Appendix O

Potential Project Design Modifications Assessment

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1.0 Introduction

As part of the project applicant's (Matrix) review of the Draft EIR and through subsequent evaluation of its proposed Project, Matrix has put forth a potential design modification to the Project in an attempt to reduce environmental impacts. The design modifications are considered refinements to the proposed Project and not a separate alternative. This Appendix provides an analysis of the potential impacts of the design modifications in each one of the issue areas and highlights the areas where those modifications may have changes in environmental impacts from those analyzed in the body of the EIR. The analysis also provides information on the mitigation measures that would be applicable to the design modifications. Section 2.0 provides a description of the design modifications, while Section 3.0 provides a discussion of each of the issue areas and the potential ramifications of the design changes to those issue areas in comparison to the proposed Project analyzed in the body of the EIR. Finally, Section 4.0 provides as set of conclusions about the impacts related to the design modifications.

The information contained in this Appendix O does not require the City to recirculate the Draft EIR, as this information does not constitute significant new information as defined under CEQA Guidelines section 15088.5. In particular, no new significant environmental effects would result from the design modifications and no new mitigation measures would be required. In fact, some of the impacts disclosed in the Draft EIR would decrease. Overall, the design modifications would lessen impacts to the Habitat area.

In some limited instances, however, the severity of impacts would slightly increase. The increases would be minor and would occur in the areas of biology, aesthetics, and noise as further detailed in this Appendix O. The increases would not rise to a level that would change the impact classification already disclosed in the Draft EIR, nor would they result in impacts that are substantially more severe than previously disclosed. Indeed, as discussed below, the impacts in these areas would increase only marginally. Additionally, the existing mitigation in the Draft EIR would continue to reduce these impacts. For biology and noise, the proposed mitigation would continue to reduce these impacts to a less than significant level. For aesthetics, the mitigation detailed in the Draft EIR also would reduce this impact, however, the impact, as disclosed in the Draft EIR, would continue to be significant and unavoidable. As disclosed in the Draft EIR, no other mitigation is available to reduce this impact. In short, recirculation is not required as a result of these potential project design modifications.

2.0 Project Description

Matrix has proposed the following changes to the original Project design. Changes have focused on redesigning the layout and the amount of grading required for the Project pads with the primary objective to reduce the number of truck trips during project construction.

The revised site plan design described in Figure O-1 and O-2 attempts to achieve the following:

1. Overall cuts and fills for dirt work are balanced, i.e., no required soil export or berm installations;
2. Eliminates the collateral impact to the surrounding area outside the 7 acre facility to minimize footprint and rehabilitation acreage, i.e. 27 acres impact with berms and slope-backs;
3. Significant reduction in visual impacts from the Preserve (eastern side) by not sloping back hillsides and retaining the large eucalyptus grove to the southeast;
4. Eliminates retaining walls in the 30-40' category. Retaining walls will be held to heights of 8-10 feet, thus substantially reducing cost and safety concerns;
5. Final consolidated facility area is 6.9 acres. The redesign loses about one acre of usable area inside the fence because the natural slope between the upper tier and the wellpad area is retained.

The expectation is that the design revisions would reduce the amount of grading and result in a reduced overall impact area to the Preserve. Under the modification, the amount of earth moved from the site during Project grading would be reduced from 147,000 yds^3 to zero. The duration of grading would be cut in half, from 24 weeks to 12 weeks.

Most significantly, by eliminating soil export, the design modification would eliminate the requirement to transport soils to the Landfill or other destinations, which would eliminate the grading soil export trips from those listed in Table 2-13 in Section 2 of the EIR. This results in a reduction of 9,313 truck trips during Project grading.

The design changes would result in variations from the proposed Project in the amount of area disturbed (both permanent and temporary), the amount of grading and schedule. As the Project components within the pads would be somewhat re-arranged, the distances to receptors would also change. Those variations are reflected in the following tables.

Table O-1 Project Disturbed and Facility Areas

Location	Permanent Facility Area (acres)	Permanent Fuel Modification Area (acres)	Construction Temporary Disturbed Area (acres)
Pad Area	6.9 (6.9)	1.5 (1.1)	0.1 (3.7)
Road Areas	6.9 (6.5)	4.3 (4.0)	0.7 (0.7)

Parking and Staging Area	-	-	4.1 (4.1)
Secondary Fire Access (Loop Trail Road)	1.7 (1.7)	1.7 (1.7)	-
Total	**15.6 (15.2)**	**7.6 (6.9)**	**4.9 (8.5)**

Notes: Numbers may not add exactly due to rounding.
Numbers in parenthesis are the numbers from Table 2-3 in section 2 of the EIR (the proposed Project numbers from the EIR)

Table O-2 Distance from Proposed Project Components to Sensitive Receptors

Project Component Location	Ocean View Residences	School Buildings	School Playground	San Lucas Drive Residences	Public Trails	Ranger Residence
Well Pad Cellars	1,240 (1,300)	1,670 (1,780)	1,250 (1,350)	1,670 (1,800)	800 (820)	990 (1,110)
Processing Oil Plant Equipment	1,080 (1,130)	1,410 (1,450)	990 (1,010)	1,340 (1,370)	400 (450)	700 (720)
Processing- Gas Plant Equipment	1,510 (1,490)	2,090 (2,100)	1,680 (1,670)	2,190 (2,260)	1,060 (1,220)	1,460 (1,520)

Numbers in parenthesis are the numbers from table 2-4 in Section 2 of the EIR (the proposed Project numbers from the EIR)

Table O-3 Natural Gas and Oil Processing Plants Construction Schedule

Activity	Duration (weeks)	Duration (weeks)
	Proposed Project	Design Modification
Grading and Earthwork	24	12
Foundations and Retaining walls	16	16
Vessels and tanks construction/installation	32	32
Piping	32	32
Electrical	24	24
Preparation and painting	8	8
Instrumentation and controls	8	8
Start up and commissioning	12	12

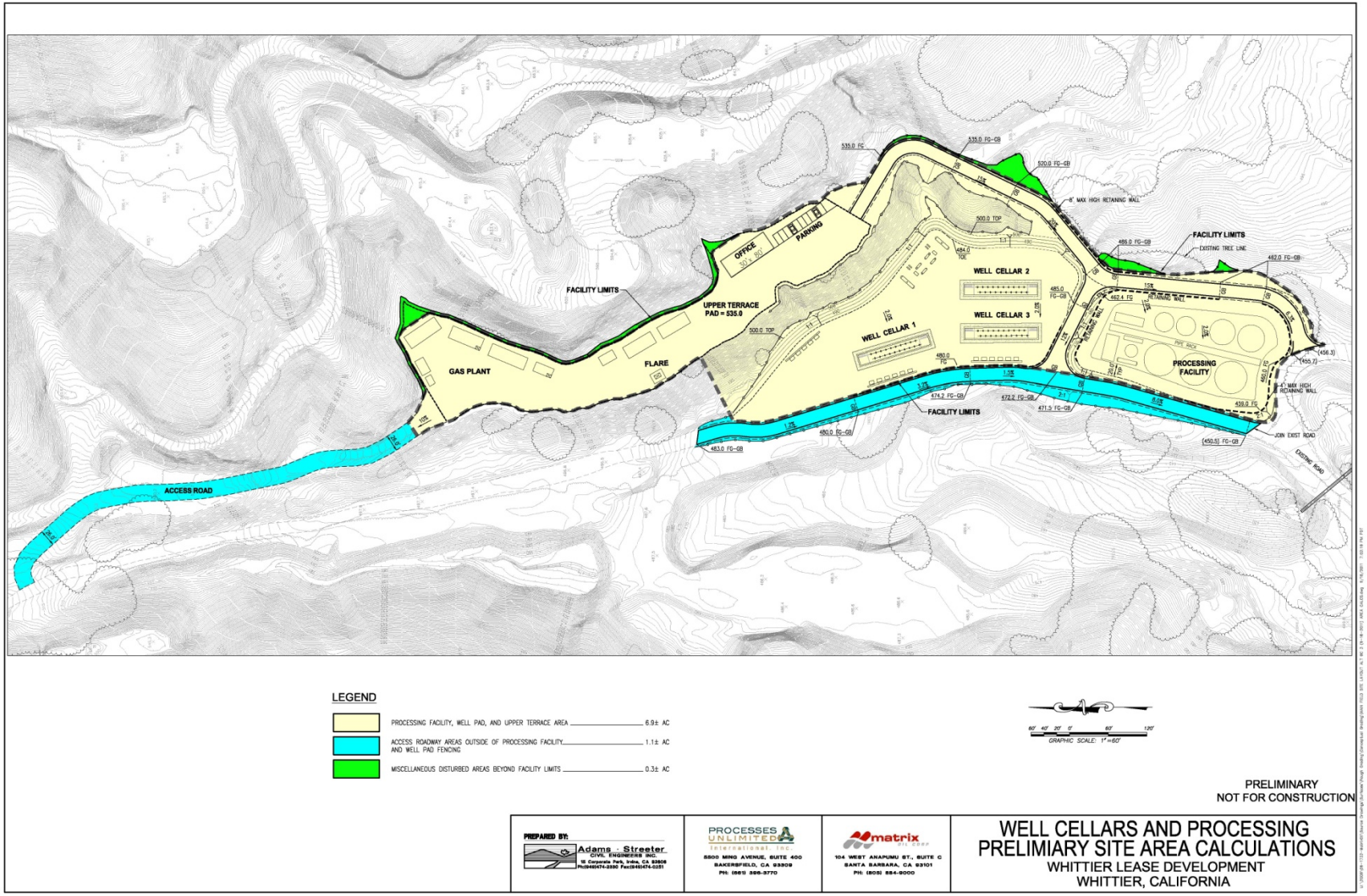
Note: Several activities would occur concurrently with one another. Proposed Project numbers are from Table 2-8 in the Section 2 of the EIR

Figure O-1 shows the design modification layout and Figure O-2 shows the design modification with the proposed Project, as described in section 2.0 of the EIR, overlaid on top. For more information on the proposed Project equipment locations, please see Figure 2-7 in section 2 of the EIR and Appendix A.

Under the design modification, other components and Project characteristics would remain the same as the proposed Project, including the following:

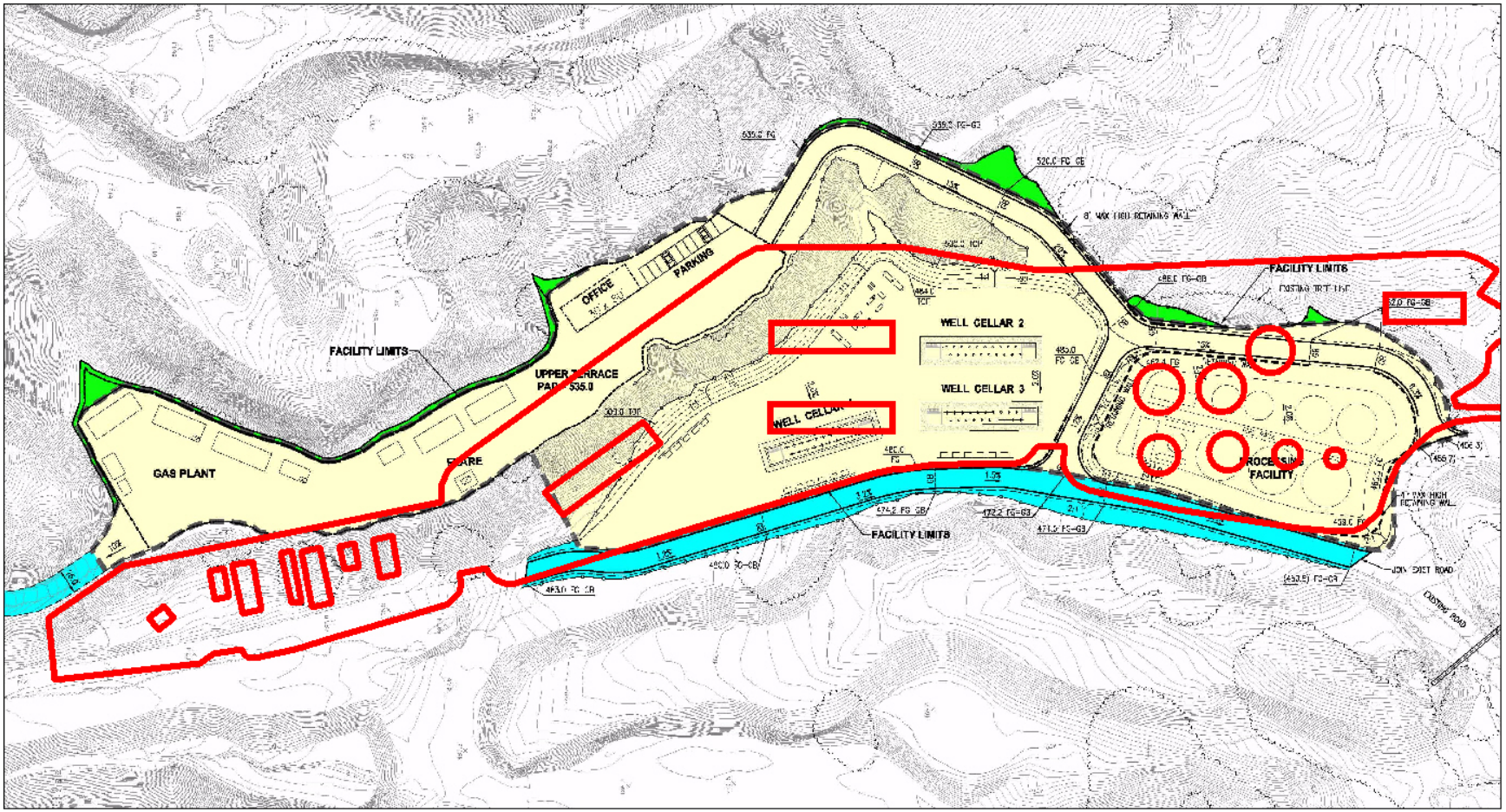
- The design parameters, including crude oil and gas production levels, number of production and injection wells, pipeline lengths, etc. as detailed in Table 2-2 of section 2 of the EIR.
- Construction schedule, equipment and impacts associated with the improvements to the North Access Road;
- Construction schedule, equipment and impacts associated with installation of the pipelines along Colima Road;
- Construction schedule, equipment and impacts associated with improvements to the Loop Access Fire Road,
- Construction, drilling and operational material usage such as water use, electrical use, materials use, etc.
- Vehicle trips not associated with soil hauling.

Figure O-1 Design Modifications Layout



Source: Matrix Submittal

Figure O-2 Design Modification Layout with Proposed Project Overlay



Note: Please see Figure 2-7 in Section 2 of the main EIR for the location of the proposed Project components (in red in the figure).

3.0 Impact Analysis of Design Changes

This section provides an analysis of the potential impacts of the design changes and how those impacts may differ from those analyzed under the proposed Project in the body of this environmental document.

3.1 Air Quality

Air quality emissions would continue to occur during construction and operations. Construction emissions would change somewhat due to the elimination in soil export and the reduced time spent grading the site. Operation emissions would remain identical to the proposed Project.

Most construction activity emissions would be identical to the proposed Project I**mpact AQ.1** except for the emissions associated with grading and with soil export. As soil export would not occur, the emissions associated with soil export would no longer be generated. In addition, although grading would still take place, less soil would be cut and filled. Therefore, total grading emissions would decrease. Although peak day grading emissions would most likely remain the same, the number of days would be reduced by 12 weeks.

The elimination of the soil export would reduce the unmitigated emissions of NOx by 87 lbs/day. Impacts would remain significant before mitigation as the emissions of NOx would be above the regional thresholds. Emissions of NOx would remain below the localized thresholds.

Impacts associated with fugitive dust emissions would also be significant before mitigation, as they would exceed the localized thresholds but not the regional thresholds (same as the proposed Project).

Mitigation measures AQ-1a (fugitive dust plan), AQ-1b and AQ-1c (treating of dirt roads) and AQ-1d (NOx reduction measures) would be applicable and would reduce the emissions of fugitive dust and NOx associated with the construction activities. Mitigation measures elements (portions of AQ-1d) related to the requirements for cleaner and newer soil hauling trucks and requirements for hauling the soil to the local landfill would no longer apply. Emissions of fugitive dust would be reduced with mitigation measures to below both the regional and the local thresholds. Emissions of NOx would not be reduced to below the regional thresholds and would therefore remain a significant and unavoidable impact. This would be the same level of impact as identified in Section 4.1, Air Quality for the proposed Project.

Impact AQ.2, associated with emissions from the operational phase of the Project, would be identical to the proposed Project and could be mitigated to less than significant with mitigation

through the application of mitigation measures AQ-2a (AQMD Rules) and AQ-2b (NOx, VOC, and PM reduction measures).

Impact AQ.3 (odors) would be the same as the proposed Project and mitigation measures AQ-3a-e would still apply.

Impact AQ.4 (GHG emissions) would be identical for the operational phase of the Project, but the construction emissions of GHG would be less by 473 tons, as there would be fewer offsite truck trips associated with soil hauling and less grading. Mitigation measure AQ-4 would apply.

Impact AQ.5 (Health Risk) would be the same as the proposed Project and mitigation measure AQ-5 would still apply.

3.2 Biology

Impacts to biology would occur during both the construction phase and the operational phase of the Project. Impacts to biology would change due to the different areas impacted for the different site configuration and the elimination of soil hauling trips, which would reduce the noise impacts along the North Access Road. Impacts for all areas would remain less than significant with mitigation.

Impact BIO.1 (habitat impacts) would be generated at the site due to 1) grading/construction activities at the Project site and along the North Access Road, 2) noise from hauling of soils along the North Access Road during construction, 3) operational noise impacts on the surrounding habitat; and 4) permanent loss of habitat at the Project site.

Changes to plant community impacts that would occur under the design modification are shown in Table O-4.

Soil hauling activities during the construction phase for the proposed Project, which would total 9,313 round trip truck trips during the soil hauling phase, have the potential to disturb nesting birds including nesting California gnatcatchers and wildlife movement. The noise contour analysis in the EIR for the proposed Project describes noise levels higher than 60 dBA on 8.4 acres of native or naturalized habitats located along the North Access Road due to soil hauling activities. This is identified in the EIR as a temporary but potentially significant impact. With the design modification, this impact would no longer occur because no offsite soil transport would have to occur.

Construction noise levels along the North Access Road for the design modification would be below 55 dBA average hourly due to construction traffic.

Impacts would remain associated with impact BIO.1 due to construction activities at the site and vehicle traffic, although substantially less, along the North Access Road. Impacts would be greater as more area would be impacted from increased fuel modification areas. Impacts from operational noise would be similar to the proposed Project.

Mitigation measure BIO-1a would still apply. However, the extent of permanent loss of coastal sage scrub, to be replaced at a minimum 3:1 area replacement, would increase from 4.16 acres to 4.84 acres due to the different habitat mix impacted by the design modification and the increased area impacted due to the increased size of the fuel modification zone. This increase would be offset by the area requiring replacement, which would increase to 19.99 acres from 17.97 acres.

Mitigation measure BIO-1b would still apply. Impacted areas would change due to the different arrangement at the site. Impacts to chaparral would increase, but impacts due to construction-disturbed areas would decrease and noise impacts associated with soil hauling along the North Access Road would be eliminated. This would decrease the area requiring replacement to 22.5 acres from 36.8 acres.

Mitigation measure BIO-1c would still apply. Mitigation measure BIO-1d would also still apply, and acreages would nominally change due to the different arrangements (coastal sage scrub decreasing by 0.03 acres).

Impact BIO.2 (riparian impacts) would be similar to the proposed Project. Mitigation measure BIO-2a would still apply with the same acreages as detailed for the proposed Project. Mitigation measure BIO-2b would still apply.

Impact BIO.3 (spills) would remain the same as the proposed Project. Mitigation measure BIO-3a and BIO-3b would still apply.

Impact BIO.4 (wildlife movement) would remain the same as the proposed Project. Mitigation measures BIO-4a through BIO-4n would still apply.

Impact BIO.5 (conflicts with policies) would be the same as the proposed Project.

Table O-4 Areas of Design Modification Impacted Plant Communities Summary, acres

	Pad Areas and Roads		Permanent Fuel Mod		Temporary Construction Grading (outside of fuel mod area)	
Vegetative Type	**Pad**	**Roads**	**Pad**	**Roads**	**Pad**	**Roads**
Coastal Sage Scrub						
Mixed Sage Scrub	0 (0)	0.13 (0.06)	0 (-0.06)	0.04 (0.04)	0 (-0.08)	0 (0)
Encelia Scrub	1.48 (0.29)	0 (0)	0.26 (0.07)	0.01 (0)	0 (-0.31)	0.06 (0)
Black Sage Scrub	0.28 (-0.01)	0.13 (0.1)	0.13 (0.07)	0.09 (0.07)	0 (-0.12)	0 (0)
Sagebrush Scrub	0.13 (0.03)	0.08 (0)	0 (0)	0.07 (0)	0 (0)	0 (0)
Coyote Brush Scrub	0.74 (-0.01)	0.33 (0)	0.02 (0.02)	0.2 (0)	0 (-0.21)	0 (0)
Mixed Sage Scrub/Grassland Ecotone	0 (0)	0.03 (0)	0 (0)	0.27 (0)	0 (0)	0.04 (0)
Sagebrush-monkey Flower Scrub	0 (0)	0.05 (0)	0 (0)	0.12 (0)	0 (0)	0.01 (0)
Purple Sage Scrub/Toyon-Sumac Chaparral	0 (0)	0.01 (0)	0 (0)	0.03 (0)	0 (0)	0.03 (0)
Sage Scrub Restoration	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Total Coastal Sage Scrub	2.63 (0.3)	0.76 (0.16)	0.41 (0.1)	0.84 (0.11)	0 (-0.72)	0.14 (0)
Chaparral						
Toyon-Sumac Chaparral	3.23 (0.86)	0.86 (0.24)	0.61 (0.44)	1.08 (0.2)	0.04 (-1.02)	0.36 (0)
Toyon-Sumac Chaparral/Annual Grassland	0.05 (-0.23)	0 (0)	0.08 (0)	0 (0)	0 (-0.02)	0 (0)
Total Chaparral	3.28 (0.63)	0.86 (0.24)	0.69 (0.44)	1.08 (0.2)	0.04 (-1.05)	0.36 (0)
Annual Grassland						
Annual Grassland	0.04 (-0.1)	0.29 (0)	0.05 (0.01)	0.42 (0)	0 (-0.82)	0.03 (0)
Ornamental Plantings	0.02 (0.01)	0.07 (0)	0 (0)	0.14 (0)	0 (-0.08)	0 (0)
Eucalyptus Woodland/Forest	0.24 (-0.8)	0.32 (0)	0.34 (-0.11)	0.19 (0)	0 (-0.54)	0.09 (0)
Ruderal	0 (0)	0.18 (0)	0 (0)	0.08 (0)	0 (0)	0.1 (0)
Total Annual Grassland	0.3 (-0.89)	0.87 (0)	0.39 (-0.1)	0.83 (0)	0 (-1.44)	0.22 (0)
Riparian						
Mulefat Scrub	0 (0)	0.07 (0)	0 (0)	0.12 (0)	0 (-0.03)	0 (0)
Riparian Habitats (Streambed)	0 (0)	0.01 (0)	0 (0)	0.01 (0)	0 (0)	0 (0)
Total Riparian	0 (0)	0.08 (0)	0 (0)	0.13 (0)	0 (-0.03)	0 (0)
Total Vegetative Communities Disturbed	6.21 (0.04)	2.57 (0.4)	1.49 (0.45)	2.89 (0.31)	0.04 (-3.23)	0.72 (0)
Disturbed	0.69 (-0.04)	4.39 (0.01)	0.04 (-0.03)	1.45 (0.01)	0 (-0.39)	0.03 (0)
Total Area Disturbed	6.9 (0)	6.96 (0.41)	1.53 (0.41)	4.34 (0.32)	0.04 (-3.61)	0.75 (0)

Note: Number in parenthesis is the change from the proposed Project. Data in all tables is based on Habitat Authority Vegetative layers as provided by the Habitat Authority

3.3 Safety, Risk

Impacts associated with Safety and Risk would exist associated with the proposed Project pipeline operations and would be the same as the proposed Project as the operational phase of the Project would be the same and equipment locations do not change substantially relative to sensitive receptors. Impacts to Safety and Risk would be less than significant with mitigation.

Impact SR.1 (impacts from drilling and operations) would be the same as the proposed Project and mitigation measure SR-1a, SR-1b and SR-1c would apply.

Impact SR.2 (impacts from natural gas pipeline transportation) would be the same as the proposed Project and mitigation measure SR-2a and SR-2b would apply.

Impact SR.3 (impacts from site contamination) would be the same as the proposed Project and mitigation measure SR-3 would apply.

3.4 Geology

Impacts associated with the geology would be similar to the proposed Project as the construction and operations would take place in the same location, although graded areas would be different and some equipment would be arranged differently. Impacts for all impact areas would be less than significant with mitigation.

Impact GR.1 (ground shaking damage) would be similar to the proposed Project. Mitigation measures GR-1a through GR-1h would apply.

Impact GR.2 (expansive soils) would be similar to the proposed Project. Mitigation measures GR-2 would apply.

Impact GR.3 (uncertified fill) and **impact GR.4** (landslide) would be similar to the proposed Project. Mitigation measures GR-1c would apply.

Impact GR.5 (temporary excavations) would be similar to the proposed Project. Mitigation measures GR-5a through GR-5c would apply.

Impact GR.6 (corrosion) would be similar to the proposed Project. Mitigation measures GR-6a through GR-6e would apply.

Impact GR.7 (subsidence) would be similar to the proposed Project. Mitigation measures GR-7a and GR-7b would apply.

Impact GR.8 (wastewater injection) would be similar to the proposed Project.

3.5 Noise

Noise impacts are associated with both construction and operations. Noise is generated by motorized construction equipment associated with grading, facility construction and vehicles associated with construction. Operational noise is associated with drilling and the operation of the gas and oil plant compressors, pumps and other assorted equipment.

Impacts would be similar to the proposed Project as equipment would be located in similar locations as the proposed Project. Impacts would all be less than significant with mitigation.

Impact N.1 (construction) would be the same as the proposed Project. Mitigation measures N-1a through N-1c would still apply.

Impact N.2 (drilling) would increase over the proposed Project due to the re-arranged equipment. The drilling would be located by up to 130 feet closer to sensitive receptors. This difference could cause noise levels to increase by at most 1.0 dBA at the Ranger's residence during the peak hour drilling, which would still be a less than significant impact with mitigation. Mitigation measures N-2a through N-2c would still apply.

Impact N.3 (vibration) would be the similar as the proposed Project. As drilling would take place closer to residences, vibration levels could be greater than the proposed Project, but would still be substantially below the significance thresholds. Therefore, impacts would remain less than significant.

Impact N.4 (operations) would be similar to the proposed Project. Mitigation measure N-4 would still apply requiring noise walls around the gas plant and enclosure of most rotating equipment in sound enclosures or barriers. The gas plant equipment would be elevated more than the proposed Project, but impacts would still be mitigated to less than significant with appropriately designed sound barriers.

Impact N.5 (concurrent operations and drilling) would increase over the proposed Project due to the re-arranged equipment. The drilling would be located by up to 130 feet closer to sensitive receptors. This difference could cause noise levels to increase at the Ranger's residence during the peak hour concurrent drilling and operations. However, the overall increase in noise levels would be less than the significance thresholds and would therefore remain less than significant. Noise levels at the Loop Trail receptor would increase only nominally as the equipment would be located only marginally closer to the Loop Trail than the equipment arrangement associated with the proposed Project. Impacts would still be a less than significant impact with mitigation.

3.6 Aesthetics

Aesthetic impacts are associated with equipment installed at the processing sites and the drilling rig. Impacts would be similar to the proposed Project as equipment would be located in approximately the same locations as the proposed Project. The drilling activities could take place about 130 feet more to the south of the proposed Project drilling sites (the well cellar sites,

see Figure 2-7 in the main EIR) and slightly more out of the canyon in order to avoid the steeper slopes to the north and the level of grading required there.

The change in visual impacts with moving the rig 130 feet is marginal. A viewshed analysis, which determines the areas that could theoretically see the drilling rig, was done to compare the results to the viewshed analysis for the Project as analyzed in the EIR. This analysis, which was conducted to generate the Figure 4.6-7, was done with a 3D GIS modeling system. The viewshed analysis shows the areas that could view the drilling rig based only on terrain and assumes an "unobstructed" view, although it should be noted that there are relatively few "unobstructed" view locations due to obstructions from trees and buildings.

Re-running the viewshed analysis with the design modifications new rig location indicates that the design modification location would be 5.7% more viewable (that much more area could see the rig) than under the proposed Project. This area would primarily be to the west of the Project site, located around Bronte Drive and to the west of Mar Vista and California Streets. However, the views from these areas would be through trees, only of the top of the drilling rig, would not extend above ridgelines and therefore the impacts from these areas would remain less than significant. The significant and unavoidable views associated with the proposed Project (and the design modification) would primarily be from the Preserve, along the trails and from the viewing area, which would not change under the design modification. The effect of moving the drilling rig 130 feet is shown in Figure O-3, which is a view simulation from the viewing area.

Consequently, impacts would be essentially the same as the proposed Project and view simulations shown in Figures 4.6-8 through 4.6-12 would be approximately the same as under the design modifications. The aesthetic impacts of the processing equipment (but not the drilling rig) could be mitigated to less than significant. Impacts associated with the drilling rig would remain significant and unavoidable.

Impact AE.1 (drilling rig) would be similar to the proposed Project and mitigation measures AE-1a through AE-1b would still apply. Impacts would remain significant and unavoidable even after mitigation.

Impact AE.2 (operational equipment) would be similar to the proposed Project and mitigation measures AE-1a through AE-1b would still apply. Impacts still would be less than significant with mitigation.

Impact AE.3 (use of the North Access Road) would be less severe than the proposed Project as less traffic would utilize the North Access Road for the hauling of soils. Impacts would remain less than significant.

Impact AE.4 (nighttime lighting and glare) would be similar to the proposed Project and mitigation measures AE-4 would still apply. Impacts still would be less than significant with mitigation.

Figure O-3 Design Modification View Simulation from the Viewing Area

3.7 Traffic

Impacts would occur to traffic during the construction and operational phases of the Project. Impacts would be substantially less than the proposed Project during the construction phase along Penn Street as soil hauling would no longer occur, resulting in 9,313 fewer truck trips. Impacts for all areas would be less than significant with mitigation.

Impact T.1 (construction and operation traffic) would be somewhat less severe than the proposed Project due to the elimination of soil hauling. However, if soil is deposited at the Landfill, then the impacts of the design modification on Penn Street would be identical to the proposed Project. Mitigation measures T-1a through T-1d and T-1f would still apply. Mitigation measure T-1e, related to soil hauling, would no longer apply.

Impact T.2 (pipeline construction) would be the same as the proposed Project as the same pipeline would have to be constructed along the same route. Mitigation measure T-2 would still apply.

3.8 Hydrology

Impacts associated with hydrology would be similar to the proposed Project as the construction and operations would take place in the same location, although graded areas would be different and some equipment would be arranged differently. Impacts for all impact areas would be less than significant or less than significant with mitigation.

Impact WR.1 (site grading and drainage) would be similar to the proposed Project. Mitigation measures WR-1a through WR-1g would apply.

Impact WR.2 (site grading and drainage) would be similar to the proposed Project. Mitigation measures WR-2a and WR-2b would apply.

Impact WR.3 (surface water quality) would be similar to the proposed Project. Mitigation measures WR-3a through WR-3e would apply.

Impact WR.4 (leaks and spills) would be similar to the proposed Project. Mitigation measures WR-4a through WR-4c would apply.

Impact WR.5 (reinjection) would be similar to the proposed Project.

Impact WR.6 (groundwater depletion) would be similar to the proposed Project. Mitigation measures WR-6a and WR-6b would still be recommended.

Impact WR.7 (flooding) would be similar to the proposed Project.

3.9 Cultural Resources

Impacts to cultural resources would be similar to the proposed Project as the construction and operations would take place in the same location, although graded areas would be different and some equipment would be arranged differently. Impacts for all impact areas would be less than significant or less than significant with mitigation.

Impact CR.1 (historical resources) would be similar to the proposed Project. Mitigation measure CR-1a would apply.

Impact CR.2 (human remains) would be similar to the proposed Project. Mitigation measure CR-2 would apply.

Impact CR.3 (paleontological) would be similar to the proposed Project. Mitigation measure CR-3 would apply.

3.10 Wastewater

Impacts to wastewater would be similar to the proposed Project as the construction and operations would take place in the same location, and the same quantities of wastewater would be generated. Impacts for all impact areas would be less than significant or less than significant with mitigation.

Impact WAS.1 (sanitary) would be similar to the proposed Project. Mitigation measures WAS-1 would apply.

Impact WAS.2 (drainages and creeks) would be similar to the proposed Project. Mitigation measures from Hydrology would apply.

3.11 Land Use

Impacts to land use would be similar to the proposed Project as the construction and operations would take place in the same location. Impacts still would be both significant and unavoidable related to the presence of a drilling rig. Other land use impacts still would be less than significant.

Impact LU.1 and LU.2 (noise) would be the same as the proposed Project. Mitigation measures from the noise section would apply.

Impact LU.3 (aesthetics) would be the same as the proposed Project. Mitigation measures from the Aesthetics section would apply. This impact would remain significant and unavoidable, as in the proposed Project.

Impact LU.4 (lighting) would be the same as the proposed Project. Mitigation measures from the Aesthetics section would apply.

Impact LU.5 (emissions and odors) would be the same as the proposed Project. Mitigation measures from the Air Quality section would apply.

Impact LU.5 (policies) would be the same as the proposed Project. Mitigation measures from Air Quality, Biology, Noise, Aesthetics and Visual Resources, and Recreation would apply.

3.12 Fire Protection

Impacts to fire protection would be similar to the proposed Project as the construction and operations would take place in the same location with a similar layout as the proposed Project. Impacts would be less than significant with mitigation.

Impact FP.1 (fire water supplies, layout) would be the same as the proposed Project. Mitigation measures FP-1a through FP-1d would still apply.

Impact FP.2 (wildfires) would be the same as the proposed Project. Mitigation measures FP-2a and FP-2b would still apply.

3.13 Public Services and Utilities

Impacts to public services and utilities would be the same as the proposed Project as the construction and operations would take place in the same location, and the same demands on public services and utilities would be the same. Impacts for all impact areas would be less than significant.

Impact PS.1 (solid waste) would be similar to the proposed Project. **Impact PS.2** (potable water) would also be similar to the proposed Project.

3.14 Recreation

Impacts to recreation would be the same as the proposed Project as the construction and operations would take place in the same location. Impacts would be significant and unavoidable for aesthetics impacts of the drilling rig to recreational users, and less than significant with mitigation for other recreational impacts.

Impact REC.1 (noise) would be similar to the proposed Project. Mitigation measures REC-1a and REC-1b would still apply.

Impact REC.2 (odors) would be similar to the proposed Project. Mitigation measures as defined in the Air Quality section would still apply.

Impact REC.3 (aesthetics) would be similar to the proposed Project. Mitigation measures as defined in the Aesthetics section would still apply. This impact would remain significant and unavoidable.

3.15 Energy

Impacts to energy would be similar to the proposed Project as the construction and operational equipment would be the same. Construction energy use would be less under the design modification scenario as fewer truck trips would be required associated with soil hauling. Impacts would be less than significant.

Impact E.1 (electrical demand) would be the same as the proposed Project.

Impact E.2 (fuel demand) would be similar to the proposed Project. There would be some decrease in fuel demand as trucks would not be hauling soils offsite, but impacts would remain less than significant.

3.16 Environmental Justice

Impacts to environmental justice would be similar to the proposed Project. However, a substantial reduction in truck traffic would occur since the modifications would eliminate excess fill that might have to leave the Landfill through Penn Street and be transported offsite under the proposed Project. The potential reduction in traffic during the construction stage of the Project would substantially reduce any nuisance factor that could be experienced by Penn Street residents, although the EIR determined that impacts from the proposed Project would be less than significant.

Impact EJ.1 (impact minority and low-income populations) would be similar to the proposed Project, but of a lower severity during the construction period due to the potential for reduced haul traffic.

4.0 Conclusions

The design modification would reduce the time associated with grading the site and would eliminate the hauling of soils offsite. This would reduce the severity of impacts associated with portions of the following issue areas:

- Air Quality
- Traffic

- Biology (construction phase)

Impacts to air quality would be reduced as the use of haul trucks would be eliminated, thereby reducing the peak day emissions of criteria pollutants and the total emissions of GHG associated with the grading and hauling of material. The shorter duration of grading would reduce both total criteria pollutants and the GHG emissions associated with grading. However, impacts associated with construction emissions would remain significant and unavoidable.

Impacts to traffic would be reduced as 9,313 fewer truck trips would utilize Penn Street without the soil hauling. However, the impacts for the proposed Project already are determined in the EIR to be less than significant with mitigation and this would not change under the design modifications.

Impacts under biology would be reduced primarily because noise impacts associated with soil haul trucks along the North Access Road would be eliminated, thereby reducing the total acreage of habitat impacted above 60 dBA. However, the impacts for the proposed Project already are determined in the EIR to be less than significant with mitigation and this would not change under the design modifications.

Some impacts would experience slight increases in severity, but no change in classification. These include biology, aesthetics and noise. Biological impacts would increase as the amount of permanent area associated with fuel modification and road area would increase under the different site arrangement. The mitigation detailed in the EIR would continue to be effective at reducing these impacts to a less than significant level because placements of impacted areas would continue to occur under the mitigation measures detailed in section 4.2, Biological Resources. Likewise, although noise impacts could increase nominally because the drilling rig would be located approximately 130 feet closer to residences, this slightly increased proximity does not translate into a substantially more severe impact because noise levels would remain below the significance thresholds . And, the proposed mitigation discussed in the EIR would be sufficient to reduce any noise impacts to less than significant here as well.

Finally, impacts to aesthetics also would increase nominally due to the change in location of the drilling rig. Area with increased visibility would primarily be to the west of the project site, located around Bronte Drive and to the west of Mar Vista and California Streets. However, the views from these areas would be through trees, only of the top of the drilling rig, would not extend above ridgelines and therefore the impacts from these areas would remain less than significant. The significant and unavoidable views associated with the proposed Project (and the design modification) would primarily be from the Preserve, along the trails and from the viewing area, which would not change under the design modification. This does not result in a substantial increase in the severity of the impact.

Under the design modifications, the number of significant and unavoidable impacts would remain the same as the proposed Project. These would include:

1. Air Quality related to construction;
2. Air Quality related to GHG emissions;

3. Aesthetics related to the visual impacts of the drilling rig;
4. Hydrology related to the potential for oil spills;
5. Land Use related to the visual impacts of the drilling rig; and
6. Recreation related to the visual impacts of the drilling rig;

Finally, comparison with the alternatives analyzed in the body of this EIR would remain the same as for the proposed Project and the finding that the proposed Project with the design modifications is environmentally superior to the other alternatives.