

6.0 ALTERNATIVES

Section 15126.6(a) of the CEQA Guidelines states that “*an EIR shall describe a range of reasonable alternatives to a project or location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.*”

CEQA Guidelines Section 15126.6(f) further states that “*the range of alternatives required in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.*”

As described in RSEIR Section 2.4, the objective of the proposed project is to increase oil and gas production from the existing facility.

6.1 NO PROJECT ALTERNATIVE

Under the No Project Alternative, proposed project PL13-0158 would not be approved and the requested modification of CUP 3543 would not occur. CUP 3543 would expire, oil production operations at the project site would not be resumed, no new oil wells would be constructed at the project site, and project-related tanker truck traffic would not be authorized to use Koenigstein Road. Under the No Project Alternative the existing project site would be restored in accordance with the requirements of the Ventura County Non-Coastal Zoning Ordinance and the existing requirements of CUP 3543.

Air Quality. Short-term oil well drilling emissions that would result from the proposed project would be avoided, and recommended conditions of approval to minimize construction emissions would not be required. Less than significant long-term air emissions and health risks associated with the existing and proposed oil wells would also be avoided.

Traffic Circulation and Safety. Traffic that would be generated by proposed oil well drilling operations would not occur under the No Project Alternative, and long-term traffic required to transport produced fluids from the project site and for routine well maintenance would also be avoided.

Biological Resources. The potential for short-term impacts to nesting birds and California condor that may result from the proposed project would be avoided by the No Project Alternative. Potential project-related long-term impacts to nesting birds and California condor would also be avoided under the No Project Alternative.

Climate Change. The less than significant greenhouse gas emission that would result from proposed short-term oil well drilling operations, and less than significant long-term greenhouse

gas emissions that would result from the proposed project would be avoided under the No Project Alternative.

Water Resources. The No Project Alternative would avoid the less than significant ground water use impacts that would result from drilling the proposed oil wells. The less than significant potential ground and surface water quality impacts that may result from the construction and operation of the wells would also be avoided.

Noise. The No Project Alternative would avoid the significant short-term noise impacts that would occur if the proposed oil wells are drilled and mitigation measures to reduce drilling noise impacts would not be required. This alternative would also avoid the less than significant project-related long-term noise that would result from project-generated traffic and the operation of additional equipment at the project site.

6.2 OPERATE EXISTING FACILITIES ONLY ALTERNATIVE

The Operate Existing Facilities Only Alternative would allow the continued operation of the three existing oil wells, the existing on-site flare, and other accessory equipment located on the project site; and would allow project-related tanker trucks to use Koenigstein Road to access the project site. Under this alternative, an existing on-site well would not be re-drilled and no new wells would be constructed on the project site.

Air Quality. Short-term oil well drilling emissions that would result from the proposed project would be avoided, and recommended conditions of approval to minimize construction emissions would not be required. Less than significant long-term air emissions and health risks that would result from the proposed project would be reduced by this alternative because no new oil wells would be drilled or operated on the project site.

Traffic Circulation and Safety. Traffic that would be generated by proposed oil well drilling operations at the project site would not occur under the Operate Existing Facilities Only Alternative because no wells would be drilled or re-drilled. Long-term traffic trips required to transport produced fluids from the project site and traffic for routine well maintenance would generally be similar to the low volume of traffic that would be generated by the proposed project. Similar to the proposed project, potential traffic safety impacts under this alternative resulting from truck turning movements at the State Route 150/Koenigstein intersection would be reduced to a less than significant level by proposed traffic safety mitigation measures.

Biological Resources. The potential for short-term impacts to nesting birds that may result from the proposed project would be avoided by the Operate Existing Facilities Only Alternative because the potential for drilling-related noise to result in active nest abandonment would be avoided. Potential short-term impacts to California condor resulting from drilling activities would also be avoided, although potential long-term impacts to condor could result and similar mitigation measures to minimize the potential for oil well operation-related impacts would be required.

Climate Change. The less than significant greenhouse gas emissions that would result from proposed short-term oil well drilling operations would be avoided by the Operate Existing Facilities Only Alternative. The less than significant long-term greenhouse gas emissions that would result from the proposed project would be reduced by this alternative because fewer oil wells would be operated at the project site.

Water Resources. The Operate Existing Facilities Only Alternative would avoid the less than significant ground water use impacts that would result from drilling the proposed oil wells. The less than significant potential long-term ground and surface water quality impacts that may result from the proposed project would be reduced by this alternative because fewer oil wells would be operated at the project site.

Noise. The Operate Existing Facilities Only Alternative would avoid the significant short-term noise impacts that would occur if the proposed oil wells are drilled. The less than significant long-term noise impacts that would result from the operation of equipment at the project site would be reduced by this alternative because fewer oil wells would be operated at the project site. Long-term noise from vehicle traffic traveling to and from the project-site would be similar to the long-term traffic noise generated by the proposed project.

6.3 REDUCED PROJECT INTENSITY ALTERNATIVE

The Reduced Project Intensity Alternative would allow the continued operation of the three oil wells and accessory equipment located on the project; would allow project-related tanker trucks to use Koenigstein Road to access the project site; and would require a reduction in the number of new or re-drilled wells. For this alternative, it was assumed that one new well would be constructed and one existing well would be re-drilled.

Air Quality. Short-term oil well drilling emissions that would result from the proposed project would be reduced by the Reduced Project Intensity Alternative, and recommended conditions of approval would reduce less than significant short-term construction-related emissions to the extent feasible. Less than significant long-term air emissions and health risks that would result from the proposed project would also be reduced by this alternative because only one new well would be constructed and one well would be re-drilled.

Traffic Circulation and Safety. The Reduced Project Intensity Alternative would result in two separate drilling periods for the construction/re-drilling of oil wells on the project site. Both drilling periods would generate short-term traffic volumes that are similar to the short-term construction traffic that would be generated by each of the drilling periods that would occur if the proposed project were implemented. The proposed project, however, would result in three drilling periods over the life of the project (i.e., two new wells and one re-drilled well). Therefore, the Reduced Project Intensity Alternative would result in a reduction in the total amount of construction traffic when compared to the total amount of construction traffic that would be generated by the proposed project. Overall, the Reduced Project Intensity Alternative would result in a reduction in the less than significant short-term traffic impacts that would result from the

proposed project. Long-term traffic trips required to transport produced fluids from the project site and traffic for routine well maintenance would generally be similar to the low volume of traffic that would be generated by the proposed project. Similar to the proposed project, potential traffic safety impacts under this alternative resulting from truck turning movements at the State Route 150/Koenigstein intersection would be reduced to a less than significant level by proposed traffic safety mitigation measures.

Biological Resources. The Reduced Project Intensity Alternative would reduce the number of drilling periods and the number of oil wells on the project site when compared to the on-site development that would occur if the proposed project were to be approved. This alternative, however, could still result in impacts to nesting birds and California condor, and mitigation measures to reduce those potential those impacts would still be required. Therefore, the potential impacts of this alternative to biological resources would be similar to the impacts of the proposed project.

Climate Change. Short-term emissions emission of greenhouse gases that would result from the proposed project would be reduced by the Reduced Project Intensity Alternative. The less than significant long-term air emissions of greenhouse gases that would result from the proposed project would also be reduced by this alternative. This alternative would result in reduced short- and long-term greenhouse gas emission because only one new well would be constructed and one well would be re-drilled.

Water Resources. The Reduced Project Intensity Alternative would reduce the proposed project's less than significant short-term groundwater use impacts because constructing fewer wells on the project site would reduce the total amount of water used for drilling operations. The reduced on-site development would also reduce the proposed project's less than significant potential to result in short- and long-term ground and surface water quality impacts.

Noise. The Reduced Project Intensity Alternative would reduce the number of drilling periods and the number of oil wells on the project site when compared to the total duration of drilling that would occur if the proposed project were to be approved. This alternative, however, would still result in drilling noise impacts to nearby residents and mitigation measures to reduce short-term noise impacts would still be required. Therefore, the potential short-term noise impacts of this alternative would be similar to the impacts of the proposed project. The Reduced Project Intensity Alternative would reduce the total number of oil wells on the project site when compared to the proposed project, however, overall long-term noise impacts resulting from the operation of on-site equipment would be similar to the long-term impacts of the proposed project. Long-term noise from vehicle traffic traveling to and from the project-site would be similar under this alternative when compared to the long-term traffic noise generated by the proposed project.

6.4 ALTERNATIVES REJECTED FROM FURTHER ANALYSIS

Several additional alternatives were considered but rejected from further analysis because the alternatives would result in additional environmental impacts when compared to the proposed project. The alternatives rejected from further consideration are described below.

Alternative Project Site. As described in RSEIR Section 3.3 (Land Use Planning) and depicted on Figure 3.2-1, CUP 3543 encompasses an area of approximately 160 acres. Development of the proposed project on other property included within the boundaries of CUP 3543, or the development of the project at another site located in the Ojai Oil Field, was rejected from further consideration because the use of an alternative project site would likely result in environmental impacts that are greater than the impacts of the proposed project.

The development of new oil wells at a different project location would likely require the construction of a new oil well pad. Grading to develop a new pad, and possibly a new access road, would have the potential to result in vegetation removal and other grading-related impacts (e.g., erosion, water quality, and aesthetics) that would not result from the proposed project. Grading to construct a new drill pad, and long-term oil well operations at an alternative site would also have the potential to result in impacts to nesting birds and California condor, similar to the potential impacts of the proposed project.

The development of new oil wells at a site located within the boundaries of CUP 3543 would require the use of Koenigstein Road for access. Therefore, an alternative site would not avoid or reduce the less than significant traffic and circulation impacts associated with the proposed project. To be consistent with the proposed project's objective of increasing oil production, the development of an alternative site would require the development and operation of six oil wells, similar to what would be located at the existing project site if the proposed project were to be approved. The construction of six new oil wells at an alternative site would result in an increase in air quality, traffic, climate change, water resources and noise impacts when compared to the impacts of the proposed project.

Since an alternative project site would have the potential to result in environmental impacts that are greater than the impacts of the proposed project, this alternative was eliminated from further consideration.

Alternative Site Access. The development and use of an alternative access route to serve the proposed project, rather than the proposed use of Koenigstein Road, would not be an alternative to the proposed project but would be an alternative to a component of the project. The most likely potential alternative project site access would be the route previously approved by CUP 3543, which included the use of a bridge over Sisar Creek.

The site of the former creek crossing is now an active stream channel that supports sensitive wildlife habitat. Construction of a new at-grade crossing and associated drainage culvert, or a bridge

spanning the creek, would have the potential to result in significant impacts to biological resources and would result in impacts that are greater than the biological resource impacts of the proposed project. It is also unlikely that a required Streambed Alteration Agreement from the California Department of Fish and Wildlife could be obtained given the availability of an existing paved public roadway (i.e. Koenigstein Road) that serves the same purpose and has served other oil projects in the area for a number of decades. Since the proposed use of Koenigstein Road would not result in significant biological resource, traffic, or circulation impacts, and the development of an alternative access would likely result in significant impacts, an alternative access route to the proposed project was rejected from further analysis.

Conveyance of Produced Fluids by Pipeline. The development and use of a pipeline to transport fluids produced at the project site, rather than using trucks that travel on Koenigstein Road, would not be an alternative to the proposed project but would be an alternative to a component of the project.

CUP 3543 (Condition of Approval 49) requires the development of a pipeline to transport produced fluids when oil production reaches 350 barrels per day. As depicted on RSEIR Table 3.2-1, between 2015 and 2017, a total of 11,893 barrels of water and oil were transported from the project site. Over this three year period (1,095 days) the average amount of fluid produced by the existing project was approximately 11 barrels per day. Future oil production rates from the proposed new and re-drilled wells are uncertain. However, as described in RSEIR Section 4.2.3, for analysis purposes it has been estimated that fluids (oil and wastewater) produced by the proposed project would be 1.33 times the volume of fluid produced by the existing operations at the project site. At the assumed production rate, the proposed new and re-drilled wells would produce approximately 15 barrels of fluid per day. Combined with existing fluids produced at the project site (approximately 8 barrels per day produced by the two existing wells that would not be re-drilled), the entire project would produce approximately 23 barrels of fluid per day. Even if initial oil production from the proposed new and re-drilled wells is somewhat higher than existing production rates, total oil production by the entire Agnew lease project would be substantially lower than the 350 barrels per day that would require the construction of a project-related pipeline.

In the unlikely event that future project-related oil production exceeds 350 barrels per day, the project applicant would be required to construct a pipeline as required by CUP 3543. If a pipeline were to be constructed, additional environmental review would be required based on the proposed location of the pipeline and its construction characteristics. A programmatic evaluation of potential environmental impacts that may result if a project-serving pipeline were to be constructed was included in the 1983 EIR prepared for the proposed project. Possible pipeline-related impacts identified by the 1983 EIR included potential impacts to Sisar Creek if the pipeline was buried beneath the creek; potential construction-related fire hazards and long-term pipeline failure impacts; short-term construction-related erosion and sedimentation impacts; and potential vegetation and habitat disturbance impacts. In addition to the impacts identified in the 1983 EIR, the construction of a project-serving pipeline would also have the potential to result in significant short-term air quality and noise impacts.

The environmental impacts associated with the construction of a project-serving pipeline would also occur if a pipeline were to be constructed as an alternative to trucking project-related oil volumes that do not exceed the 350 barrel per day threshold established by CUP 3543. In addition, constructing a pipeline to transport very low volumes of oil, such as the low volumes of oil that are anticipated to be produced by the proposed project, would likely be financially infeasible. Therefore, due to the potential for increased environmental impacts when compared to the impacts of the proposed project, an alternative to construct a project-serving pipeline was rejected from further analysis.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6.5-1 summarizes the potential for the alternatives evaluated by this RSEIR to avoid, or result in reduced or similar environmental impacts when compared to the impacts of the proposed project.

If the No Project Alternative were to be implemented, no new oil wells would be constructed at the project site and the existing oil production facilities at the site would be removed. Therefore, the No Project Alternative is the environmentally superior alternative. The No Project Alternative, however, would not attain the objective of the project to increase oil production at the project site. CEQA Guidelines Section 15126.6(e)(2) states that *“if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”*

The Operate Existing Facilities Only Alternative would avoid the short-term oil well development impacts of the proposed project, and would reduce long-term project-related impacts associated with air quality, climate change, and water resources. The Operate Existing Facilities Only Alternative, however, would not achieve the objective of the proposed project to increase oil production.

The Reduced Project Intensity Alternative would reduce the short-term oil well development impacts of the proposed project related to air quality, traffic and circulation, climate change, and water resources. The Reduced Project Intensity Alternative would also reduce long-term project-related impacts associated with air quality, climate change, and water resources. The reduction in the number of oil wells developed at the project site under this alternative would reduce the amount of oil that may be produced by the proposed project, however, this alternative would partially implement the objective of the project to increase on-site oil production. Therefore, the Reduced Project Intensity Alternative would be environmentally superior to the proposed project. The implementation of this alternative, however, is not necessary to reduce the proposed project’s environmental impacts to a less than significant level.

**Table 6.5-1
Alternatives Impact Comparison Summary**

Environmental Issue Area	Air Quality		Traffic		Biological Resources		Climate Change		Water Resources		Noise	
	Short Term Impact	Long Term Impact	Short Term Impact	Long Term Impact	Short Term Impact	Long Term Impact	Short Term Impact	Long Term Impact	Short Term Impact	Long Term Impact	Short Term Impact	Long Term Impact
Alternative												
No Project	Avoided	Avoided	Avoided	Avoided	Avoided	Avoided	Avoided	Avoided	Avoided	Avoided	Avoided	Avoided
Operate Existing Facilities Only Alternative	Avoided	Reduced	Avoided	Similar	Avoided	Similar	Avoided	Reduced	Avoided	Reduced	Avoided	Similar
Reduced Project Intensity Alternative	Reduced	Reduced	Reduced	Similar	Similar	Similar	Reduced	Reduced	Reduced	Reduced	Similar	Similar

KEY

Avoided = The impacts associated with this impact evaluation criterion would not occur under this alternative.
 Reduced = This alternative's impacts would be reduced when compared to the impacts of the proposed project.
 Similar = This alternative would result in impacts similar to the impacts of the proposed project.