

SANTA MONICA MOUNTAINS CONSERVANCY

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June 1, 2015

Ms. Iris Chi
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, California 90012

**Notice of Preparation for Draft Environmental Impact Report for Termo North Aliso
Field Oil Development Project, R2012614-(5)**

Dear Ms. Chi:

The Santa Monica Mountains Conservancy (Conservancy) offers comments and recommendations on the Notice of Preparation (NOP) for the above-referenced proposed project, located in the County-designated Santa Susana Mountains Significant Ecological Area. The Conservancy is concerned with the potential significant adverse impacts to public resources, including recreational, biological, and water resources, that could result from the subject project.

The subject proposed project sites are located at the top of the Rice Canyon and Towsley Canyon watersheds. Multiple USGS blue line streams run through and near the proposed project sites. These streams are tributaries of the south fork of the Santa Clara River. The proposed sites are also within close proximity to the headwaters of Mormon Canyon and Limekiln Canyon Creeks, which are tributaries of the upper Los Angeles River. The proposed sites are also located in the center of the Santa Clarita Woodlands core habitat (and located within on-half mile of Santa Clarita Woodlands Park).

The project has the potential to significantly adversely impact many local water sources, including underground seeps and springs, which feed into both the watersheds of the Santa Clara River and the upper Los Angeles River. Wildlife which depend on these local water sources also have the potential to be significantly adversely impacted as well. The Draft Environmental Impact Report (DEIR) must address these potential impacts with a thorough analysis of all local water sources, including underground seeps and spring.

Even though the applicant has stated that no hydraulic fracturing or “well stimulation” will be used as part of the subject project, there are other oil and gas extraction methods and technologies that increase the risk of significant adverse impacts to water sources. To ensure the maximum amount of protection for water resources, the DEIR must include

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Project Alternatives with specifically defined and described extraction techniques that minimize the risk of adverse impacts to local water sources, especially groundwater.

The NOP incorrectly states that there is not a likelihood of Recreational Resources being significantly impacted. In fact, the planned Rim of the Valley Trail (ROV Trail) runs either adjacent to, or through five of the six subject parcels. (Please see attached aerial photo maps with Rim of the Valley Trail alignment). The trail alignment runs contiguous with the Palo Sola Truck Road, also known as the Oat Mountain Motorway. Further information can be found in the Rim of the Valley Corridor Draft Special Resources Study, released by the National Park Service in April 2015. Implementation of the ROV Trail is part of the Conservancy's legislative mandate.

The DEIR must address, and mitigate for potential adverse impacts to the ROV Trail, including viewshed impacts, impacts from project-related fencing, project-related traffic, and impacts to the health and well-being of trail users. The DEIR must also include Project Alternatives that specifically minimize the adverse impacts to the ROV Trail.

Please direct all correspondence related to this project to Paul Edelman, Deputy Director of Natural Resources and Planning, at the above letterhead, or by phone at 310-589-3200, ext. 128. Both County staff, and the applicant should feel encouraged to contact our agency. Thank you for the opportunity to comment.

Sincerely,

LINDA PARKS
Chair

Attachments: A - Two aerial photo maps of proposed project sites and Rim of the Valley Trail