to sunset, and no work is anticipated to occur outside of the 7:00 a.m. to 7:00 p.m. timeframe. In an emergency situation or for operational safety purposes to prevent well failure during permanent sealing, nighttime work may occur but is not anticipated. If nighttime work is required due to an emergency, and the site is close to public areas, precautions will be taken to reduce noise and light disturbances. This may include enclosing the work area with barricades or fencing. If an emergency occurs and nighttime activities

are needed, the site will be well illuminated, and all vehicles will operate at speeds of five miles per hour or less during emergency nighttime hours. All temporary construction lighting fixtures required during nighttime hours will be shielded and focused downward. Any local municipal codes will be followed.

5. The Project does not require the use of herbicide for any reason.

If an ES is unexpectedly encountered during Project activities, all potentially harmful work to the ES will stop immediately until the species leaves the area on its own. United States Fish and Wildlife Service (USFWS) and CDFW will be promptly notified. A Qualified Biologist will be sent to collaborate with the relevant agencies on mitigation efforts.

While unexpected, other potential risks to the public arising from this work include the generation of air pollution during intrusive procedures, as well as noise and other physical hazards, unanticipated roadblocks or closures, waste materials, and the potential for damage to public utilities. The protocols implemented to address any prospective hazards to the community are detailed below:

1. Air Contaminants: Visual monitoring of air quality will be conducted throughout the duration of activities. In the event that dust levels exceed the stipulated requirements of the Air Pollution Control District/Air Quality Management District and are observed emanating from the work area, operations will be promptly halted, and measures to suppress dust will be expeditiously enacted including the use of water trucks.
2. Barricades: Whenever work activities are being executed in close proximity to the public, the designated work zone will be enclosed by barricades or fencing. These measures will serve to demarcate the field teams from the public.
3. Stockpiles: All soil stockpiles will be managed in rigorous adherence to the approved, Project-specific waste management plan. They will be meticulously positioned atop plastic sheeting and securely anchored by additional layers of plastic sheeting on top of the soils during periods of inactivity. Only the actively utilized face of the soil stockpile will be exposed during periods of active work. The waste will be systematically partitioned and secured to prevent public access. Any soils potentially contaminated will be tested and disposed of as per established hazardous material disposal requirements.

4. Traffic: Large truck travel and construction traffic will be limited to off-peak commute hours. A permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways will be obtained from Caltrans as required. If construction traffic is expected to cause issues on any State facilities, a construction traffic control plan detailing potential impacts will be submitted to Caltrans for review.
5. Drainage Protection: CalGEM will follow drainage protection measures for all drainages that could be affected by project activities. All bed, banks, or channels of any drainage shall be avoided and not modified. In addition, drainages shall be protected from fugitive dust and debris with best management practices including debris and sediment control, and erosion and polluted runoff would be minimized. The project shall not divert or obstruct the natural flow of any river, stream or lake; change the bed, channel, or bank of any river, stream, or lake; use material from any river, stream, or lake; or deposit or dispose of material into any river, stream, or lake.
6. Fugitive Dust Control Postings: CalGEM shall post AQMD and VCAPCD's complaint hotline number in a sign viewable to the public on the southern entrance of the Victory access route and any staging areas. The 24-hour VCAPCD Complaint Hotline is 805-303-3700 and the SCAQMD complaint phone number is 800-288-7664.

c. Contingency Plans. A site-specific Health and Safety Plan will be developed following the guidelines set forth in the CCR, Title 8, Section 5192 and Division guidance. This plan will encompass a comprehensive set of measures, including contingency plans, to ensure the safety and well-being of the public and the environment during field operations. This will involve delivering an emergency response plan, outlining procedures for notification, immediate action, and reporting in the event of an emergency during State permanent sealing work. The following will be required to ensure public well-being and environmental safety during the Project:

1. Before commencing any site work, a thorough job hazard analysis will be conducted to identify potential risks and hazards throughout the Project's duration. These may include scenarios like blowouts, fires, serious accidents, as well as gas and water leaks. As part of this analysis, a certified Health and Safety Officer will be identified. This officer will be responsible for conducting in-person audits of the sites every two weeks. They will then

submit a written report to CalGEM, outlining the identified risks and their corresponding mitigation measures throughout the Project's duration.

2. Preparing a Project-specific Emergency Response Plan that covers the following:
    a. Identify all relevant government agencies (federal, state, and local) having jurisdiction over the Project in case of an emergency, including potential emergency situations;
    b. Outline notification and response processes and identify roles and responsibilities;
    c. Describe the training provided to ensure the Emergency Response Plan is effectively implemented, including any required certifications;
    d. Outline procedures for the mitigation of a release or threatened release to minimize any potential harm or damage to people, property, or the environment;
    e. Identify evacuation plans and procedures, including immediate notice, for all Project sites;
    f. Include spill contingency planning developed in accordance with the CCR, Title 14 Section 1722.9.
3. Conducting emergency response trainings and drills prior to initiation of work and at the beginning of each subsequent month until the Project work is complete.
4. Conducting safety meeting with all crew members. Topics include safe driving protocols, emergency driving procedures in case of an accident, and evacuation procedures in case of a natural disaster.
5. Updating the Emergency Response Plan and/or Spill Contingency Plan if any issues are identified during the emergency response drill and must have CalGEM approve the updated plan prior to implementation.
6. In the event of an emergency or incident, the California Governor's Office of Emergency Services, Division, and other agencies will be notified, consistent with state requirements and the release reporting matrix: https://www.caloes.ca.gov/FireRescueSite/Documents/Release%20Reporting%20Matrix.pdf.

7. In the event the permanent sealing is on Bureau of Land Management (BLM) land, the appropriate BLM representative will be notified of the emergency as well.
8. Any discharge or threatened discharge of oil into waters of the state will be immediately reported and proceed with spill response activities consistent with the State Oil Spill Contingency Plan, incorporated references and attachments, and other applicable federal, state or local spill response plans. The State Oil Spill Contingency Plan can be found here: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=172767&inline
9. Incident and spill response activities will be managed utilizing the Incident Command Structure in accordance with the Incident Management Handbook [https://www.atlanticarea.uscg.mil/Portals/7/Ninth%20District/Documents/USCG_IMH_2014_COMDTPUB_P3120.17B.pdf?ver=2017-06-14-122531-930]
10. In the event of an emergency or incident that arises due to the work, CalGEM, with the assistance of the P&A contractor (Contractor), will manage the incident as the responsible acting party consistent with state requirements and the Project-specific Emergency Response Plan. The P&A Contractor will cooperate with federal, state, and local government officials to develop a unified command structure for emergency response, if that becomes necessary.

d. Fire Response Planning. The Applicant shall ensure that fire response capabilities are in place during the entire Project, including the following:

1. Cutting and welding shall comply with California Fire Code 3304.6 and National Fire Protection Association 51B;
2. Fire Watch shall conform to California Fire Code 3304.5;
3. Fire extinguishers are required in accordance with California Fire Code 3315 and 906;
4. All construction equipment used for any vegetation clearing shall be equipped with spark arrestors, and monitoring and training to prevent vehicle traffic off roadways to ensure activities do not impact dry brush and lead to fire.

2.5 APPLICABLE AGENCY REQUIREMENTS

This Project includes well P&A and decommissioning activities in the County of Los Angeles and trail widening/leveling activities in the City of Los Angeles. The

primary issue related to local codes is noise limits on construction. Each are discussed below.

Los Angeles County

Los Angeles County Municipal Code (Section 12.08.440) indicates that "*Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line.*"

Los Angeles City

Regarding construction, Los Angeles Municipal Code Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) indicates that no construction or repair work shall be performed between the hours of 9:00 p.m. and 7:00 a.m. No construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, or at any time on Sunday. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits.

2.5.1 Project Approvals and Permits Under CEQA

Upon Project approval, CalGEM would adopt this Initial Study/Mitigated Negative Declaration (IS/MND) as the lead agency pursuant to CEQA.

Additionally, the following permits, reviews, consultations, and approvals would be required to be completed or approved prior to the commencement of the Project (refer to Table 2.5-1).

Table 2.5-1. Project Approvals and Permits

Agency	Permit/Approval
Federal	
United States Bureau of Land Management Sundry Notices	Sundry Notice for wells located within Federal leases
State	
SWRCB SWRCB in Coordination with CalGEM	Construction Stormwater Pollution Prevention Plan
CalGEM	Well permitting
CDFW	Biological species oversight/permits

Agency	Permit/Approval
Santa Monica Mountains Conservancy (SMMC)	Site disturbance permits
Local	
Air Quality Management District	Authority to Construct Permits Current Permit to Operate
LA County Public Works	Grading permits
LA County Fire	Well permitting and hotwork
LA County Office of Oil and Gas	Well permitting
Ventura County Planning and Zoning	Grading review
City of LA Parks and Rec	Encroachment review
City of LA Public Works	Grading permit
City of LA Fire	Well permit
Council District 12	Permit review
Mountains Recreation and Conservation Authority (w/SMMC)	Permit review
West Hills Neighborhood Council	Permit review

CalGEM = California Geologic Energy Management Division; SWRCB = State Water Resources Control Board; CDFW = California Department of Fish and Wildlife.

3.0 SUMMARY OF FINDINGS

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

This Project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

Table 3.1-1. Environmental Issues and Potentially Significant Impacts

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

3.2 ENVIRONMENTAL DETERMINATION

☐ On the basis of this initial evaluation: I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by

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mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

DocuSigned by:
576670DDEE56422

Signature	*Date*
Robert Schaaf	Department of Conservation, CalGEM
Printed Name	*Agency*

4.0 ENVIRONMENTAL ANALYSIS AND INITIAL STUDY CHECKLIST

The evaluation of environmental impacts provided in this IS/MND is based in part on the impact questions contained in Appendix G of the State CEQA Guidelines; these questions, which are included in an impact assessment matrix for each environmental category (Aesthetics, Agriculture/Forestry Resources, Air Quality, Biological Resources, etc.), are "intended to encourage thoughtful assessment of impacts." Each question is followed by a check-marked box with column headings that are defined below.

Potentially Significant Impact. This column is checked if there is substantial evidence that a Project-related environmental effect may be significant. If there are one or more "Potentially Significant Impacts," a Project Environmental Impact Report would be prepared.

Less than Significant with Mitigation. This column is checked when the Project may result in a significant environmental impact, but the incorporation of identified Project revisions or MMs would reduce the identified effect(s) to a less than significant level.

Less than Significant Impact. This column is checked when the Project would not result in any significant effects. The Project's impact is less than significant even without the incorporation of Project-specific MMs.

No Impact. This column is checked when the category does not apply.

Detailed descriptions and analyses of impacts from Project activities and the basis for significance determinations are provided for each environmental factor on the following pages.

4.1 AESTHETICS

AESTHETICS – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) 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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 Environmental Setting

The well sites are clustered within vegetated foothills along El Escorpion Trail. The Project site is surrounded by trails and scattered vegetation to the north, south, and west and residential development to the east. Views of foothills to the north are accessible at the Project site. The nearest designated state scenic highway to the well sites is State Route 27, located approximately 9.5-miles southeast of the well sites (California Department of Transportation [Caltrans] 2024).

4.1.2 Regulatory Setting

There are no federal or state regulations, laws, or policies pertaining to aesthetics relevant to the proposed Project. Local regulations, laws, and policies pertaining to aesthetics relevant to the Project are included below.

4.1.2.1 Local

Los Angeles General Plan 2035. The General Plan 2035 contains multiple policies designed to protect visual and scenic resources. The County of Los Angeles General Plan 2035 recognizes hillsides and ridgelines as scenic resources in Los Angeles (County of Los Angeles 2022). Policies relevant to the proposed Project include the following:

- **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 13.5:** Encourage required grading to be compatible with the existing terrain.

Los Angeles County Code Section 22.140.400. This section requires orphan wells to undergo P&A, and all equipment and pipelines not necessary for the operation and maintenance of other existing wells are to be removed.

City of Los Angeles General Plan. The City's General Plan defines scenic views or vistas are the panoramic public view access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views is from park lands, private and publicly owned sites and public rights-of-way (City of Los Angeles 2001).

4.1.3 Impact Analysis

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

Less Than Significant. The well sites are adjacent to hillsides and ridgelines which provide scenic views to the public. The proposed Project would not develop any new structures and would not result in any additions to the existing wells or well sites. Due to the existing topography of the Project area, the well sites are obscured from viewers along residential roads east of the Project site. Temporary closure of El Escorpion Trail would temporarily impede trail access near the site. However, connector trails approximately 150 feet north would remain accessible. Viewers from hiking trails to the north would be able to view the well

sites and construction equipment, including use of a 20-meter-tall workover rig, temporary proposed Project activities would not result in substantial obstructions of views of hillsides, ridgelines, or general open space within the canyon from these trails. Equipment would be staged along the hillside, reducing the potential to obstruct the views of hills, ridgelines, and open space, visible when traveling east and west along the hiking trail to the north of El Escorpion Trail, while the well sites are located down the hillside to the south. Following P&A and decommissioning activities, no long-term obstructions would occur beyond existing conditions. Therefore, the proposed Project would have a less than significant impact on scenic vistas.

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

No Impact. Due to the distances between the well sites and State Route 27, varying topography, and intervening structures, the well sites are not visible from State Route 27. The proposed Project would not require the removal of existing trees, rock outcroppings, or historic buildings visible from a state scenic highway. Therefore, the proposed Project would not substantially damage scenic resources within a state scenic highway. No impact would occur.

c) 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?

Less Than Significant. The well sites are within areas classified as urbanized.[2] Therefore, this analysis examines the potential for the proposed Project to conflict with applicable zoning and other regulations governing scenic quality. The well sites are located in the unincorporated community of West Hills on parcels zoned Residential Planned Development (RPD) and Single Family Residential (R-1). While oil infrastructure and extraction are not permitted uses in these zones, the proposed Project involves the P&A and decommissioning of six orphan wells. Construction equipment, including a 20-meter-tall workover rig, may be visible

[2] California Public Resources Code Section 21071 defines an unincorporated area as an "Urbanized area" only when the area is completely surrounded by one or more incorporated cities, or located within an urban growth boundary and has an existing residential population of at least 5,000 persons per square mile. The well sites are within the sphere of influence of the City of Los Angeles (Los Angeles Local Agency Formation Commission 2015). According to the California Department of Finance, the population of Los Angeles is 3,776,109 (2024). According to the United States Census Bureau, Los Angeles is 469.49 square miles (2024). Accordingly, the population per square mile for Los Angeles is approximately 8.043. Therefore, the well sites qualify as an urbanized area pursuant to California Public Resources Code Section 21071.

during P&A activities. Pursuant to Los Angeles County Code Section 22.140.400, orphan wells are required to undergo P&A, and all equipment and pipelines not necessary for the operation and maintenance of other existing wells are required to be removed. The proposed Project would fulfill the requirements of Los Angeles County Code Section 22.140.400, and by doing so would remove views of well facilities in the Residential Planned Development and Single Family Residence zones. Therefore, implementation of the Project would improve scenic quality and allow for future development in the RPD and R-1 zones, and the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

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

Less Than Significant. The proposed Project does not involve components which have the potential to cause glare. As described in Section 2.4, *Best Management Practices*, P&A and decommissioning activities are scheduled during daylight hours, and therefore no nighttime lighting is anticipated to be used. In the unlikely event nighttime work is required for emergency situations or operational safety purposes, all temporary lighting would be shielded and focused downward on work areas. Because nighttime lighting is not anticipated to be used, and in the event nighttime lighting is required, BMPs to reduce glare would be implemented, the proposed Project would have a less than significant impact related to creating substantial light or glare.

4.1.4 Mitigation Measures

The proposed Project would not result in significant impacts on aesthetics; therefore, no mitigation is required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

AGRICULTURE AND FORESTRY RESOURCES – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Project of the California Natural Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Pub. Resources Code, § 12220, subd. (g)), timberland (as defined by Pub. Resources Code, § 4526), or timberland zoned Timberland Production (as defined by Gov. Code, § 51104, subd. (g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

4.2.1 Environmental Setting

The well sites are within unincorporated Los Angeles County while the portion of the access trail that would be widened/leveled is within the City of Los Angeles in El Escorpion Park. None of the wells are located in a reporting Williamson Act contract area nor are they located in areas designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland (California Department of Conservation [DOC] 2024a, 2024b). The wells are not located on

public land with forests or areas designated as timberland or timberland zoned Timberland Production.

4.2.2 Regulatory Setting

There are no federal or state regulations, laws, or policies pertaining to agriculture and forestry that are applicable to the proposed Project. Local regulations, laws, and policies pertaining to agriculture and forestry resources relevant to the Project are included below.

4.2.2.1 Local

Los Angeles County General Plan 2035. The General Plan 2035 includes policies to protect productive farmland in Los Angeles County:

- **Policy C/NR 8.1:** Protect Agricultural Resource Areas (ARA), and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, from encroaching development and discourage incompatible adjacent land use.
- **Policy C/NR 8.2:** Discourage land uses in ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, that are incompatible with agricultural activities.

City of Los Angeles Conservation Element. The City's Conservation Element includes the following objective related to agriculture (City of Los Angeles 2001):

- Objective: Retain, to the extent feasible, the last remaining agricultural features of the city as part of the city's heritage and economy.

4.2.3 Impact Analysis

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

No Impact. The well locations are not within lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2024a). Therefore, no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The well sites are in areas zoned Residential Planned Development (RPD-30000-1.5U) and Single Family Residence (R-1-10000) which permit agricultural uses. The proposed Project would not result in the rezoning of the well sites or conflict with existing zoning because, pursuant to Los Angeles County Code Section 22.140.400, orphan wells are required to undergo P&A, and all equipment and pipelines not necessary for the operation and maintenance of other existing wells are required to be removed. The well sites are not located within areas subject to a Williamson Act contract (DOC 2024b). Therefore, no impact would occur.

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

No Impact. The well sites are not located on public land with forests or areas designated as timberland or timberland zoned Timberland Production. Therefore, no impact would occur.

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

No Impact. The well sites are not located on public land with forests or areas designated as timberland or timberland zoned Timberland Production. The Project does not involve the conversion of forest land to non-forest use. Therefore, no impact would occur.

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

No Impact. The proposed Project would not occur on agricultural land or forest land. The proposed Project would not require the conversion of the agricultural land to non-agricultural use. Therefore, no impact would occur.

4.2.4 Mitigation Measures

The Project would not result in significant impacts to agriculture and forestry resources; therefore, no mitigation is required.

4.3 AIR QUALITY

AIR QUALITY - Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 Environmental Setting

The Project site is located within the South Coast Air Basin (SCAB), which is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east and includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The access road ("Victory Access Route") leading to the Project site is partially within Ventura County.

The regional climate in the SCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The predominant wind direction in the Project area, as recorded by the South Coast Air Quality Management District (SCAQMD) Station 23130, the closest monitoring station to the Project site that records wind direction, is southeast (SCAQMD 2017). Station 23130 is located approximately 10 miles east of the well sites (SCAQMD 2017).

According to SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 2005). The nearest sensitive receptors to the well sites are single-family residences located approximately 400 feet east of the Lucky Star 1 well.

4.3.1.1 Overview of Air Pollution

The federal Clean Air Act and state Clean Air Act mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide (CO), volatile organic compounds (VOCs)/reactive organic gases (ROGs),[3] nitrogen oxides (NO_x), particulate matter with diameters of 10 microns or less (PM_{10}) and 2.5 microns or less ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone (O_3), which is created by atmospheric chemical and photochemical reactions primarily between VOCs and NO_x. Secondary pollutants include oxidants, O_3, and sulfate and nitrate particulates (smog). Air pollutants can be generated by the natural environment, such as when high winds suspend fine dust particles).

Air pollutant emissions are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.
- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

[3] CARB defines VOCs and ROGs similarly as, "any compound of carbon excluding CO, CO_2, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOCs are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROGs and VOCs are considered comparable in terms of mass emissions, and the term VOCs is used in this IS/MND.

- On-road sources that may be legally operated on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

4.3.2 Regulatory Setting

The following information on SCAQMD regulations and thresholds of significance are relevant to the proposed Project.

4.3.2.1 Air Quality Standards and Attainment

As the local air quality management agency, SCAQMD is required to monitor air pollutant levels to ensure that the NAAQS and CAAQS are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the SCAB is classified as being in "attainment" or "nonattainment." In areas designated as non-attainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants. The SCAB is currently designated nonattainment for the O_3 NAAQS and CAAQS, the PM_{10} CAAQS, and the $PM_{2.5}$ NAAQS and CAAQS. SCAB is either unclassified or designated attainment for all other NAAQS and CAAQS (SCAQMD 2018).

Air Quality Management Plan

To meet the NAAQS and CAAQS, SCAQMD has adopted a series of Air Quality Management Plans (AQMP) that serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The most significant air quality challenge in the Air Basin is to reduce NO_x emissions to meet the 2037 O_3 standard deadline for the non-Coachella Valley portion of the SCAB, as NO_x plays a critical role in the creation of O_3. The 2022 AQMP includes strategies to ensure the SCAQMD contributes to furthering the district's ability to meet the 2015 federal O_3 standards (SCAQMD 2022). The 2022 AQMP builds on the measures already in place from the previous AQMPs and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technology, BMPs, co-benefits from existing programs, incentives, and other Clean Air Act measures to meet the 8-hour O_3 standard.

The SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, state, and local levels and industries. Most of these emissions are from heavy-duty trucks, ships, and other state and federally regulated mobile source emissions that the majority of which are beyond SCAQMD's control. SCAQMD has limited control over truck emissions

with rules such as Rule 1196. In addition to federal action, the 2022 AQMP relies on substantial future development of advanced technologies to meet the standards, including the transition to zero- and low-emission technologies. The AQMP also incorporates the transportation strategy and transportation control measures from Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (Connect SoCal) (SCAG 2020).

Ventura County Air Pollution Control District (VCAPCD) adopted the 2022 Ventura County AQMP, which presents Ventura County's strategy to attain the 2015 federal 8-hour ozone standard, as required by the federal Clean Air Act Amendments of 1990. Photochemical air quality modeling indicates that Ventura County will attain the 2015 federal 8-hour ozone standard by 2026 using local, state, and federal clean air programs.

Air Emission Thresholds

SCAQMD approved the CEQA Air Quality Handbook in 1993. Since then, SCAQMD has provided supplemental guidance on their website to address changes to the methodology and nature of CEQA. Some of these changes include recommended thresholds for emissions associated with both construction and operation of the Project are used to evaluate a Project's potential regional and localized air quality impacts (SCAQMD 2023). Table 4.3-1 presents the significance thresholds for regional construction-related criteria air pollutant and precursor emissions being used for the purposes of this analysis. SCAQMD significance thresholds for operation are not provided as the Project would not result in operation and maintenance activities following the completion of P&A and decommissioning.

Table 4.3-1. SCAQMD Regional Significance Thresholds

Criteria Air Pollutant	Construction Threshold
VOC	75 pounds per day
NO_x	100 pounds per day
CO	550 pounds per day
SO_x	150 pounds per day
PM_{10}	150 pounds per day

Criteria Air Pollutant	Construction Threshold
$PM_{2.5}$	55 pounds per day

Notes: VOC: volatile organic compound; NO_x: nitrogen oxides; CO: carbon monoxide; SO_x: sulfur oxides; PM_{10}: particulate matter measuring 10 microns in diameter or less; $PM_{2.5}$: particulate matter measuring 2.5 microns in diameter or less.
Source: SCAQMD 2023.

In addition to the regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LST) in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs have been developed for NO_x, CO, PM_{10}, and $PM_{2.5}$ and represent the maximum emissions from a Project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor. LSTs take into consideration ambient concentrations in each source receptor area, distance to the sensitive receptor, and Project size. LSTs have been developed for emissions generated in construction areas up to five acres in size. LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2009).

The well sites are in unincorporated Los Angeles County, located in Source Receptor Area 6: West San Fernando Valley. SCAQMD provides LST lookup tables for Project sites that measure one, two, or five acres. Project activities at the wells would disturb up to three acres. Therefore, this analysis utilizes the two-acre LSTs. LSTs are provided for receptors at distances of 82, 164, 328, 656, and 1,640 feet from the Project disturbance boundary to the sensitive receptors. The nearest sensitive receptors to the well sites are located approximately 400 feet east of the Lucky Star 1 well. This analysis conservatively utilizes the LSTs at 328 feet as this represents the closest LST metric for distance to sensitive receptors. The LSTs for construction activities are shown in Table 4.3-2.

Table 4.3-2. SCAQMD LSTs for Construction

Criteria Air Pollutant	LST at 328 Feet (pounds per day)*
Gradual Conversion of NO_x to NO_2	156
CO	1,497
PM_{10}	33

Criteria Air Pollutant	LST at 328 Feet (pounds per day)*
$PM_{2.5}$	9

Notes: * Allowable Construction Emissions for a Two-Acre Site in Source Receptor Area 6.
NO_x = nitrogen oxides; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns.
Source: SCAQMD 2009.

The Ventura County Air Quality Assessment Guidelines (2003) is an advisory document that provides a framework and uniform methods for preparing air quality evaluations for environmental documents. Chapter 3 provides information on the air quality significance thresholds. Emissions above 25 pounds per day for NO_X or ROC in the Project area. In addition, a project with emissions of two pounds per day or greater of ROC, or two pounds per day or greater of NO_X that is found to be inconsistent with the AQMP will have a significant cumulative adverse air quality impact.

4.3.2.2 Toxic Air Contaminants

The California Health and Safety Code defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel particulate matter (DPM) from diesel-fueled engines. SCAQMD and VCAPCD have developed significance thresholds for the emissions of TAC based on health risks associated with elevated exposure to such compounds. For carcinogenic compounds, cancer risk is assessed in terms of incremental excess cancer risk. A project would result in a potentially significant impact if it would generate an incremental excess cancer risk of 10 in 1 million (1×10^{-6}) or (for SCAQMD) a cancer burden of 0.5 excess cancer cases in areas exceeding a one-in-one-million risk. In addition, non-carcinogenic health risks are assessed in terms of a hazard index. A project would result in a potentially significant impact if it would result in a chronic and acute hazard index greater than 1.0 (SCAQMD 2023).

4.3.3 Methodology

Air pollutant emissions generated by the proposed Project were estimated using the California Emissions Estimator Model, version 2022.1, which uses project-specific information, including land use, square footage for different uses, and location, to model a project's construction emissions.

Project activities would primarily generate temporary criteria pollutants from equipment operation, construction worker vehicle trips to and from the site, and off-site export of materials. The proposed Project was analyzed based on the applicant-provided schedule, equipment use, and area of disturbance. The estimated area of temporary impact totals approximately three acres.

4.3.4 Impact Analysis

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The proposed Project would be inconsistent with the 2022 AQMPs if the proposed Project would generate population, housing, or employment growth exceeding forecasts used in the development of the 2022 AQMPs. The 2022 AQMPs incorporate local general plans and SCAG's Connect SoCal socioeconomic forecast projections of regional population, housing, and employment growth (SCAQMD 2022, VCAPCD 2022).

As described in Section 4.14, *Population and Housing*, the proposed Project would not cause direct growth as the proposed Project does not include new residences, businesses, or other land uses which would generate population growth. The proposed Project would not result in indirect growth because the proposed Project involves the P&A of six oil wells rather than the expansion of oil extraction activities to serve additional population growth. Given the small-scale and temporary nature of Project construction activities, it is likely construction workers would be drawn from the existing, regional workforce and would not indirectly result in the relocation of people to Los Angeles or Ventura County. Upon completion of construction, the proposed Project would not require additional staff because the six wells would be abandoned. Accordingly, the proposed Project would not result in population growth and therefore would not have the potential to conflict with or obstruct implementation of the 2022 AQMPs. Less than significant impact would occur.

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

Less Than Significant. Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles. Table 4.3-3 summarizes the estimated maximum daily criteria air pollutant emissions associated with P&A and decommissioning activities. As shown therein, criteria air pollutant emissions generated by P&A and decommissioning activities would not exceed

SCAQMD or VCAPCD thresholds and would not result in a cumulatively considerable net increase of any criteria pollutant for which the SCAB is designated non-attainment. Furthermore, the proposed Project would not require new operations or maintenance activities upon completion of P&A and decommissioning activities. Therefore, no Project emissions would be generated beyond the conclusion of P&A and decommissioning activities. This impact would be less than significant.

Table 4.3-3. Estimated Maximum Daily Emissions – pounds/day

Construction	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
All Project Activities	8	62	53	<1	76	9
SCAQMD Regional Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Threshold SCAQMD Exceeded?	No	No	No	No	No	No
Ventura County Activities only	1.1	9.2	9.3	0.03	1.04	0.42
VCAPCD Regional Thresholds	**25**	**25**	**-**	**-**	**-**	**-**
Threshold VCAPCD Exceeded?	No	No	No	No	No	No

Notes: pounds/day = pounds per day; VOC = volatile organic compounds NO_x = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns in diameter or less; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter. VCAPCD activities are the worst day for decommissioning facilities.

Source: Appendix B, Table 2.2 "Construction Emissions by Year, Unmitigated".

SCAQMD Localized Significance Thresholds

The SCAQMD *Final LST Methodology* was developed to be used as a tool to analyze localized impacts associated with specific proposed projects. If the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables (Appendix C of *Final LST Methodology;* SCAQMD 2009) and no potentially significant impacts are found to be associated with other environmental issues, then the proposed construction or operation activity is not considered to be a significant impact on air quality. As described in Section 4.3.2.1, this analysis conservatively utilizes the LSTs at 328 feet. Table 4.3-4 summarizes the proposed Project's maximum localized daily emissions. As shown therein, localized construction emissions would not exceed the applicable SCAQMD LSTs. Therefore, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

Table 4.3-4. Project LST Emissions – pounds/day

Emissions and Thresholds	NO_x	CO	PM_{10}	$PM_{2.5}$
Maximum Construction On-site Emissions	62	51	2	2
SCAQMD LST	**156**	**1,497**	**33**	**9**
Threshold Exceeded?	No	No	No	No

Notes: pounds/day = pounds per day; VOC = volatile organic compounds NO_x = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns in diameter or less; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter.

Source: Appendix B, Table 2.2 "Construction Emissions by Year, Unmitigated".

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant. The nearest sensitive receptors to the well sites are single-family residences located approximately 400 feet east of the Lucky Star 1 well. As described in Section 4.17.3, the Project would not result in an increase of operational vehicle trips. Therefore, the Project would not emit the levels of CO necessary to result in a localized hot spot. Therefore, CO hotspots are not discussed further in this document. The Project does not include any stationary sources of air pollutant emissions, and once P&A and decommissioning activities are complete, the proposed Project would not require additional operation and maintenance activities. Therefore, following the conclusion of P&A and decommissioning activities the proposed Project would not expose sensitive receptors to substantial pollutant concentrations and is not discussed further.

As the Project would involve soil movement, there is the potential for fugitive dust impacts. SCAQMD Rule 403 and VCAPCD Rule 55 have requirements related to fugitive dust that would be followed by the Project as required by the rules. These rules prohibit visible dust beyond the property lines, opacity, track-out and other requirements, thereby minimizing the potential impacts of fugitive dust.

The discussions below analyze the potential for the proposed Project to expose receptors to substantial TAC emissions during P&A and decommissioning activities.

Toxic Air Contaminants

TAC emissions associated with the proposed Project can be attributed to DPM from diesel-fueled engines. DPM is primarily composed of PM_{10} and $PM_{2.5}$ emissions (CARB 2024). Generation of DPM from construction projects typically occurs in a single area for a short period of time. P&A and decommissioning activities would occur for approximately eight weeks. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, meaning a longer exposure period would result in a higher exposure level for the maximally exposed individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time.

CalGEM has conducted health risk assessments for drilling and construction activities utilizing point sources and the HARP2 model. This analysis indicates that emissions of DPM less than 100 pounds per year for a duration of less than one

year would not produce cancer impacts exceeding 10 in a million at the closest receptor (Appendix C). As this Project would not generate more than 10 pounds in total and the duration would be less than one year, the health risk impacts are less than significant. Furthermore, construction activities would also be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes, which would further reduce nearby workers exposure to temporary and variable DPM emissions. Compliance with the standard construction measures required by the SCAQMD would also further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. As such, Project construction would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant.

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

Less Than Significant. Construction equipment could generate odors during P&A and decommissioning activities. Such odors would be temporary in nature and although minimally perceptible to the nearest residences to the southeast, primarily limited to the vicinity of the Project site within the canyon. The Project would also be required to adhere to SCAQMD Rule 402 (Nuisance) and VCAPCD Rule 51 (Nuisance), which prohibits discharge of air contaminants or any other material from a source that would cause nuisance to any considerable number of persons or the public, including odor. Following P&A and decommissioning activities, the proposed Project would not generate odors. Therefore, the proposed Project would not result in odors adversely affecting a substantial number of people. This impact would be less than significant.

4.3.5 Mitigation Measures

The proposed Project would not result in significant impacts to air quality; therefore, no mitigation is required.

4.4 BIOLOGICAL RESOURCES

BIOLOGICAL RESOURCES – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) 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?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community	☐	☐	☒	☐

BIOLOGICAL RESOURCES – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
Conservation Plan, or other approved local, regional, or State habitat conservation plan?				

4.4.1 Environmental Setting

The Project area occurs within open space in the City of Los Angeles and unincorporated Los Angeles County. The access road ("Victory Access Route") leading to the Project site is partially within Ventura County. The Project area is surrounded by trails and scattered vegetation to the north, south, and west and residential development to the east. The six well sites and trail widening would encompass a total of three acres and occur in both previously disturbed and natural areas. An ephemeral drainage feature and associated riparian corridor occur just north of the Project site.

The six well sites are located approximately 0.40-mile west of Valley Circle Boulevard, with the trail widening portion located just west of the well sites. The western portion of the trail widening occurs at an elevation of 1,032 feet above sea level and reaches 995 feet above sea level at the easternmost well site. An unnamed drainage is located approximately 260 feet north of the well sites. Within the three-acre site, the vegetation community consists of scattered scrub and grassland with small trees. Silty clay and sandy loam soils make up the substrate within this site.

A desktop analysis was conducted to identify any threatened or ES of flora and fauna that may be present within or surrounding the well sites. A query of the site with a five-mile radius was conducted using the CDFW California Natural Diversity Database (CDFW 2024), California Native Plant Society (CNPS) Rare Plant Inventory List (United States Geologic Survey (USGS) 9-quadrangle search area) (CNPS 2024), USFWS's Information for Planning and Conservation planning tool (USFWS 2024a), and USFWS Critical Habitat Report (USFWS 2024b). The database search yielded a total of 14 threatened, endangered, and/or special status species with moderate to high potential to occur (PTO) within or near the Project area (Appendix D).

4.4.1.1 Special Status Plant Species

Of the 39 rare plant species evaluated, two have a high PTO in the coastal scrub and grassland habitats on-site: Braunton's milk-vetch (*Astragalus brauntonii*,

federally endangered, California Rare Plant Rank [CRPR 1B.1]) and San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*, State endangered, CRPR 1B.1). Five rare plants were identified as having moderate PTO on-site: slender mariposa lily (*Calochortus clavatus* var. *gracilis*, CRPR 1B.2), Santa Susanna tarplant (*Deinandra minthornii*, CRPR 1B.2), Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*, CRPR 1B.1), many-stemmed dudleya (*Dudleya multicaulis*, CRPR 1B.2), and Ojai navarretia (*Navarretia ojaiensis*, CRPR 1B.1). Moderately suitable habitat for these species is present in the coastal scrub and grassland within and adjacent to the sites.

4.4.1.2 Special Status Wildlife Species

Of the 21 sensitive wildlife species evaluated, seven have a moderate PTO: Crotch's bumble bee (*Bombus crotchii,* state candidate endangered), California red-legged frog (*Rana draytonni*, Federally Threatened [FT], CDFW Species of Special Concern [SSC]), coastal whiptail (*Aspidoscelis tigris stejnegeri*, SSC), southern California rufous-crowned sparrow (Aimophila ruficeps canescens, CDFW Watch List), burrowing owl (*Athene cunicularia*, SSC, CESA), coastal California gnatcatcher (*Polioptila californica californica*, FT, SSC), and San Diego woodrat (*Neotoma lepida intermedia*, SSC).

4.4.1.3 Pre-activity Survey

In addition to the desktop survey, Pax Environmental, Inc. (Pax) conducted a pre-activity survey on August 21, 2025. The survey focused on the presence of nesting birds and sensitive special-status species habitat. A 2.25-hour survey was conducted and consisted of walking belt transects, covering six (6) localized well sites and structures, including a 100-ft buffer around the perimeter and a 300-ft buffer for possible activity of raptor roosting or nesting habitat. The survey report is included in Appendix D.

Within the Project site, three vegetation communities were present and consist of Upland mustard or star-thistle fields within the open space field, laurel sumac scrub along the lower toe slopes and California sagebrush – (purple sage) scrub that include scattered shrubs with coast live oak trees emergent at the perimeter. Silty clay and sandy loam soils make up the substrate within this site with 0 to 50 percent slopes.

Dominate plant species identified during the survey include native species of chamise (*Adenostoma fasciculatum*), coastal goldenbush (*Isocoma menziesii*), southern coastal mallow (*Malacothamnus fasciculatus*) laurel sumac (*Malosma laurina*) and purple sage (*Salvia leucaphylla*) on the perimeter with emergent

coast live oak (*Quercus agrifolia*) on the hillsides. The open space field is dominated by non-native species of black mustard (Brassica nigra) and Maltese star-thistle (*Centaurea melitensis*).

Wildlife species observed during the survey include monarch (*Danaus Plexippus*), cabbage white butterfly (*Pieris rapae*), California scrub-jay, (*Aphelocoma californica*), oak titmous (*Baeolophus inornatus*), Anna's hummingbird (*Calypte anna*), wrentit (*Chamaea fasciata*), great egret (*Ardea alba*), great-blue heron (*Ardea herodea*), red-tailed hawk (*Buteo jamaicensis*), Anna's hummingbird (*Calypte anna*), turkey vulture (*Cathartes aura*), American crow (*Corvus brachyrhynchos*), house finch (*Haemorhous mexicanus*), song sparrow (*Melospiza melodia*), California towhee (*Melozone crissalis*), northern mockingbird (*Mimus polyglottos*), spotted towhee (*Pipilo maculatus*), mountain chickadee (*Poecile gambeli*), bushtit (*Psaltiparus minimus*), lesser goldfinch (*Spinus psaltria*), European starling (*Sturnus vulgaris*), Bewick's wren (*Thryomanes bewicki*), mourning dove (*Zenaida macroura*) and California cottontail rabbit (*Sylvilagus Audubonii*).

El Escorpion Creek which contains wooded riparian vegetation, is within the 300-foot survey area. In addition, two potential blueline streams within the Project area were identified by visible flowlines, but no riparian vegetation was present. There are no plans to conduct work within the wetland or any other wetland areas, and no modifications to the wetland habitat will take place.

One southern California black walnut [*Juglans californica*, California Rare Plant Rank (CRPR) 4.2], occurs adjacent to Knapp 1 and Knapp 1A well sites. Archeological survey activities will not negatively impact this tree or suitable habitat for this Southern California black walnut.

No other special status plant or wildlife species were observed during the survey. Bird species were observed foraging within the open space field and shrubs, but no active nests were observed during the survey. Suitable nesting bird habitat is present within and around the Project site.

4.4.2 Regulatory Setting

Federal, state, and local regulations, laws, and policies pertaining to biological resources relevant to the Project are included below.

Federal Endangered Species Act (7 United States Code [USC] Section 136, 16 USC Section 1531 et seq.). The Federal Endangered Species Act (FESA), which is administered in California by the USFWS and National Marine Fisheries Service, provides protection to species listed as threatened or endangered, or proposed

for listing as threatened or endangered. When applicants propose projects with a federal nexus that "may affect" a federally listed or proposed species, the federal agency must (1) consult with the USFWS or National Marine Fisheries Service, as appropriate, under Section 7, and (2) ensure that any actions authorized, funded, or carried out by the agency are not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of areas determined to be critical habitat. The USFWS Oil and Gas Programmatic Biological Opinion (2017) addresses the FESA.

Section 9 prohibits the "take" of any member of a listed species.

Take – To harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

Harass – An intentional or negligent act or omission that creates the likelihood of injury to a listed species by annoying it to such an extent as to significantly disrupt normal behavior patterns that include, but are not limited to, breeding, feeding, or sheltering.

Harm – Significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering.

Migratory Bird Treaty Act (16 USC Section 703 et seq.). The Migratory Bird Treaty Act (MBTA) makes it unlawful to take or possess any migratory nongame bird (or any part of such migratory nongame bird) as designated under the MBTA.

Federal Noxious Weed Act of 1974 (P.L. 93-629) (7 USC 2801 et seq.; 88 Stat. 2148). The Federal Noxious Weed Act establishes a federal program to control the spread of noxious weeds. Authority is given to the Secretary of Agriculture to designate plants as noxious weeds by regulation, and the movement of all such weeds in interstate or foreign commerce was prohibited except under permit.

Bald and Golden Eagle Protection Act (16 USC Section 668 et seq.). The Bald and Golden Eagle Protection Act declares it is illegal to take, possess, sell, purchase, barter, offer to sell or purchase or barter, transport, export or import a bald or golden eagle, alive or dead, or any part, nest or egg of these eagles unless authorized. Active nest sites are also protected from disturbance during the breeding season.

Clean Water Act (33 USC Section 1251 et seq.). The Clean Water Act (CWA) requires the permitting and monitoring of all discharges to surface water bodies. Section 404 requires a permit from the United States Army Corps of Engineers for

a discharge from dredged or fill materials into Waters of the U.S., including wetlands. Section 401 requires a permit from a Regional Water Quality Control Board (RWQCB) for the discharge of pollutants. By federal law, every applicant for a federal permit or license for an activity that may result in a discharge into a California water body, including wetlands, must request state certification that the proposed activity would not violate state and federal water quality standards.

4.4.2.1 State

California Endangered Species Act (Fish and Game Code Section 2050 et seq.). The California Endangered Species Act (CESA) provides for the protection of rare, threatened, and endangered plants and animals, as recognized by the CDFW, and prohibits the taking of such species without its authorization. Furthermore, the CESA provides protection for those species that are designated as candidates for threatened or endangered listings. Under the CESA, the CDFW has the responsibility for maintaining a list of threatened species and endangered species (Fish and Game Code, Section 2070). The CDFW also maintains a list of candidate species, which are species that the CDFW has formally noticed as under review for addition to the threatened or endangered species lists. The CDFW also maintains lists of SSC that serve as watch lists. Pursuant to CESA requirements, an agency reviewing a proposed Project within its jurisdiction must determine whether any state-listed endangered or threatened species may be present in the Project area and determine whether the proposed Project would have a significant impact on such species. The CDFW encourages informal consultation on any proposed Project that may affect a candidate species. The CESA also requires a permit to take a state-listed species through incidental or otherwise lawful activities (Section 2081, subd. (b)).

Porter-Cologne Water Quality Control Act (Water Code Section 13000 et seq.). The Porter-Cologne Water Quality Control Act requires that each of the nine RWQCBs prepare and periodically update basin plans for water quality control. Each basin plan sets forth water quality standards for surface water and groundwater and actions to control nonpoint and point sources of pollution to achieve and maintain these standards.

Protection of Birds and Nests (Fish and Game Code Section 3503 and 3503.5). These policies protect California's birds by making it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Raptors (e.g., hawks and owls) are specifically protected.

Migratory Birds (Fish and Game Code Section 3513). This policy protects California's migratory birds by making it unlawful to take or possess any migratory

nongame bird as designated in the MBTA or any part of such migratory nongame birds.

Fully Protected Species (Fish and Game Code Section 3511, 4700, 5050, and 5515). These policies identify several amphibian, reptile, fish, bird, and mammal species that are Fully Protected. CDFW cannot issue a take permit for these species, except for take related to scientific research.

CEQA Guidelines Section 15380. CEQA defines rare species more broadly than the definitions for species listed under CESA and FESA. Under Section 15830, species not protected through state or federal listing but nonetheless demonstrable as "endangered" or "rare" under CEQA should also receive consideration in environmental analyses. Included in this category are many plants considered rare by the CNPS and some animals on the CDFW's Special Animals List.

Lake and Streambed Alteration Agreement (Fish and Game Code Section 1600 et seq.). This policy regulates activities that may divert, obstruct, or change the natural flow or the bed, channel, or bank of any river, stream, or lake in California designated by CDFW in which there is at any time an existing fish or wildlife resource or from which these resources derive benefit. Impacts to vegetation and wildlife resulting from disturbances to waterways are also reviewed and regulated during the permitting process.

4.4.2.2 Local

Oak Tree Regulations (County of Los Angeles Regulation 22.46.2100). This regulation states that removal of an oak tree or encroachment upon the Protected Zone (defined as the area within the drip line of an oak tree and extended to a point at least five feet outside of the drip line, or 15 feet from the trunk of the tree, whichever distance is greater) may be requested by filing a Substantial Conformance Review application in accordance with procedures set forth in County of Los Angeles Regulation 22.46.2190. Removal of oak trees shall include cutting, destroying, removing, relocating, inflicting damage, or encroaching into the root zone or grading/filling within the drip line area of an oak tree (County of Los Angeles 2019).

Preservation of Protected Trees (City of Los Angeles Municipal Code 46.00). This ordinance states that no protected tree or shrub may be relocated or removed except without first acquiring a permit from the Board of Public Works. Protected trees include valley oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*) or any other tree of the oak genus indigenous to California but

excluding the scrub oak (*Quercus berberidifolia*), southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), California bay (*Umbellularia californica*), and protected shrubs include Mexican elderberry (*Sambucus mexicana*) and toyon (*Heteromeles arbutifolia*) (City of Los Angeles 2006).

Santa Susana Mountains/Simi Hills Significant Ecological Area. The Santa Susana Mountains/Simi Hills Significant Ecological Area (SEA) covers approximately 26,795 acres of mostly open space that supports a diverse array of native vegetation communities and wildlife species. Located mostly within unincorporated Los Angeles County, several important linkages for wildlife movement exist within the Santa Susanna Mountains/Simi Hills SEA. Proposed new developments within the Santa Susanna Mountains/Simi Hills SEA should be designed to be highly compatible with the continued ecological function of biological resources that exist within the SEA (County of Los Angeles 2000). Los Angeles County Code Chapter 22.158 requires a Conditional Use Permit for development in Significant Ecological Areas, but exempts the maintenance, minor additions, or changes to legally established development if these changes do not expand the previously approved development footprint.

4.4.3 Impact Analysis

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

Less Than Significant With Mitigation. Ground disturbance could directly result in the damage or removal of special status plant species including Braunton's milkvetch, San Fernando Valley spineflower, slender mariposa lily, Santa Susana tarplant, Blochman's dudleya, many-stemmed dudleya, and Ojai navarretia if they are present at the Project site. Individuals of these species, if present, could be removed, damaged, or disturbed by Project activities of the proposed Project, a potentially significant impact. Indirect impacts could result from habitat modifications, such as by the introduction of invasive plants disseminated from construction equipment, contamination of soils, and habitat degradation due to accidental fuel spills during well permanent sealing and decommissioning. Adherence to **MM BIO-1** through **MM BIO-3** would reduce potential direct and indirect effects to these plant species to a less than significant level by requiring surveys, worker environmental awareness training, and avoidance measures.

Special status animal species that may be found in the coastal scrub habitat in the Project site and could be directly impacted include the following potentially occurring land-dwelling or nesting animals: Crotch's bumble bee, California red-legged frog, coastal whiptail, southern California rufous-crowned sparrow, burrowing owl, coastal California gnatcatcher, and San Diego woodrat. Direct impacts could occur via direct strikes to individuals by construction equipment or entrapment, particularly to species that may occur on/in the ground (i.e., Crotch's bumble bee, California red-legged frog, coastal whiptail, burrowing owl, and San Diego woodrat). Nesting birds could also be disrupted by equipment potentially leading to nest abandonment. In addition, indirect impacts could occur through vibrations and dust, which could alter behavioral patterns of land-dwelling special status wildlife species and cause them to become exposed to predators. Therefore, the proposed Project could cause potentially significant impacts to species, and mitigation is required. Project measures outlined in Section 2.4 aim to avoid or reduce any significant impacts to special status species by conducting a pre-disturbance biological survey. Vegetation removal would be limited to previously disturbed lands to the maximum extent possible; however, given the Project description provided, it is likely vegetation removal could occur in previously undisturbed lands. Additional details on potential impacts to individual species and measures for avoidance are provided below.

The coastal scrub community on-site has potential to support preferred plant food genera of Crotch's bumble bee. This species has three occurrences within five miles of the Project site. Crotch's bumble bee is a flying insect species; therefore, it would be capable of escaping harm during P&A and decommissioning while foraging. If the Project were to involve ground disturbance in undisturbed areas, an occupied nest potentially present on-site could be significantly impacted. If, pursuant to **MM BIO-1**, disturbance can be limited to previously developed/disturbed areas, impacts to Crotch's bumble bee would be avoided. If habitat avoidance is not feasible, the proposed Project would cause potentially significant impacts to Crotch's bumble bee, and adherence to **MM BIO-4** would be required to reduce potential direct and indirect effects to these species to a less than significant level.

The Project site overlaps with California red-legged frog USFWS-designated Critical Habitat. California red-legged frogs are dependent on aquatic habitat for all their life stages; however, they are known to travel upland of riparian areas in search of food or shelter. Any loss of potential upland refugia habitat (300 feet of a riparian area) within critical habitat is a potentially significant impact.

Implementation of **MM BIO-5** would mitigate impacts for this species. **MM BIO-5** includes a pre-construction survey for all life stages of California red-legged frog, biological monitoring, and includes avoidance of occupied habitat if found in the work site. If occupied habitat cannot be avoided, formal consultation under FESA with USFWS will be necessary. With implementation of these mitigation measures, impacts to the species would be reduced to less than significant.

Ground-dwelling reptiles, such as the coastal whiptail, could occur on site during Project activities that may result in significant impacts to such species. Implementation of **MM BIO-6** would ensure impacts to sensitive reptile species are avoided, and effects to these species would be reduced to a less than significant level.

The coastal scrub and disturbed vegetation communities provide suitable nesting habitat for burrowing owl (CESA species). If the species is present within the vicinity of the well sites, the proposed Project has the potential to directly (by destroying a burrow) or indirectly (removal of habitat, construction noise, dust, and other human disturbances that may cause a burrow to fail) impact the species. Implementation of **MM BIO-7** would mitigate potential direct and indirect impacts to the species. This measure includes pre-construction burrowing owl surveys conducted in accordance with CDFW protocol to determine presence/absence of burrowing owls or burrows within the Project vicinity. **MM BIO-7** also outlines protocols to implement "no disturbance" buffers around active burrows. With implementation of these mitigation measures, impacts to the species would be reduced to less than significant.

Other nesting birds, such as Coastal California gnatcatcher and southern California rufous-crowned sparrow, may be present in the coastal scrub communities within the Project site. If these species are present within the vicinity of the Project, the proposed Project has the potential to directly (by destroying a nest) or indirectly (removal of habitat, construction noise, dust, and other human disturbances) impact the species. Implementation of **MM BIO-8** and **MM BIO-9** would mitigate potential direct and indirect impacts to these species. **MM BIO-8** includes pre-construction coastal California gnatcatcher surveys conducted in accordance with USFWS protocol to determine presence/absence of coastal California gnatcatchers or nests within the Project vicinity. **MM BIO-8** also outlines protocols to implement "no disturbance" buffers around active nests. **MM BIO-9** includes preconstruction nesting bird surveys to identify active nests that would be affected by Project activities. With implementation of these mitigation measures, impacts to the species would be reduced to less than significant.

Project-related noise and light has the potential to negatively affect wildlife activity, including nesting bird/raptor activity, within or adjacent to the Project area. Adherence to **MM BIO-9** would mitigate potential impacts to nesting birds; accordingly, impacts to the nesting birds would be reduced to less than significant.

Direct impacts could occur via direct strikes to individuals by construction equipment or entrapment, including mammals that live on/in the ground such as San Diego woodrat. **MM BIO-10** would mitigate potential direct and indirect impacts to San Diego woodrat. This measure includes a pre-construction sweep and mapping of any woodrat middens (nests). Any middens are considered sensitive, whether or not the occupying woodrat species is determined. **MM BIO-10** also contains protocol for relocation of woodrats if Project impacts cannot be avoided.

General BMPs to be followed by construction personnel are described in Section 2.4, *Best Management Practices*.

MM BIO-1: Pre-disturbance Biological Survey Report. Per CalGEM's BMPs, a pre-disturbance biological survey shall be conducted by a Qualified Biologist.

The pre-disturbance biological survey shall consist of walking belt transects to accomplish 100 percent coverage of the Project site plus a 100-foot buffer. During the survey, all direct and indirect observations of special status biological resources shall be noted if encountered and recorded using a handheld Global Positioning Satellite device and on field forms. Habitat shall be evaluated by the Qualified Biologist to determine the potential for biological resource monitoring and/or surveys for species that are seasonal or require focused surveys during specified periods (e.g., special status plants). If no such follow-up surveys are required to determine current status of special status biological resources on the Project site, that information shall be included in the biological survey report to be completed within 14 days of the pre-disturbance survey. If follow-up surveys are required, a follow-up survey report shall be completed by the Qualified Biologist and submitted to the Project proponent within 14 days of the follow-up survey. To meet seasonal requirements stipulated by Species Protocols, some surveys may be required more than 30 days prior to ground disturbances. In such cases, follow-up pre-disturbance surveys shall also be required within 30 days prior to initiation of the ground disturbance to confirm that no

changes in species status or occupancy have occurred within the survey area.

The Project proponent shall maintain copies of all pre-disturbance biological survey reports completed by the Qualified Biologist. The pre-disturbance biological survey report shall include a map of the proposed Project construction boundary, biological survey area, special status species observations (when observed), areas of potential and/or occupied habitat (if any), areas identified for avoidance, and a list of all applicable mitigation measures that shall be implemented for the respective Project activity site.

MM BIO-2: Worker Environmental Awareness Training. Per CalGEM's BMPs, the Qualified Biologist shall develop and implement a Worker Environmental Awareness Program (WEAP) for all personnel that may access the Project. WEAP trainings shall be conducted for each individual prior to their first access into the Project. The Project shall consist of a presentation with material given on-site or off-site by trained personnel (e.g., Qualified Biologist or assigned Company Environmental Specialists). WEAP trainings shall cover an overview of the laws and regulations governing the protection of biological resources; a description of protected (i.e., special status) species known to occur or with the PTO in the Project area; their status and legal protections; what is considered habitat and disturbance; biological resource protection measures; and a list of designated Qualified Biologist contacts. The Project shall provide general awareness to workers and supply materials to assist workers in recognizing protected species that may occur on the Project area, avoidance, and minimization measures to protect biological resources, and how to report biological resources if observed on-site. The WEAP shall implement the following:

1. The WEAP shall emphasize the need to avoid contact with wildlife, to avoid entry into areas where biological resources have been identified for avoidance, to review Project-specific, pre-disturbance biological results reports and maps, and to implement all applicable avoidance and minimization measures included in the Project specific pre-disturbance biological survey results report.
2. All Project personnel present on the Project activity site must sign a statement verifying that they have completed the WEAP and that they understand the biological requirements during Project activities. The Project proponent shall maintain a list of all persons who have

completed the WEAP and shall provide the list to CalGEM upon request.

MM BIO-3: Sensitive Plant Species Avoidance. If the pre-disturbance survey determines that additional targeted plant surveys are required for the detection of sensitive plant species within the construction footprint or a 100-foot buffer, rare plant surveys shall be conducted during the appropriate season for their detection. If additional targeted plant surveys are required, the Project proponent shall retain a Qualified Biologist to conduct focused surveys for the additional targeted plant species prior to Project activities. If required, focused surveys shall be conducted pursuant to CDFW's March 20, 2018, Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018) or CDFW's most recent guidance. If required, findings from the targeted surveys shall be provided to CDFW prior to ground disturbing activities. If surveys for special status plants occur in a year during which rainfall totals reach at least 80 percent of normal, survey results shall be considered valid for three years. For surveys conducted in years of less-than-ideal rainfall (less than 80 percent average rainfall), results shall be valid for only one year. A survey of appropriate reference populations shall be necessary to support survey findings for the Project activity site.

If the pre-disturbance survey identifies special status plant populations, the following measures shall be implemented:

1. Any special status plant populations detected shall be fully described, well documented, and mapped via a Global Positioning Satellite device and appropriately georeferenced on Project maps. For each population occurrence detected, a California Natural Diversity Database (CNDDB) field report and a CNPS Field Survey Form or written equivalent shall be prepared.
2. If pre-construction surveys detect the presence of any State-listed plant species, the plant populations shall be protected from disturbance activities by implementing applicable impact avoidance measures consistent with CNPS's mitigation guidelines (1998 or more current). If impact avoidance measures have not been established for the species, plant populations shall be buffered from new ground disturbance activities by a minimum of 50 feet, as determined by a Qualified Biologist. A smaller buffer may be established, provided there are adequate measures such as placement of a physical barrier

(e.g., construction fencing) in place to avoid the destruction of individuals, with the approval of CalGEM. The buffer zone shall be established around these areas to eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. A Qualified Biologist shall be on-site, at minimum, during initial ground disturbing activities to ensure that sensitive plant species are not impacted.

3. If plants with a CRPR of 1B or 2B are observed in the impact area, no Project activities shall commence, and CalGEM shall coordinate with CDFW to discuss avoidance of the rare plants on site. If complete avoidance is unattainable, the Project proponent shall provide compensatory mitigation to offset the Project's impact on rare plants observed on site at no less than 2:1. A Rare Plant Salvage and Restoration Plan shall be submitted to CalGEM for approval. The plan shall include the following at a minimum:

    a. Relocation of individual plant(s) to an appropriate habitat area free from Project-related ground disturbance;

    b. Boundaries of non-State protected special status plant species shall be geo referenced and mapped;

    c. Topsoil removed during site clearing where non-State protected special status plant species are located shall be spread onto existing disturbed areas within the same geographic area and in the same soil type;

    d. Post-construction monitoring to confirm continued site occupancy by special status plants affected by ground disturbance; and

    e. Adaptive management or other contingency measures; and/or weed management.

MM BIO-4: Crotch's Bumble Bee Surveys and Avoidance. If, at the commencement of Project construction, Crotch's bumble bee is still considered a CESA candidate species or has been listed as threatened or endangered under CESA, the Project shall implement the following measures to avoid, minimize, and offset Project impacts to the species:

1. A Qualified Biologist shall conduct a pre-construction survey for Crotch's bumble bee and nests in Project area prior to initial ground-disturbing activities, such as staging and vegetation clearing.
2. If active Crotch's bumble bee nests are observed within the Project area or within a 100-foot buffer surrounding the Project area, an incidental take permit (ITP) will be obtained from CDFW prior to commencing work.
3. If establishment of a no-disturbance buffer is feasible, construction activities shall not occur within the buffer until a Qualified Biologist determines that the colony is no longer active (i.e., no Crotch's bumble bees are seen flying in or out of the nest for three consecutive days, indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony). Once the nest has been determined to be inactive, construction activities within the no-disturbance buffer(s) shall be allowed to resume.
4. If avoidance of a no-disturbance buffer is not feasible, the lead biologist shall consult with CDFW regarding potential encroachment into the no-disturbance buffer with other measures implemented. Work would not begin in the no-disturbance buffer without CDFW approval.

If avoidance of the nest is not feasible, the lead biologist shall consult with the CDFW regarding the potential for Project activities to result in take of the Crotch's bumble bee and shall comply with all avoidance, minimization, and compensatory mitigation requirements set forth in any incidental take permit issued for the Project by CDFW.

MM BIO-5: California Red-Legged Frog Surveys and Avoidance. Measures that shall be implemented during the Project construction to avoid and/or minimize direct take of California red-legged frog include:

1. At least two weeks prior to ground disturbing activities, a USFWS permitted biologist shall conduct a pre-construction survey for California red-legged frogs.
2. If California red-legged frogs, tadpoles, or eggs are found, the biologist shall contact USFWS to determine a strategy to avoid impacts to occupied habitat and individuals. A path forward for obtaining an Incidental Take Authorization under the Endangered

Species Act shall be determined if avoidance of occupied habitat is not feasible.

3. The biologist shall conduct a training session for all construction personnel prior to the start of construction activities, which shall include, at minimum, a description of California red-legged frog and its habitat, general measures being implemented to conserve the species, and any boundaries necessary to ensure California red-legged frogs are not disturbed by work activities.
4. A qualified biological monitor shall be present at the work site until all Project-related disturbance has been completed.
5. All trash that may attract predators shall be properly contained and removed from the work site and disposed of regularly.
6. All fueling and maintenance of vehicles and other equipment and staging areas shall occur at least 65 feet from any riparian habitat or water body. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.
7. The biologist shall permanently remove, from within the Project area, any bullfrogs, crayfish, or centrachid fishes, to the maximum extent possible.

MM BIO-6: Sensitive Reptile Species Avoidance. If the pre-disturbance biological survey identifies the presence of habitat for special status reptile species within the proposed work area, the following measures shall be implemented.

1. If any coastal whiptail or any other reptile species of special concern are observed during construction, the identified special status reptiles shall be allowed to move out of the work area on their own or shall be removed from the work area and released in adjacent suitable habitat by the Qualified Biologist. The Qualified Biologist shall have all appropriate permits in place prior to handling any special status reptiles or any other wildlife.
2. All construction equipment and construction personnel vehicles shall be checked prior to moving them, to ensure that no special status reptile is under equipment/vehicles. If any individuals are detected beneath equipment or vehicles, the equipment or vehicles shall be

left in place until the individual(s) moves out of harm's way on its own accord, as determined by a Qualified Biologist.

MM BIO-7: Burrowing Owl Surveys and Avoidance. Measures that shall be implemented during the Project construction to avoid and/or minimize direct take of burrowing owl include:

1. Burrowing owl pre-construction surveys shall be conducted within 14 days of the start of ground disturbing construction. The survey area shall include the Project site and a 500-foot buffer around the Project boundary. If construction is proposed during the breeding season, a Qualified Biologist shall conduct the focused surveys for burrowing owl prior to Project activities. In California, the burrowing owl breeding season extends from February 1 to August 31, with some variances by geographic location and climatic conditions.
2. A burrow is assumed occupied if records indicate that at least one burrowing owl has been observed occupying a burrow on-site during the past three years. If active burrowing owl burrows are detected in the Project boundary or the 500-foot survey buffer, they shall be avoided through implementation of a "no disturbance" buffer designated by a barricade.
3. Determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrows within that habitat) in coordination with the Wildlife Agencies. Active relocation and eviction/passive relocation requires the preservation and maintenance of suitable burrowing owl habitat determined through coordination with CDFW.
4. Any materials on-site during construction shall be made unsuitable for burrowing owl occupation by various methods, including capping open pipes or other materials that could attract burrowing owls.
5. If an occupied burrow or burrowing owl is found within the Project site, site activities will cease and the Project proponent shall coordinate with CDFW.

MM BIO-8: Coastal California Gnatcatcher. Measures that shall be implemented during the Project construction to avoid and/or minimize direct take of coastal California gnatcatcher include:

1. All brushing, grading, or excavation taking place adjacent to occupied habitat of the coastal California gnatcatcher (defined as within 500 feet of any gnatcatcher sightings [USFWS 2007]) shall be conducted from September 1 through February 14, which is outside the coastal California gnatcatcher breeding season.
2. When conducting any other construction activities during the coastal California gnatcatcher breeding season of February 15 through August 30, adjacent to habitat in which coastal California gnatcatcher are known to occur or have PTO (within 500 feet of suitable scrub habitat), the following avoidance measures shall apply:
3. A USFWS-permitted biologist shall survey for coastal California gnatcatcher within 10 calendar days prior to initiating activities in an area. If coastal California gnatcatcher are present, but not nesting, a USFWS permittee biologist shall survey for nesting coastal California gnatcatcher approximately once per week within 500 feet of the construction area, where accessible, for the duration of the activity in that area during the breeding season. The standard California gnatcatcher survey protocol shall be followed for all surveys.
4. If an active nest is located, a 500-foot no-construction buffer shall be established around each nest site; however, there may be a reduction of this buffer zone depending on site-specific conditions such as topography, line-of-sight to the nest, or the existing ambient level of activity at the discretion of the Qualified Biologist. No construction shall take place within this buffer until the nest is no longer active.

MM BIO-9: Nesting Bird Pre-construction Surveys. A pre-disturbance nesting bird survey for active bird nests shall be conducted by a Qualified Biologist no more than 3 days prior to the start of any Project activities that shall take place during the bird nesting season (February 1 through August 31). Surveys shall follow USFWS and CDFW guidance and/or protocols, as applicable. If ground-disturbing activities were initiated prior to, and continue into, the bird nesting season without a break in activity of more than one week, no nesting bird survey is necessary. If no active nests or nesting birds are identified during the pre-disturbance survey, then ground-disturbing activities may proceed, and no further mitigation measures shall be required for nesting birds.

If active nests are identified, the following shall be included as part of the pre-disturbance active bird nest survey results report.

Active bird nest(s) shall be avoided by establishing a minimum 250-foot non-disturbance buffer around it, a minimum 500-foot non-disturbance buffer around any active non-listed raptor nest(s) or any federal or State-listed passerine species, or a minimum 0.5-mile non-disturbance buffer around any federal or State-listed raptor nest(s) until the breeding season has ended. Non-disturbance buffers can be removed when a Qualified Biologist has determined that the birds have fledged, are no longer reliant on the nest or parental care for survival and adult birds are no longer occupying the nest, or the nest is no longer active (e.g., failed). Reduced non-disturbance buffers may be implemented if a Qualified Biologist concludes that work within the buffer area shall not be likely to cause nest avoidance or abandonment (e.g., when the disturbance area is concealed from a nest site by topography, when work activities shall have a limited duration within the buffer area, or when the species has been known to tolerate higher levels of disturbance). If reduced non-disturbance buffers are implemented, a Qualified Biologist shall monitor the active nest(s) before and during construction to establish a baseline for nest behavior and determine whether construction activities are adversely affecting the nest. The pre-disturbance monitoring of the nest site shall occur on at least two occasions of at least one hour each during anticipated work hours prior to construction to establish a behavioral baseline. The monitoring during construction shall be within the buffer area to detect behavioral changes of the birds because of the Project (e.g., adults flushed off the nest) that could lead to nest abandonment. If behavioral changes are observed, the work causing that change shall cease within the buffer area until the nest has fledged or is determined by the Qualified Biologist to no longer be active. The Qualified Biologist shall have the authority to halt or redirect construction activities to protect nesting birds from Project activities. Any reduction of buffer areas for State or federal listed species during the nesting season must be authorized by CDFW and/or USFWS.

MM BIO-10: San Diego Woodrat Avoidance. The Project site contains suitable scrub habitat for San Diego woodrat. Middens (nests) are large nests or dens made of woody debris, such as sticks, dead cacti, and bark. San Diego woodrat may be present at the Project site and any observed

middens shall be treated as potentially sensitive. Within 30 days of initial site disturbance, a pre-construction survey shall be conducted for woodrat middens. All occupied woodrat middens shall be mapped and flagged for avoidance to the extent feasible, with a minimum of 10 feet surrounding the active midden. If avoidance is not feasible, middens shall be disturbed ("daylighted") by a Qualified Biologist one night before anticipated vegetation removal to allow for the rats to escape and passively relocate prior to disturbance of the area.

b) 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?

Less than Significant. The riparian corridor of an unnamed drainage is located approximately 260 feet north of the well sites. No work is planned within this or any other riparian areas, and no alterations to those areas would occur. As per the August 2025 survey (see Appendix D), El Escorpion Creek, which contains wooded riparian vegetation, is within the 300-foot survey area. In addition, two potential blueline streams within the Project area were identified by visible flowlines, but no riparian vegetation was present. Additionally, no sensitive natural communities occur or would be adversely affected by the Project. The proposed Project would not have any adverse effects on any riparian habitat or other sensitive natural community. As per Section 4.10, *Hydrology and Water Quality*, no work is planned within any waterway and no alterations to any natural drainages or streams would occur. Impacts would be less than significant.

c) 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?

Less than Significant. One potentially jurisdictional wetland occurs approximately 260 feet north of the Project site. No work is planned within the potentially jurisdictional wetland or any other protected wetland areas, and no alterations to those areas would occur. The proposed Project would not have adverse effects on state or federally protected wetlands. Therefore, this impact would be less than significant.

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

Less than Significant. The proposed Project would not have an effect on localized wildlife movement as temporary P&A and decommissioning activities would be temporary, occurring for approximately eight weeks and would only disturb approximately three acres within the Project site. The proposed Project would not have the potential to create habitat fragmentation in the region or substantially impact wildlife movement. Therefore, this impact would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant. The proposed Project is not anticipated to result in impacts to protected trees. If protected trees are observed on-site, implementation of the Project's BMPs outlined in Section 2.4 would ensure impacts remain less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

Less than Significant. The Project falls withing the Santa Susan Mountains/Simi Hills SEA. The northern part of the site is within Incorporated City lands, thus are not subjected to SEA Ordinances; however, the western part of the Project site (which encompasses parts the access roads) does fall within the City of Los Angeles boundaries, thus SEA Ordinances do apply. Los Angeles County Code Chapter 22.158 requires a Conditional Use Permit for development in SEAs, but exempts the maintenance, minor additions, or changes to legally established development if these changes do not expand the previously approved development footprint. The Project involves the P&A and decommissioning of well sites and would not expand the development footprint of the wells. Accordingly, the Project would be exempt from securing a Conditional Use Permit from the County. Accordingly, the Project would not conflict with the provisions of a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. This impact would be less than significant.

4.4.4 Mitigation Measures

Implementation of the following mitigation measures would reduce the potential for biological resource impacts to less than significant:

- BIO-1: Pre-disturbance Biological Survey Report
- BIO-2: Worker Environmental Awareness Training
- BIO-3: Sensitive Plant Species Avoidance
- BIO-4: Crotch's Bumble Bee Surveys and Avoidance
- BIO-5: California Red-Legged Frog Surveys and Avoidance
- BIO-6: Sensitive Reptile Species Avoidance
- BIO-7: Burrowing Owl Surveys and Avoidance
- BIO-8: Coastal California Gnatcatcher Surveys and Avoidance
- BIO-9: Nesting Bird Pre-construction Surveys
- BIO-10: San Diego Woodrat Avoidance

4.5 CULTURAL RESOURCES

CULTURAL RESOURCES – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

4.5.1 Environmental Setting

Los Angeles County contains numerous historical resources, including the remnants of vast ranchos, routes of early explorers, historic railroad lines, and influences from Spanish, Mexican, and Anglo-American immigrants (County of Los Angeles 2022). Several areas throughout Los Angeles contain archaeological resources. In Los Angeles County, archaeological resources originating from the indigenous Chumash Nation and Gabrieliño/Tongva Nation are present (County of Los Angeles 2022).

Rincon Consultants, Inc. (Rincon) prepared a Cultural Resources Desktop Survey[4] in April 2024 which included archival records search and review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historical Landmarks list, and the Built Environment Resources Directory, as well as its predecessor the California State Historic Property Data File. Additionally, Rincon reviewed the Archaeological Determination of Eligibility list.

On March 26, 2024, Rincon completed a California Historical Resources Information System (CHRIS) records search at the South-Central Coastal Information Center, which is the official state repository for cultural resources

[4] This Survey is confidential and therefore not included for public distribution. Archaeological site locations are exempt from the California Public Records Act, as specified in Government Code 6254.10, and from the Freedom of Information Act (Exemption 3), under the legal authority of both the National Historic Preservation Act (PL 102-574, Section 304[a]) and the Archaeological Resources Protection Act (PL 96-95, Section 9[a]).

records and reports for the portion of Los Angeles County in which the Project falls. The CHRIS records search did not identify any cultural resources within a 0.5-mile radius of the Project site. The CHRIS records search identified one cultural resources study encompassing the Project site; 100 percent of the Project site has been studied and surveyed within the last 42 years.

4.5.2 Regulatory Setting

Federal, state, and local regulations, laws, and policies pertaining to cultural resources relevant to the Project are included below.

4.5.2.1 Federal

National Register of Historic Places. Properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects.

4.5.2.2 State

California Register of Historical Resources. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code [PRC] Section 5024.1[a]).

California Health and Safety Code Section 7050.5. Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the Coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the Coroner must notify the Native America Heritage Commission within 24 hours of this identification.

California Public Resources Code Section 5097.98. Section 5097.98 of the California PRC states that the Native American Heritage Commission, upon notification of the discovery of Native American human remains, pursuant to

Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

4.5.2.3 Local

Los Angeles County General Plan 2035. The following General Plan 2035 policy is designed to preserve cultural 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.

City of Los Angeles Conservation Element. The City's Conservation Element includes the following policy related to archaeological resources (City of Los Angeles 2001):

- **Policy:** continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.

4.5.3 Impact Analysis

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. The well sites are not listed on the NRHP, CRHR, or included as a local historic site (National Park Service 2024; California Office of Historic Preservation 2024; County of Los Angeles 2022). Therefore, P&A and decommissioning of wells would not change the significance of a historical resource. No impact would occur.

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

Less Than Significant with Mitigation. The proposed Project involves the P&A and decommissioning of six well facilities and the leveling and regrading of approximately 500 feet of El Escorpion Trail to access the well sites. Minimal ground-disturbing activities associated with grading would be required for the

proposed Project. Based on previous ground disturbances at the well sites from previous installations of the wells and vehicle travel on the proposed access road, there is a low likelihood archaeological resources are present at the well sites. Nonetheless, there is a possibility of encountering previously undiscovered archaeological resources during P&A and decommissioning activities. **MM CUL-1** would provide standard procedures to follow in the event unanticipated archaeological resources are discovered. With the implementation of **MM CUL-1**, the impact would be reduced to a less than significant level.

MM CUL-1: Unanticipated Discovery of Cultural Resources. In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR, and significant impacts to the resource cannot be avoided via Project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant with Mitigation. No human remains are known to be present in proximity to the well sites. However, the discovery of human remains is always a possibility during ground-disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. To further ensure that appropriate procedures are followed in the event of unanticipated

discovery of human remains, **MM CUL-2** has been developed. With implementation of **MM CUL-2**, impacts pertaining to the potential discovery of human remains would be less than significant because all work would be temporarily halted if and when such resources were discovered, and all federal, state, and local guidelines would be adhered to. With implementation of **MM CUL-2**, the Project's impact on human remains would be reduced to a less than significant level.

MM CUL-2: Unanticipated Discovery of Human Remains. The discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD), and as determined by the Native American Heritage Commission (NAHC) should those findings be determined as Native American in origin. The MLD shall complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access.

4.5.4 Mitigation Measures

Implementation of the following mitigation measures would reduce the potential for cultural resource impacts to less than significant:

- CUL-1: Unanticipated Discovery of Cultural Resources
- CUL-2: Unanticipated Discovery of Human Remains

4.6 ENERGY

ENERGY – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

4.6.1 Environmental Setting

According to the California Energy Commission, gas consumption in Los Angeles County in 2022, the most recent year data is available, totaled 2,820 million therms (California Energy Commission 2024). In 2022, approximately 295 million gallons of diesel were used in Los Angeles County (California Energy Commission 2023).

4.6.2 Regulatory Setting

There are no federal or local laws, regulations, or policies pertaining to energy that are relevant to the proposed Project. State regulations, laws, and policies pertaining to energy relevant to the Project are included below.

4.6.2.1 State

California Code of Regulations Title 13 Section 2449 and 2485. CCR Title 13 Section 2449 sets idling restrictions for construction vehicles. Pursuant to Title 13, Section 2449, off-road diesel vehicles are not permitted to idle for more than five minutes. Pursuant to Title 13 Section 2485, diesel-fueled commercial motor vehicles are not permitted to idle for more than five minutes.

4.6.3 Impact Analysis

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

Less than Significant. Energy use during P&A and decommissioning activities would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. Construction contractors would be required to comply with the provisions of CCR Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. These practices would result in efficient use of energy necessary to perform the temporary eight-week construction period. In the interest of cost-efficiency, the Project proponent also would not utilize fuel in a manner that is wasteful or unnecessary. The proposed Project would not require new operations and maintenance activities or electricity consumption. Therefore, after P&A and decommissioning activities, the proposed Project would not consume additional energy resources. Therefore, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction. Impacts would be less than significant.

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

Less Than Significant. Energy would be consumed during the proposed P&A and decommissioning activities in the form of petroleum-based fuels to power off-road construction vehicles and equipment on the Project site, and vehicles used to transport materials and construction personnel to and from the Project site. Energy use during P&A and decommissioning activities would be temporary in nature, lasting approximately eight weeks. The contractor would be required to comply with the CCR Title 13 Section 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to CARB diesel rules which include the use of energy efficient construction equipment. The proposed Project would comply with regulations intended to promote energy efficiency and would be consistent with state regulations related to energy efficiency. Therefore, this impact would be less than significant.

4.6.4 Mitigation Measures

The proposed Project would not result in significant impacts on energy; therefore, no mitigation is required.

4.7 GEOLOGY AND SOILS

GEOLOGY AND SOILS – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) 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?	☐	☐	☐	☒

GEOLOGY AND SOILS – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

4.7.1 Environmental Setting

The well sites are situated within the northwest and northeast portion of the Transverse Ranges geomorphic province in Southern California (California Geologic Survey 2002). The Transverse Ranges geomorphic province are characterized by east-west trending series of steep mountain ranges and valleys to include San Miguel, Santa Rosa, and Santa Cruz islands. The eastern extension of the Transverse Ranges, the San Bernardino Mountains, has been displaced to the south along the San Andreas Fault. As a result of the north-south compression along these geomorphic provinces, this is one of the most rapidly rising regions on earth. According to the USGS, faults near the well sites include the Northridge Hills Fault located approximately 5.5 miles northeast of the well sites, the Mission Hills Fault located approximately seven miles northeast of the well sites, and the Santa Susana Fault located approximately 8.5 miles northeast of the well sites (USGS 2024). According to the DOC, the Project site is within landslide and liquefaction hazard areas (DOC 2021).

The Project area is underlain by Balcom and Gaviota series soils (United States Department of Agriculture 2024). The geology of the region was mapped by Dibblee and Ehrenspeck (1992) and Bedrossian et al. (2012), who identified two geologic units within the well sites, Quaternary young alluvial fan deposits and Monterey Formation.

4.7.2 Regulatory Setting

Federal, state, and local regulations, laws, and policies pertaining to geology and soils relevant to the Project are included below.

4.7.2.1 Federal

Uniform Building Code. The Uniform Building Code was first published in 1927 by the International Council of Building Officials, a non-governmental organization. It was intended to promote public safety and provided standardized requirements for safe construction. Updated editions of the code were published every three years until 1997, which was the final version of the

code. Since that time, the Uniform Building Code, published by the Internation Code Council since 1997, has been adopted by many jurisdictions, including the State of California, in their building codes.

Clean Water Act. The CWA (33 USC Section 1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. Several provisions of the CWA regulate activities that could affect soil erosion and chemical composition of water. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). Projects that disturb one or more acres of land are required to obtain NPDES coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (General Permit). Construction General Permits are implemented and enforced by the California Water Resources Control Board under Order No. 2009-0009-DWQ. The General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which includes BMPs to protect storm water runoff.

Requirements of the federal CWA and associated SWPPP requirements are described in further detail in Section 4.10, *Hydrology and Water Quality*.

Earthquake Hazards Reduction Act. The National Earthquake Hazards Reduction Program was established by the U.S. Congress when it passed the Earthquake Hazards Reduction Act of 1977, Public Law (P.L.) 95– 124. At the time of its creation, Congress' stated purpose for the National Earthquake Hazards Reduction Program was "to reduce the risks of life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program." Congress recognized that earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early-warning systems, coordinated emergency preparedness plans, and public education and involvement programs.

Oil and Gas Pipelines. The Pipeline and Hazardous Material Safety Administration, under the United States Department of Transportation is responsible for regulating and ensuring the safe and secure movement of hazardous materials to industry and consumers by all modes of transportation, including pipelines. The Pipeline and Hazardous Material Safety Administration's

Office of Pipeline Safety administers the United States Department of Transportation's national regulatory program to assure the safe transportation of natural gas, petroleum, and other hazardous materials by pipeline. The Office of Pipeline Safety develops regulations and other approaches to risk management to ensure safety in design, construction, testing, operation, maintenance, and spill response planning of pipeline facilities. Pipeline safety regulations are listed in the Code of Federal Regulations (CFR), Title 49 Parts 190 to 199.

4.7.2.2 State

Seismic Hazards Mapping Act of 1990. In accordance with PRC, Chapter 7.8, Division 2, the DOC, Division of Mines and Geology (now California Geological Survey) is directed to delineate Seismic Hazard Zones through the Seismic Hazards Zonation Program. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards, such as those associated with strong ground shaking, liquefaction, landslides, other ground failures, or other hazards caused by earthquakes. Cities, counties, and state agencies are directed to use seismic hazard zone maps developed by California Geological Survey in their land-use planning and permitting processes.

California Building Code. The State of California provides minimum standards for building design and construction relating to fire and life safety, structural safety, and access compliance through the California Building Code (CBC), CCR, Title 24. CBC provisions provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures and certain equipment. The CBC incorporates by adoption the 2012 International Building Code of the International Code Council.

Among other provisions, the CBC requires that a grading permit be issued by applicable local land use authorities if more than 50 cubic yards of soil are moved during the implementation of a project, and Chapter 16 (Structural Design) of the code describes seismic load calculation and design.

California Public Resources Code. Section 5097.5 of the PRC states:

> *No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency,*

or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

Here "public lands" means those owned by, or under the jurisdiction of, the State or any City, County, District, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance and for permit actions (e.g., encroachment permits) undertaken by others.

Underground Injection Control Program. In California, wells that inject fluids associated with oil and natural gas production operations (Class II injection wells) also are regulated by CalGEM under its Underground Injection Control (UIC) Program. Injection operations regulated under the UIC Program include enhanced oil recovery through waterflood, steamflood, and cyclic steam wells, produced water disposal, and gas storage. CalGEM is authorized to regulate Class II injection wells under EPA oversight, pursuant to the 1982 primacy agreement between the EPA and CalGEM under the Federal Safe Drinking Water Act (SDWA). The requirements of CalGEM's UIC Program are found in the PRC, the SDWA, and in the state and federal regulations. The main features of the UIC Program include permitting, inspection, enforcement, mechanical integrity testing, P&A oversight, data management, and public outreach. It is CalGEM's intent that the UIC Program will be administered consistently in each of CalGEM's six districts.

4.7.2.3 Local

Los Angeles County General Plan 2035. The following General Plan 2035 policies are designed to minimize risk of injury and damage due to seismic and geotechnical hazards.

- **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 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 14.6:** Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

City of Los Angeles Conservation Element. The City's Conservation Element includes the following policy related to paleontological resources (City of Los Angeles 2001):

- **Policy:** continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.

4.7.3 Impact Analysis

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The well sites do not overlie a known or mapped earthquake fault. Therefore, the proposed Project would not use potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. No impact would occur.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction?

iv. Landslides?

Less Than Significant. As described in Section 4.7.1, the well sites are surrounded by fault zones and are within landslide and liquefaction hazard areas (DOC 2021). Collectively, the wells are subject to seismic hazards including strong seismic ground shaking, liquefaction, and landslides. However, the proposed Project would not construct habitable development. Once complete, the proposed Project would minimize the potential for soil and groundwater pollution due to inadvertent leaks from the orphan wells consistent with the California Phase-1 State Permanent Sealing of Orphan Wells expenditure plan. Following P&A and decommissioning activities, anticipated to eight weeks, the wells would not require personnel to travel to the well sites. Accordingly, the proposed Project would not result in the risk of loss, injury, or death involving fault rupture, seismic

ground shaking, liquefaction, or landslides. Therefore, this impact would be less than significant.

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

Less than Significant. Project construction would include up to approximately three acres of ground disturbance during construction activities. After site grading at each well site is completed, the soil would be immediately compacted to stabilize the soil surface prior to P&A, which would reduce the potential for erosion of the disturbed soil. Topsoil removed during grading would be placed on top of areas disturbed by grading activities to stimulate vegetation growth in the areas surrounding each well pad which would help to stabilize the soil from erosion. Additionally, implementation of a SWPPP would ensure erosion and sediment control BMPs would be implemented during P&A and decommissioning activities. Therefore, this impact would be less than significant.

c) 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?

Less than Significant. As stated in Threshold 4.7(a) and 4.7(d), the well sites are within liquefaction and landslide hazard areas and are underlain by expansive soils and therefore could be subject to hazards associated with unstable geologic units and soils. However, because Project activities involve minor surface grading and excavation, resulting soil work would not cause soil within the well locations to become unstable. The proposed Project would not result in deep excavations or other activities which could exacerbate existing geologic hazards. Therefore, this impact would be less than significant.

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

Less than Significant. Expansive soils are soils with high shrink-swell potential. The shrink-swell potential is low if the soil has a linear extensibility of less than three percent (United States Department of Agriculture 2017). The Balcom soils underlying the Project area have a linear extensibility rating of 4.1 and are therefore considered expansive soils. However, the proposed Project would not construct new development, but rather would plug, abandon, and decommission existing orphan wells. No habitable development is included as part of the proposed Project. Therefore, the proposed Project would not create a substantial direct or indirect risk to life or property due to expansive soils. This impact would be less than significant.

e) 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?

No Impact. The proposed Project does not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

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

Less than Significant. An analysis by CalGEM evaluated the paleontological sensitivity of the geologic units that underlie the Project area to assess the Project's potential for significant impacts to scientifically important paleontological resources. The analysis was based on the results of a review of existing information in the scientific literature regarding known fossils within geologic units mapped at the Project site. According to the Society of Vertebrate Paleontology (SVP 2010) classification system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources. Following the literature review, a paleontological sensitivity classification was assigned to each geologic unit mapped within the Project area. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

Quaternary young alluvial fan deposits underlie the lower-lying areas of the Project area, including the portion of El Escorpion Trail that would be widened. Quaternary young alluvial fan deposits consist of loose to moderately consolidated sand and clay that is Holocene in age (Bedrossian and Roffers 2012). Holocene-aged sediments are generally considered too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary young alluvial fan deposits have low paleontological sensitivity.

The Monterey Formation underlies the sloped areas in and around the Project area and may occur at depths as little as one foot below the surface in areas mapped as Quaternary young alluvial fan deposits. The Monterey Formation consists for gray-brown; white-weathering; thin-bedded; siliceous, diatomaceous, or cherty shale that is Miocene in age (Dibblee and Ehrenspeck 1992). The Monterey Formation has produced numerous paleontological resources in southern California, including whales (Cetacea), seals (Pinnipedia), birds (Aves), sharks (Chondrichthyes), ray-finned fish (Actinopterygii), and

invertebrates (Paleobiology Database 2024; Tweet et al. 2014). Given this fossil-producing history, the Monterey Formation has high paleontological sensitivity.

The Project site is underlain by Quaternary young alluvial fan deposits and the Monterey Formation, which have low and high paleontological sensitivity, respectively. Above-ground activities associated with the P&A and decommissioning of well and tank infrastructure do not pose a risk to paleontological resources. Removal of below-ground infrastructure is expected to reach up to 10 feet below the surface, but these activities would only impact previously disturbed sediments which are not paleontologically sensitive. Grading associated with access roads to the individual wells and the widening of El Escorpion Trail would reach 6–12 inches below the surface. The well sites are previously disturbed, so this activity is not anticipated to significantly impact paleontological resources. Given the previous development of the well sites, it is likely that the entire Project site is disturbed down to at least this depth. Therefore, impacts to paleontological resources would be less than significant.

4.7.4 Mitigation Measures

The Project would not result in significant impacts to geological resources and soils; therefore, no mitigation is required.

4.8 GREENHOUSE GAS EMISSIONS

GREENHOUSE GAS EMISSIONS - Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

4.8.1 Environmental Setting

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of greenhouse gas (GHG) emissions contributing to the "greenhouse effect," a natural occurrence which takes place in Earth's atmosphere and helps regulate the temperature of the planet. The majority of radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions.

GHG emissions occur both naturally and from human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), CH_4, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of a specific GHG emitted multiplied by its GWP. CO_2 has a 100-year GWP of one. By contrast, CH_4 has a GWP of 30, meaning its global warming effect is 30 times

greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).

The United Nations IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatons of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high O_3 days, more large forest fires, and more drought years (California Natural Resources Agency 2019).

4.8.1.1 Significance Thresholds

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

According to the CEQA Guidelines, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the proposed Project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals in its white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions.

On April 16, 2024, the County of Los Angeles Board of Supervisors unanimously approved an updated 2045 Climate Action Plan. This plan sets a goal of reducing GHG emissions in unincorporated Los Angeles County to net zero by 2045 and includes strategies, measures, and implementing actions related to

reducing oil and gas operations (County of Los Angeles 2023). While the County of Los Angeles has other policies and plans to reduce GHG emissions, such as the General Plan 2035 and the Los Angeles Countywide Sustainability Plan, the policies included in those plans are not applicable to short-term activities such as the proposed Project.

The SCAQMD has adopted a numerical significance threshold for assessing GHG emissions of 10,000 $MTCO_2e$ per year for operational emissions, with construction emissions amortized over 30 years and added to the operational emissions.

The significance of the proposed Project's GHG emissions is also evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the proposed Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Therefore, the significance of the proposed Project's potential impacts regarding GHG emissions and climate change is evaluated based on SCAQMD thresholds and consistency with plans and polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change. The most directly applicable adopted regulatory plan to reduce GHG emissions is CARB's 2022 Scoping Plan and the County's 2045 Climate Action Plan.

4.8.2 Regulatory Setting

Federal and state regulations, laws, and policies pertaining to GHG emissions relevant to the Project are included below. Local regulations related to GHG emissions are not relevant to the proposed Project.

4.8.2.1 Federal

United States Environmental Protection Agency. The United States Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) that the United States EPA has the authority to regulate motor vehicle GHG emissions under the federal Clean Air Act. The EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions.

4.8.2.2 State

Assembly Bill 1279 (The California Climate Crisis Act). Assembly Bill (AB) 1279, "The California Climate Crisis Act," was passed on September 16, 2022, and declares the policy of the State is to achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. In addition, the bill states the State's policy is to reduce GHG emissions by 85 percent below 1990 levels no later than 2045, which means that California would emit no more than 64.65 million metric tons of CO_2e per year by 2045 and would continue to reduce emissions thereafter. In response to AB 1279, CARB adopted the 2022 Scoping Plan, which lays out a path to achieve the AB 1279 targets. The actions and outcomes in the 2022 Scoping Plan would achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

4.8.3 Impact Analysis

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

Less Than Significant. Since the proposed Project would not include new operational activity, this analysis does not consider GHG emissions beyond P&A and decommissioning "construction" activities. P&A and decommissioning activities would temporarily generate GHG emissions primarily from the use of construction equipment and transportation to and from the well sites. As shown in Table 4.8-1, P&A and decommissioning activities would generate 181 metric tons of CO_2e.[5] Amortized over a 30-year period pursuant to SCAQMD guidance, construction associated with the Project would generate approximately six metric tons of CO_2e per year.

Table 4.8-1. GHG Emissions Generated During P&A and Decommissioning

Year	Emissions (MT of CO_2e)
2024	181
Total	**181**

[5] CO_2e is a measure used to compare the emission from various greenhouse gases based on their global warming potential. It converts amounts of other gases to the equivalent amount of CO_2 with the same global warming potential.

Year	Emissions (MT of CO_2e)
Amortized over 30 Years	**6.03**

Notes: MT = metric tons; CO_2e = carbon dioxide equivalent.
Source: Appendix B.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant. Plans and policies have been adopted to reduce GHG emissions in the Southern California region, including CARB's 2022 Scoping Plan and the County's 2045 Climate Action Plan. The following 2022 Scoping Plan goal applies to the proposed Project (CARB 2022a):

> **2022 Scoping Plan Goal:** Support climate adaptation and biodiversity that includes protection of the state's water supply, water quality, and infrastructure to achieve carbon neutrality as soon as possible.

The 2022 Scoping Plan's goals and policies are concentrated on building decarbonization, transportation electrification, and vehicle miles traveled (VMT) reduction and therefore are not applicable to the proposed Project (CARB 2022b). The proposed Project would plug and abandon six existing orphan wells, thereby reducing the potential for residual hazardous materials to contaminate groundwater. Therefore, the proposed Project would improve the protection of the state's water supply and water quality, consistent with the 2022 Scoping Plan goal. Although the proposed Project would temporarily generate GHG emissions during P&A and decommissioning activities, the proposed Project would ultimately be consistent with the applicable goal of the 2022 Scoping Plan.

The following 2045 Climate Action Plan strategies, measures, and implementing actions are applicable to the proposed Project (County of Los Angeles 2023):

Strategy 1: Decarbonize the Energy Supply.

Measure ES1: Develop a Sunset Strategy for All Oil and Gas Operations.

Implementing Action ES1.1: Collaborate with other local jurisdictions and utilities to develop a sunset strategy for all oil and gas operations that prioritizes disproportionately affected communities. Develop an ordinance.

The proposed Project involves the P&A and decommissioning of six orphan wells. Completing the proposed Project would support the County's vision of reducing reliance on oil and gas operations. In addition, the proposed Project would minimize the potential for the orphan wells to contaminate soils or

groundwater proximate to existing residences. Therefore, the proposed Project would be consistent with the County's 2045 Climate Action Plan.

The proposed Project would not conflict with any applicable plans, policies, or regulations to reduce GHG emissions. Therefore, impacts related to GHG emissions would be less than significant.

4.8.4 Mitigation Measures

The proposed Project would not result in significant impacts related to GHG emissions; therefore, no mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

HAZARDS AND HAZARDOUS MATERIALS – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) 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?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒

HAZARDS AND HAZARDOUS MATERIALS – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

4.9.1 Environmental Setting

The well sites are located within private land in Los Angeles County surrounded by trails and scattered vegetation and the portion of the access trail that would be widened/leveled is within the City of Los Angeles in El Escorpion Park. Existing single-family residences are located approximately 400 feet east of the Lucky Star 1 well. Hazardous materials brought to the Project site and used as part of Project activities would include fuels and lubricating oils.

The closest airport to the Project site is Van Nuys Airport is located approximately 10 miles east of the Project site. The nearest school to the Project site is West Hills Montessori, located approximately 0.4-mile east of the Project site.

The State Water Resources Control Board (SWRCB) GeoTracker database and California Department of Toxic Substances Control (DTSC) EnviroStor database do not include any hazardous cleanup sites listed within the Project site (SWRCB 2024, DTSC 2024). The closest documented hazardous cleanup site to the Project site is a closed leaking underground storage tank cleanup site, located approximately 0.9-mile southeast of the Project site (SWRCB 2024).

4.9.2 Regulatory Setting

Federal, state, and local regulations, laws, and policies pertaining to hazards and hazardous materials relevant to the proposed Project are included below.

4.9.2.1 Federal

National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Section 300). The National Oil and Hazardous Substances Pollution Contingency

Plan (NCP) was first developed in 1968. The NCP is administered by the EPA. Its purpose is to provide the organizational structure and procedures for preparing for and responding to discharges of oil and releases of hazardous substances, pollutants, and contaminants.

It applies to oil discharges into or on navigable waters of the United States as well as hazardous substance releases into the environment that may present an imminent or substantial danger to public health or welfare of the United States. It specifies responsibilities among the federal, state, and local governments and requires the establishment of federal, regional, and area contingency plans. It summarizes state and local emergency planning requirements under the Superfund Amendments and Reauthorization Act (SARA). It also provides the procedures for undertaking removal actions pursuant to Section 311 of the CWA and response actions pursuant to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), which is discussed below.

Resource Conservation and Recovery Act (40 CFR Section 240-299). The federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act (RCRA) of 1976 established a program administered by the EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the HSWA, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Hazardous waste is regulated under the RCRA subtitle C. The RCRA established the system for controlling hazardous waste from its point of origin to its final disposal, specifically the handling, storage, and disposal requirements. A RCRA hazardous waste is a waste that appears on one of the four hazardous wastes lists (F-list, K-list, P-list, or U-list), or exhibits at least one of four characteristics—ignitability, corrosivity, reactivity, or toxicity. The Hazardous Waste Manifest System includes a set of forms, reports, and procedures designed to seamlessly track hazardous waste from the time it leaves the generator facility where it was produced, until it reaches the off-site waste management facility that will store, treat, or dispose of the hazardous waste. Operating records, for example, must be kept on-site for the duration of the facility's operation. Recordkeeping and reporting requirements are found at 40 CFR Part 264 Subpart E and 40 CFR Part 265 Subpart E.

Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act. CERCLA, commonly known as Superfund, was enacted by Congress on December 11, 1980. This law (USC Title 42, Chapter 103) provides broad federal authority to respond directly to releases

or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enables the revision of the NCP. The NCP (40 CFR, Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the NPL. CERCLA was amended by the SARA on October 17, 1986.

Emergency Planning and Community Right-to-Know Act. Under the Emergency Planning and Community Right-to-Know Act, or Title III of the SARA, the EPA requires local agencies to regulate the storage and handling of hazardous materials and requires development of a plan to mitigate the release of hazardous materials. Businesses that handle any of the specified hazardous materials must submit to government agencies (i.e., fire departments or public health departments), an inventory of the hazardous materials, an emergency response plan, and an employee training program. The business plans must provide a description of the types of hazardous materials/waste on-site and the location of these materials. The information in the business plan can then be used in the event of an emergency to determine the appropriate response action, the need for public notification, and the need for evacuation.

In 1990, Congress passed the Pollution Prevention Act which requires facilities to report additional data on waste management and source reduction activities to the EPA under the Toxics Release Inventory Program. The goal of the Toxics Release Inventory is to provide communities with information about toxic chemical releases and waste management activities and to support informed decision making at all levels by industry, government, non-governmental organizations, and the public.

The Safe Drinking Water Act of 1974 (42 USC Section 300f et seq.). The SDWA regulates the amount of toxic substances in drinking water sources. The SDWA requires the EPA to develop minimum federal requirements for UIC programs and other safeguards to protect public health by preventing injection wells from contaminating underground sources of drinking water. The EPA developed the UIC Program requirements, but states, territories, and tribes can obtain primary enforcement responsibility, or primacy. State regulations must be as stringent as federal requirements but may be more stringent. As discussed in detail in Section

4.10, *Hydrology and Water Quality*, the EPA has delegated responsibility to CalGEM for implementing UIC Program requirements for Class II wells in California.

Clean Air Act Amendments of 1990: Section 112I (40 CFR 68). The EPA requires facilities that handle listed regulated substances to develop Risk Management Plans (RMP) to prevent accidental releases of these substances. RMP materials are submitted to both local agencies (generally the fire department) and the EPA. Stationary sources with more than a threshold quantity of a regulated substance shall be evaluated to determine the potential for, and impacts of, accidental releases of that substance. Under certain conditions, the owner or operator of a stationary source may be required to develop and submit an RMP. RMPs consist of three main elements: a hazard assessment that includes an off-site consequence analysis and a five-year accident history; a prevention program; and an emergency response program.

Hazardous Liquid Pipeline Safety Act. The Hazardous Liquid Pipeline Safety Act of 1979 and amendments authorize the United States Department of Transportation to regulate pipeline transportation of hazardous liquids (including crude oil, petroleum products, anhydrous ammonia, and CO_2). The Act provides advanced safety and environmental protection in pipeline transportation, increases the transparency of pipeline safety evaluation, and provides funding for future pipeline safety studies.

Exploration and Production Exemption from RCRA. While RCRA was enacted to regulate hazardous waste from industrial, commercial, mining, agricultural, and community activities, certain hazardous wastes which are exempted from the Subtitle C regulations are regulated under RCRA Subtitle D. Congress exempted "drilling fluids, produced waters, and other wastes associated with the exploration, development, or production of crude oil or natural gas or geothermal energy" from regulation under RCRA Subtitle C as hazardous wastes.

The exempted oil and gas wastes are unique because they are generated in large quantities but are relatively low in toxicity. Produced waters make up about 98 percent of all oil and gas waste. The exemption only applies to wastes generated from the exploration, development, and production of oil and gas associated with primary field operations. Primary field operations include primary, secondary, and tertiary production of oil or gas.

The Oil Pollution Act of 1990 (33 USC 2701 et seq.). Under the authority of Section 311 of the CWA, the Oil Pollution Act of 1990 prescribes a prevention, response, liability, and compensation program for oil pollution from vessels,

offshore facilities, pipelines, and onshore facilities. The Oil Pollution Act requires contingency plans be developed and includes reporting requirements to ensure the earliest possible notice of discharges of oil and hazardous substances and imminent threats of such discharges to the appropriate state and federal agencies. The Bureau of Safety and Environmental Enforcement (formerly part of Mineral Management Service), U.S. Coast Guard, and EPA are involved in the implementation of the Oil Pollution Act. In June of 1996, the EPA issued a Spill Prevention and Reporting Compliance Guidance Plan Document which integrated all the various related rules and regulations into one compliance program.

Hazard Communication, 29 CFR 1910.1200. The purpose of this section is to ensure that the hazards of all chemicals produced or imported are classified and that information concerning the classified hazards is transmitted to employers and employees. The requirements of this section are intended to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals, Revision 3. The transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, safety data sheets and employee training.

4.9.2.2 State

Emergency Services Act of 2009. Under the Emergency Services Act, the state developed an emergency response plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an important segment of the plan administered by the California Office of Emergency Services, formerly the California Emergency Management Agency. The California Office of Emergency Services is responsible for the coordination of overall state agency response to major disasters in support of local government. The office is responsible for assuring the state's readiness to respond to and recover from all hazards – natural, manmade, war-caused emergencies and disasters – and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

Hazardous Waste Control Act of 1972 (Health and Safety Code, Division 20, Chapter 6.5). The Hazardous Waste Control Act established the state hazardous waste management program, which is similar to, but more stringent than RCRA program requirements. The Hazardous Waste Control Law regulates the management of hazardous waste under Health and Safety Code, Division 20

Chapter 6.5. This law defines hazardous wastes and the procedures for the handling, transportation, and disposal of hazardous waste. The implementing regulations prescribe management practices for hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in landfills. Hazardous waste is tracked from the point of generation to the point of disposal or treatment using hazardous waste manifests. The manifests list a description of the waste, its intended destination, and regulatory information about the waste. The hazardous waste control program is administered by the state DTSC and by local Certified Unified Program Agencies.

The Porter-Cologne Water Quality Control Act, California Water Code Section 13300-13999 and Title 23 of the California Administrative Code. This Act is analogous to the federal CWA and regulates discharges that may affect the quality of the state's waters. Unlike the federal CWA, which defines "waters of the United States" to exclude groundwater, "waters of the State" as defined under the Porter-Cologne Act include groundwater. The SWRCB and the nine RWQCBs are responsible for planning, permitting, and enforcement. The SWRCB formulates policies for water-quality control and implements the required permit system.

The Porter-Cologne Act gives the Los Angeles RWQCB the authority to regulate discharges of waste to land in Los Angeles County. Drilling muds and boring wastes associated with oil and gas development are currently regulated under SWRCB General Order 2003-0003-DWQ which addresses low-threat discharges to land.

AB 1960 Public Resources: Oil Production Facilities and Oil Spills. Under this bill, CalGEM is required to regulate the minimum facility maintenance standards for production facilities. The regulations that accompany this bill (14 CCR Section 1722–1777.3) require operators to develop and implement spill contingency plans where condensate storage volume exceeds 50 barrels or at facilities that produce at least one barrel per day. The implementing regulations provide specific requirements for the spill contingency plan that include emergency contacts, available safety equipment, checklist for spill response, maps of the facility, a list of chemicals at the facility, containment features, corrosion prevention techniques, and the sensor and alarm systems.

California Pipeline Safety Act of 1981 (California Government Code Section 51010). This California Pipeline Safety Act gives regulatory jurisdiction to the State Fire Marshal for the safety of all intrastate hazardous liquid pipelines and oil interstate pipelines used for the transportation of hazardous or highly volatile liquid

substances. The law establishes the federal Hazardous Liquid Pipeline Safety Act (49 USC Section 2001 et seq.) and federal pipeline safety regulations as the governing rules for intrastate pipelines. This statute also authorizes the State Fire Marshal by agreement with the United States Secretary of Transportation, to implement the federal Hazardous Liquid Pipeline Safety Act and federal pipeline safety regulations as to those portions of interstate pipelines located within the state. It also establishes civil penalties for violations of the act or its regulations.

4.9.2.3 Local

Los Angeles County General Plan 2035. The following General Plan 2035 policies are designed to prevent or minimize 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 6.3:** 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.

County of Los Angeles All-Hazards Mitigation Plan. The All-Hazards Mitigation Plan assesses risk in Los Angeles County related to climate change, dam failure, earthquake, flood, landslide, tsunami, and wildfire. The All-Hazards Mitigation Plan includes evacuation protocols in the event of a natural hazard (County of Los Angeles 2020a).

City of Los Angeles Safety Element. The City's Safety Element includes the following policies to minimize the potential for hazards to risk injury, loss of life, property damage, and the disruption of social and economic life (City of Los Angeles 2021):

- **Policy 1.1.5 Risk Reduction.** Reduce potential risk hazards due to disaster with a focus on protecting the most vulnerable people, places and systems.

City of Los Angeles Base Emergency Operations Plan. The Base Emergency Operations Plan delineates the functions, roles, and responsibilities of emergency response agencies and the overall emergency management system for Los Angeles. The plan includes designations of agencies responsible for facilitating emergency evacuation (City of Los Angeles 2023).

4.9.3 Impact Analysis

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant. Construction activities for the Project would involve storage, transport, use, and disposal of small quantities of hazardous materials, primarily related to fuel and maintain construction equipment. These small quantities materials may include gasoline, diesel, hydraulic fluids, concrete, and solvents all of which are regulated by federal, state, and local laws and regulations. Improper transport, use, or disposal of these materials could be considered a potentially significant impact to the public or the environment. However, the proposed Project would be short term, and the handling of these materials would be subject to applicable federal and state health and safety requirements. Construction contractors would be required to prepare a SWPPP for construction activities according to the NPDES Construction Stormwater General Permit requirements. The SWPPP would list the hazardous materials (including petroleum products) proposed for use during construction; describe spill prevention measures, equipment inspections, and equipment and fuel storage; protocols for responding immediately to spills; and describe BMPs for controlling site runoff. As such, Project construction would not create a significant hazard to the public through the routine transport, use, or disposal of hazardous materials. Therefore, Project impacts would be less than significant.

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

Less than Significant. P&A and decommissioning activities would involve limited use of hazardous materials such as fuels, oils, and other chemicals. Potentially hazardous materials removed from the Project area include fuels and oils. Subsurface pipelines would be cleaned to remove any hydrocarbons and would be filled with an inert substance (water or nitrogen) with a cap welded on its end(s). The pipelines would have very little to no gas inside of them since they would be depressurized. Once complete, the proposed Project would minimize the potential for soil and groundwater pollution due to inadvertent leaks from the orphan wells consistent with the California Phase-1 State Permanent Sealing of Orphan Wells expenditure plan.

The transportation, use, and storage of hazardous materials would be carried out in accordance with federal and state regulations and requirements.

These requirements would ensure proper handling of hazardous materials and limit the chance of hazardous materials being released into the environment. Furthermore, as described in Section 2.4, *Best Management Practices*, CalGEM would implement a site-specific Health and Safety Plan which would encompass a comprehensive set of measures, including contingency plans, to ensure the safety and well-being of the public and the environment during field operations. This would involve delivering an emergency response plan, outlining procedures for notification, immediate action, and reporting in the event of an emergency during State permanent sealing work. As part of this Health and Safety Plan, CalGEM would prepare a spill contingency plan to ensure appropriate measures are taken in the event of accidental spills. With compliance with regulatory measures and implementation of the site-specific Health and Safety Plan, the proposed Project would not 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. Therefore, this impact would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant. There are no existing or proposed schools within 0.25-mile of the two well locations. The proposed Project would involve the limited use of small quantities of hazardous materials such as fuels, oils, drilling materials, and other chemicals. Minor release of TACs would be emitted from the use of diesel fuel. This impact would be less than significant.

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

No Impact. There are no hazardous material sites within or proximate to the Project site. The closest documented hazardous cleanup site to the Project site is a closed leaking underground storage tank cleanup site, located approximately 0.9-mile southeast of the Project site (SWRCB 2024). Furthermore, the proposed Project does not include new well drilling or other activities that could expose potential contamination and result in the creation of a hazardous materials site. Furthermore, once complete the proposed Project would minimize the potential for soil and groundwater pollution due to inadvertent leaks from the orphan wells consistent with the California Phase-1 State Permanent Sealing of Orphan Wells expenditure plan. Therefore, no impact would occur.

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

No Impact. The closest airport to the Project site is Van Nuys Airport is located approximately 10 miles east of the Project site. The Project site is located outside of the noise contours and safety areas of the Van Nuys Airport, as designated by the Los Angeles County Airport Land Use Commission (Los Angeles County Airport Land Use Commission 2004). Therefore, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. No impact would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant. No lane or road closures are proposed as a part of the Project. The proposed Project would not conflict with any of the identified emergency evacuation or emergency response plans identified in the County of Los Angeles All-Hazards Mitigation Plan because the Project would not occur on or proximate to roadways used for substantial evacuation and would otherwise not impede access to evacuation routes. The Project would not interfere with the City's Base Emergency Operations Plan because the Project would not include development that would impede the City's ability to facilitate emergency evacuation. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant. According to the California Department of Forestry and Fire Protection's (CAL FIRE) Fire Hazard Severity Zones Map, the Project site is located within a Very High Fire Hazard Severity Zones within both a State Responsibility Area and Local Responsibility Area (CAL FIRE 2024).

Construction activities would involve the use of fuels for construction equipment and water would be available during hot work to reduce potential for fires and other hot-work related issues. All cutting and welding would comply with California Fire Code 3304.6 and National Fire Protection Association 51B and a Fire Watch procedure would conform to California Fire Code 3304.5. The Project proponent would be responsible for maintaining fire extinguishers in accordance

with California Fire Code 3315 and 906 as well as providing monitoring and training to prevent vehicle traffic off roadways to ensure activities do not impact dry brush and lead to fire. P&A and decommissioning activities would occur in compliance with applicable PRC and local regulations to minimize fire risk. The Project does not include the construction of habitable structures. Therefore, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, this impact would be less than significant.

4.9.4 Mitigation Measures

The proposed Project would not result in significant impacts related to hazards and hazardous materials; therefore, no mitigation is required.

4.10 HYDROLOGY AND WATER QUALITY

HYDROLOGY AND WATER QUALITY – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through 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 a substantial erosion or siltation of on- or off-site;	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐

HYDROLOGY AND WATER QUALITY – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.10.1 Environmental Setting

According to the FEMA Flood Map, the well sites are within Zone D, indicating an area with possible but undetermined flood hazard (FEMA 2024). The well sites are located approximately 260-feet south of Bell Creek (California Department of Water Resources [DWR] 2024a).

The Project site is within the Los Angeles River Watershed (Water For LA County 2024). The Los Angeles River Watershed spans approximately 834 square miles. The eastern portion spans from the Santa Monica Mountains to the Simi Hills and in the west from the Santa Susana Mountains to the San Gabriel Mountains. The watershed encompasses and is shaped by the path of the Los Angeles River, which flows from its headwaters in the mountains eastward to the northern corner of Griffith Park. At this point, the channel turns southward through the Glendale Narrows before it flows across the coastal plain and into San Pedro Bay near Long Beach (Los Angeles County Department of Public Works 2024).

The Project site does not overlie a groundwater basin (DWR 2024b).

Water necessary during construction of the proposed Project would be utilized during the P&A phase to water unpaved roads to suppress dust and during the pipeline decommissioning phase where below-ground pipelines would be capped and filled with water. Water would also be available during hot work to reduce potential for fires and other hot work-related issues.

4.10.2 Regulatory Setting

Federal, state, and local regulations, laws, and policies pertaining to hydrology and water quality relevant to the Project are included below.

4.10.2.1 Federal

The Safe Drinking Water Act of 1974 (42 USC Section 300f et seq.). The SDWA was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The law was amended in 1986 and 1996 and requires many actions to protect drinking water and its sources: rivers, lakes, reservoirs, springs, and ground water wells. The SDWA authorizes the EPA to set national health-based standards for drinking water to protect against both naturally occurring and man-made contaminants that may be found in drinking water.

The regulations allow for disposal into aquifers that would otherwise meet the criteria for a USDW if the aquifers are determined to be exempt by the EPA in accordance with an exemption application and review process (40 CFR 146.4). For oil and gas production and Class II well operations, an aquifer may be designated as "exempted" if it does not currently serve as a source of drinking water and cannot currently or in the future serve as a source of drinking water because it is: (1) mineral, hydrocarbon, or geothermal energy producing, or can be demonstrated to contain commercially producible minerals or hydrocarbons; (2) situated at a depth or location which makes recovery of water for drinking water purposes economically or technologically impractical; or (3) so contaminated that it would be economically or technologically impractical to render the water fit for human consumption.

In 1983, California was granted primacy to regulate Class II wells under the SDWA and must meet federal requirements for the UIC program, including construction, operating, monitoring and testing, reporting, and closure requirements for well owners or operators. All UIC injection activity in the state must be permitted by CalGEM. Class II well operators must meet well construction and conversion standards and perform regular testing and inspection to ensure well integrity. In general, the UIC regulations (40 CFR 146 et seq.) require that owners and operators of new Class II injection wells: (1) site wells in locations free of faults and other adverse geological features; (2) drill to a depth that allows the injection into formations that do not contain USDWs, or that contain only exempt aquifers, and that are confined from any other formation that may contain potential drinking water sources; (3) inject fluids through an internal pipe (tubing) that is located inside another pipe (casing), with cement placed between the outside pipe and the well borehole; (4) test well integrity at the time of completion and at least every five years thereafter; and (5) continuously monitor well integrity. CalGEM administers the UIC program for Class II wells in California.

4.10.2.2 State

Stormwater Discharge Regulations. The SWRCB has adopted a general NPDES permit for construction activities that disturb more than one acre of land (Construction General Permit, Order No. 2012-0006-DWQ, NPDES No. CAS000002) in compliance with the federal CWA. The general permit applies to discharges of sediment from construction activities associated with oil and gas exploration, production, processing, or treatment operations or transmission facilities. To comply with the general permit, a Notice of Intention must be filed with the RWQCB, and a SWPPP must be implemented at the commencement of grading and remain in effect until construction is completed. Construction-related pollutants must be controlled with the best available technology economically achievable and best conventional pollutant control technology (the BAT/BCT standard). The Construction General Permit also requires effluent monitoring and reporting, receiving water monitoring and reporting, a rain event action plan, project area soil characteristics and monitoring, new and redevelopment performance standards for water quality and hydromodification impacts, technology-based numeric action levels, and risk-based permitting.

Porter-Cologne Water Quality Control Act. The Porter–Cologne Water Quality Control Act (Porter-Cologne Act) authorizes regulation of California water rights and water quality by the SWRCB. The Porter–Cologne Act also established nine RWQCBs to ensure that water quality on local/regional levels is maintained. The Project area is under the jurisdiction of the Los Angeles RWQCB.

California Toxics Rule. In 2000, the EPA promulgated federal water quality standards for California after previously adopted water quality objectives for toxic pollutants were overturned in a court proceeding. These federal water quality standards are known as the California Toxics Rule (CTR) and have since been incorporated into regional basin plans, where applicable. The SWQCB has adopted a policy implementing the CTR (Resolution 2000-015, as amended by Resolution 2000-30). The CTR specifies water quality criteria for 128 priority pollutants based on toxicity to aquatic species, which are used as a basis for the establishment of effluent limitations in NPDES permits. The CTR is applicable to surfaced waters only.

Senate Bill 1281, Disclosure of Oil and Gas Water Use and Disposal. Senate Bill (SB) 1281, effective January 2015, amended Section 3226.3 and 3227 of the PRC to require that well operators provide CalGEM with quarterly information regarding the source and disposition of water produced by or used in oil and gas

production in addition to existing obligations to report gas and oil production and produced water information on a monthly basis.

CalGEM and Underground Injection Control. In California, wells that inject fluids associated with oil and natural gas production operations (Class II injection wells) also are regulated by CalGEM under its UIC Program. See Section 4.7, *Geology and Soils*.

4.10.2.3 Local

Los Angeles County General Plan 2035. The following General Plan 2035 policies are designed to protect useable local surface water resources:

- **Policy C/NR 5.6:** Minimize point and non-point source water pollution.
- **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.

4.10.3 Impact Analysis

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

Less than Significant. The Project would include P&A and decommissioning of six well sites by removing tanks, above-ground pipelines, debris, and other Project-related facilities and equipment. In addition, the Project would include minor trail widening and leveling activities. Each well would be cleaned out and plugged, and the site would be backfilled with soil up to ground level. Bell Creek is located approximately 260 feet north of the Project site. However, all pollutants and hazardous materials, including fuels, oils, and lubricants, would be managed in accordance with federal and state regulations which would be fulfilled through implementation of a SWPPP during Project activities. The SWPPP would specify the stormwater monitoring and construction BMPs required to reduce pollutants in stormwater runoff. Construction BMPs would include, but not be limited to, Erosion Control BMPs and Sediment Control BMPs designed to minimize erosion and retain sediment on-site and Good Housekeeping BMPs to prevent spills, leaks, and off-site discharge of construction debris and waste. With implementation of a SWPPP, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. This impact would be less than significant.

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

Less than Significant. The Project site does not overlie a groundwater basin and therefore would not interfere substantially with groundwater recharge. The proposed Project would include decommissioning and abandoning of six wells and would not require a minimal amount for cement mixing and soil work and washing roads with water trucks to suppress dust. Approximately 1,000 gallons per day would be required. Therefore, the proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. This impact would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through 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 a substantial erosion or siltation of on- or off-site?

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

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

iv. Impede or redirect flood flows?

Less Than Significant. Bell Creek is located approximately 260 feet north of the well sites. No work is planned within any waterway and no alterations to any natural drainages or streams would occur. The disturbance area would be limited to the location of the wells and minor widening and leveling of the existing access trail. An alternative route for site access was considered but not chosen due to the proposed work requiring disturbance of a drainage in the area (the Van Owen route).

As these sites have previously been disturbed and compacted, the Project would not substantially alter the existing drainage pattern of the Project area such that substantial excess stormwater runoff would occur. No additional roads are proposed and the existing access road to the Project site would remain unpaved. As described in Threshold 4.10(a) above, erosion and polluted runoff would be minimized through implementation of a SWPPP. The proposed Project would not include additional impervious surfaces which could result in flooding on- or off-

site. The Project is located outside of the 100-year and 500-year flood hazard areas. Furthermore, the proposed Project would not include the addition of impervious surfaces or other features which could impede or redirect flood flows. Therefore, impacts related to the drainage pattern of the site would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant. The well sites are located approximately 11.3 miles north of the Pacific Ocean and are therefore not subject to tsunami. No large bodies of water are proximate to the well sites such that the sites are at risk of seiche. According to the FEMA Flood Map, the well sites are within Zone D, indicating an area with possible but undetermined flood hazard (FEMA 2024). The Project site is located outside of the 100-year and 500-year flood hazard zones mapped by FEMA. The proposed Project would plug orphan wells and therefore minimize the potential for pollutants from the existing oil wells to be released in the event of localized flooding. Therefore, the proposed Project would not risk release of pollutants due to Project inundation. This impact would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant. The Project site does not overlie a groundwater basin; therefore, there are no applicable sustainable groundwater management plans for the proposed Project.

The Basin Plan, published and managed by the Los Angeles RWQCB, is the water quality control plan applicable to the Project site. The Basin Plan defines beneficial uses, sets forth water quality objectives, and establishes programs to manage the quality of surface water and groundwater and achieve those water quality objectives for protection of beneficial uses. As discussed in Threshold 4.10(a), construction and decommissioning would involve soil disturbing activities that would effectively be controlled through implementation of erosion control measures and BMPs as part of the SWPPP and Construction Stormwater General Permit. Impacts to water quality during Project operation would be effectively controlled through the proposed retention basin. Consequently, the Project would not impede beneficial uses identified in the Basin Plan or otherwise conflict with the Basin Plan. This impact would be less than significant.

4.10.4 Mitigation Measures

The proposed Project would not result in significant impacts to hydrology and water quality; therefore, no mitigation is required.

4.11 LAND USE AND PLANNING

LAND USE AND PLANNING – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

4.11.1 Environmental Setting

The well sites are within unincorporated Los Angeles County, while the proposed access route is within both unincorporated Los Angeles County and City of Los Angeles.

4.11.2 Regulatory Setting

There are no relevant federal laws or regulations pertaining to land use and planning applicable to the Project. State and local laws, regulations, and policies applicable to land use and planning relevant to the Project are included below.

4.11.2.1 State

The well sites are located within an established oil field. The following presents Statewide legislation related to oil and gas projects.

Senate Bill 1137. The provisions of SB 1137 (Gonzalez, Chapter 385, Statutes of 2022) are currently stayed by operation of law pending a vote on a referendum against that legislation. SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with CalGEM on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.

4.11.2.2 Local

Los Angeles County Code. Section 22.140.400 of the Los Angeles County Code states orphan wells are required to be plugged and abandoned, and all equipment and pipelines not necessary for the operation and maintenance of other existing wells are required to be removed.

City of Los Angeles Mobility Plan. The City's Mobility Plan contains the following policy relevant to transportation on trails (City of Los Angeles 2016):

- **Policy 1.9:** Balance user needs on the City's public recreational trails**.**

4.11.3 Impact Analysis

a) Physically divide an established community?

Less than Significant. The Project site is located within private land and open space encompassing a recreational trail in El Escorpion Park. Residences are located approximately 400 feet east of the well sites. The proposed Project would not include activities, such as construction of roads, that could physically divide the residential neighborhoods east of the Project site or otherwise physically divide any other established communities. This impact would be less than significant.

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

Less than Significant. The proposed Project involves the P&A and decommissioning of six wells. The Project would be consistent with plans, policies, and regulations associated with P&A of idle wells in the State of California, the minor construction impacts (ex. release of criteria pollutants, noise, construction worker traffic) have been evaluated in this IS/MND. As described throughout this IS/MND, the proposed Project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated on all environmental issue areas. Furthermore, once complete the proposed Project would minimize the potential for soil and groundwater pollution due to inadvertent leaks from the orphan wells consistent with the California Phase-1 State Permanent Sealing of Orphan Wells expenditure plan and Los Angeles County Code. Therefore, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

4.11.4 Mitigation Measures

The Project would not result in significant impacts related to land use and planning; therefore, no mitigation is required.

4.12 MINERAL RESOURCES

MINERAL RESOURCES – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

4.12.1 Environmental Setting

The Los Angeles County General Plan 2035 identifies areas of known mineral resources. The well sites are not in an area of known mineral resources such as concrete aggregate (County of Los Angeles 2014). However, the well sites are within the Canoga Park oil field and thus underlie an area which, historically, has produced oil.

4.12.2 Regulatory Setting

There are no relevant state laws or regulations relevant to mineral resources applicable to the Project. Federal and local regulations, laws, and policies pertaining to mineral resources relevant to the Project are included below.

4.12.2.1 Federal

Surface Mining and Reclamation Act of 1975. The Surface Mining and Reclamation Act of 1975 was mandated in order to identify and protect mineral resources of statewide or regional significance and ensure that those resources are available when needed. The Surface Mining and Reclamation Act requires the State Geologist to classify land into Mineral Resource Zones according to its known or inferred mineral potential. The primary goal of mineral land classification is to ensure that the mineral potential of land is recognized by local government decision makers and considered before land use decisions are made that could preclude mining.

4.12.2.2 Local

Los Angeles County Code. Section 22.140.400 of the Los Angeles County Code states orphan wells are required to be plugged and abandoned, and all

equipment and pipelines not necessary for the operation and maintenance of other existing wells are required to be removed.

4.12.3 Impact Analysis

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. The proposed Project involves the removal of tanks, above-ground pipelines, debris, and other Project-related facilities and equipment. However, the wells are orphan wells which are out of commission and not currently in extracting oil resources. Accordingly, the P&A of the wells would not result in the loss of availability of oil in the state. The Project site is not within a known mineral resources zone, as identified by the County of Los Angeles. The proposed Project would not involve mining or the extraction of mineral resources. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur.

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

No Impact. The Project site is not within mineral resource recovery sites designated in the Los Angeles County General Plan 2035. The P&A of the wells would not result in the loss of availability of oil resources because the wells are not currently in extracting oil resources. Therefore, the proposed Project would not 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. No impact would occur.

4.12.4 Mitigation Measures

The proposed Project would not result in significant impacts to mineral resources; therefore, no mitigation is required.

4.13 NOISE

NOISE – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

4.13.1 Environmental Setting

Overview of Noise

The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called "A-weighting" is used to filter noise frequencies which are not audible to the human ear. A-weighting approximates the frequency response of the average young ear when listening to most ordinary everyday sounds. A person's relative judgment of the loudness or annoyance of a sound correlates well with the "A-weighted" levels of those sounds. Therefore, the A-weighted noise scale is used for measurements and standards involving the human perception of noise. In this analysis, all noise levels are A-weighted, and "dBA" is understood to identify the A-weighted dB. Decibels are measured on a logarithmic scale which quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A 10 dB increase represents a 10-fold increase in sound intensity, a 20 dB change is a 100-fold difference, 30 dB is a

1,000-fold increase, etc. Thus, a doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the energy would result in a 3 dB decrease.

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two equivalent noise sources combined do not sound twice as loud as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA; a change of 5 dBA is readily perceptible; and an increase of 10 dBA sounds twice as loud.

Noise Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this analysis is the Maximum Sound Level (Lmax). Lmax is the highest Root Mean Squared sound pressure level within the sampling period.

Propagation

Sound from a small, localized source (approximating a "point" source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of 6 dBA for each doubling of the distance. Traffic noise is not a single, stationary point source of sound. Over some time interval, the movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point. The drop-off rate for a line source is 3 dBA for each doubling of distance.

The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site (such as parking lots or smooth bodies of water) receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) are simply the geometric spreading of the source. A soft site (such as soft dirt, grass, or scattered bushes and trees) receives an additional ground attenuation value of 1.5 dBA per doubling of distance.

Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will

provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration 2011).

Overview of Vibration

Vibration levels are usually expressed as a single-number measure of vibration magnitude in terms of velocity or acceleration, which describes the severity of the vibration without the frequency variable. The peak particle velocity is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second. Since it is related to the stresses experienced by buildings, peak particle velocity is often used in monitoring and controlling construction vibration.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive land uses are those in which persons occupying the uses are particularly sensitive to the effects of noise, including housing, schools, medical facilities, libraries, social care facilities, and similar facilities. Vibration-sensitive receptors, which are similar to noise-sensitive receptors, include residences and institutional uses, such as schools, churches, and hospitals. However, vibration-sensitive receptors also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels (e.g., recording studios or medical facilities with sensitive equipment). The nearest sensitive receptors to the well sites are single-family residences located approximately 400 feet east of the Lucky Star 1 well.

Existing Noise Setting

The primary noise sources in the vicinity of the well sites are the single-family residences as well as vehicle traffic on Randiwood Lane and Welby Way.

4.13.2 Regulatory Setting

The following information on noise and vibration regulations and thresholds of significance is relevant to the proposed Project.

Significance Thresholds

The nearest sensitive receptors to the Project site are located in the County of Los Angeles. Trail widening/leveling would occur within the City of Los Angeles; however, because the nearest sensitive receptors are located within the County of Los Angeles, the County's noise thresholds are utilized for the purpose of this analysis. For informational purposes, the City of Los Angeles's Municipal Code requires construction work to be confined to weekdays between 7:00 a.m. and

9:00 p.m. The Los Angeles County Code requires construction work to be confined to weekdays between 7:00 a.m. and 7:00 p.m. and includes the noise restrictions shown in Table 4.13-1.

Table 4.13-1. Los Angeles County Construction Noise Thresholds

Work Hours	Single-Family Residential Maximum Noise Level (Lmax)
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60 dBA

Source: Los Angeles County Code Section 12.08.440.

The County utilizes Lmax to set construction noise thresholds. The quantitative construction noise thresholds within the Los Angeles County Code is utilized for the purposes of this analysis.

The City of Los Angeles Municipal Code does not include a quantitative threshold for vibration. The Los Angeles County Code Section 12.08.560 prohibits operating any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property. The perception threshold utilized by the Los Angeles County Code is motion velocity of 0.01 inches per second over the range of one to 100 Hertz. The quantitative vibration threshold within the Los Angeles County Code is utilized for the purposes of this analysis.

4.13.3 Impact Analysis

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant. Temporary noise levels caused by construction activity would be a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of noise-generating activities.

Project-generated noise was estimated using the Federal Highway Administration's Roadway Construction Noise Model (RCNM) Version 1.0. Typical construction projects have long-term noise averages that are lower than louder short-term noise events due to equipment moving from one point to another on the site, work breaks, and idle time. Each phase of construction has a specific equipment mix depending on the work to be carried out during that phase.

Accordingly, each phase also has its own noise characteristics; some would have higher maximum noise levels than others, and some may have discontinuous high-impact noise levels. Project activities would include P&A and decommissioning activities. It is assumed that diesel engines would power all construction equipment. For assessment purposes, the loudest phase (P&A) was modeled under the conservative assumption that an auger drill rig, crane, tractor, concrete mixer truck, and generator would be operating simultaneously. Decommissioning was modeled assuming a crane, scraper, backhoe, and dump truck would be operating simultaneously.

Construction would occur from 7:00 a.m. to 7:00 p.m. on weekdays and therefore would not conflict with the allowable construction hours designated in the City of Los Angeles Municipal Code or Los Angeles County Code. Exposure to the nearest sensitive receptors would be temporary, over the course of approximately eight weeks.

The nearest sensitive receptors to the well sites are single-family residences located approximately 400 feet east of the Lucky Star 1 well. The Lucky Star 1 well and the single-family residences are separated by a hill which rises 51 vertical feet over approximately 224 horizontal feet east from Lucky Star 1 and remains at this elevation to the single-family residences, located approximately 176 feet east of the hill's plateau. Accordingly, the topography of the land between Lucky Star 1 and the single-family residences provides a natural noise barrier. Appendix A of the RCNM Version 1.0 User's Guide provides best practices for calculating estimated shielding for use in the RCNM (Federal Highway Administration 2006). For the purposes of this analysis, it is conservatively estimated that the natural barrier would provide at least 15 dBA of noise reduction. Table 4.13-2 shows the results of the noise modeling from RCNM.

Table 4.13-2. Construction Noise Levels at Sensitive Receptors

Stage	Sensitive Receptor	Distance (feet)	Noise Level
P&A	Residences 400-feet east of Lucky Star 1	400	52
Decommissioning	Residences 400-feet east of Lucky Star 1	400	52

Source: Appendix E.

As shown in Table 4.13-2, Project construction noise levels would be up to 52 dBA Lmax, which would not exceed the County's threshold of 60 dBA for construction proximate to single family residences. Therefore, the proposed Project would not substantially increase ambient noise levels in the vicinity of the wells. This impact would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant. Construction activities known to generate excessive groundborne vibration, such as pile driving, would not be conducted as part of the Project. The greatest known source of vibration during P&A and decommissioning activities would be a large bulldozer. At 400 feet, the large bulldozer and similar equipment would not generate vibration greater than the 0.01 inches per second threshold utilized by the County at the nearest residences as per Federal Transportation Administration reports (FTA 2018) calculation methodologies. Accordingly, vibration caused by the proposed Project would not result in excessive groundborne vibration or groundborne noise levels. This impact would be less than significant.

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

No Impact. The closest airport to the Project site is Van Nuys Airport is located approximately 10 miles east of the Project site. The Project site is located outside of the noise contours of the Van Nuys Airport, as designated by the Los Angeles County Airport Land Use Commission (Los Angeles County Airport Land Use Commission 2004). Therefore, Project personnel would not be exposed to substantial airport noise. No impact would occur.

4.13.4 Mitigation Measures

The proposed Project would not result in significant impacts related to noise; therefore, no mitigation is required.

4.14 POPULATION AND HOUSING

POPULATION AND HOUSING – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 Environmental Setting

The well sites are located in unincorporated Los Angeles County and the trail widening/leveling area is located in the City of Los Angeles. According to the California Department of Finance, the population of unincorporated Los Angeles County is 997,999 and the population of the City of Los Angeles is 3,766,109 (California Department of Finance 2024). There would be no activities related to the Project after completion and restoration of the sites.

No new access roads would be constructed as part of the Project. The Project would utilize existing oil field work crews and existing oil field subcontractors (rig crew).

4.14.2 Regulatory Setting

There are no federal, state, or local laws, regulations, or policies pertaining to population and housing that are relevant to the proposed Project.

4.14.3 Impact Analysis

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

No Impact. The proposed Project would be temporary and would not include any additional housing or other infrastructure which would directly or indirectly result in population growth. After completion of the P&A and decommissioning activities, the Project would not require additional

maintenance. Therefore, the Project would not induce population growth directly or indirectly. No impact would occur.

b) Displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed Project includes the permanent sealing of six oil wells within existing open space. The Project would not require the removal of housing or otherwise displace people or housing. Therefore, no impact would occur.

4.14.4 Mitigation Measures

The Project would not result in significant impacts on population and housing; therefore, no mitigation is required.

4.15 PUBLIC SERVICES

PUBLIC SERVICES		Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the Project 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:					
i)	Fire protection?	☐	☐	☒	☐
ii)	Police Protection?	☐	☐	☐	☒
iii)	Schools?	☐	☐	☐	☒
iv)	Parks?	☐	☐	☐	☒
v)	Other public facilities?	☐	☐	☐	☒

4.15.1 Environmental Setting

Fire Protection

The well sites are located in unincorporated Los Angeles County and the trail widening/leveling area is located in the City of Los Angeles. The closest fire stations to the Project site are Los Angeles Fire Department Fire Station 105, located approximately 2.4 miles east of the Project site, and Los Angeles County Fire Department Station 68, located approximately three miles south of the Project site.

Police Protection

Police services are provided to the Project area by the Los Angeles County Sherrif's Department. The nearest Los Angeles County Sherrif's Department station to the Project site is located approximately 4.8 miles southwest of the Project site in Calabasas.

Schools

The Project site is within the service area of the Los Angeles Unified School District. The nearest Los Angeles Unified School District public school to the Project site is the Haynes Charter for Enriched Studies, located approximately one mile east of the Project site.

Parks

Information about the nearby parks is discussed in Section 4.16, *Recreation*.

4.15.2 Regulatory Setting

There are no federal or state laws, regulations, or local policies pertaining to public services that are relevant to the Project. Local regulations, laws, and policies pertaining to public services relevant to the Project are included below.

4.15.2.1 Local

Los Angeles County General Plan 2035. The General Plan 2035 Public Services and Facilities Element contains the following policies relevant to maintaining public services:

- **Policy PS/F 7.2:** Proactively work with school facilities and education providers to coordinate land use and facilities planning.
- **Policy PS/F 8.1:** Ensure a desired level of library service through coordinated land use and facilities planning.

City of Los Angeles Public Facilities and Services Element. The City's Public Facilities and Services Element contains the following policies relevant to maintaining public services (City of Los Angeles 1969a):

- To continue superior library service as befits the high educational level of the Los Angeles Citizens.
- To provide school sites of sufficient size to provide adequate space for all school activities.

4.15.3 Impact Analysis

a) Would the project 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?

i) Fire Protection?

Less than Significant. The proposed Project includes the P&A of six wells within Los Angeles County and site access improvements in the City of Los Angeles. No permanent structures would be built and therefore there would be no increase in the long-term need for fire protection services. During P&A and decommissioning, vegetation would be cleared surrounding the existing well pads in order to minimize fire risk. Furthermore, construction personnel would be required to comply with applicable PRC and local regulations to minimize fire risk,

including the use of spark arrestors in construction equipment, and removal of combustible debris prior to P&A and decommissioning activities.

All cutting and welding would comply with California Fire Code 3304.6 and National Fire Protection Association 51B and a Fire Watch procedure would conform to California Fire Code 3304.5. The Project proponent would be responsible for maintaining fire extinguishers in accordance with California Fire Code 3315 and 906 as well as providing monitoring and training to prevent vehicle traffic off roadways to ensure activities do not impact dry brush and lead to fire.

Because the proposed Project would be temporary, implement fire safety controls during Project activities, and would not require additional fire protection services beyond the completion of Project activities, the Project would not require the provision of new or physically altered fire protection facilities. This impact would be less than significant.

ii) Police Protection?

No Impact. The proposed Project includes the P&A of six wells in existing oil fields and site access improvements. There would be no added infrastructure as a result of the Project that could be subject to vandalism, and the Project would not increase demand for police protection. Therefore, no impact to police protection services would occur.

iii) Schools?

No Impact. As discussed within Section 4.14, *Population and Housing*, the proposed Project would not result in a population increase. As a result, enrollment within the school system would not be affected. Therefore, no impact to schools would occur.

iv) Parks?

No Impact. As discussed within Section 4.14, *Population and Housing*, the proposed Project would not result in population increases within the area. Therefore, the proposed Project would not increase the use of parks, contribute to the deterioration of existing parks, or require new or expanded parks. Therefore, no impact would occur.

v) Other public facilities?

No Impact. The proposed Project would not contribute to population growth in the area. As a result, there would be no increase in demand for public facilities such as postal service or libraries. Therefore, no impact would occur.

4.15.4 Mitigation Measures

The Project would not result in significant impacts on public services; therefore, no mitigation is required.

4.16 RECREATION

RECREATION	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

4.16.1 Environmental Setting

The well sites are located on private land. The portion of El Escorpion Trail where widening/leveling would occur is within El Escorpion Park. The Victory Trail and El Escorpion Trail provide access to the Project site. The nearest recreational facilities to the Project site include the Knapp Ranch Baseball field located approximately 0.5-mile south of the Project site.

4.16.2 Regulatory Setting

There are no federal or state regulations, laws, or policies pertaining to recreation that are relevant to the Project. Local regulations, laws, and policies pertaining to recreation relevant to the Project are included below.

4.16.2.1 Local

Los Angeles County General Plan 2035. The General Plan 2035 Parks and Recreation Element contains the following policies relevant to maintaining parks and recreational facilities.

- **Policy P/R 1.5:** Ensure that County parks and recreational facilities are clean, safe, inviting, usable and accessible.

City of Los Angeles Mobility Plan. The City's Mobility Plan contains the following policy relevant to transportation on trails (City of Los Angeles 2016):

- **Policy 1.9:** Balance user needs on the City's public recreational trails.

4.16.3 Impact Analysis

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

No Impact. The deterioration of neighborhood and regional parks or other facilities within an area is expedited by increased use, prompted by population growth. As discussed within Section 4.14, *Population and Housing*, the proposed Project would not result in population increases within the area. Therefore, the proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant. The proposed Project does not include or require the construction or expansion of recreational facilities. The proposed Project would result in the temporary closure of El Escorpion Trail, which would temporarily impede trail access. However, connector trails approximately 150 feet north of El Escorpion Trail would remain accessible, thereby providing recreational hikers and mountain bikers with access to the greater El Escorpion Park and surrounding recreational trails. Therefore, the temporary closure of El Escorpion Trail would not result in the need for additional trails. This temporary disturbance would cease following widening/leveling activities. Therefore, the Project would not require the construction or expansion of recreational facilities. This impact would be less than significant.

4.16.4 Mitigation Measures

The Project would not result in significant impacts on recreational facilities; therefore, no mitigation is required.

4.17 TRANSPORTATION

TRANSPORTATION – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with a Project, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

4.17.1 Environmental Setting

The Project site is located approximately 3.1 miles south of United States Route 101, which provides regional access to the Project site. Roadway circulation in the vicinity of the Project site includes a network of one-lane residential streets. Access to the Project site is provided via the Victory Trail and El Escorpion Trail, which are unpaved recreational trails.

4.17.2 Regulatory Setting

There are no federal laws, regulations, or policies potentially applicable to this Project relevant to transportation. State and local laws, regulations, and policies pertaining to transportation relevant to the Project are included below.

4.17.2.1 State

California Department of Transportation Regulations. Caltrans has jurisdiction over state highways and sets maximum load limits for trucks and safety requirements for oversized vehicles that operate on California highways. Orange County is under the jurisdiction of Caltrans District 7. The following Caltrans regulations apply to the potential transportation impacts of the Project:

- California Vehicle Code, Division 15, Chapters 1 through 5 (Size, Weight, and Load). Includes regulations pertaining to licensing, size, weight, and load of vehicles operated on highways; and
- California Street and Highway Code, Section 660-711, 670-695. Requires permits from Caltrans for any roadway encroachment during truck transportation and delivery, includes regulations for the care and protection of State and County highways and provisions for the issuance of written permits, and requires permits for any load that exceeds Caltrans weight, length, or width standards for public roadways.

These state regulations would relate to the haul of heavy equipment and materials to the Project area during construction. Trucking companies and the proposed Project must comply with these regulations.

4.17.2.2 Local

CEQA Guidelines Section 15064.3(b). CEQA Guidelines Section 15064.3(b) indicates that VMT is the most appropriate measure for transportation impacts. The County of Los Angeles utilizes the following impact criteria for assessing potential impacts to VMT (County of Los Angeles 2020b):

- The project will increase the project area VMT, as measurable by the SCAG RTP/SCS base year Travel Demand Forecasting Model plus an induced travel elasticity factor per lane mile.

The City of Los Angeles utilizes Los Angeles Department of Transportation guidelines to assess VMT impacts. According to the Los Angeles Department of Transportation, a project can be screened out of VMT analysis and presumed to have no impact if it would generate less than 250 daily vehicle trips and not result in a net increase in daily VMT (Los Angeles Department of Transportation 2022).

Los Angeles County General Plan 2035. The General Plan 2035 Mobility Element contains the following policy relevant to transportation on trails:

- **Policy M 2.7:** Require sidewalks, trails and bikeways to accommodate the existing and projected volume of pedestrian, equestrian and bicycle activity, considering both the paved width and the unobstructed width available for walking.

City of Los Angeles Mobility Plan. The City's Mobility Plan contains the following policy relevant to transportation on trails (City of Los Angeles 2016):

- **Policy 1.9:** Balance user needs on the City's public recreational trails.

4.17.3 Impact Analysis

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

Less than Significant. The Mobility Element of the Los Angeles County General Plan 2035 and the City of Los Angeles Mobility Plan policies that address the circulation system and guide development of planned multimodal transportation systems within Los Angeles County and the City of Los Angeles. Policies relevant to transportation on trails are described in Section 4.17.2.2.

Construction-related vehicle trips would include construction workers traveling to and from the Project site and trucks associated with equipment and material deliveries. Roadway closures would not be required as part of the Project. While the access trail would be closed during widening activities, the temporary closure of this road would not substantially impact the County's circulation system because the access trail is used as a recreational trail, rather than a transportation corridor. Given that the proposed Project would be a short-term and temporary activity, trips would account for a relatively small portion of existing traffic on area roadways, and construction-related traffic impacts would not be substantial. Therefore, Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

The Project would not include an operational phase since the Project would result in the P&A and decommissioning of six wells. Once these activities are completed, the Project would not result in an increase in traffic and would not include any new or modified land uses that would generate long-term vehicle trips or other features that would affect the local or regional circulation system. Thus, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. This impact would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less than Significant. CEQA Guidelines Section 15064.3(b) indicates that VMT is the most appropriate measure for transportation impacts. In December 2018, the California Governor's Office of Planning and Research provided an updated Technical Advisory to help evaluate transportation impacts under CEQA. In particular, the Technical Advisory provides that a project generating or attracting fewer than 110 one-way trips per day generally may be assumed to cause a less than significant transportation impact (California Governor's Office of Planning and Research 2018). During the proposed Project, up to 25 one-way

trips would occur per day (Appendix B). These temporary trips would not substantially increase long-term VMT in the area. The proposed Project would not require additional vehicle trips once completed, and therefore would not result in a long-term increase in regional VMT. Therefore, the proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact would be less than significant.

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

Less than Significant. Project activities would involve minor widening and leveling of the access trail. This would be completed to transport construction equipment to the well sites. The proposed Project would not include any modifications to existing roadways. The proposed Project does not include the installation of curves or intersections and would not include the use of incompatible uses such as farm equipment. Once completed, the Project site would be similar to existing conditions. Accordingly, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be less than significant.

d) Result in inadequate emergency access?

Less than Significant. The proposed Project would require temporary trail closure during access trail widening. However, this trail is not utilized for emergency access, but rather is a recreational trail. The proposed Project would not substantially increase roadway traffic or otherwise require the closure of paved roads. Accordingly, the proposed Project would not result in inadequate emergency access to nearby residences. This impact would be less than significant.

4.17.4 Mitigation Measures

The Project would not result in significant impacts on transportation; therefore, no mitigation is required.

4.18 TRIBAL CULTURAL RESOURCES

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

4.18.1 Environmental Setting

A cultural resources desktop study completed in support of CalGEM Phase I State Permanent Sealing of Orphan Wells Project was conducted in April 2024. The analysis documented the results of the cultural resources records searches, an assessment for the cultural resources sensitivity of the well locations, and management recommendations. The following sources were utilized to develop an understanding of the Project site and its context:

- Historical aerial photographs accessed via NETR Online.
- Historical topography maps accessed via topoView.

In addition, a California Historical Resources Information System (CHRIS) records search at the South-Central Coastal Information Center (SCCIC) was also conducted. The SCCIC is the official state repository for cultural resources records and reports for the county in which the Project falls. The purpose of the records search was to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the Project site and a 0.5-mile radius surrounding it. The National Register of Historic Places, the California Register of Historical Resources, the California Historical Landmarks list, and the Built Environment Resources Directory, as well as its predecessor the California State Historic Property Data File, were also reviewed. Additionally, the Archaeological Determination of Eligibility list was also reviewed.

Historical topographic maps from 1903 through 1949 depict the Project site as undeveloped land with a roadway or trail depicted north of the Project site. Aerial imagery from 1947 through 1952 depicts the Project site as undeveloped land with agricultural development visible to the east. Aerial imagery from 1959 through 1967 depicts rapid residential development east and south of the Project site. Aerial imagery from 1977 depicts the Project site in its current condition with residential development to the south and east.

The CHRIS records search did not identify any cultural resources within a 0.5-mile radius of the Project site. However, the CHRIS records search did identify one cultural resources study encompassing the Project site, indicating that 100 percent of the Project site has been studied and surveyed within the last 42 years.

In summary, no cultural resources were identified within the Project site as a result of the CHRIS record search and the Project site has been completely surveyed within the last 42 years. Historic aerials and topography maps indicate that the well locations are currently located in undeveloped open space and have remained unchanged for the last 121 years. The Project site has not been

modified by construction or agricultural activities. Based on the findings of the current analysis, the likelihood of encountering or disturbing cultural resources during the well permanent sealing is low.

A review of the potential for known tribal cultural resources listed or eligible for California Register of Historical Resources or local register listing in the proposed Project area was also conducted.

During CalGEM's tribal consultation with the Fernandeño Tataviam Band of Mission Indians, the tribe identified the Canoga Park Project site as extremely sensitive. Given the sensitivity of the Project site, the tribe has requested full cultural monitoring for the duration of the Project.

The Santa Ynez Band of Chumash Indians indicated that the Canoga Park Project was an area of concern. The tribe has requested cultural monitoring during any excavation operations.

As part of the proposed Project, CalGEM in accordance with Assembly Bill 52 on October 10, 2023, notification was sent to tribes. Notification included information regarding CalGEM's Orphan Well Program and maps for all the proposed P&A work. CalGEM contacted all Tribes from the Native American Heritage Commission contact list that identified any cultural affiliation within a county where an orphan well P&A was being proposed, including Los Angeles and Ventura counties. On October 25, 2023, CalGEM held a virtual roundtable for tribes with attendance from Rincon Band of Luiseño Indians, Gabrieliño/Tongva Indians of California, Fernandeño Tataviam Band of Mission Indians, and Santa Ynez Band of Chumash Indians. On January 22, 2024, GalGEM conducted consultations with two responding tribes who had submitted requests for consultation: the Fernandeño Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash.

4.18.2 Regulatory Setting

Under AB 52, lead CEQA agencies must avoid damaging effects on tribal cultural resources, when feasible, whether consultation occurred or is required.

4.18.3 Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

Less than Significant with Mitigation. The potential for adverse impacts to tribal cultural resources is considered low. However, to address the potential event of an inadvertent discovery during ground disturbing activities, the Project proponent would implement the procedures identified in **MM TRI-1, MM TRI-2, MM CUL-1, and MM CUL-2**. Adherence to **MM TRI-1 and MM TRI-2** would ensure a sensitivity training program is conducted and followed, informing workers of procedures to follow in case of unanticipated discovery and allow for monitoring during ground disturbance. **MM CUL-1** would provide standard procedures to follow in the event unanticipated archaeological resources are discovered and **MM CUL-2** would ensure work is temporarily halted if and when human remains were discovered, and all federal, state, and local guidelines would be adhered to. Therefore, impacts would be less than significant with mitigation.

MM TRI-1: Tribal Cultural Sensitivity Training Program. All Project employees conducting work in the Project area identified in the Project Description, including the road access areas, shall complete a Cultural Sensitivity Training Program including training dedicated to tribal resources protection. The Project proponent shall reach out to the Fernandeño Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians no less than 10 days before the training is needed, to schedule the training with the respected tribe(s).

MM TRI-2: Tribal Cultural Monitoring. The Project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians as well as the Santa Ynez Band of Chumash Indians to observe all ground-disturbing activities during pre-construction, including, but not limited to, civil survey, mobilization and staging. The Project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians as well as the Santa Ynez Band of Chumash Indians to observe all ground-disturbing activities

during construction, including, but not limited to, clearing, grubbing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity. Tribal Monitoring Services will continue until confirmation is received from the Project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are complete. If the Project's scheduled activities require the Tribal Monitor to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by Client, in writing, upon completion of each set of scheduled activities and 5 days' notice (if possible) shall be submitted to the Tribe by Project applicant, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archaeologist meeting Secretary of Interior standards retained by the Project applicant as well as the Tribal Monitor shall assess the find. The Lead Agency and/or Project applicant shall, in good faith, consult with the tribes on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

MM CUL-1: Unanticipated Discovery of Cultural Resources. In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR, and significant impacts to the resource cannot be avoided via Project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native

American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance.

MM CUL-2: Unanticipated Discovery of Human Remains. The discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD), and as determined by the Native American Heritage Commission (NAHC) should those findings be determined as Native American in origin. The MLD shall complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access.

4.18.4 Mitigation Measures

Implementation of the following MMs would reduce potential tribal cultural resource impacts to less than significant:

- TRI-1: Tribal Cultural Sensitivity Training Program
- TRI-2: Tribal Monitoring
- CUL-1: Unanticipated Discovery of Cultural Resources
- CUL-2: Unanticipated Discovery of Human Remains

4.19 UTILITIES AND SERVICE SYSTEMS

UTILITIES AND SERVICE SYSTEMS – Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

4.19.1 Environmental Setting

The Project includes P&A of six orphan wells located on the western side of Los Angeles County and minor leveling/grading of a trail in the City of Los Angeles. The water and sewer purveyor for this area is Las Virgenes Municipal Water District (Las Virgenes Municipal Water District 2021).

Construction activities for the Project would require approximately 1,000 gallons per day for well P&A, decommissioning activities, and dust suppression. The water would be hauled to the Project site via a water truck. No water or sewer service is proposed as part of the Project.

The closest landfill to the Project site that accepts construction waste, the Calabasas landfill, has a maximum permitted throughput of 3,500 tons per day and a remaining capacity of approximately 14,500,000 cubic yards (California Department of Resources, Recycling, and Recovery [CalRecycle] 2024a).

4.19.2 Regulatory Setting

There are no federal laws, policies or regulations applicable to the proposed Project relevant to utilities and service systems. State and local regulations, laws, and policies pertaining to utilities and service systems relevant to the Project are included below.

4.19.2.1 State

Sustainable Groundwater Management Act. In 2014, California enacted the Sustainable Groundwater Management Act (Water Code Section 10720 et seq.). The Act, and related amendments to California law, require that all groundwater basins designated as high- or medium-priority in the DWR California Statewide Groundwater Elevation Monitoring program and that are subject to critical overdraft conditions must be managed under a new Groundwater Sustainability Plan (GSP), or a coordinated set of GSPs, by January 31, 2020. High- and medium-priority basins that are not subject to critical overdraft conditions must be managed under a GSP. Where GSPs are required, one or more local Groundwater Sustainability Agencies must be formed to cover the basin and prepare and implement applicable GSPs. The Act does not apply to basins that are managed under a court-approved adjudication, or to low-or very–low-priority basins.

The Act defines groundwater as "water beneath the surface of the earth within the zone below the water table in which the soil is completely saturated with water, but does not include water that flows in known and definite channels." A groundwater extraction facility is defined as "a device or method for extracting groundwater from within a basin" Water Code Section 10721(g-h).

California Integrated Waste Management Act (AB 939). California adopted its first statewide, general recycling program in 1989. The Integrated Waste Management Act of 1989 (PRC 40050 et seq. or AB 939, codified in PRC 40000), administered by the California Department of Resources, Recycling, and

Recovery requires all local and county governments to adopt a Source Reduction and Recycling Element to identify means of reducing the amount of solid waste sent to landfills.

4.19.2.2 Local

Los Angeles County General Plan 2035. The General Plan 2035 Public Services and Facilities Element contains the following policies relevant to utilities and service systems:

- **Policy PS/F 2.1:** Support water conservation measures.
- **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 5.7:** Encourage the recycling of construction and demolition debris generated by public and private projects.

City of Los Angeles Infrastructure Systems Element. The City's Infrastructure Systems Element contains the following policies relevant to utilities and service systems (City of Los Angeles 1969b):

- To set forth design standards for the water system relating to the total water demand and availability of supply, number, and size of facilities, and to assure construction of facilities to be aesthetically compatible with adjacent lands and development.

4.19.3 Impact Analysis

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

Less than Significant. The proposed Project involves the P&A and decommissioning of six wells and minor trail widening and leveling. These activities would be temporary and would not include habitable development or other structures requiring additional water, wastewater, stormwater, electric power, natural gas, or telecommunications facilities. During proposed Project activities, water would be conveyed to the Project site via a water truck and wastewater would be collected via portable facilities. Electric power for the proposed Project would be provided through the use of generators. Accordingly, the proposed Project would not require substantial additional utility infrastructure during Project activities. Therefore, impacts would be less than significant.

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

Less than Significant. Water use would be minimal (approximately 1,000 gallons per day, primarily for dust suppression) and would only occur during P&A and decommissioning activities. According to the Las Virgenes Municipal Water District's 2020 Urban Water Management Plan, the District anticipates being able to adequately provide water supply in normal, dry, and multiple dry years through 2045 (Las Virgenes Municipal Water District 2021). Accordingly, the minimal, temporary water use utilized by the proposed Project would be adequately served by existing water supplies via a water truck at the Project site. This impact would be less than significant.

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

Less than Significant. The proposed Project would not require services from a wastewater treatment provider. During proposed Project activities, portable sanitary facilities would be brought to the Project site as necessary. Sanitary waste generated during proposed Project activities would be transported off-site to a local wastewater treatment facility for proper treatment. The proposed Project would not include habitable development or other structures that would generate substantial wastewater. Accordingly, the proposed Project would result in a less than significant impact related to wastewater.

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

Less than Significant. The proposed Project would result in limited volumes of solid waste requiring disposal at a licensed disposal facility. In accordance with state and federal regulations, only drilling fluids and additives classified as non-hazardous would be used and disposed of. Prior to removal, subsurface pipelines would be cleaned to remove any hydrocarbons and be filled with an inert substance (water or nitrogen) with a cap welded on its end(s). The pipelines would have very little to no gas inside of them since they would be depressurized.

Solid waste generated by the proposed Project would be disposed of at the Calabasas Landfill or the Simi Valley Landfill and Recycling Center. Calabasas Landfill has a maximum permitted throughput of 3,500 tons per day and a remaining capacity of approximately 14,500,000 cubic yards, which is enough

capacity to keep the landfill in operation through 2029 (CalRecycle 2024a). The Simi Valley Landfill and Recycling Center has a maximum permitted throughput of 9,250 tons per day and a remaining capacity of 82,954,873 cubic yards, which is enough capacity to keep the landfill in operation through 2063 (CalRecycle 2024b). Thus, this landfill has adequate remaining capacity to accept waste from Project activities. Therefore, impacts would be less than significant.

e) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant. A small amount of solid waste would be generated as a result of proposed Project activities. Solid waste resulting from the proposed Project would consist of deserted tank(s), containers debris, and other remnants of facilities which would be disposed of at the Calabasas landfill in accordance with local, state, and federal laws and regulations as required by the Project plans and specifications. Following the completion of the proposed Project, no solid waste would be generated. Therefore, the proposed Project would have a less than significant impact.

4.19.4 Mitigation Measures

The Project would not result in significant impacts on utilities and service systems; therefore, no mitigation is required.

4.20 WILDFIRE

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

4.20.1 Environmental Setting

According to CAL FIRE, the Project site is located in Very High Fire Hazard Severity Zones within both a State Responsibility Area and Local Responsibility Area (CAL FIRE 2024). The Project site is within open space with vegetation that could ignite or contribute fuel to a wildfire. The Project site is approximately 400 feet downslope from residential development to the east.

4.20.2 Regulatory Setting

There are no federal laws, regulations, or policies pertaining to wildfire that are relevant to the proposed Project. State and local regulations, laws, and policies pertaining to wildfire relevant to the Project are included below.

4.20.2.1 State

California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire, require the use of spark arrestors on construction equipment that use an internal combustion engine, specify requirements for the safe use of gasoline-powered tools in fire hazard areas, and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442)
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC Section 4428.

4.20.2.2 Local

County of Los Angeles All-Hazards Mitigation Plan. The All-Hazards Mitigation Plan assesses risk in Los Angeles County related to climate change, dam failure, earthquake, flood, landslide, tsunami, and wildfire. The All-Hazards Mitigation Plan includes evacuation protocols in the event of a natural hazard (County of Los Angeles 2020a).

Los Angeles County Code (Section 22.140.400). Section 22.140.400 requires oil well sites to be kept free of debris, trash, and liquids. The area within 25 feet of any oil well is required to be kept free of dry weeds, brush, or other combustible material.

City of Los Angeles Base Emergency Operations Plan. The Base Emergency Operations Plan delineates the functions, roles, and responsibilities of emergency response agencies and the overall emergency management system for Los Angeles. The plan includes designations of agencies responsible for facilitating emergency evacuation, including during wildfire (City of Los Angeles 2023).

City of Los Angeles Municipal Code. Section 57.4906.5.1.1.10 of the City's Municipal Code requires grass and brush clearance within a Very High Fire Hazard Severity Zone to adhere to specific requirements, including not engaging in other activities during brush clearance, keeping a fire extinguisher within 10 feet of any grass or brush clearing activities, and prohibiting grass or brush clearance operations during high fire risk days.

4.20.3 Impact Analysis

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

No Impact. As described in Section 4.9, *Hazards and Hazardous Materials*, no lane or road closures are proposed as a part of the proposed Project. The proposed Project would not conflict with any of the identified emergency evacuation or emergency response plans identified in the County of Los Angeles All-Hazards Mitigation Plan or the City's Base Emergency Operations Plan. Therefore, the proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

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

Less Than Significant. The Project site is located within foothills subject to Santa Ana winds, which are strong, dry offshore winds that that affect Southern California in autumn and winter (AccuWeather 2024). Santa Ana winds could push potential wildfire and wildfire smoke to areas with residential development, thereby exposing nearby residences to pollutant concentrations associated with wildfire. However, construction personnel would be required to comply with applicable PRC and local regulations to minimize fire risk. These regulations include the use of spark arrestors in construction equipment and removal of combustible debris prior to P&A and decommissioning activities.

Water would be available during hot work to reduce potential for fires and other hot work-related issues. All cutting and welding would comply with California Fire Code 3304.6 and National Fire Protection Association 51B and a Fire Watch procedure would conform to California Fire Code 3304.5. The Project proponent would be responsible for maintaining fire extinguishers in accordance with California Fire Code 3315 and 906 as well as providing monitoring and training to prevent vehicle traffic off roadways to ensure activities do not impact dry brush and lead to fire. Construction personnel would be required to comply with applicable PRC and local regulations to minimize fire risk and remove combustible debris prior to P&A and decommissioning activities. Compliance with these regulations would reduce the potential for a fire to occur during P&A and decommissioning activities and therefore reduce the potential for the proposed Project to expose residences to pollutant concentrations from wildfire. Therefore,

the proposed Project would not exacerbate wildfire risk due to slope or prevailing winds which could expose occupants to substantial pollutant concentrations or the uncontrolled spread of a wildfire. This impact would be less than significant.

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

Less Than Significant. The proposed Project would not require the installation or maintenance of fuel breaks, emergency water sources, power lines, or other utilities. The proposed Project includes minor leveling and widening of the access trail to the Project site. However, this minor widening and leveling would not introduce electric infrastructure associated with paved roadways (i.e. streetlights, stoplights, etc.) that could exacerbate fire risk. Therefore, this impact would be less than significant.

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

Less Than Significant. As described in Section 4.10, *Hydrology and Water Quality*, the well sites are within an area with possible but undetermined flood hazard (FEMA 2024). The proposed Project does not include Project activities which would exacerbate flood risk at the Project site. As described in Section 4.7, *Geology and Soils,* the Project site is in an area subject to landslides. The proposed Project would require minimal ground-disturbing activities, and prior to P&A, the graded soil would be compacted to stabilize the soil surface, thereby reducing the potential for soil instability.

As described in Threshold 20(b), water would be available during hot work to reduce the potential for fires and other hot work-related issues. All cutting and welding would comply with California Fire Code 3304.6 and National Fire Protection Association 51B and a Fire Watch procedure would conform to California Fire Code 3304.5. The Project proponent would be responsible for maintaining fire extinguishers in accordance with California Fire Code 3315 and 906 as well as providing monitoring and training to prevent vehicle traffic off roadways to ensure activities do not impact dry brush and lead to fire. P&A and decommissioning activities would occur in compliance with applicable PRC and local regulations to minimize fire risk. Compliance with these regulations would reduce the potential for a fire to occur during P&A and decommissioning

activities and therefore reduce the potential for proposed Project activities to expose people to significant landslide risk as a result of post-fire slope instability.

Furthermore, the proposed Project does not include habitable development that could expose people or structures to flooding or landslide risk. With adherence to applicable regulations, the proposed Project would not 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. This impact would be less than significant.

4.20.4 Mitigation Measures

The proposed Project would not result in significant impacts related to wildfire; therefore, no mitigation is required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or

restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant. The proposed Project is limited to activities that would occur at the Project site. Therefore, the proposed Project would not impact the total mapped habitat of a species. The proposed Project does not include large-scale activities which threaten to eliminate species or the entirety of their habitats. Due to its local scale, the proposed Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. This impact would be less than significant.

As discussed in Section 4.5, *BIO-1:* Pre-disturbance Biological Survey Report

- BIO-2: Worker Environmental Awareness Training
- BIO-3: Sensitive Plant Species Avoidance
- BIO-4: Crotch's Bumble Bee Surveys and Avoidance
- BIO-5: California Red-Legged Frog Surveys and Avoidance
- BIO-6: Sensitive Reptile Species Avoidance
- BIO-7: Burrowing Owl Surveys and Avoidance
- BIO-8: Coastal California Gnatcatcher Surveys and Avoidance
- BIO-9: Nesting Bird Pre-construction Surveys
- BIO-10: San Diego Woodrat Avoidance

Cultural Resources, there are no historical resources located at the Project site, and the proposed Project would not cause a substantial change in the significance of a historic resource. There is a low potential to encounter archaeological resources at the Project site, as the well sites have been previously disturbed and minimal grading is required, and the proposed Project would implement standard procedures for evaluation, consultation, avoidance, and data recovery of unanticipated archaeological resources. Because no important examples of the major periods of California history or prehistory are known to be present at the Project site, the proposed Project would not eliminate important examples of the major periods of California history or prehistory. This impact would be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental

effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects.)

Less Than Significant With Mitigation. As described in Sections 4.1 through 4.20, with respect to all environmental issues, the proposed Project would either have no impact, a less than significant impact, or impacts would be reduced to a less than significant level with implementation of required mitigation. Cumulatively considerable impacts could occur if the construction or operation of other projects coincides with the proposed Project in the same vicinity of the Project site, such that similar impacts of multiple projects combine to expose a resource to greater levels of impacts than what would occur in accordance with the proposed Project. Where it was determined the Project would have no impact (i.e., agriculture and forestry resources, mineral resources, and population and housing) no cumulative operational impacts would be exacerbated to these issue areas as a result of the proposed Project. In addition, certain resource areas (e.g., cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources) are by their nature specific to a project location such that impacts at one location do not add to impacts at other locations and therefore would not result in cumulative impacts.

The proposed Project involves short-term construction and therefore would not contribute to long-term cumulative impacts to increases in waste use, wastewater generation, solid waste generation, or VMT. The significance of project-specific air quality and GHG emissions impacts are dependent on a project's potential to contribute considerably to cumulative air quality and GHG emissions. As evaluated in Sections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*, the proposed Project would not generate cumulatively considerable criteria air pollutant emissions in excess of SCAQMD thresholds or GHG emissions that would conflict with applicable plans, policies, or regulations to reduce GHG emissions. Therefore, the proposed Project's contribution to cumulative air quality and GHG emissions impacts would not be cumulatively considerable. Overlapping construction activities in local neighborhoods could result in cumulative noise and vibration impacts. However, because the proposed Project would not exceed County noise or vibration standards, and the proposed Project is short-term, the proposed Project would not contribute considerably to cumulative noise impacts.

Cumulative impacts to energy could occur if cumulative development results in substantial wasteful energy use that would conflict with state or local energy policy. However, cumulative development, similar to the proposed

Project, would adhere to energy regulations such as CCR Title 13 Sections 2449 and 2485 and the USEPA Construction Equipment Fuel Efficiency Standard. Adherence to these standards would ensure cumulative development would not wastefully, inefficiently, or unnecessarily consume energy resources. Therefore, cumulative energy impacts would be less than significant.

Cumulative impacts to hydrology and water quality could occur if cumulative development would introduce pollutants within the same watershed and receiving waters as the proposed Project. Similar to the proposed Project, cumulative projects would be required to adhere to the Stormwater Construction General Permit and implement an SWPPP and construction BMPs, which would reduce the generation of cumulative stormwater pollutants. With adherence to existing regulations to protect water quality, it is anticipated cumulative water quality impacts would be less than significant. Therefore, the proposed Project would not contribute considerably to cumulative water quality impacts.

Cumulative impacts related to land use could occur if cumulative development would physically divide an established community. The proposed Project does not include activities, such as construction of roads, that could physically divide the residential neighborhoods east of the Project site or otherwise physically divide any other established communities. Therefore, the proposed Project would not contribute considerably to cumulative land use impacts.

Cumulative development could result in impacts to public services and recreation if cumulative development would increase population such that additional public service buildings or parks and recreational facilities are required to serve the additional population. The proposed Project would not result in population growth and therefore would not place additional long-term demand for public services or parks and recreational facilities on the County or City. Therefore, the proposed Project would not contribute considerably to cumulative public services or recreation impacts.

Similar to the proposed Project, cumulative development could also result in impacts to biological resources and would be subject to similar regulatory requirements as the proposed Project, including FESA, CESA, and the Migratory Bird Treaty Act. These regulations are designed to protect individual species and their habitats. Cumulative projects would be required to abide by the provisions of these regulations and could potentially be subject to review from agencies including, but not limited to, CDFW and the USFWS, to ensure potential impacts to species or habitat are minimized. However, existing regulatory requirements alone cannot guarantee species loss, habitat loss, or other impact to biological

resources due to cumulative development. The proposed Project would incorporate **MM BIO-1** through **MM BIO-10** to reduce potential impacts to biological resources to a less than significant level. As a result, the proposed Project would not have a cumulatively considerable contribution to cumulative impacts on biological resources.

The proposed Project would not have a cumulatively considerable contribution to cumulative impacts.

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

Less Than Significant. Adverse effects on human beings are typically associated with air quality, hazards and hazardous materials, noise, and wildfire impacts. These impacts are addressed in Section 4.3, *Air Quality*, Section 4.9, *Hazards and Hazardous Materials*, Section 4.13, *Noise*, and Section 4.20, *Wildfire*. As discussed in detail in these sections, the proposed Project would result in less than significant impacts related to air quality, hazards, noise, and wildfire. Therefore, the proposed Project would have a less than significant impact on human beings.

5.0 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
MM BIO-1: Pre-disturbance Biological Survey Report	Per CalGEM's BMPs, a pre-disturbance biological survey shall be conducted by a Qualified Biologist. The pre-disturbance biological survey shall consist of walking belt transects to accomplish 100 percent coverage of the Project site plus a 100-foot buffer. During the survey, all direct and indirect observations of special status biological resources shall be noted if encountered and recorded using a handheld Global Positioning Satellite device and on field forms. Habitat shall be evaluated by the Qualified Biologist to determine the potential for biological resource monitoring and/or surveys for species that are seasonal or require focused surveys during specified periods (e.g., special status plants). If no such follow-up surveys are required to determine current status of special status biological resources on the Project site, that information shall be included in the biological survey report to be completed within 14 days of the pre-disturbance survey. If follow-up surveys are required, a follow-up survey report shall be completed by the Qualified Biologist and submitted to the Project proponent within 14 days of the follow-up survey. To meet	Survey Results. Prior.	Review of Survey Results.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	seasonal requirements stipulated by Species Protocols, some surveys may be required more than 30 days prior to ground disturbances. In such cases, follow-up pre-disturbance surveys shall also be required within 30 days prior to initiation of the ground disturbance to confirm that no changes in species status or occupancy have occurred within the survey area. The Project proponent shall maintain copies of all pre-disturbance biological survey reports completed by the Qualified Biologist. The pre-disturbance biological survey report shall include a map of the proposed Project construction boundary, biological survey area, special status species observations (when observed), areas of potential and/or occupied habitat (if any), areas identified for avoidance, and a list of all applicable mitigation measures that shall be implemented for the respective Project activity site.			
MM BIO-2: Worker Environmental Awareness Training	Per CalGEM's BMPs, the Qualified Biologist shall develop and implement a Worker Environmental Awareness Program (WEAP) for all personnel that may access the Project. WEAP trainings shall be conducted for each individual prior to their first access into the Project. The Project shall consist of a presentation with	Training Records. Prior.	Review of Training Results.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	material given on-site or off-site by trained personnel (e.g., Qualified Biologist or assigned Company Environmental Specialists). WEAP trainings shall cover an overview of the laws and regulations governing the protection of biological resources; a description of protected (i.e., special status) species known to occur or with the PTO in the Project area; their status and legal protections; what is considered habitat and disturbance; biological resource protection measures; and a list of designated Qualified Biologist contacts. The Project shall provide general awareness to workers and supply materials to assist workers in recognizing protected species that may occur on the Project area, avoidance, and minimization measures to protect biological resources, and how to report biological resources if observed on-site. The WEAP shall implement the following: 1. The WEAP shall emphasize the need to avoid contact with wildlife, to avoid entry into areas where biological resources have been identified for avoidance, to review Project-specific, pre-disturbance biological results reports and maps, and to implement all applicable avoidance and minimization measures included in the Project specific pre-disturbance biological survey results report.			

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	2. All Project personnel present on the Project activity site must sign a statement verifying that they have completed the WEAP and that they understand the biological requirements during Project activities. The Project proponent shall maintain a list of all persons who have completed the WEAP and shall provide the list to CalGEM upon request.			
MM BIO-3: Sensitive Plant Species Avoidance	If the pre-disturbance survey determines that additional targeted plant surveys are required for the detection of sensitive plant species within the construction footprint or a 100-foot buffer, rare plant surveys shall be conducted during the appropriate season for their detection. If additional targeted plant surveys are required, the Project proponent shall retain a Qualified Biologist to conduct focused surveys for the additional targeted plant species prior to Project activities. If required, focused surveys shall be conducted pursuant to CDFW's March 20, 2018, Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018) or CDFW's most recent guidance. If required, findings from the targeted surveys shall be provided to CDFW prior to ground disturbing activities. If surveys for special	Avoidance Measures. Prior and during.	Review of Avoidance Measures.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	status plants occur in a year during which rainfall totals reach at least 80 percent of normal, survey results shall be considered valid for three years. For surveys conducted in years of less-than-ideal rainfall (less than 80 percent average rainfall), results shall be valid for only one year. A survey of appropriate reference populations shall be necessary to support survey findings for the Project activity site. If the pre-disturbance survey identifies special status plant populations, the following measures shall be implemented: 1. Any special status plant populations detected shall be fully described, well documented, and mapped via a Global Positioning Satellite device and appropriately georeferenced on Project maps. For each population occurrence detected, a California Natural Diversity Database (CNDDB) field report and a CNPS Field Survey Form or written equivalent shall be prepared. 2. If pre-construction surveys detect the presence of any State-listed plant species, the plant populations shall be protected from disturbance activities by implementing applicable impact avoidance measures consistent with CNPS's mitigation guidelines (1998 or more current). If impact avoidance			

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	measures have not been established for the species, plant populations shall be buffered from new ground disturbance activities by a minimum of 50 feet, as determined by a Qualified Biologist. A smaller buffer may be established, provided there are adequate measures such as placement of a physical barrier (e.g., construction fencing) in place to avoid the destruction of individuals, with the approval of CalGEM. The buffer zone shall be established around these areas to eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. A Qualified Biologist shall be on-site, at minimum, during initial ground disturbing activities to ensure that sensitive plant species are not impacted. 3. If plants with a CRPR of 1B or 2B are observed in the impact area, no Project activities shall commence, and CalGEM shall coordinate with CDFW to discuss avoidance of the rare plants on site. If complete avoidance is unattainable, the Project proponent shall provide compensatory mitigation to offset the Project's impact on rare plants observed on site at no less than			

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	2:1. A Rare Plant Salvage and Restoration Plan shall be submitted to CalGEM for approval. The plan shall include the following at a minimum: a. Relocation of individual plant(s) to an appropriate habitat area free from Project-related ground disturbance; b. Boundaries of non-State protected special status plant species shall be geo referenced and mapped; c. Topsoil removed during site clearing where non-State protected special status plant species are located shall be spread onto existing disturbed areas within the same geographic area and in the same soil type; d. Post-construction monitoring to confirm continued site occupancy by special status plants affected by ground disturbance; and e. Adaptive management or other contingency measures; and/or weed management.			
MM BIO-4: Crotch's Bumble Bee Surveys and Avoidance	If, at the commencement of Project construction, Crotch's bumble bee is still considered a CESA candidate species or has been listed as threatened or endangered under CESA, the Project shall implement the following measures to	CDFW sign-off if needed. Prior to project initiation and during as needed.	Review of Survey Results.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	avoid, minimize, and offset Project impacts to the species: 1. A Qualified Biologist shall conduct a pre-construction survey for Crotch's bumble bee and nests in Project area prior to initial ground-disturbing activities, such as staging and vegetation clearing. 2. If active Crotch's bumble bee nests are observed within the Project area or within a 100-foot buffer surrounding the Project area, an incidental take permit (ITP) will be obtained from CDFW prior to commencing work. 3. If establishment of a no-disturbance buffer is feasible, construction activities shall not occur within the buffer until a Qualified Biologist determines that the colony is no longer active (i.e., no Crotch's bumble bees are seen flying in or out of the nest for three consecutive days, indicating the colony has completed its nesting season and the next season's queens have dispersed from the colony). Once the nest has been determined to be inactive, construction activities within the no-disturbance buffer(s) shall be allowed to resume. 4. If avoidance of a no-disturbance buffer is not feasible, the lead biologist shall consult with CDFW regarding			

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	potential encroachment into the no-disturbance buffer with other measures implemented. Work would not begin in the no-disturbance buffer without CDFW approval. If avoidance of the nest is not feasible, the lead biologist shall consult with the CDFW regarding the potential for Project activities to result in take of the Crotch's bumble bee and shall comply with all avoidance, minimization, and compensatory mitigation requirements set forth in any incidental take permit issued for the Project by CDFW.			
MM BIO-5: California Red-Legged Frog Surveys and Avoidance	Measures that shall be implemented during the Project construction to avoid and/or minimize direct take of California red-legged frog include: 1. At least two weeks prior to ground disturbing activities, a USFWS permitted biologist shall conduct a pre-construction survey for California red-legged frogs. 2. If California red-legged frogs, tadpoles, or eggs are found, the biologist shall contact USFWS to determine a strategy to avoid impacts to occupied habitat and individuals. A path forward for obtaining an Incidental Take Authorization under the Endangered Species Act shall be	Survey Results. Prior and during.	Review of Survey Results.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	determined if avoidance of occupied habitat is not feasible. 3. The biologist shall conduct a training session for all construction personnel prior to the start of construction activities, which shall include, at minimum, a description of California red-legged frog and its habitat, general measures being implemented to conserve the species, and any boundaries necessary to ensure California red-legged frogs are not disturbed by work activities. 4. A qualified biological monitor shall be present at the work site until all Project-related disturbance has been completed. 5. All trash that may attract predators shall be properly contained and removed from the work site and disposed of regularly. 6. All fueling and maintenance of vehicles and other equipment and staging areas shall occur at least 65 feet from any riparian habitat or water body. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. 7. The biologist shall permanently remove, from within the Project area,			

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	any bullfrogs, crayfish, or centrachid fishes, to the maximum extent possible.			
MM BIO-6: Sensitive Reptile Species Avoidance	If the pre-disturbance biological survey identifies the presence of habitat for special status reptile species within the proposed work area, the following measures shall be implemented. 1. If any coastal whiptail or any other reptile species of special concern are observed during construction, the identified special status reptiles shall be allowed to move out of the work area on their own or shall be removed from the work area and released in adjacent suitable habitat by the Qualified Biologist. The Qualified Biologist shall have all appropriate permits in place prior to handling any special status reptiles or any other wildlife. 2. All construction equipment and construction personnel vehicles shall be checked prior to moving them, to ensure that no special status reptile is under equipment/vehicles. If any individuals are detected beneath equipment or vehicles, the equipment or vehicles shall be left in place until the individual(s) moves out of harm's	CDFW sign-off if needed. Prior and during.	Review of Survey Results.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	way on its own accord, as determined by a Qualified Biologist.			
MM BIO-7: Burrowing Owl Surveys and Avoidance	Measures that shall be implemented during the Project construction to avoid and/or minimize direct take of burrowing owl include: 1. Burrowing owl pre-construction surveys shall be conducted within 14 days of the start of ground disturbing construction. The survey area shall include the Project site and a 500-foot buffer around the Project boundary. If construction is proposed during the breeding season, a Qualified Biologist shall conduct the focused surveys for burrowing owl prior to Project activities. In California, the burrowing owl breeding season extends from February 1 to August 31, with some variances by geographic location and climatic conditions. 2. A burrow is assumed occupied if records indicate that at least one burrowing owl has been observed occupying a burrow on-site during the past three years. If active burrowing owl burrows are detected in the Project boundary or the 500-foot survey buffer, they shall be avoided through	Survey Results. Prior to project initiation and during as needed.	Review of Survey Results.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	implementation of a "no disturbance" buffer designated by a barricade. 3. Determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrows within that habitat) in coordination with the Wildlife Agencies. Active relocation and eviction/passive relocation requires the preservation and maintenance of suitable burrowing owl habitat determined through coordination with CDFW. 4. Any materials on-site during construction shall be made unsuitable for burrowing owl occupation by various methods, including capping open pipes or other materials that could attract burrowing owls. 5. If an occupied burrow or burrowing owl is found within the Project site, site activities will cease and the Project proponent shall coordinate with CDFW.			
MM BIO-8: Coastal California Gnatcatcher	Measures that shall be implemented during the Project construction to avoid and/or minimize direct take of coastal California gnatcatcher include:	Survey Results. Prior and during.	Review of Survey Results.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	1. All brushing, grading, or excavation taking place adjacent to occupied habitat of the coastal California gnatcatcher (defined as within 500 feet of any gnatcatcher sightings [USFWS 2007]) shall be conducted from September 1 through February 14, which is outside the coastal California gnatcatcher breeding season. 2. When conducting any other construction activities during the coastal California gnatcatcher breeding season of February 15 through August 30, adjacent to habitat in which coastal California gnatcatcher are known to occur or have PTO (within 500 feet of suitable scrub habitat), the following avoidance measures shall apply: 3. A USFWS-permitted biologist shall survey for coastal California gnatcatcher within 10 calendar days prior to initiating activities in an area. If coastal California gnatcatcher are present, but not nesting, a USFWS permittee biologist shall survey for nesting coastal California gnatcatcher approximately once per week within 500 feet of the construction area, where accessible,			

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	for the duration of the activity in that area during the breeding season. The standard California gnatcatcher survey protocol shall be followed for all surveys. 4. If an active nest is located, a 500-foot no-construction buffer shall be established around each nest site; however, there may be a reduction of this buffer zone depending on site-specific conditions such as topography, line-of-sight to the nest, or the existing ambient level of activity at the discretion of the Qualified Biologist. No construction shall take place within this buffer until the nest is no longer active.			
MM BIO-9: Nesting Bird Pre-construction Surveys	A pre-disturbance nesting bird survey for active bird nests shall be conducted by a Qualified Biologist no more than 3 days prior to the start of any Project activities that shall take place during the bird nesting season (February 1 through August 31). Surveys shall follow USFWS and CDFW guidance and/or protocols, as applicable. If ground-disturbing activities were initiated prior to, and continue into, the bird nesting season without a break in activity of more than one week, no nesting bird survey is necessary. If no active nests or nesting birds are identified	Survey Results. Prior.	Review of Survey Results.	CalGEM; CDFW (if needed)

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	during the pre-disturbance survey, then ground-disturbing activities may proceed, and no further mitigation measures shall be required for nesting birds. If active nests are identified, the following shall be included as part of the pre-disturbance active bird nest survey results report. Active bird nest(s) shall be avoided by establishing a minimum 250-foot non-disturbance buffer around it, a minimum 500-foot non-disturbance buffer around any active non-listed raptor nest(s) or any federal or State-listed passerine species, or a minimum 0.5-mile non-disturbance buffer around any federal or State-listed raptor nest(s) until the breeding season has ended. Non-disturbance buffers can be removed when a Qualified Biologist has determined that the birds have fledged, are no longer reliant on the nest or parental care for survival and adult birds are no longer occupying the nest, or the nest is no longer active (e.g., failed). Reduced non-disturbance buffers may be implemented if a Qualified Biologist concludes that work within the buffer area shall not be likely to cause nest avoidance or abandonment (e.g., when the disturbance area is concealed from a nest site by topography, when work activities shall have a limited duration within the buffer			

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	area, or when the species has been known to tolerate higher levels of disturbance). If reduced non-disturbance buffers are implemented, a Qualified Biologist shall monitor the active nest(s) before and during construction to establish a baseline for nest behavior and determine whether construction activities are adversely affecting the nest. The pre-disturbance monitoring of the nest site shall occur on at least two occasions of at least one hour each during anticipated work hours prior to construction to establish a behavioral baseline. The monitoring during construction shall be within the buffer area to detect behavioral changes of the birds because of the Project (e.g., adults flushed off the nest) that could lead to nest abandonment. If behavioral changes are observed, the work causing that change shall cease within the buffer area until the nest has fledged or is determined by the Qualified Biologist to no longer be active. The Qualified Biologist shall have the authority to halt or redirect construction activities to protect nesting birds from Project activities. Any reduction of buffer areas for State or federal listed species during the nesting season must be authorized by CDFW and/or USFWS.			

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
MM BIO-10: San Diego Woodrat Avoidance	The Project site contains suitable scrub habitat for San Diego woodrat. Middens (nests) are large nests or dens made of woody debris, such as sticks, dead cacti, and bark. San Diego woodrat may be present at the Project site and any observed middens shall be treated as potentially sensitive. Within 30 days of initial site disturbance, a pre-construction survey shall be conducted for woodrat middens. All occupied woodrat middens shall be mapped and flagged for avoidance to the extent feasible, with a minimum of 10 feet surrounding the active midden. If avoidance is not feasible, middens shall be disturbed ("daylighted") by a Qualified Biologist one night before anticipated vegetation removal to allow for the rats to escape and passively relocate prior to disturbance of the area.	CDFW sign-off if needed. Prior and during.	Review of Survey Results.	CalGEM; CDFW (if needed)
MM CUL-1: Unanticipated Discovery of Cultural Resources	In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to	Program drafted. Prior and during.	Review of Training and program.	CalGEM

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR, and significant impacts to the resource cannot be avoided via Project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance.			
MM CUL-2: Unanticipated Discovery of Human Remains	The discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of	Program drafted. Prior and during.	Review of Training and program.	CalGEM

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD), and as determined by the Native American Heritage Commission (NAHC) should those findings be determined as Native American in origin. The MLD shall complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access.			
MM TRI-1: Tribal Cultural Sensitivity Training Program	All Project employees conducting work in the Project area identified in the Project Description, including the road access areas, shall complete a Cultural Sensitivity Training Program including training dedicated to tribal resources protection. The Project proponent shall reach out to the Fernandeño Tataviam Band of Mission Indians and the Santa Ynez Band of Chumash Indians no less than 10 days before the training is needed, to schedule the training with the respected tribe(s).	Program drafted. Prior.	Review of Training and program.	CalGEM

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
MM TRI-2: Tribal Cultural Monitoring	The Project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians as well as the Santa Ynez Band of Chumash Indians to observe all ground-disturbing activities during pre-construction, including, but not limited to, civil survey, mobilization and staging. The Project applicant shall retain a professional Tribal Monitor procured by the Fernandeño Tataviam Band of Mission Indians as well as the Santa Ynez Band of Chumash Indians to observe all ground-disturbing activities during construction, including, but not limited to, clearing, grubbing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity. Tribal Monitoring Services will continue until confirmation is received from the Project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are complete. If the Project's scheduled activities require the Tribal Monitor to leave the Project for a period of time and return, confirmation shall be submitted to the Tribe by Client, in writing, upon completion of each set of scheduled activities and 5	Monitoring during all ground disturbance. Prior and during.	Monitoring during ground disturbance.	CalGEM

Mitigation Measure # Mitigation Title	Mitigation Description	Timing and Method of Verification	Reporting	Responsible Agency
	days' notice (if possible) shall be submitted to the Tribe by Project applicant, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archaeologist meeting Secretary of Interior standards retained by the Project applicant as well as the Tribal Monitor shall assess the find. The Lead Agency and/or Project applicant shall, in good faith, consult with the tribes on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.			

Notes: All mitigation measures are associated with a Class II impact level; the location for all mitigation measures is the Project site.

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APPENDIX A

PLUGGING AND ABANDONING EQUIPMENT AND WELL SITE PHOTOS

APPENDIX B

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APPENDIX F

SITE STABILIZATION PLAN