

OIL WELL SITE TRANSITION AND REUSE FEASIBILITY STUDY

Los Angeles County, California

June 2026



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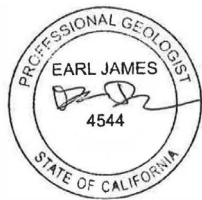
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EXECUTIVE SUMMARY

Context and Importance

Los Angeles County is entering a critical phase in its transition away from oil production. As oil wells are phased out, hundreds of sites across unincorporated communities will require not only proper closure and environmental remediation, but also thoughtful planning for their future use. Many of these sites are located in communities that have long experienced disproportionate environmental and public health burdens, creating both an urgent need and a meaningful opportunity for equitable reinvestment.

Purpose and Approach

This Study focuses on how oil well sites—not just individual wells—can be evaluated, remediated, and repositioned for community-serving reuse. It moves beyond traditional approaches that focus primarily on well plugging and regulatory compliance, and provides a practical framework for understanding the full lifecycle of site transition, from initial identification through long-term stewardship.

Key Findings and Insights

A key finding of this Study is that oil well site transition is a multi-year, multi-step, and multi-agency process. Advancing a site toward reuse requires coordination across regulatory agencies, alignment of funding sources, and careful sequencing of technical and planning activities. To support implementation, the Study introduces a six-phase process and a decision-tree framework that identifies key threshold conditions for feasibility, including site control, well responsibility, regulatory clarity, technical feasibility, financial feasibility, and land use compatibility.

Evaluation of specific sites highlights several important considerations. Oil well sites often contain wells with mixed operational statuses, requiring coordinated approaches to cessation of production, abandonment, and remediation. Many sites are constrained by ownership complexity, limited access, and proximity to sensitive land uses. In addition, database review indicates that nearby off-site contamination is a common factor, particularly in urbanized areas, introducing additional uncertainty and influencing both cost and regulatory pathways.

At the same time, these sites represent opportunities in highly developed areas of the county to create new community assets. Depending on site conditions and context, potential reuse pathways may include parks and open space, affordable housing, community facilities, and clean energy infrastructure—either as standalone uses or, in some cases, in combination depending on site conditions and ownership. Realizing these opportunities will require early integration of reuse planning, sustained community engagement, and strategic public and private investment.

Implementation Priorities and Next Steps

Based on these findings, the Study identifies several priorities for moving from feasibility to implementation. These include advancing pilot projects to test and refine approaches, including one County-owned site and one privately owned site, integrating reuse options earlier in the well abandonment and site evaluation process, aligning funding strategies across different phases of work, and strengthening collaboration among County departments and regulatory agencies.

This Study provides a foundation for action. By approaching oil well site transition as an integrated process—one that connects environmental remediation with long-term community benefit—Los Angeles County can help ensure that these sites are not only safely closed, but thoughtfully transformed into assets that support healthier, more equitable, and more resilient communities.

1 INTRODUCTION

This Oil Well Site Transition and Reuse Feasibility Study supports Los Angeles County (LA County)'s commitment to a fair and equitable shift away from oil drilling and toward a clean energy economy. This study focuses on the process for the identification, evaluation, remediation and reuse of oil well sites in unincorporated areas of LA County, with particular attention to sites located within and adjacent to Disadvantaged Communities (DACs). This project was initiated by the LA County Chief Sustainability Office (CSO) as part of efforts to implement the *OurCounty Plan* and the *Just Transition Strategy*. The findings of this Study are intended to inform future efforts to acquire and reuse oil well sites in ways that protect public health, advance equity, and support community revitalization.

While initial screening efforts focused on inactive and high-priority idle wells identified through prior analyses, evaluation of candidate sites revealed that they contain wells with mixed operational statuses, including active, idle, orphaned, and previously abandoned wells. Accordingly, this Study addresses oil well sites more broadly, recognizing that well status is dynamic and that transition planning must account for regulatory sequencing, site control, environmental conditions, and financial feasibility across varying well classifications.

Oil well sites across LA County, many of which can be classified as brownfields—properties where redevelopment, reuse, or expansion may be complicated by the presence or potential presence of hazardous substances, pollutants, or contaminants—present both significant challenges and promising opportunities. These sites often require extensive investigation, remediation, and regulatory oversight before redevelopment can occur. Thoughtful planning and strategic investment are necessary to support their transition to productive private or public uses. In the highly developed landscape of LA County, they also represent unique opportunities for reuse as valuable community assets such as parks, affordable housing, community gardens, or clean energy installations, advancing sustainability and providing benefits for surrounding neighborhoods.

This Study first presents an overview of the oil well site reuse process, outlining the technical, regulatory, financial, and planning considerations involved. It then assesses the potential for redeveloping a variety of oil well sites, focusing on environmental remediation, financial feasibility, and community benefit. The process and sites evaluated here represent illustrative cases intended to inform a broader Countywide strategy for remediation and redevelopment, as well as specific examples of potential reuse pathways. Ongoing community engagement, particularly with individuals and organizations within DACs and Tribal governments, remains essential to shaping equitable reuse plans and ensuring that lessons learned guide future County decision-making.

This Study builds on existing County efforts by testing and refining site reuse approaches at the parcel level. Drawing from prior work to address environmental risks and advance brownfield remediation, the CSO and EKI worked together to examine how individual oil well sites in unincorporated communities could be evaluated, remediated, and repositioned for community-serving uses. The goal of this Study is to provide practical guidance and planning tools that can inform future County, community, and partner-led efforts to safely transform former oil well sites into sustainable assets for LA County residents.

Through this integrated approach, this Study provides a roadmap for transforming underutilized, environmentally burdened oil well sites into safe, functional, and socially beneficial spaces—advancing environmental justice, economic resilience, and sustainable development.

Study Scope and Limitations

This Study is intended to support future County decision-making related to the remediation and reuse of oil well sites. The analysis helps identify opportunities, constraints, and considerations that can inform pilot projects and implementation efforts. This Study does not commit the County to acquire, remediate, or redevelop any specific site, but rather is intended to support future evaluation of potential remediation and reuse opportunities as sites progress through regulatory, technical, and community-driven processes.

The analysis presented in this Study is planning-level in nature and relies on available data sources, existing regulatory information, and site conditions at the time of analysis. Site-specific environmental conditions, ownership status, regulatory requirements, market conditions, and redevelopment feasibility may change over time and would require additional evaluation as individual sites advance through future planning, environmental review, or implementation processes.

Although this Study focuses on unincorporated areas under County jurisdiction, many of the process, regulatory, environmental, and redevelopment considerations discussed are broadly applicable across jurisdictions. The frameworks and case examples included in this Study can help inform future oil well site transition and reuse efforts by cities and other public or community entities throughout Los Angeles County.

Many traditional land acquisition and redevelopment programs prioritize sites that are more readily developable and may exclude properties with oil wells due to environmental, regulatory, liability, and redevelopment complexities. For example, the Los Angeles County Land Bank Pilot, an affordable housing-focused acquisition initiative, generally excludes sites with oil wells from eligibility for acquisition. While such limitations are understandable within the context of near-term development objectives, oil well sites still warrant strategic public-sector attention, particularly in disadvantaged communities, park-poor areas, and other locations where environmental restoration and community-serving reinvestment may provide long-term public benefit.

2 OVERVIEW OF THE SITE REUSE PROCESS

This section provides an overview of the process for identifying potential sites, evaluating environmental issues, planning potential reuses, and implementing the vision of the community. The process has been broken down into six (6) Phases and sixteen (16) Steps (Figure 1). This graphic was developed by examining both actual and potential oil well site reuse projects, drawing from their real-world pathways of site identification, land acquisition or site control, environmental assessment and cleanup, and eventual reuse. While the sites evaluated in this Study have primarily only advanced through Phase 1, they are used illustratively to demonstrate how the full process may unfold across different site conditions, ownership structures, and initiation pathways.

This section is intended as a planning and implementation guide rather than a prescriptive checklist. Not all sites will proceed sequentially through every phase, and some steps may occur in parallel or be revisited as conditions change. This Study aligns with the broadly understood sequence of plugging and abandonment, remediation, and long-term reuse, and further organizes this process into six phases to support implementation.

Throughout this process, meaningful community engagement plays a critical and ongoing role. Communities located near oil and gas operations have often experienced long-term environmental and public health burdens, and their perspectives are essential to shaping appropriate and equitable reuse outcomes. Engagement is not a single event or discrete phase, but an ongoing process that should occur throughout site identification, feasibility assessment, remediation planning, and reuse implementation. Key opportunities for engagement may include identifying community priorities during site screening, informing reuse concepts and feasibility assessments, providing input on remediation and redevelopment plans, and supporting long-term stewardship of completed projects.

Approaches to engagement should be tailored to the specific community context and may include coordination with trusted community partners and other locally appropriate outreach strategies. As site conditions, regulatory requirements, and funding opportunities evolve over time, continued dialogue with residents, community-based organizations, and other stakeholders helps inform priorities, manage expectations, and ensure that reuse strategies remain responsive to local needs and concerns.

2.1 Phase 1 – Site Identification and Initial Screening

Phase 1 establishes the foundation for potential reuse by identifying candidate sites and conducting an initial screening to understand ownership, well status, and community context. This phase consists of three primary steps.

Step 1: Site Identification and Screening

The locations of oil wells sites in LA County are primarily documented through the California Department of Conservation, Geologic Energy Management Division (CalGEM). CalGEM provides information on well status (active, idle, or previously abandoned), which serves as a primary resource in evaluating both potential environmental burden and abandonment obligations.

In this Study, sites were identified based on previous LA County work documenting parcels with idle wells. These sites were then screened for additional evaluation based on their location within or near Disadvantaged Communities (DACs). It is important to note that unidentified oil wells not documented in the CalGEM system may be present on a site.

Initial screening considerations include:

- Well status (active, idle, previously abandoned, or orphaned)

- Location within or near Disadvantaged Communities (DACs)
- Proximity to residential areas and other sensitive land uses
- Known ownership information

Step 2: Preliminary Environmental Assessment

Publicly available information is utilized to gain a preliminary understanding of property ownership and the operator of the oil wells. A Preliminary Environmental Site Assessment or Phase I ESA is often conducted at this stage to develop information regarding current and past site uses that may have impacted soil, soil vapor, or groundwater and created environmental liabilities. Such liabilities may result from oil well drilling and production activities, activities conducted on the site before or after oil development, or impacts from off-site sources.

This work may include:

- Requesting public records from the City, County, and regulatory agencies such as the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB).
- Reviewing historical aerial photographs and other sources of information about past site conditions and uses.
- Conducting a review of CalGEM well files and historical production records to understand well construction, status, and condition.

Contacting CalGEM to obtain well files is a critical component of this review process.

Step 3: Purchase and Sale Agreement

Once a site has been identified as a potential candidate for reuse, site control options may be evaluated. For privately owned sites, this may include negotiating a purchase and sale agreement or similar arrangement to establish parameters for a potential transfer of ownership.

Such agreements typically include timeframes that allow for:

- Additional due diligence
- Site access
- Feasibility assessments
- Regulatory coordination

Establishing site control does not necessarily commit the County or another entity to acquisition but may create a structured framework for continued evaluation.

2.2 Phase 2 – Environmental Assessment and Well Evaluation

Phase 2 focuses on site characterization, regulatory coordination, and feasibility assessment. Activities during this phase include environmental investigation, evaluation of well conditions, identification of regulatory pathways, and development of preliminary remediation and cost considerations. The phase consists of three primary steps.

Step 4: Regulatory Oversight Determination

Early in Phase 2, the appropriate regulatory oversight agency must be identified based on the nature and extent of contamination, affected environmental media (e.g., soil, groundwater, or soil vapor), and the

applicable regulatory authorities. Well abandonment is conducted under oversight from CalGEM. However, environmental remediation oversight may be provided by:

- Department of Toxic Substances Control (DTSC)
- Regional Water Quality Control Board (RWQCB)
- A local agency (e.g., County health or fire department) with delegated authority

Oversight jurisdiction is generally determined based on the nature and extent of contamination and the applicable statutory authorities of each agency. For example, DTSC typically oversees sites with significant hazardous waste contamination or where cleanup occurs under state hazardous waste statutes. RWQCB provides oversight where groundwater or soil contamination affects surface water and/or groundwater of the State. In some cases, local agencies with delegated authority may oversee investigation and remediation activities. Early coordination with these agencies is necessary to confirm the appropriate lead oversight authority and applicable cleanup framework.

The identity of the lead oversight agency can influence:

- Regulatory timing
- Cleanup standards
- Liability protections
- Cost implications

DTSC and RWQCB may enter into liability protection agreements with prospective purchasers or property owners (e.g., Prospective Purchaser Agreements or California Land Reuse and Revitalization Act (CLRRA) agreements), which can provide substantial benefits related to future liability exposure and regulatory re-openers. These agreements may help limit a new owner's responsibility for pre-existing contamination, provided that agreed-upon cleanup actions are completed and ongoing compliance obligations are met.

Sites may enter regulatory oversight through multiple pathways, including voluntary participation, regulatory violations, community complaints, or referrals from agencies such as CalGEM or local jurisdictions.

Step 5: Detailed Site Investigation

Step 5 focuses on characterizing environmental conditions and evaluating well integrity.

Phase II Environmental Site Assessment (ESA)

A Phase II ESA is conducted to determine the nature and extent of impacts to soil, soil vapor, and groundwater. The investigation typically includes:

- Drilling soil borings and soil sampling
- Soil vapor and groundwater sampling
- Construction of soil vapor probes and/or groundwater monitoring wells
- Laboratory analysis of constituents of concern

A workplan is prepared to summarize historical information, add detail to the conceptual site model (CSM), and outline the environmental sampling program. The CSM describes potential sources, pathways, and receptors associated with site contamination based on current known site conditions and reasonably anticipated land use. Regulatory review and approval of the workplan is typically conducted to facilitate agency acceptance of the proposed sampling program and investigation approach. Permits are required

for investigation and remediation activities (e.g., drilling and monitoring well installation). Notices may also be required by regulatory agencies to notify the public of drilling operations.

Conceptual Site Model (CSM) Development

A preliminary assessment of contamination sources and exposure pathways should be performed to develop a CSM. The CSM informs potential remediation approaches, such as:

- Soil excavation
- Vapor intrusion mitigation systems (VIMS)
- Soil vapor extraction (SVE) remediation systems
- Potential bioremediation options
- Groundwater treatment

Well Status Verification and Evaluation

Evaluation of oil wells during Phase 2 of the reuse process includes:

- Verification of well status (idle, previously abandoned, or orphaned) based on CalGEM records and available operator information.
- Review of CalGEM well files, including well bore diagrams which are technical cross-sections showing well depth, casing configuration, geologic intervals, and plugging history, to evaluate current well conditions and historical abandonment methods. An example of a well bore diagram is included in Appendix F.
- Assessment of whether prior abandonment meets current CalGEM standards, including whether producing intervals have been properly sealed from freshwater aquifers.
- Identification of wells requiring re-abandonment, due to outdated plugging practices, incomplete records, changes in regulatory standards, or evidence of potential well integrity concerns.

Investigations conducted during Phase 2 of the reuse process also help identify the types of regulatory coordination and permitting that may be required during subsequent phases of well abandonment and remediation.

Coordination with CalGEM may include:

- Permitting, including approval of Notices of Intent and authorization to conduct well operations.
- Bonding requirements, which may require additional financial assurances to ensure proper abandonment.
- Change of operator considerations, where ownership or operational responsibility for wells is transferred.

Additional site factors influencing well abandonment under CalGEM oversight may include:

- Site access constraints, such as limited staging areas or proximity to sensitive land uses.
- Surface infrastructure removal, including dismantling equipment, tanks, or piping prior to abandonment.
- Safety requirements, including health and safety plans and traffic control measures.
- Variable well status, where differing conditions (idle, previously abandoned, orphaned) affect sequencing, scope, and cost.

Remediation Action Planning

A Remedial Action Plan (RAP) is a regulatory work plan that outlines the specific cleanup approach, remediation technologies, performance standards, and implementation procedures for addressing contamination at a site. The RAP is developed following site characterization and submitted for regulatory approval. Cleanup goals are typically based on the intended future land use of the site (e.g., residential vs. commercial standards), as determined through the reuse planning process.

While well abandonment requirements focus on restoring the well itself to a safe and stable condition, site remediation addresses contamination in surrounding soils and groundwater. Cleanup standards are typically established using a risk-based framework tied to the approved future land use, such as residential, commercial, or open space development.

Step 6: Well Abandonment and Environmental Cost Estimate

Following completion of site investigation activities and preliminary coordination with oversight agencies, order-of-magnitude cost estimates can be developed to evaluate potential financial liabilities and inform feasibility determinations.

Both well abandonment (or re-abandonment) and environmental remediation may involve significant costs and uncertainties. Estimates prepared at this stage are intended to provide reasonable ranges rather than detailed engineering-level budgets.

Well Abandonment Cost Considerations

Preliminary abandonment cost estimates should reflect site-specific technical and regulatory factors, including:

- Number, depth, and condition of wells
- Whether existing abandonment meets current CalGEM standards or re-abandonment is required
- Review of well bore diagrams and historical well records
- Surface infrastructure removal and site preparation requirements
- Air quality, dust, and noise monitoring or mitigation during field operations
- Variability in subsurface conditions that may affect field execution and introduce cost uncertainty
- Potential funding sources or cost-sharing mechanisms

Because field conditions cannot be fully verified until work begins, abandonment cost estimates should incorporate appropriate contingencies.

Environmental Remediation Cost Considerations

Environmental remediation cost estimates are influenced by investigation findings, regulatory standards, and intended future land use. Considerations may include:

- Extent and type of contamination identified during site investigation
- Applicable screening levels and risk-based cleanup standards (e.g., residential vs. commercial)
- Potential need for site-specific human health risk assessment
- Long-term monitoring, operation, or maintenance requirements
- Identification of data gaps or uncertainties that may require additional investigation

As with abandonment costs, remediation estimates should be presented as order-of-magnitude ranges and refined as additional information becomes available.

Site-Specific Barriers and Opportunities

At this stage, it is also important to identify barriers and opportunities that may affect overall feasibility, including:

- Parcel size, configuration, and access constraints, which may limit the type or intensity of feasible reuse.
- Proximity to active operations or adjacent contamination sources, which may introduce additional risk or regulatory complexity.
- Ownership complexity, including split surface and mineral estates or multiple responsible parties that may complicate coordination.
- Opportunities where County ownership, adjacent public land, and/or community priorities may create clearer pathways for reuse.
- Regulatory timing, funding availability, and market conditions, which may influence project sequencing and implementation timelines.

This cost and feasibility assessment helps inform whether a site can reasonably advance toward remediation, stabilization, and potential community-serving reuse.

2.3 Phase 3 – CEQA and Funding Strategies

Phase 3 addresses environmental review requirements and identifies liability, funding, acquisition, and implementation considerations necessary to advance a site beyond feasibility. This phase consists of four primary steps.

Step 7: CEQA Review and Determination

All aspects of well abandonment, environmental remediation, and site redevelopment require California Environmental Quality Act (CEQA) review and clearance.

If a future reuse has been identified, CEQA analysis may be conducted at the project level and encompass:

- Well abandonment;
- Environmental remediation;
- Site restoration; and
- Development of the proposed reuse.

CEQA review may occur prior to acquisition to ensure that the proposed reuse is legally and environmentally feasible before a transaction is finalized.

Depending on the proposed action, different CEQA pathways may apply:

- CalGEM's permitting program includes a relatively streamlined CEQA process for well abandonment and restoration.
- DTSC, RWQCB, CalGEM, or a local agency may serve as the lead CEQA agency depending on the scope of action. The level of CEQA review required depends on the scope of the proposed activities, the presence of potential environmental impacts, and the role of the lead agency overseeing the project.

The required level of CEQA review will typically fall into one of the following categories:

- Statutory or categorical exemptions, where CEQA does not apply because the activity is exempt under defined statutory provisions or categorical classes. Statutory or categorical exemptions may apply to limited activities such as certain well abandonment operations or minor site restoration activities where the action meets defined exemption criteria.
- Negative Declaration (ND), where CEQA applies but the lead agency determines there is no substantial evidence that the project will have significant environmental effects.
- Mitigated Negative Declaration (MND), where potential impacts can be reduced to less-than-significant levels through mitigation measures.
- Environmental Impact Report (EIR), where significant environmental impacts are identified and require detailed analysis and mitigation.

Project-level CEQA analyses may address issues such as:

- Consistency with state and local land use policies.
- Potential environmental effects associated with remediation and redevelopment.
- Construction-related impacts (e.g., noise, air quality, traffic, and stormwater).
- Hazardous materials and public health considerations.

These processes can be complex and time-consuming, but they are intended to ensure thorough environmental review, public participation, and informed decision-making.

Step 8: Liability and Funding Strategy

A key determinant of project advancement is identifying short- and long-term liabilities associated with:

- Oil well abandonment or re-abandonment
- Environmental remediation
- Long-term monitoring and stewardship

Well Responsibility

Responsibility for oil wells lies with the operator identified by CalGEM. The operator may or may not be the property owner but retains liability for abandonment costs. For orphan wells—where no financially viable operator remains—plugging responsibility may fall to the State, potentially resulting in extended timelines and funding constraints.

In some cases, partnerships with nonprofit organizations (e.g., philanthropic well-plugging entities) may supplement state efforts, though such partnerships do not replace regulatory responsibility. These organizations may provide additional technical capacity, funding support, or coordination assistance, particularly in cases involving orphan wells or where responsible parties lack sufficient resources.

Well abandonment or re-abandonment may also be advanced as part of a proposed redevelopment or reuse project rather than through regulatory enforcement. Previously abandoned wells may require additional evaluation or upgrades to meet current standards or support future land uses. Under these circumstances, property owners, public agencies, developers, or partner organizations may pursue funding and coordination strategies to facilitate site transition.

Funding Strategies

Funding strategies for remediation and reuse typically involves multiple sources and phases, reflecting the high costs and extended timelines associated with transitioning former oil production sites. Because well abandonment, environmental remediation, acquisition, and redevelopment may occur sequentially, funding approaches often need to be layered over time.

Potential funding sources aside from the operator may include:

- State and federal well abandonment programs, including orphan well funding initiatives administered through state or federal agencies.
- Environmental cleanup grants, such as brownfield or hazardous site remediation funding programs.
- Park, open space, or housing funding programs, where reuse aligns with adopted public investment priorities.
- Philanthropic contributions, particularly for community-serving or environmental justice-oriented projects.
- Public/private partnerships, where risks and financing responsibilities are shared among entities, such as partnerships with developers for redevelopment or with nonprofit organizations and land trusts for acquisition and stewardship.
- Private investment, where redevelopment generates sufficient financial return to support cleanup and construction costs.

Different funding mechanisms typically apply to different stages of work, such as:

- Well abandonment primarily undertaken by the well operator or supported through state orphan well programs.
- Environmental remediation costs are the primary legal responsibility of the well operator, who is required under California law to maintain adequate financial assurance, including bonding, to cover the full costs of well plugging, abandonment, and site remediation. Where an operator fails to meet these obligations, CalGEM may pursue reimbursement through regulatory enforcement actions, liens against operator assets, or settlement agreements. In cases where no solvent responsible operator exists, such as orphaned wells, remediation may be funded in whole or in part through state appropriations or federal grant programs.
- Site acquisition which may involve nonprofit or public capital.
- Reuse development which may rely on state or local public funding programs.

Public agencies in California may also pursue cost recovery from responsible parties where appropriate. Availability and eligibility of funding are influenced by site ownership, regulatory status, community characteristics, and alignment with public program priorities.

This Study identifies potential funding considerations and gaps rather than recommending specific funding commitments.

Community-led Land Trust Models for Acquisition and Reuse

Community land trusts and similar nonprofit ownership models can provide an alternative pathway for acquiring and stewarding former oil sites for long-term community benefit. These models may help reduce land speculation pressures and ensure that reuse outcomes remain aligned with community priorities.

Land trust approaches often require strong partnerships among community-based organizations, public agencies, and philanthropic or public funding sources. While not feasible in all contexts, these models offer valuable lessons regarding governance structures, long-term stewardship, and mechanisms for maintaining community accountability.

This Study phase focuses on understanding how such models have been applied elsewhere and whether similar approaches may be relevant under certain conditions in LA County (discussed further in Section 7).

Liability Management and Long-Term Stewardship

Liability considerations are central to decisions about acquisition, remediation, and reuse of former oil sites. Key liability issues may include:

- Responsibility for past contamination, including allocation of cleanup costs among prior operators, property owners, or other responsible parties.
- Long-term monitoring obligations, such as ongoing groundwater sampling, vapor monitoring, or reporting requirements imposed by regulatory agencies.
- Future exposure related to subsurface conditions, including potential migration of groundwater contamination or soil vapor that may affect buildings or adjacent properties.

Legal tools such as indemnification agreements, regulatory closures, and insurance mechanisms may help manage or mitigate risk, depending on site conditions. These tools often require extended coordination and negotiation to implement effectively.

Long-term stewardship considerations include site maintenance, monitoring, and governance structures following reuse. Funding mechanisms to support stewardship may include escrow accounts, tax financing districts, or revenue generated from site uses.

Liability and stewardship considerations should therefore be evaluated alongside funding and acquisition strategies when determining whether and how a site can advance.

Step 9: Property Acquisition

Once the parameters of site reuse have been established and funding secured, property acquisition is generally completed before additional investments are made or implementation work proceeds.

The acquisition process typically involves coordination with legal counsel, real estate professionals, and regulatory agencies. Timeframes for drafting, negotiating, and finalizing agreements may range from approximately 6 to 12 months, depending on transaction complexity and regulatory contingencies.

Key Considerations During Property Acquisition:

- **Allocation of Cleanup Responsibilities**

Purchase and sale agreements may be structured so that the original owner retains responsibility for some or all well abandonment or environmental remediation tasks. This may include funding specific work through escrow accounts established as part of the property transfer. If a sale is contingent upon the seller achieving regulatory closure for abandonment or remediation programs, timelines may extend significantly—ranging from months to multiple years. Deposits or other financial assurances may be required to secure the transaction during this period.

- **Liability Transfer and Regulatory Protections**

Sellers may need to participate in agreements to facilitate liability transfer. Regulatory tools that may help shield prospective purchasers from liability include prospective purchaser agreements, California Land Reuse and Revitalization Act (CLRRA) agreements, and environmental insurance

products. These mechanisms require coordination with oversight agencies and may take time to implement. Examples of these mechanisms as California Environmental Liability Protection Processes are included in Appendix A.

- **Hazardous Waste Manifest Responsibility**

Identifying which party is responsible for signing hazardous waste manifests is a significant issue. The entity signing the manifest typically retains long-term liability for the wastes after disposal. Because waste shipments are tracked through the manifest system, future cost recovery actions may target the responsible party if disposal facilities later encounter financial or regulatory failure.

Oil-impacted waste must be transported to appropriately permitted facilities. If classified as hazardous, disposal typically occurs at authorized Class I landfills. If testing demonstrates that the material does not meet hazardous waste criteria, disposal may occur at a permitted non-hazardous industrial landfill; however, the generator remains ultimately responsible for proper disposal.

Step 10: Cleanup and Well Work Planning

Once property acquisition has been completed, implementation planning begins. Depending on project structure and sequencing, well abandonment and environmental remediation activities are typically undertaken prior to construction of reuse improvements.

This stage focuses on contracting, permitting, and logistical preparation necessary to execute abandonment and cleanup activities safely and efficiently.

Contracting and Procurement Considerations

For government agency–led projects, detailed plans and specifications must be developed to support competitive bidding. Greater specificity in scope, sequencing, and technical requirements increases the likelihood of obtaining accurate and competitive bids.

Public agency contracts typically include:

- Prevailing wage requirements, consistent with state labor laws governing public works projects.
- Insurance and bonding requirements, to ensure financial protection and performance guarantees.
- Compliance with public contracting rules, including competitive bidding and procurement procedures.

Pre-qualification of contractors may be appropriate to ensure bidders have relevant expertise in oil well abandonment, environmental remediation, and regulatory compliance.

Permitting and Regulatory Coordination

Implementation may require permits and coordination with multiple agencies, including:

- Local building or fire authorities
- Regional agencies such as the South Coast Air Quality Management District (AQMD)
- Utility providers (electricity, water, sewer)

Oil well/production facilities in more urban areas of LA County may already have utility connections, but modifications or disconnections may be necessary.

Permitting timelines can be lengthy. For example, AQMD permits for certain abandonment or remediation activities may take 12 to 18 months or more to obtain. Early coordination with regulatory agencies can help reduce schedule uncertainty.

Site Logistics and Waste Management Planning

Because well abandonment and remediation activities often involve heavy equipment, truck traffic, and off-site disposal of impacted materials, detailed logistics planning is necessary to minimize disruption and ensure safe operations.

Traffic and hauling plans should address:

- Equipment mobilization
- Off-haul of contaminated soils
- Importation of backfill materials
- Staging areas to prevent congestion and reduce diesel emissions
- Flagging operations to manage site access
- Hazardous waste transportation contingency planning

Waste disposal planning should include pre-identification of permitted landfills or treatment facilities. Considerations include:

- Facility location and transportation costs
- Financial stability of disposal facilities
- Permit classifications and waste acceptance criteria

Careful coordination of contracting, permitting, and logistics at this stage helps reduce implementation risks, minimize community impacts, and support a smoother transition from remediation to reuse development.

2.4 Phase 4 – Cleanup and Well Work Implementation

Phase 4 consists of implementing well abandonment and environmental remediation activities under regulatory oversight. This phase translates planning, investigation, and permitting into on-the-ground execution.

Step 11: Well Abandonment/Re-Abandonment

The initial step in site conversion is well abandonment or re-abandonment under CalGEM oversight. The process generally involves three major components.

1. Permitting and Work Plan Approval

Abandonment begins with filing a Notice of Intent to Abandon with CalGEM. The notice:

- Describes the current condition of the well
- Includes a well bore diagram
- Outlines the proposed abandonment program

CalGEM requires sealing oil- and gas-producing intervals from freshwater aquifers. Because wells are constructed with steel casing inside a drilled borehole, abandonment may require perforating casing and placing grout or cement into the annular space to create required seals.

CalGEM reviews the submittal and, if acceptable, issues a Permit to Conduct Well Operations. Work plans typically include health and safety measures, traffic control provisions, and may require additional permits from other agencies.

2. Field Abandonment Operations

Abandonment work is conducted using a workover rig or drilling rig (size dependent on well depth and configuration), along with support vehicles and equipment. Operations will generate noise and truck traffic.

CalGEM inspectors observe and verify critical steps, including:

- Placement of required seals
- Isolation of producing intervals from aquifers
- Surface pressure testing to confirm no gas leakage

Following completion of downhole abandonment activities, surface restoration and wellhead closure measures are implemented to ensure long-term stability and safety:

- Soils around the wellhead are excavated to address impacts from historic operations or abandonment activities.
- A steel plate is welded over the casing approximately 5–10 feet below grade.
- Gravel and/or a cement cone may be installed to provide additional protection and visibility.
- Vent piping may be required, extending above grade to allow for controlled gas venting, where applicable.

3. Surface Restoration and Infrastructure Removal

All oilfield-related infrastructure is removed and disposed of offsite. If all wells on a lease are abandoned, a Lease Restoration Plan is prepared and submitted to CalGEM for approval. The Lease Restoration Plan documents how the site will be returned to a safe and stable condition following cessation of oil operations. Specifically, the plan addresses:

- Removal of equipment, piping, tanks, and related structures
- Offsite disposal of materials in accordance with regulatory requirements
- Site grading and restoration to eliminate pits, hazards, or unsafe conditions

If future development is planned, venting systems associated with abandoned wells may later be modified or integrated into site improvements, consistent with regulatory requirements.

Step 12: Environmental Remediation Implementation

Environmental remediation is conducted under oversight from DTSC, RWQCB, or a local agency, and may occur after or in parallel with well abandonment. Remediation may include:

- Short-term activities such as soil excavation and offsite disposal
- Longer-term systems such as soil vapor extraction or groundwater treatment

In-situ remediation systems may remain operational for extended periods and may be designed to function concurrently with redevelopment. Such systems (e.g., soil vapor extraction or groundwater treatment systems) may operate beneath or adjacent to new improvements and require ongoing monitoring and maintenance.

Implementation Considerations

Implementation of remediation activities involves coordination among regulatory agencies, contractors, and the surrounding community. Key considerations during this phase may include:

- Public participation plans that outline meetings, mailers, and/or other communication tools required by the oversight agency.
- Involvement of agency offices of public engagement, equity, or tribal affairs in outreach efforts, recognizing that community engagement should occur throughout the site transition and reuse process, as discussed at the beginning of Section 2.
- Dust, air, noise, and stormwater monitoring during active field operations.
- City or County inspections associated with excavation, system installation, or related activities.

Community engagement is critical during the site transition and reuse process, and is particularly important during active field operations, when visible activity and equipment mobilization may generate questions or concerns from nearby residents. Clear communication regarding the scope of work, duration of activities, safety protocols, and regulatory oversight can help manage expectations, reduce misinformation, and maintain community trust during implementation.

Step 13: Verification and Closure Preparation

Following completion of field activities, documentation is submitted to oversight agencies to demonstrate compliance with approved work plans and to support regulatory closure determinations. Upon review and acceptance of this documentation, the respective agencies issue formal confirmation letters reflecting the status of well abandonment and environmental remediation.

Well Closure Documentation

CalGEM issues a confirmation letter stating whether wells were abandoned to current standards (often referred to as a “good” letter). In certain cases—such as when sidetrack bores cannot be re-entered—the letter may note deviations. If no ongoing risk is identified, development may proceed.

Environmental Regulatory Closure

Environmental oversight agencies may issue:

- A Closure Letter, indicating that required cleanup actions have been completed in accordance with the approved remedial plan.
- A No Further Action (NFA) determination, confirming that no additional active remediation is required under current site conditions.
- Or other documentation confirming remedial objectives were met.

Closure conditions may include:

- Deed restrictions or land use limitations
- Continued groundwater monitoring
- Institutional controls
- Vapor mitigation systems for future buildings

Some closures represent completion of active remediation while requiring ongoing monitoring or maintenance obligations to ensure that the site remains protective under its approved reuse scenario.

2.5 Phase 5 – Reuse Planning, Permitting, and Construction

Phase 5 transitions from remediation to redevelopment planning, permitting, and construction of the intended reuse. While conceptual reuse planning may begin earlier in the process, this phase focuses on advancing defined reuse concepts toward implementation.

Step 14: Reuse Planning, Permitting, and Construction

Following regulatory closure and confirmation of site readiness, reuse planning may be refined through additional opportunities for community input and coordination with relevant agencies.

Reuse planning may include:

- Refinement of conceptual plans, translating high-level scenarios into site-specific layouts and design concepts.
- Integration of oil well abandonment constraints, including setback considerations, vent locations, and subsurface conditions.
- Incorporation of health-protective measures (e.g., vapor mitigation systems) where required by regulatory approvals.
- Evaluation of multi-use configurations for larger sites, allowing for combinations of parks and open space, community facilities, housing, or other compatible uses. In some cases, particularly for privately owned sites, redevelopment may be led by the private sector and include community-serving components such as affordable housing units and publicly accessible open space. Mechanisms such as development agreements, community benefits agreements, or other negotiated frameworks may help support these outcomes.

Before construction proceeds, it is important to confirm that processes necessary to redevelop the site have been completed, including:

- Identification of utility needs (power, water, sewer) and confirmation that adequate capacity and connections are available.
- Coordination with service providers, including utilities and local agencies, to secure required approvals and service agreements.
- Compliance with local planning and zoning requirements, such as consistency with general plans, zoning designations, and development standards.
- Confirmation that remediation conditions and institutional controls are integrated into site design, including deed restrictions, vapor mitigation systems, and any required setbacks or monitoring infrastructure.

Scenario-Based Reuse Framework

Because oil well sites vary significantly in size, ownership, and context, this Study uses scenario planning to illustrate a range of potential reuse pathways and feasibility considerations rather than advancing detailed, site-specific redevelopment plans. A detailed scenario planning outline is included in Appendix E.

Scenarios illustrate how different combinations of constraints and opportunities influence feasible reuse options. The following categories structure the scenario analysis and identify the key variables that shape reuse feasibility.

- Ownership Considerations:
 - Ownership structure significantly affects feasibility, timing, and control over reuse decisions.

- County-owned or publicly owned sites may offer clearer planning pathways but remain subject to technical, regulatory, and funding constraints.
- Privately owned sites may require acquisition, negotiated agreements, or partnership models prior to reuse.
- Split estate conditions, mineral rights, or multiple owners may add complexity.
- **Scale Considerations:**
 - Parcel size and configuration influence the range of feasible reuse options.
 - Smaller or irregularly shaped sites may be limited to lower-intensity or passive uses.
 - Larger sites may allow multi-use development but typically involve higher remediation costs and longer timeframes.
 - In some cases, coordinated reuse across multiple parcels may be feasible.
- **Land Use Context:**
 - Surrounding land uses, zoning, and community context shape appropriate reuse scenarios.
 - Proximity to residential neighborhoods, schools, parks, or commercial areas may influence both regulatory standards and community priorities.
 - Compatibility with adopted land use plans and policies is a critical consideration.
 - Context-sensitive reuse can help minimize conflicts and enhance community acceptance.

Potential Reuse Categories

The following reuse categories represent common community-serving outcomes considered within the scenario framework. These categories reflect documented County needs and policy priorities but are presented at a typological level rather than as recommendations for any specific site.

Examples of reuse concepts may include:

- Parks and open space
- Affordable housing
- Community gardens and urban agriculture
- Community centers
- Renewable energy installations
- Cultural or educational uses
- Other community-serving projects

Reuse concepts are informed by community input, site conditions, and broader County planning goals. Not all reuse types are appropriate for all site types; scenarios illustrate relative suitability rather than recommendations. This feasibility study phase identifies plausible reuse categories, not site-specific designs.

Feasibility Considerations

Feasibility is evaluated at a high level, considering:

- Technical constraints, including site conditions, well status, and remediation requirements.

- Regulatory pathways, including oversight agency jurisdiction and CEQA requirements.
- Cost ranges, reflecting order-of-magnitude estimates for abandonment, remediation, and development.
- Ownership conditions, including public or private control, split estates, and acquisition feasibility.
- Funding availability and timing, including alignment with grant cycles, public funding programs, or responsible party contributions.

Environmental remediation requirements and well abandonment status are primary drivers of reuse feasibility, as they affect cost, sequencing, regulatory review, and long-term stewardship obligations. Findings at this stage identify constraints and uncertainties that must be addressed in subsequent implementation phases before redevelopment can proceed.

Step 15: Reuse Construction and Mitigation Monitoring

The final step in the process is construction of the intended reuse. This phase represents the transition from remediation to reuse and requires continued attention to previously identified environmental and well-related conditions to ensure long-term protectiveness.

Mitigation monitoring may be required to ensure:

- Compliance with CEQA mitigation measures
- Proper management of residual soil contamination
- Implementation of vapor mitigation or institutional controls
- Compliance with dust, noise, and other construction permit requirements

While reuse construction generally follows standard development practices, certain elements—such as venting systems, institutional controls, subsurface barriers, or monitoring infrastructure—may be directly influenced by the site’s prior oil production history and associated regulatory closure conditions.

This Study does not address detailed construction design but acknowledges that redevelopment must remain consistent with regulatory closure conditions and long-term stewardship requirements.

2.6 Phase 6 – Long-Term Stewardship and Completion

Phase 6 focuses on long-term stewardship, monitoring, and governance following site redevelopment. Even after regulatory closure and construction are complete, certain environmental, legal, or operational responsibilities may continue.

Step 16: Long-Term Stewardship and Completion

Long-term site stewardship involves overseeing ongoing responsibilities related to environmental conditions, oil well abandonment status, and institutional controls. Even after regulatory closure is issued, certain monitoring and compliance obligations may continue for years or decades, depending on site conditions and approved reuse. Stewardship structures vary depending on ownership and reuse type.

Ongoing responsibilities may include:

- Monitoring groundwater, soil vapor, or other environmental media
- Maintaining vapor mitigation systems or other engineering controls
- Complying with deed restrictions or land use covenants
- Reporting to regulatory agencies as required

Governance and Funding Mechanisms

Long-term stewardship for publicly owned sites requires clearly defined governance structures and sustainable funding sources to ensure that monitoring, maintenance, and compliance obligations are met over time. These elements support the long-term protection of human health and the environment, while reinforcing public confidence in site reuse. For privately owned sites, long-term stewardship obligations may rest with the property owner or responsible party, as established through regulatory closure conditions, deed restrictions, or environmental covenants.

Stewardship responsibilities for publicly owned sites may be administered by:

- A public agency (such as the property-owning entity)
- A nonprofit organization or land trust
- A community-based organization
- A special district or similar governance structure

Funding mechanisms may include:

- Escrow accounts established during acquisition
- Tax increment financing or assessment districts
- Operational revenue generated from site uses
- Dedicated public funding allocations

Clear assignment of long-term responsibility ensures ongoing regulatory compliance and sustained stewardship of the site over time.

Project Completion and Community Recognition

Celebrating project completion may take the form of a ribbon-cutting, grand opening, or community event—particularly where a park or other public-serving facility is constructed. These events provide an opportunity to acknowledge the collaborative efforts of public agencies, community partners, regulators, and residents who contributed to the project’s success.

Such milestones serve as visible markers of progress, demonstrating how formerly industrial or extractive sites can be responsibly closed, restored, and returned to beneficial community use. They reflect the culmination of regulatory oversight, technical remediation, interagency coordination, and community engagement efforts carried out over multiple phases of work. These events also reinforce transparency, accountability, and the long-term commitment to stewardship.

2.7 Decision-Tree Diagram

To support future implementation, the County’s approach to oil well site transition can be conceptualized through a high-level decision-tree framework that highlights key threshold questions encountered after a potential site is identified. While Figure 1a illustrates the comprehensive, multi-phase process for site transition, the decision-tree focuses on the critical feasibility screening conditions that determine whether and how a site can realistically advance toward community-serving reuse.

The framework applies to sites containing wells of varying operational statuses—including inactive, idle, orphaned, or mixed-status wells—and does not assume that all wells are inactive at the time of evaluation.

The six major decision points are:

1. **Site Control:** Is there a viable pathway to site control (e.g., County acquisition, partnership, option agreement, community-based organization or land trust acquisition, or seller-led remediation prior to transfer)?
2. **Well Responsibility:** Are abandonment responsibilities clearly assigned and financially viable, including for sites with mixed well status or insolvent operators?
3. **Regulatory Clarity:** Has appropriate regulatory oversight been identified (e.g., CalGEM, DTSC, RWQCB, or local agency), and is sequencing confirmed?
4. **Technical Feasibility:** Is the intended reuse compatible with site environmental conditions?
5. **Financial Feasibility:** Is there a viable and sequenced funding strategy to support abandonment, remediation, and redevelopment (including responsible party funding, State/federal programs, grants, and public capital)?
6. **Land Use/CEQA Compatibility:** Is the proposed reuse reasonably likely to achieve CEQA clearance and land use compatibility?

Each category represents a threshold condition that can independently determine whether a project proceeds, requires modification, or pauses. Together, these decision points function as gating factors that inform sequencing, funding alignment, and interagency coordination.

A conceptual decision-tree illustrating these major decision points is provided in Figure 1b as an aid to support site-specific evaluation and coordinated implementation.

3 OIL WELLS IN UNINCORPORATED LA COUNTY BACKGROUND AND CONTEXT

This section summarizes the regulatory, governance, and programmatic context for this Study as it relates to the screening and identification of oil well sites in unincorporated areas of LA County.

Most oil well sites in LA County are privately owned, and remediation is primarily regulated by the State through the California Geologic Energy Management Division (CalGEM), often in coordination with agencies such as the Department of Toxic Substances Control (DTSC) or the Los Angeles Regional Water Quality Control Board (LARWQCB). In the case of orphan wells, the State may directly manage well plugging and abandonment.

Some former oil well and production sites may be on the State’s Cortese List of hazardous waste and contaminated sites, depending on site-specific conditions and regulatory status. Sites are placed on the Cortese List when State or local regulatory agencies identify hazardous materials contamination at levels that meet statutory reporting thresholds under California Government Code §65962.5. Inclusion on the Cortese List does not preclude future reuse, but it can introduce additional notification, coordination, and disclosure requirements that may affect project timelines. Many oil well sites are regulated primarily by CalGEM and therefore may not be listed, even where contamination is present.

The County coordinates with State and local partners and can shape future reuse outcomes through its land use authorities and policy frameworks. While the County does not determine the specific reuse of privately owned sites, it plays an important role in facilitating interagency coordination, identifying opportunities, and supporting pathways for community-serving reuse. Any potential acquisition of privately owned sites would require a willing seller and separate policy authorization, and is outside the scope of this feasibility analysis. In unincorporated areas, land use entitlements are determined when a specific reuse is proposed and are governed by the Department of Regional Planning (DRP) under Title 22 of the County Code, with input from relevant County departments.

This Study was developed alongside broader County-led community engagement efforts related to the phase-out of oil drilling and the future reuse of oil well sites, including workshops and surveys conducted by DRP to gather input on future land uses in communities with existing oil wells. These efforts complement the Study by helping inform future site-specific discussions and implementation strategies.

3.1 Existing Conditions Inventory

DRP has developed a comprehensive inventory of existing oil and gas sites in the unincorporated areas to inform the Environmental Impact Report (EIR) for the Revised Oil Well Ordinance. This dataset documents 337 parcels across ten of the County’s eleven Planning Areas with active, idle, ancillary, or surface production facilities, many of which are located in close proximity to homes, schools, parks, and other sensitive land uses. Notably, the inventory identifies numerous “likely orphaned” wells that lack a financially viable operator, presenting heightened risks to public health and the environment (County of Los Angeles, 2025c). By providing parcel-specific information, including well status, operator, ownership, and land use context, this inventory establishes a critical baseline for understanding existing conditions and underscores the scale and complexity of remediation and reuse opportunities across the County. A map of these parcels is included in Appendix D.

Oil well status designations (e.g., active, idle, orphaned, abandoned) are dynamic and may change over time due to regulatory actions, market conditions, operator decisions, or enforcement activity. As a result, the number and classification of inactive wells in unincorporated LA County may evolve beyond the snapshot reflected in this Study. Additionally, as oil and gas resources are finite and production declines in mature fields, additional wells may transition from active to idle or abandoned status in future years.

Accordingly, this Study should be understood as reflecting conditions at the time of analysis rather than a fixed inventory.

As new data about wells and well sites become available from agencies such as CalGEM, Public Works, Public Health, and other partners, the County will incorporate these updates into its analyses to inform site selection and feasibility assessments. This approach ensures that future analyses build on the most current and reliable data.

3.2 Inactive Oil Wells in Unincorporated LA County

The Framework for Oil Well Cleanup Pilot Program Report developed by MRS Environmental, Inc. (hereafter referred to as the MRS report) identified and prioritized idle oil wells across unincorporated areas based on their potential risks to public health, safety, and the environment. This report builds upon the efforts of the County's Oil and Gas Strike Team, which had previously conducted extensive field assessments of oil and gas wells in unincorporated areas. The MRS report is included in Appendix B.

Using data from CalGEM's WellSTAR database and additional health and environmental equity indicators, the MRS report applied a refined prioritization framework that considered factors such as well age, reservoir characteristics, proximity to active injection wells, population density, and CalEnviroScreen. This screening process identified 42 high-priority idle wells (listed in Table 2.8 of the report) that posed the greatest potential risk to nearby communities (Figure 2).

This Study builds upon the 42 high-priority idle wells identified in the MRS report as an initial screening universe and expands the analysis to evaluate site-level feasibility across parcels that may contain wells with mixed operational statuses. Rather than focusing solely on individual idle wells, the Study assesses broader parcel conditions—including ownership, accessibility, regulatory context, environmental constraints, and redevelopment potential—to inform potential pathways for remediation and community-serving reuse.

This Study focuses on a subset of these high-priority well sites to evaluate the environmental, financial, and community redevelopment potential of transforming them into safe, beneficial uses. This work builds directly upon the findings of the MRS report and previous County planning efforts, including the identification of Priority Areas for Environmental Restoration (also referred to as Priority Restoration Areas or PRAs in this Study) through the 2022 Countywide Parks Needs Assessment Plus (PNA+). Several of the candidate sites evaluated in this Study fall within or near these PRAs, highlighting opportunities where remediation and reuse of oil well sites could also advance County priorities for environmental restoration and park access. The Study also discusses two sites owned by LA County that contain idle or previously abandoned wells and examines how well status and site conditions may affect potential reuse options.

3.3 State and Regional Context

Several legislative, legal, and regulatory activities are shaping the trajectory of the transition away from oil production in Los Angeles County, with implications for the closure, remediation, and reuse of oil well sites.

3.3.1 Assembly Bill 2716

California's AB 2716 (2022), the Low Producing Well Accountability Act, establishes a framework to accelerate the phaseout of low-producing oil and gas operations at the Inglewood Oil Field (IOF) in the Baldwin Hills area, the largest urban oil field in the United States, by holding operators of low-producing wells accountable and mandating their closure. The bill classifies low-production wells as those yielding fewer than 15 barrels of oil per day or 60,000 cubic feet of gas per day, and beginning March 1, 2026,

imposes a \$10,000 per month penalty on wells that fail to comply until they are permanently plugged and abandoned. By December 31, 2030, all wells within the Baldwin Hills and Urban Watersheds Conservancy area must be plugged and abandoned, with the same penalty applying for violations beginning on January 1, 2031 (CalMatters, 2025).

The legislation is driven by public health and environmental justice concerns, particularly for nearby communities that face elevated risks of respiratory disease and cancer due to proximity to oil operations. Penalty revenues are directed to the Equitable Community Repair and Reinvestment Account, a fund established through AB 2716 to support community reinvestment in neighborhoods surrounding the IOF. Revenues may be used for local initiatives such as park creation, open space restoration, and development of affordable housing. Overall, AB 2716 seeks to advance a responsible and time-bound closure of the IOF, protect community health, and hold the operator accountable for environmental cleanup and community reinvestment (CalMatters, 2025).

The ongoing transition of the IOF illustrates the complexity of post-production land use decision-making in urban oil landscapes. Public discussion has highlighted competing visions for the site's future, including regional park expansion, housing development, or mixed-use scenarios (LA Times, 2025). At the same time, fragmented ownership patterns, limited public acquisition funding, and evolving policy priorities have complicated the path forward.

While the scale of the IOF differs from the parcel-level sites evaluated in this Study, the example demonstrates several themes relevant to feasibility screening: the importance of early clarity regarding ownership and site control, the influence of funding availability on land use outcomes, and the need to align environmental remediation timelines with long-term planning objectives.

3.3.2 Inglewood Oil Field Litigation

Litigation related to AB 2716 centers on a lawsuit filed by Sentinel Peak Resources California LLC, the sole operator of the IOF, seeking to invalidate the statute. Filed on November 25, 2024, in Los Angeles County Superior Court, the lawsuit names the State of California, the California Geologic Energy Management Division (CalGEM), and the State Oil and Gas Supervisor as defendants. Sentinel Peak argues that AB 2716 constitutes unconstitutional "special legislation," asserting that amendments made during the legislative process improperly narrowed the law's applicability exclusively to the IOF. The operator further contends that the statute's \$10,000-per-month penalty for noncompliant wells is excessive and disproportionate to any demonstrated harm, and that the law effectively results in an uncompensated taking by eliminating vested operational rights. In addition, Sentinel Peak claims that closure of the field would reduce local oil production, increase reliance on foreign oil, and result in adverse global air quality and greenhouse gas emission impacts.

Supporters of AB 2716, including Assemblymember Isaac Bryan and the nonprofit organization Consumer Watchdog, defend the statute as a necessary public health and environmental justice measure for frontline communities long burdened by pollution from oil operations. They argue that the low-producing wells targeted by the legislation contribute minimally to the state's energy supply while posing disproportionate health and environmental risks to nearby residents. The State maintains that it has the authority and responsibility to regulate oil and gas operations in the public interest.

The case remains pending, and its outcome will influence the near-term regulatory landscape affecting oil production and potential site transitions within the IOF. At a larger scale, the IOF illustrates the potential magnitude, sequencing challenges, and coordination needs that may arise where large concentrations of inactive or low-producing wells transition toward closure over a defined timeframe.

3.3.3 CalGEM Requirements

CalGEM serves as the State’s primary regulatory authority for oil and gas well operations, including well integrity, idle well management, and permanent plugging and abandonment. Beyond the specific requirements established under AB 2716 for the IOF, CalGEM oversees statewide standards governing well closure, site restoration, and financial assurance to ensure that operators remain responsible for end-of-life oil well obligations.

As part of this role, CalGEM reviews and approves Notices of Intention to Plug and Abandon, establishes technical standards for abandonment activities, and requires operators to demonstrate sufficient financial resources to cover closure and decommissioning costs. Where operators fail to comply or no viable operator remains, CalGEM may initiate enforcement actions and/or implement State-led well plugging programs to address public health, safety, and environmental risks.

For the purposes of this Study, CalGEM’s regulatory framework plays an important role in shaping the timing, cost, and sequencing of oil well abandonment activities. The feasibility of site remediation and future land reuse is closely tied to the status of wells and the regulatory processes required before sites may be considered suitable for redevelopment or other community-serving uses. Accordingly, several key regulatory considerations under CalGEM oversight are particularly relevant to understanding site feasibility, sequencing, and potential reuse pathways, including the following:

- **Well plugging and abandonment standards and Notice of Intention (NOI) approval:** CalGEM establishes technical requirements for well plugging to ensure protection of freshwater aquifers and prevention of gas migration. Before well abandonment activities can begin, the well operator must submit a Notice of Intention (NOI) to CalGEM describing the proposed abandonment procedures, including technical information about the well condition and the planned plugging methods. CalGEM reviews the NOI to confirm that the proposed work meets regulatory and engineering standards and must approve the NOI before abandonment activities may proceed. The NOI review and approval process therefore plays an important role in determining when abandonment work can begin and can significantly influence overall project timelines.
- **Idle well management and re-abandonment requirements:** Wells classified as idle are subject to periodic testing, bonding requirements, and mandatory re-abandonment if they do not meet current standards. These requirements can affect both cost estimates and the sequencing of remediation and redevelopment activities because wells may need to be tested, re-entered, or re-abandoned before site remediation or redevelopment work can proceed.
- **Financial assurance and liability provisions:** CalGEM requires operators to maintain bonding or other financial assurance mechanisms to cover plugging and abandonment costs. The adequacy and enforceability of these mechanisms influence whether abandonment costs are borne by the operator, the State, or potentially a future site controller. In some cases, bonding amounts may be insufficient to cover actual abandonment costs, or funds may be difficult to recover if an operator becomes insolvent or otherwise fails to meet its obligations.
- **Site restoration requirements following well closure:** In addition to subsurface plugging, CalGEM requires removal of oilfield infrastructure and restoration of surface conditions. In practice, this typically includes removal of equipment such as pumps, tanks, and piping; securing the wellhead below grade; removal of debris; and grading or stabilizing the surface to eliminate safety hazards. These requirements do not necessarily include broader environmental remediation—such as removal of subsurface contamination or restoration of soil conditions—which may instead fall under the jurisdiction of other regulatory agencies depending on site conditions. Completion of

basic surface restoration is often a prerequisite to advancing land-based reuse and may affect the timing of subsequent remediation or construction activities.

3.4 Los Angeles County Revised Oil Well Ordinance (ROWO)

In January 2023, the Los Angeles County Board of Supervisors adopted the Oil Well Ordinance, establishing a regulatory framework to phase out oil and gas extraction activities in unincorporated areas and strengthen protections for public health, safety, and environmental quality. The ordinance followed earlier Board actions affirming the County’s commitment to advancing a just transition away from fossil fuel extraction, particularly in communities that have experienced disproportionate environmental burdens.

The County is currently advancing a Revised Oil Well Ordinance (ROWO) to align local regulations with recent State legislation, including Assembly Bill 3233 (Addis), which clarifies local authority to limit or prohibit oil and gas operations. The ROWO project includes preparation of an Environmental Impact Report and associated updates to the County General Plan and Community Standards Districts. Adoption of the revised ordinance is anticipated later this year.

While the ROWO primarily governs oil and gas operations rather than land reuse, it has direct relevance to this Study. Implementation of the ordinance is expected to influence the pace and sequencing of oil well phase-out activities in unincorporated areas. As additional wells transition from active production to idle, abandoned, or orphaned status, the need for coordinated well plugging, environmental remediation, long-term stewardship, and potential land reuse will increase. Accordingly, this feasibility analysis should be understood within the broader regulatory trajectory established by the County’s oil phase-out policies.

3.5 Just Transition Strategy and Land Reuse Context

In 2022, the CSO, in collaboration with the City of Los Angeles and cross-sector members of the Just Transition Task Force, released the Los Angeles Just Transition Strategy. The Strategy provides recommendations to ensure a just transition for workers and communities impacted by the proposed phase-out of oil drilling and extraction activities.

The report identifies three long-term priority areas: (1) support for workers, (2) site remediation and reuse, and (3) finance and coordination. Specifically, the three goals of the Just Transition Strategy are:

- Provide oil workers impacted by the phase-out of drilling and extraction with the necessary support to transition their skills into jobs of comparable, family-sustaining compensation or retirement in ways that promote livelihoods and dignity.
- Properly remediate and monitor impacts of closing oil well sites and integrate co-visioning and input from sovereign Native Nations on whose ancestral homelands Los Angeles is built—Tongva, Tataviam, Serrano, Kizh, and Chumash—and frontline communities in community visioning, remediation, and land use redevelopment planning processes.
- Leverage public and private funds to equitably and sustainably finance and coordinate the successful implementation of the Strategy and its Action Recommendations, with ongoing accountability, transparency, and advising from the Just Transition Task Force.

This Study is most directly aligned with the second goal, focused on site remediation and reuse. The feasibility analysis presented herein examines the technical, regulatory, financial, and governance conditions necessary to safely close oil wells, remediate environmental impacts, and evaluate potential pathways for community-serving reuse. At the same time, the third goal—finance and coordination—is

integral to implementation, as successful transition of former oil sites depends on alignment of regulatory authority, funding mechanisms, institutional capacity, and long-term stewardship structures.

Accordingly, this Study should be understood as one component of the broader Just Transition Strategy, contributing to the County's efforts to reduce environmental risk, advance equitable reinvestment, and coordinate phased transition of oil-impacted land toward safer and more beneficial future uses.

4 CRITERIA FOR IDENTIFYING AND SCREENING SITES IN UNINCORPORATED AREAS OF LA COUNTY

This section describes the methodology used to screen and prioritize oil well sites in unincorporated areas of LA County for feasibility evaluation. The approach is designed to balance equity-driven identification of high-need communities with site-level feasibility considerations, recognizing that not all high-priority well sites are physically accessible, controllable, or suitable for near-term reuse.

The screening process builds on prior County analyses and applies a two-tier framework (County of Los Angeles, 2025a). The first tier focuses on understanding the broader environmental, public health, and equity context surrounding oil wells, while the second tier evaluates parcel-level characteristics that affect feasibility, sequencing, and potential reuse. Together, these tiers help narrow a large universe of sites to a smaller set suitable for more detailed feasibility evaluation.

The specific criteria applied in this Study, summarized in Table 1, are consistent with Phase 1 Step 1 of the Oil Well Reuse Process outlined in Figure 1. Establishing clear and consistent criteria is critical for assessing and selecting potential sites for pilot projects. The criteria should be developed based on current data inventories, tools and frameworks, feasibility analyses, and community and stakeholder input.

4.1 Foundation for Screening: Prior County Work

This Study builds on the *Framework for Oil Well Cleanup Pilot Program Report* prepared for Los Angeles County by MRS Environmental, Inc. (2022). That report identifies 42 high-priority inactive oil wells located in unincorporated areas of the County based on a combination of environmental risk indicators, proximity to sensitive receptors, and community vulnerability considerations.

Rather than replicating or re-evaluating the prioritization methodology used in that effort, this Study treats the 42 wells identified in the MRS report as the starting universe for further screening. The purpose of the methodology described in this section is to refine that initial list to identify sites that may realistically support further feasibility evaluation for land-based reuse, given both community context and site-specific constraints.

4.2 Tier One Screening: Equity, Health, and Community Context

The first tier of screening applies countywide planning and public health tools to understand the cumulative environmental and social conditions in which the identified wells are located. These tools are used to contextualize need and potential benefit, rather than to determine site-level feasibility.

A primary tool used in this tier is CalEnviroScreen, the State of California's cumulative impact screening methodology. CalEnviroScreen combines indicators related to pollution exposure, environmental effects, sensitive populations, and socioeconomic vulnerability to identify communities experiencing disproportionate environmental and public health burdens. Wells located within or near Disadvantaged Communities (DACs), as identified through CalEnviroScreen, were given priority consideration due to the long-standing environmental and health impacts experienced by these communities.

In addition to CalEnviroScreen, the screening process draws on the County's Parks Needs Assessment (PNA) and Parks Needs Assessment Plus (PNA+), which provide complementary planning perspectives. The PNA identifies Very High and High park need areas based on factors such as population density and park access, helping to highlight neighborhoods with documented deficits in local parks and recreational resources. The PNA+ expands this framework to include broader environmental considerations, including the urgency and need to restore degraded lands, and identifies Priority Restoration Areas or PRAs where land reuse could deliver meaningful environmental and community benefits.

Together, these tools help focus feasibility evaluation efforts on locations where oil well site remediation and reuse can address both community-level park access needs and environmental restoration priorities, while also aligning with County equity, public health, and sustainability goals.

Countywide screening maps illustrating the distribution of high-priority idle wells and their overlap with DACs, Very High and High park need areas, and PRAs are provided in the Figures section of this report. These maps visually depict the broader equity and environmental context that informed Tier One screening.

Tier One screening also considers surrounding land use patterns, including proximity to residential neighborhoods, schools, parks, and other sensitive receptors. Taken together, these factors help ensure that feasibility evaluation efforts remain centered on communities with elevated need and potential benefit, without predetermining site-specific reuse outcomes.

4.3 Tier Two Screening: Site-Specific Feasibility Factors

While Tier One screening identifies areas of elevated need and cumulative burden, Tier Two screening evaluates site-specific characteristics that directly affect feasibility, sequencing, and implementation potential. Many high-priority wells were eliminated at this stage due to physical, ownership, or operational constraints.

Site-specific factors considered include:

- The number and operational status of wells present at a site (idle, abandoned, orphan, or active), which can influence sequencing, liability considerations, and overall feasibility.
 - Sites containing wells with mixed operational statuses, which can introduce additional complexity related to sequencing, liability, and remediation timing.
 - Sites containing active wells were not automatically excluded from consideration; however, the feasibility and timing of transition may depend on the operator's cessation of production and coordination of well abandonment with regulatory agencies. Lease terms, bonding requirements, and state oversight mechanisms may influence sequencing and overall implementation complexity.
- Property ownership and site control, including public versus private ownership, surface and mineral rights, parcel size, configuration, and physical accessibility.
- Parcel structure, such as whether wells are located on a single parcel or across multiple contiguous parcels that may need to be planned collectively.
- Physical accessibility and surrounding conditions, including constraints posed by adjacent development or ongoing site uses.

Collectively, these site-specific factors help distinguish locations that are theoretically high priority from those that are practically feasible to evaluate and potentially advance.

4.4 Screening Outcomes

Application of the two-tier screening framework significantly narrowed the initial universe of sites as shown in Figures 3 to 5. Of the 42 high-priority wells identified through prior County work:

- Twenty-six (26) wells were inaccessible due to physical or operational constraints.
- Eight (8) wells were located outside both DACs and PRAs.

- Three (3) wells were located on sites actively undergoing redevelopment, and were therefore excluded from further consideration.

In practice, parcels containing only inactive wells were often small, inaccessible, or otherwise constrained, whereas sites with mixed-status wells more frequently occurred on larger or more consolidated parcels, allowing for evaluation of broader reuse options.

While location within DACs was a central consideration in Tier One screening, not all sites selected for evaluation in this Study are located within DACs. However, five of the six sites described in Section 5 are either within areas identified as High park need, within PRAs, or adjacent to DACs.

4.5 Purpose and Limitations of the Screening Approach

The screening methodology applied in this Study is intended to support focused feasibility evaluation, not to function as a rigid site selection formula. Site conditions, ownership status, regulatory context, and community priorities may evolve over time, and future analyses may warrant revisiting sites that were screened out at this stage.

The two-tier approach provides a transparent and repeatable framework that can be adapted for future studies, while recognizing that parcel-level feasibility ultimately depends on factors that cannot be fully assessed through mapping and desk-based review alone.

5 SITE SELECTION AND SPECIFIC CASES

This section describes the approach used to identify specific sites for further evaluation and explains how a subset of sites was selected for more detailed screening in this Study. The selected sites reflect a range of ownership conditions, well statuses, parcel characteristics, and community contexts to illustrate the types of challenges and opportunities the County may encounter in advancing oil well site transition and potential reuse. For privately owned sites, inclusion in this Study does not imply planned public acquisition; any transfer of ownership would require a willing seller and would be subject to the County's standard real estate due diligence, funding, and other related processes.

The work described here is consistent with Phase 1 Steps 1 to 3 of the Oil Well Reuse Process outlined in Figure 1 and summarized in Table 2. Site-specific figures for each location evaluated in this Study are provided in the Figures section of this report. These figures depict parcel boundaries, well locations and status (where available), surrounding land uses, and historic aerial context to support the feasibility discussion presented in the subsections below and included in Appendix C.

5.1 Specific Sites

Using Geographic Information Systems (GIS) data from CalGEM and the County, EKI mapped the locations of the 42 high priority wells in relation to DACs, Very High/High park need areas, and PRAs. This spatial analysis identified four (4) privately owned sites containing at least one high priority oil well. Two (2) additional sites containing inactive oil wells were included because the County has site control over the land. The six (6) sites identified for evaluation in this Study are:

1. West Carson – Residential (privately-owned)
2. West Carson – Commercial (privately-owned)
3. Rancho Dominguez (privately-owned)
4. West Rancho Dominguez (privately-owned)
5. Fairfax Site (County-owned)
6. Castaic Site (County-owned)

These six sites are presented as specific cases intended to illustrate a range of ownership structures, well-status combinations, parcel sizes, neighborhood contexts, and regulatory conditions characteristic of oil well sites in the unincorporated areas of LA County. While not all of the sites are located within DACs, most are situated within High park need areas, within PRAs, and/or adjacent to DACs, reflecting both equity considerations and practical feasibility conditions.

The sites collectively demonstrate the types of opportunities and constraints associated with both small- and larger-scale redevelopment in unincorporated areas. Among the privately owned sites, some wells originally identified as idle in the 2022 MRS report are now classified as active, and each site contains multiple wells in varying conditions (active, idle, or previously abandoned). This variability underscores the dynamic nature of well status and the need for site-specific technical and regulatory review when evaluating feasibility, timing, and redevelopment potential.

The reuse categories discussed for each site are illustrative only and are not intended as recommendations or endorsements of specific future land uses. Rather, they demonstrate how site-specific factors—such as ownership, environmental conditions, regulatory pathways, parcel configuration, and funding considerations—shape the range of potentially feasible reuse options. Any future reuse would require additional due diligence, community engagement, environmental review, regulatory approvals,

confirmation of well status and remediation requirements, and identification of viable funding and ownership pathways.

5.2 Privately-Owned Sites

5.2.1 West Carson – Residential

The West Carson Residential Site is a vacant 1.24-acre property located adjacent to a single-family residential area as shown on Figure 6a. The site contains six (6) wells that have been plugged, with abandonment activities occurring between January 2024 and August 2025. One of these wells was previously identified in the MRS report as a high-priority idle well; however, its status has since changed following recent plugging activities. All six (6) wells are associated with Brea Canon Oil Company, which remains the identified operator of record with CalGEM.

Although the site is not located within a DAC or PRA, it was identified for potential reuse due to three primary factors: 1) the potential environmental and public health risks posed by the idle well, 2) the site's size, which—while modest in absolute terms—represents a comparatively rare vacant parcel of meaningful scale within a largely built-out residential area and therefore creates opportunity for community-serving redevelopment, and 3) the site is located in West Carson, an area identified as having High park need in the PNA.

Review of historical aerial photographs indicates the Site was used for both agricultural and oil field operations from approximately 1933 to 1952, after which agricultural activities were phased out and oil production became the primary land use through the present. An oil derrick and associated sump are visible on the Site as early as 1933 (Figure 6b). These features represent high-priority Recognized Environmental Conditions (RECs) and should be designated as Areas of Concern during a Phase II ESA.

RECs—defined as the presence or likely presence of hazardous substances or petroleum products resulting from a release or potential release—are identified during the Phase I ESA. These RECs identify areas of concern, or portions of a site where contamination may be present, and typically trigger additional investigation (e.g., a Phase II ESA) to evaluate current environmental conditions, regulatory requirements, and potential liability.

The Phase II ESA warrants a focused investigation using geophysical surveys, soil borings, and targeted sampling of soil, groundwater, and potentially soil vapor for petroleum hydrocarbons (TPH), BTEX, and volatile organic compounds (VOCs) to evaluate the presence, extent, and potential vapor intrusion risks associated with historical releases.

Review of publicly available records from EnviroStor and GeoTracker for environmental investigations and cleanup sites within the Site vicinity indicates the potential presence of off-site contaminant releases that may be affecting groundwater and soil vapor conditions at the Site. These potential off-site sources introduce additional uncertainty and could impact the scope, complexity, and overall cost of Site characterization and remediation efforts.

A thorough review of CalGEM well records is a critical early step in site redevelopment to confirm that the wells have been abandoned in accordance with current regulatory standards, to ensure public safety, regulatory compliance, and project feasibility while avoiding costly delays and liabilities.

Legacy oil and gas wells, including those previously abandoned, may leak methane, oil, or formation water, posing fire, explosion, and contamination risks and potentially compromising structural well integrity if development occurs over or near them. Preparing a Construction Site Well Review (CSWR) with CalGEM is a legally required prerequisite to permit issuance for any site redevelopment on or near oil wells under California Public Resources Code § 3208.1. This requirement applies to all previously plugged

and abandoned wells regardless of the age or standard of the prior abandonment. The CSWR enables CalGEM to verify well locations, evaluate current conditions, and determine whether re-abandonment or other remedial action is required prior to construction. Failure to obtain a CSWR, or to follow CalGEM's resulting guidance transfers full re-abandonment liability to the property owner, developer, or permitting agency.

While CalGEM prepares CSWR documentation and reviews submitted materials for compliance, the operator or responsible party retains responsibility for ensuring that wells are abandoned to current regulatory standards. The need for and outcomes of a CSWR may vary depending on site conditions and the proposed end use, including whether additional measures—such as re-abandonment, setbacks, or vapor/gas mitigation systems—are required to support the intended level of site use (e.g., residential versus commercial). Early coordination through the CSWR process can reduce the risk of late-stage redesigns, construction stoppages, or unforeseen costs associated with re-abandonment, installation of gas mitigation systems, or long-term liability.

Based on parcel size and surrounding land use context, the site illustrates potential capacity for community-serving uses such as park or residential development. However, feasibility would depend on confirmation of well abandonment status, environmental cleanup standards, regulatory pathways, and long-term stewardship considerations.

5.2.2 West Carson – Commercial

The West Carson Commercial Site is an 8.91-acre property improved with a large single-story grocery store and associated paved parking lot, located within an established commercial corridor (Figure 7a). Five (5) plugged wells are present on the site, one (1) of which—located in the southeast corner of the parking lot—was identified in the MRS report as a high-priority idle well.

The high-priority well was reportedly abandoned in September 2022. A detailed review of CalGEM records—including well construction details, abandonment documentation, and confirmation of compliance with current standards—would be an essential early step in evaluating redevelopment feasibility and managing potential long-term liability.

Although the site is not located within a PRA or DAC, it was identified for further evaluation based on three primary considerations: (1) the environmental and human health risks associated with the high-priority well; (2) its proximity to major transportation corridors; and (3) the potential compatibility of a portion of the existing paved parking area with commercial-scale electric vehicle (EV) charging infrastructure.

Given the site's commercial zoning, established access patterns, and substantial paved area, installation of a multi-plug public EV charging facility on a portion of the parking lot may represent a feasible reuse concept. Such infrastructure could potentially be integrated without land use conversion or significant site reconfiguration, subject to confirmation of utility capacity and regulatory approvals.

Historical aerial photographs indicate that the property was used for oil field operations from approximately 1933 to 1968 before redevelopment into a commercial shopping center. Early imagery (Figure 7b) shows oil derricks and associated sumps, which represent high-priority RECs and should be designated as Areas of Concern during a Phase II ESA.

Publicly available records from EnviroStor and GeoTracker indicate the potential presence of off-site contaminant releases in the vicinity that could affect groundwater or soil vapor conditions beneath the site. These factors introduce uncertainty and may influence the scope, complexity, and cost of site characterization and remediation.

Subject to confirmation of environmental conditions, well abandonment status, and regulatory requirements, limited commercial reuse—such as EV charging infrastructure—may be technically feasible. Because the site is commercially zoned, redevelopment could be evaluated under commercial environmental screening levels, which may influence remediation standards, cost, and schedule relative to more sensitive residential uses.

5.2.3 Rancho Dominguez

The Rancho Dominguez Site is a vacant 2.3-acre property located along the southern boundary of the Rancho Dominguez Estates mobile home community (Figure 8a). The Site contains one (1) plugged well, operated by Brea Canon Oil Company, and four (4) active wells, operated by Pacific Coast Energy Company LP. One of these active wells was previously identified in the MRS report as an idle well that was potentially leaking.

Abandonment of one well occurred at this site in May 2003. A thorough review of CalGEM well records is a critical early step in site redevelopment to ensure public safety, regulatory compliance, and project feasibility while avoiding costly delays and liabilities.

Review of historical aerial photographs indicates the Site was used for both agricultural and oil field operations from approximately 1928 to 1968, after which agricultural activities were phased out and oil production became the primary land use through the present. Historical oil derricks and associated sumps and tanks are visible on the Site as early as 1979 (Figure 8b). These features represent high-priority RECs and should be designated as Areas of Concern during a Phase II ESA.

Review of publicly available records from EnviroStor and GeoTracker for environmental investigations and cleanup sites within the Site vicinity indicates the potential presence of off-site contaminant releases that may be affecting groundwater and soil vapor conditions at the Site. These potential off-site sources introduce additional uncertainty and could impact the scope, complexity, and overall cost of Site characterization and remediation efforts.

The Site is located within a DAC and a PRA, indicating that it is situated in a community where environmental and recreational equity considerations are significant. Given the condition and proximity of existing wells to sensitive receptors, any future reuse would require careful coordination of well abandonment, environmental remediation, and regulatory oversight.

Depending on final well status resolution and cleanup standards, the parcel could be evaluated for neighborhood-serving uses such as park and open space, community garden space, or residential development. The Site's dedicated access road—unlike other sites located within gated mobile home parks—provides logistical flexibility that may facilitate future decommissioning and redevelopment efforts.

Achieving reuse would require coordinated efforts with CalGEM, relevant environmental oversight agencies, and community stakeholders to address cessation of oil production, well abandonment or re-abandonment as necessary, and confirmation of site conditions prior to any redevelopment.

5.2.4 West Rancho Dominguez

The West Rancho Dominguez Site is a 3.19-acre property consisting of three parcels located between a heavy industrial zone and a single-family residential neighborhood (Figure 9a). The site contains three (3) active wells, two (2) of which were previously identified as high-priority idle wells in the MRS report.

Historical aerial photographs indicate that the site transitioned from agricultural use (1938–1941) to continuous oil production beginning in 1941. Early imagery (Figure 9b) shows oil derricks, sumps, and

tanks that represent high-priority RECs and should be designated as Areas of Concern during a Phase II ESA.

Publicly available records from EnviroStor and GeoTracker indicate the potential presence of off-site contaminant releases that may affect groundwater and soil vapor conditions beneath the site. These factors introduce uncertainty and may influence the scope, complexity, and cost of site characterization and remediation.

Because no well abandonment has occurred at this site, coordinated cessation of production and well abandonment would be a prerequisite to redevelopment. Advancing abandonment would require engagement with operators and regulatory agencies to address compliance obligations, bonding requirements, and timing of decommissioning activities. Early coordination would reduce long-term liability risks and support safer, more predictable site transition.

The site's location within a DAC and a PRA, combined with its proximity to residential uses and limited park access in the surrounding community, highlights the potential relevance of neighborhood-serving reuse concepts. However, the presence of active wells and their proximity to sensitive receptors would require sequencing of production cessation, abandonment or re-abandonment as necessary, and environmental remediation prior to any redevelopment.

Subject to resolution of well status, regulatory clearance, and confirmation of environmental conditions, the parcel could be evaluated for community-serving uses such as park and open space, community garden space, or residential development, depending on cleanup standards, funding feasibility, and community input.

5.3 County-Owned Sites

5.3.1 Fairfax Site

The Fairfax Site is a vacant 7.54-acre property owned by the County and is located along the southern boundary of the IOF of Baldwin Hills as shown on Figure 10a. The Site contains seven (7) plugged oil wells. Sentinel Peak Resources LLC is listed as the operator of the wells. These wells were not a part of the previous MRS report; however, they are located on County-owned land and within a PRA as identified in the PNA+. According to CalGEM, the seven (7) previously plugged wells were not abandoned to current plugging and abandonment requirements. To meet these requirements, the wells would need to be re-abandoned. Environmental site assessment activities are underway to evaluate potential contamination, soil stability, and/or vapor intrusion risks, and additional investigation may be required to support future site reuse.

Review of historical aerial photographs indicates the Site had been continuously used for oil field operations since approximately 1971, although the larger IOF has been actively used as an oil field as early as 1927. Historical oil derricks and associated sumps are visible on the Site as early as 1971 (Figure 10b). These features represent high-priority RECs and should be designated as Areas of Concern during a Phase II ESA.

The well abandonments at this site occurred in April 1991; however, as noted above, they do not meet current regulatory standards. A review of available well records and site conditions will be an important component of ongoing and future site evaluation efforts to confirm well status, support regulatory compliance, and inform project feasibility while avoiding costly delays and liabilities.

Because the Site is under the jurisdiction of the LA County Department of Parks and Recreation and is anticipated for park-related use, careful coordination among regulatory agencies, responsible parties, and County departments will be important to support future reuse of the property. Planning efforts should

consider how site design, environmental conditions, well status, access, and ongoing site management can be addressed in a manner compatible with park-related use. Specific programming, phasing, and design should be informed through community engagement, environmental review findings, regulatory requirements, funding availability, and long-term stewardship considerations.

5.3.2 Castaic Site

The Castaic Site is a vacant 52.5-acre property owned by the County and is located along the southern boundary of the Ryan M. Clinkunbroomer Castaic Sports Complex in Castaic, California as shown on Figure 11a. The Site contains two (2) idle oil wells operated by Anterra Services Inc. and one (1) idle oil well operated by Jean Martinez. Other wells identified in the area include two (2) plugged dry hole wells, each one operated by a different operator. All wells on the Site were not a part of the previous MRS report, however, they are located on County-owned land within a semi-rural area.

Review of historical aerial photographs indicates the Site was used primarily for agricultural field operations from approximately 1930 to 1952, after which agricultural activities were phased out, and oil production became the primary land use through the present. Historical oil derricks are visible on the Site as early as 1952 and additional oil-well related features appear on the Site in 1989 (Figure 11b). These features represent high-priority RECs and should be designated as Areas of Concern during a Phase II ESA.

Review of publicly available records from EnviroStor and GeoTracker for environmental investigations and cleanup sites within the Site vicinity indicates the potential presence of nearby off-site contaminant releases; however, the extent to which these sources may influence groundwater and soil vapor conditions at the Site would require site-specific investigation. These potential off-site sources introduce additional uncertainty and could impact the scope, complexity, and overall cost of Site characterization and remediation efforts.

Negotiating with operators to properly abandon idle wells is a critical early step in site development and requires a coordinated strategy that leverages legal, regulatory, and financial mechanisms, often with the involvement of legal counsel and state oversight agencies. Achieving early agreement on well abandonment reduces the risk of methane leaks, uncontrolled releases, and subsurface fluid migration that could pose fire, explosion, or contamination hazards to nearby communities and future site users. For the idle wells on this site, a review of available well records and site conditions will be an essential component of early redevelopment planning to ensure public safety, regulatory compliance, and project feasibility while minimizing the risk of costly delays and long-term liabilities.

Because the Site is under the jurisdiction of the LA County Department of Parks and Recreation and is adjacent to County-operated recreational facilities, it may support future park expansion, subject to confirmation of well abandonment status and environmental conditions. Specific programming, phasing, and design would be determined through community engagement, environmental review findings, funding availability, and long-term stewardship considerations.

5.4 Cross-Site Observations and Implications

Across the specific sites evaluated, review of publicly available environmental databases, including EnviroStor and GeoTracker, indicates the potential presence of nearby off-site contaminant releases at multiple locations, particularly those situated in more urbanized or historically industrial areas. These releases are commonly associated with legacy industrial and commercial land uses, including petroleum storage and handling, historical dry cleaning operations, and automotive-related activities.

However, the extent and relevance of these nearby off-site releases vary by site. In some cases, particularly in less urbanized or more rural settings, fewer nearby documented releases may be present, although site-specific investigation would be needed to confirm surrounding conditions. This pattern

reflects the broader land use context in which many oil well sites are located and highlights the importance of accounting for potential off-site influences in feasibility assessments and redevelopment planning.

As a result, groundwater and soil vapor conditions at certain sites may be influenced by sources beyond their site boundary, introducing additional uncertainty and potentially increasing the scope, cost, and regulatory complexity of site investigation and remediation. These factors should be considered early in planning to help align site characterization, risk management, and future land use objectives.

6 COORDINATION, COMMUNITY PRIORITIES, AND CASE EXAMPLES

This section examines how interagency coordination and community engagement shape the transition of former oil well and oil production sites in LA County. It describes the County's approach to aligning departmental roles, integrating community priorities into feasibility discussions, and sequencing engagement alongside regulatory and enforcement actions. The section also presents case examples that illustrate how different coordination structures, community dynamics, and regulatory pathways have influenced site stabilization and potential reuse outcomes.

6.1 Coordination with LA County Agencies

Coordination among County departments is critical to ensure consistent messaging, sequencing, and expectations related to remediation, reuse, and community engagement. Because former oil well sites implicate multiple regulatory authorities, technical disciplines, and policy objectives, effective transition requires alignment across departments responsible for environmental oversight, land use planning, public health, infrastructure, and community engagement.

The CSO plays a convening and coordinating role across this work, helping align site transition efforts with the County's broader sustainability and just transition goals. The Office of Oil and Gas (OOG), housed within Public Works, serves as a central interdepartmental coordinating body on oil and gas issues, convening regular meetings that include Regional Planning, Public Works, Public Health, the CSO, and other relevant departments. Interdepartmental coordination helps clarify agency roles, regulatory responsibilities, and points of contact for communities.

Alignment across departments reduces duplication of engagement efforts, supports clearer communication with residents, and helps ensure that community input is meaningfully incorporated into policy, planning, and feasibility discussions. It also supports appropriate sequencing of regulatory, technical, and planning activities so that engagement does not outpace what is technically or legally feasible.

Ongoing coordination is particularly important where engagement efforts are occurring in parallel with regulatory or enforcement actions led by other entities. In such circumstances, clear delineation of roles and transparent communication can help manage expectations and maintain public trust.

6.2 Integration of Priorities

Community engagement is intended to surface local priorities, concerns, and aspirations related to site remediation and potential reuse. Input from community members may include desired reuse types (e.g., parks and open space, affordable housing, community facilities), health and safety concerns, and preferences related to site design and programming. Engagement efforts should be informed by existing County planning tools and equity frameworks, including prioritization of Disadvantaged Communities and areas with high environmental burden.

Community priorities should be considered alongside technical feasibility, regulatory requirements, and funding constraints when evaluating potential reuse pathways. Community priorities are not static and may evolve as additional information becomes available regarding site conditions and implementation considerations. As a result, engagement should be viewed as an ongoing process that informs multiple phases of site evaluation and implementation, rather than a single decision point. Early engagement can help shape reuse concepts and identify concerns, while later engagement can support refinement of designs, sequencing of uses, and long-term stewardship approaches.

6.3 Case Examples

This section presents a set of illustrative case studies that demonstrate different approaches to addressing former oil well and oil production sites in LA County. Together, these examples highlight a range of pathways—including sustained community-led visioning, public acquisition following regulatory cleanup, and State-led well plugging and abandonment—that may inform future reuse considerations. While levels of community engagement vary across these cases, each provides relevant lessons related to sequencing, coordination, funding, and long-term outcomes for oil site transition.

6.3.1 Jefferson Site

The Jefferson Drill Site in South Los Angeles provides an illustrative example of sustained, community-led engagement around the future of a former oil drilling site and offers important lessons relevant to this Study. Located at 1371 W. Jefferson Boulevard near the intersection of Jefferson Boulevard and Van Buren Place, the site historically operated as an urban oil drilling facility with multiple oil wells and associated drilling infrastructure and was most recently operated by Sentinel Peak Resources. Community organizing efforts led by Redeemer Community Partnership (RCP) began in 2013 while the site was still active and continued through site shutdown efforts that culminated in 2018. These organizing efforts were driven in part by documented community concerns related to noise, petroleum odors, and potential health impacts associated with proximity to active oil operations, underscoring the lived experience of residents adjacent to urban drilling sites.

Building on this foundation, community visioning efforts were carried out over multiple years through a collaborative process led by RCP, in partnership with the Los Angeles Neighborhood Land Trust (LANLT), engaging nearby residents and stakeholders to identify future uses for the site. In 2023, this work included community visioning workshops that further refined reuse priorities. Through this engagement process, community members articulated priorities that include a neighborhood park, a community center, and affordable housing, reflecting long-standing community needs and aspirations for reinvestment in a historically burdened area. LANLT subsequently acquired the property in 2023 and, together with RCP, is advancing plans for redevelopment. This acquisition was made possible through a combination of public funding sources, including a state grant supporting land purchase and additional funding for park development, highlighting the importance of layered financing strategies in enabling site transition and reuse.

Progress at the Jefferson Site has required navigating complex and interrelated environmental, legal, and financial challenges over an extended period of time. These challenges have included addressing site contamination and well conditions, clarifying regulatory requirements, securing site control, assembling funding for environmental assessment and remediation, and aligning land reuse planning with the pace and uncertainty of technical and regulatory processes. The site is currently in the environmental assessment and remediation phase, with oversight from state regulatory agencies to evaluate soil conditions and determine appropriate cleanup actions. Progress has been incremental, underscoring that reuse of former oil sites is rarely linear and often requires sustained effort across multiple phases.

In addition to long-term visioning, the Jefferson Site is also serving as a location for interim, low-intensity site activation and learning. An experimental “Test Plot” has been established on a portion of the site as a community-based restoration and stewardship effort. The Test Plot functions as a temporary, hands-on space for site activation, bringing together residents, volunteers, and youth through community planting days and ongoing workdays. The Test Plot is intended to support limited, managed use of the site while informing future design decisions, including testing native and culturally specific plant palettes and engaging community members in stewardship activities. Recent community workdays have included planting activities and early-stage restoration efforts intended to support ecological learning, stewardship, and community engagement. Consistent with the broader Test Plot model, the effort

emphasizes iterative learning, ecological restoration, and community care, while also incorporating youth leadership and workforce development through hands-on participation and training.

For the purposes of this Study, the Jefferson Site illustrates several key considerations. First, meaningful community leadership and visioning can occur early, even as technical and regulatory work is ongoing. Second, the sequencing of remediation, funding, interim uses, and long-term reuse is critical and may extend over many years, requiring realistic expectations and sustained coordination. The Jefferson Site further demonstrates a phased trajectory from site closure (2018) to acquisition (2023), followed by remediation, interim activation, and anticipated long-term redevelopment, with a projected buildout timeline extending into the latter part of the decade. Finally, the Jefferson Site highlights the important role that community-based organizations and land trusts can play in stewarding complex reuse efforts, particularly where trust-building, local knowledge, and long-term engagement are essential to advancing equitable outcomes.

While the Jefferson Site reflects a unique set of circumstances, it serves as a valuable case study for understanding both the opportunities and constraints associated with transforming former oil drilling sites into community-serving assets. It also highlights the potential for community-driven redevelopment models to complement regulatory phase-out policies by ensuring that formerly industrial sites are not only remediated, but thoughtfully reintegrated into the urban fabric as long-term community assets.

6.3.2 Whittier Oil Field

The Whittier Oil Field illustrates a regulatory- and transaction-driven pathway for large-scale oil field remediation and public acquisition, demonstrating how extensive environmental cleanup, risk assessment, and coordinated negotiations enabled the transition of former oil production lands to permanent park and open space uses. The site consists of approximately 1,280 acres of land in Whittier, California, portions of which were used for oil field activities beginning in the early 1900s. Following investigation and remediation overseen by state regulatory agencies, Chevron U.S.A. and Unocal completed well abandonment and environmental cleanup obligations prior to property transfer, and subsequently sold the properties to the City of Whittier for long-term use as parks and open space.

Remediation responsibilities were addressed primarily by the operators prior to transfer, including well abandonment, cleanup activities, and regulatory closure actions. Independent technical evaluation of the adequacy of this cleanup was conducted with support from nonprofit partners, including funding provided by the Trust for Public Land. Property acquisition and associated transaction costs were funded by public funding sources, such as Proposition A park funding, in combination with financial and technical assistance from nonprofit and regional partners.

Redevelopment of the Whittier Oil Field required addressing extensive historical oil production infrastructure and environmental impacts. Oil field operations included well drilling and workovers, caustic water flooding, radioactive tracer injection, oil and water separation, and gas compression. Environmental due diligence investigations identified more than 500 oil production and injection wells, as well as sumps, pipelines, production facilities, a landfill, and other areas of concern. Chemicals of concern included petroleum hydrocarbons, benzene, toluene, ethylbenzene, and xylenes (BTEX compounds), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), metals such as arsenic and lead, and radioactive materials.

Several factors contributed to the successful transition of the Whittier Oil Field to public open space. Environmental liabilities were evaluated through focused review of areas with the highest potential for contamination, confirmation that investigations addressed the full range of chemicals historically used at the site, and assessment of human health, surface water, and ecological risks using ASTM Risk-Based Corrective Action (RBCA) procedures. Remedial activities were completed pursuant to agreements

negotiated among the sellers, the City of Whittier, and regulatory agencies, including provisions that allowed certain remediation activities to occur after close of escrow.

The City of Whittier received financial assistance for this site acquisition from the Trust for Public Land and the Santa Monica Mountains Recreation and Conservation Authority, both of which had prior experience facilitating acquisition and reuse of former industrial properties for open space and recreational purposes. These partners supported due diligence, including independent review of cleanup activities, as well as transaction structuring and acquisition financing, helping the City navigate the technical, financial, and logistical complexities associated with the evaluation and acquisition of a site of this scale. Consultants, including EKI, also supported technical evaluation of site conditions and cleanup adequacy as part of this due diligence process.

For the purposes of this Study, the Whittier Oil Field illustrates how large, contiguous oil production properties can be transitioned to public open space when supported by substantial financial resources, experienced nonprofit partners, and clearly defined regulatory pathways. It also demonstrates a clear sequencing of responsibilities, in which operators fund and complete core remediation, nonprofit partners help finance and conduct independent technical evaluation, and public agencies leverage dedicated funding sources to acquire land for long-term community use. While the scale, ownership structure, and level of investment associated with the Whittier Oil Field differ significantly from many of the smaller, privately owned sites evaluated in this Study, this case may offer relevant lessons for future reuse considerations at larger sites, such as the Inglewood Oil Field, where coordinated remediation, phased reuse, and public or nonprofit involvement may be more feasible over time.

6.3.3 Damson Site, Venice Beach

The former Damson Oil site at Venice Beach illustrates reuse outcomes following State and local government-led remediation of an abandoned oil site, highlighting how a contaminated beachfront property was ultimately transformed into a public recreational amenity through regulatory action, public investment, and long-term stewardship. The site, which operated as an oil production facility during the 1970s and 1980s, is located directly on the beach near the Venice Boardwalk. After oil production ceased in 1989, Damson Oil Corporation filed for bankruptcy and abandoned the site, leaving behind significant contamination and infrastructure without a responsible operator to complete site restoration, effectively creating an orphaned oil site requiring public sector intervention.

In the early 1990s, the City of Los Angeles assumed responsibility for addressing the site's environmental conditions following years of unresolved contamination issues, working in coordination with State regulatory agencies, including DTSC, which oversaw aspects of site investigation and cleanup. Conditions at the site included contaminated soils, oil-filled sumps, and unused pipelines. The City pursued legal action to recover cleanup costs but ultimately recovered only a portion of the funds required for remediation, with public resources covering the remaining costs. Cleanup efforts were complex and contentious, reflecting both the technical challenges of remediation in a coastal environment, including proximity to groundwater and the Pacific Ocean, and the absence of a viable private operator.

Following completion of remediation activities, the site was converted into public recreational space, including what is now the Venice Beach Skate Park and adjacent beach amenities. The reuse relied heavily on hardscape design, with extensive concrete features that limited direct interaction with underlying soils, a design approach that also functions as an engineering control to reduce potential exposure pathways. While the broader beachfront area reopened earlier, the Venice Beach Skate Park itself was completed and opened to the public in 2009, and has since become a well-known recreational destination.

For the purposes of this Study, the Damson site illustrates several relevant considerations. First, orphaned oil sites can impose substantial financial and administrative burdens on public agencies when responsible

parties are no longer viable, often requiring long-term public funding and interagency coordination to achieve site closure and reuse. Second, reuse outcomes may be shaped by the need to minimize exposure pathways, particularly through the use of hardscape-based recreational amenities. Finally, the Damson site demonstrates how highly constrained locations—such as coastal or urban public spaces—can still be successfully reintegrated into community use following remediation, albeit through uses that are compatible with long-term site management considerations, including ongoing monitoring and maintenance requirements associated with previously contaminated sites.

While the Damson site reflects a unique coastal and urban context, it offers valuable lessons for understanding how abandoned oil sites may be addressed when private responsibility is absent, and how design choices can support safe public use under constrained conditions. It also highlights the critical role of State oversight and local agency leadership in advancing remediation and reuse in situations where no responsible party remains.

6.3.4 AllenCo (St. James) Site

The AllenCo (St. James) site in the City of Los Angeles illustrates a State-led response to long-standing public health and safety concerns at a former oil production site with a history of operator noncompliance. The site includes 21 oil wells and an on-site tank facility and is located within a dense residential area in the University Park neighborhood. The approximately two-acre site is owned by the Archdiocese of Los Angeles and was operated by AllenCo Energy, Inc. Community concerns regarding odors, emissions, and potential health impacts, including reported symptoms such as headaches and nosebleeds, were raised over many years by neighborhood residents and organizations, including Esperanza Community Housing Corporation. The site is also located near homes and the Girls Academic Leadership Academy (GALA), a public grades 6–12 school. Parents and members of the school community were active participants in recent public meetings related to site conditions and well closure activities. The site was the subject of sustained media coverage and regulatory scrutiny due to its proximity to sensitive receptors and documented community complaints.

Due to repeated violations and the operator’s failure to adequately address site conditions, multiple public agencies pursued enforcement actions over an extended period. These actions included investigations and enforcement by CalGEM and the South Coast Air Quality Management District (SCAQMD), including a temporary shutdown of operations in 2013 following odor complaints and air quality concerns. The wells were active prior to this regulatory intervention, with approximately seven to ten of the site’s 21 wells producing before operations were shut down later that year, after which the site remained idle while regulatory and enforcement actions continued. Following years of community advocacy and regulatory action, in 2022, the State, through CalGEM, assumed control of the site under its expanded orphan and deserted well program, depressurized all 21 wells, and initiated plugging and abandonment activities. Plugging work began in late 2023. As of February 2026, all 21 wells at the site have been permanently plugged and sealed (LA Times, 2026; Esperanza Community Housing Corporation, 2026).

The AllenCo site demonstrates the critical role of State intervention in addressing high-risk oil wells where no viable operator remains, particularly in densely populated communities with sensitive receptors nearby. While the project is focused on well plugging and site stabilization rather than land reuse, it represents an essential precursor step that reduces long-term environmental and public health risks and may enable future discussions about site conditions and potential land use as remaining regulatory processes are completed. At this site, community efforts were primarily focused on immediate health and safety concerns, with consideration of future reuse emerging only after the wells were permanently plugged, reflecting a sequencing in which risk reduction and regulatory stabilization precede land use planning. Given the site’s location within a residential community and its history of sustained public

concern, any future reuse planning should provide opportunities for continued public review and input, even though the site remains privately owned.

6.3.5 West Hills Site

The West Hills site within the Canoga Park Oil Field illustrates a State-directed well plugging and abandonment effort focused on reducing public safety and environmental risks at inactive oil wells located near active recreational uses. The site includes six oil wells situated in the West Hills area of Los Angeles, in close proximity to heavily used open space and recreation areas. Access to the well sites is provided via Victory Trail and El Escorpion Trail, and a portion of the access route lies within El Escorpion Park in the City of Los Angeles, highlighting the interface between legacy oil infrastructure and publicly accessible parkland and trail systems.

The wells were previously operated by multiple entities, including Cache Oil Company, Canoga Oil Company, Frank Knapp, Liu Cheng, and Lin. Persistent violations and failure to meet regulatory requirements led CalGEM to issue orders requiring the plugging and abandonment of the wells. These conditions, combined with the proximity of the wells to residences and public trails and recreational users, elevated the priority for State intervention under CalGEM's risk-based well management framework. In contrast to sites where reuse planning proceeds concurrently with abandonment, this project reflects a regulatory enforcement pathway in which well closure is prioritized to address immediate risk conditions.

Plugging activities began in October 2025, with completion anticipated in 2026. The effort is being led by the State through CalGEM's orphan and deserted well program, supported in part by State and federal funding for well remediation, as part of its broader program to address high-risk inactive and orphaned wells, particularly where site conditions or surrounding land uses elevate public exposure concerns. The project also illustrates how well closure activities in open space settings can temporarily affect recreational access, including temporary closure of El Escorpion Trail, even while nearby connector trails remain available for hikers and mountain bikers, requiring coordination with local park agencies and clear public communication regarding access and safety.

The West Hills site demonstrates the importance of timely State intervention to stabilize oil well sites, especially in areas with significant public access. While the project is not focused on land reuse, successful well abandonment represents a critical step toward reducing long-term liabilities and preserving future options for site management or compatible open space uses, including continued recreational use once site conditions are stabilized and access is fully restored.

6.3.6 Synthesis of Case Study Lessons

Taken together, the Jefferson Site, Whittier Oil Field, Damson Site, AllenCo, and West Hills cases illustrate that there is no single pathway for transitioning former oil production sites toward safer conditions or community-serving outcomes. Each case reflects different site scales, ownership structures, regulatory contexts, and levels of public, nonprofit, and State involvement, as well as differing sequences of responsibility among operators, public agencies, and third-party partners.

The Jefferson Site highlights the importance of sustained community leadership, incremental progress, and interim uses over extended timelines when reuse is pursued in densely populated neighborhoods, with a phased trajectory from site closure to acquisition, remediation, interim activation, and eventual redevelopment. The Whittier Oil Field demonstrates how large, contiguous oil production properties may be successfully converted to open space when supported by substantial financial resources, experienced partners, and clearly defined regulatory pathways, including a structured sequencing in which operators complete core remediation, nonprofit partners support independent technical evaluation and transaction structuring, and public agencies fund acquisition and long-term reuse. The Damson Site illustrates the challenges associated with orphaned oil well sites, including the financial burden placed on public

agencies and the role that hardscape-based reuse can play in managing long-term risk, particularly where engineering controls are necessary to limit exposure in sensitive environments such as coastal areas.

By contrast, the AllenCo and West Hills cases demonstrate State-led well plugging and abandonment efforts focused on immediate public health and safety concerns, particularly where no viable operator remains or where site conditions and surrounding land uses elevate risk. These cases reflect a risk-based regulatory prioritization approach, in which State agencies intervene to stabilize high-risk wells before any consideration of land reuse. These projects underscore that well closure and site stabilization are often necessary precursor steps before land reuse can be realistically considered and evaluated, especially in densely populated or highly sensitive locations, including residential neighborhoods and publicly accessible open space and recreation areas.

Collectively, these examples reinforce that remediation, stabilization, and reuse efforts must be tailored to site-specific conditions, and that feasibility, sequencing, regulatory authority, and institutional capacity are critical factors in determining what outcomes may be achievable over time. They also highlight the importance of clearly defining roles and funding responsibilities across project phases, which may be shared among operators, public agencies, nonprofit partners, and other stakeholders. The case studies further highlight the importance of distinguishing between projects intended to advance near-term risk reduction and those positioned for longer-term community-serving reuse, as well as recognizing that these pathways may occur sequentially over extended timeframes rather than concurrently.

7 COMMUNITY-SERVING REUSE FRAMEWORK AND FEASIBILITY CONSIDERATIONS

This section applies the reuse framework to evaluate community-serving reuse pathways across different site types. It examines how community priorities, technical constraints, regulatory requirements, cost considerations, and long-term stewardship factors collectively influence which reuse options may be feasible under varying conditions.

7.1 Reuses Considered in Feasibility Study

Each of the sites identified in this Study were considered for a range of community-serving uses, including:

- Parks and Open Space
- Affordable Housing
- Community Gardens and Urban Agriculture
- Electric Vehicle (EV) Charging Stations

These reuses were selected based on documented Countywide needs related to park access, housing affordability, food access, and transportation electrification, particularly in communities experiencing elevated environmental and public health burdens.

Oil well sites may support one or more of these uses, depending on site-specific conditions and community context. In practice, reuse may also include a combination of compatible uses—such as open space, community facilities, and housing—particularly on larger or more complex sites. For privately owned sites, redevelopment may be led by the private sector, with community-serving components incorporated as part of a broader project, influenced by community priorities as well as local policies and incentives—such as zoning requirements, development agreements, or public funding programs—that support inclusion of affordable housing, open space, or other community-serving uses. In many cases, redevelopment of privately owned sites may also be influenced by the availability of private capital, which can enable more timely site transition compared to public acquisition, particularly where public funding is limited.

Community perspectives play a critical role in shaping discussions about reuse. Preliminary discussions and previously documented community feedback, including input from members of the Stand Together Against Neighborhood Drilling – Los Angeles (STAND-LA) coalition, underscore that reuse preferences vary significantly by site and by community. While no single reuse outcome is universally preferred, certain priorities are frequently expressed across neighborhoods impacted by oil and gas operations. Parks and open space, affordable housing, and community gathering places are among the most commonly cited reuse options, reflecting a strong desire for projects that deliver lasting and visible community benefits. Residents have also highlighted the importance of health- or education-related facilities that address long-standing service gaps, as well as cultural spaces, small business opportunities, and renewable energy projects that both create jobs and advance environmental goals.

For the purposes of this Study, these recurring themes help illustrate the range of community aspirations that may inform future reuse discussions. However, translating these desires into feasible projects requires careful consideration of technical constraints, regulatory requirements, ownership conditions, funding availability, and long-term stewardship considerations.

7.2 Stigma and Long-Term Concerns

Former oil wells and production sites have been part of numerous communities across LA County for decades. A narrative that forms around such sites is that they are contaminated and a threat to human

health and the environment. In reality, these sites can be cleaned up and returned to a variety of beneficial uses. However, particularly in communities that have experienced the impacts of oil operations over many years, distrust and lingering frustration over past complaints about noise, odors, and other unresolved issues may persist. As a result, redevelopment of these sites requires careful communication, transparency, and sustained engagement to build community trust.

Concerns about the suitability of former oil well sites for housing often reflect these broader perceptions about long-term health and safety. Regulatory frameworks, however, require remediation to land use-specific standards, and residential development is permissible where cleanup criteria and ongoing monitoring requirements are satisfied.

From a technical standpoint, the primary long-term issue of potential concern is the oil wells. Even when they have been abandoned to current standards, there is potential for the wells to begin leaking again in the future as abandonment materials have a finite service life—generally estimated at 50 to 100 years—and may be impacted by external forces such as seismic events. For this reason, it is generally advisable to avoid constructing occupied structures directly over abandoned wells. As a result, residential development on smaller oil well sites may present additional design and risk management considerations, particularly where it is not feasible to redevelop portions of the site without building over or in close proximity to existing wells. In such cases, housing may require enhanced engineering controls, building setbacks, or vapor mitigation systems to meet applicable regulatory standards.

Certain park uses that rely primarily on hardscape rather than direct interaction with native soils may be particularly well suited for former oil well sites. For example, skate parks typically involve the placement of reinforced concrete slabs and features, which can limit exposure pathways associated with underlying soils while accommodating active recreational use. This type of use may reduce the need for extensive soil disturbance or soil contact management compared to other park amenities.

At the same time, the selection of specific park amenities—including whether a skate park or other active recreation features are appropriate—must be informed by community input and local priorities. While this Study can identify uses that may be technically compatible with site constraints, decisions about programmatic elements should be guided by engagement with nearby residents and stakeholders to ensure that reuse aligns with community needs and expectations.

While design approaches such as hardscape-based park uses can help address some exposure and perception concerns, site reuse must still account for underlying environmental conditions and long-term risks. In addition to conventional remediation methods, emerging approaches such as bioremediation may offer supplemental strategies for addressing certain soil or groundwater contaminants at former oil well sites. Bioremediation techniques—using plants, fungi, or microorganisms to support contaminant breakdown—have been applied in other brownfield contexts and may be appropriate for limited conditions depending on site characteristics, regulatory acceptance, and performance requirements. While not evaluated as part of this Study, such approaches may warrant further exploration through pilot projects or site-specific analyses as part of future remediation planning.

The soil, soil vapor, and groundwater contamination that may be associated with oil well sites can be remediated to be safe for the uses recommended in this Study, subject to the following caveats:

- Activities involving direct and sustained contact with native soils should be carefully evaluated due to the history of oil production at many sites. Where community gardens or urban agriculture are pursued, use of raised beds with clean imported soil and separation from underlying soils may be appropriate, depending on site-specific investigation findings.

- Enclosed structures will require vapor mitigation systems to limit the potential for indoor air exposures for methane and other gases, even where structures are not located directly over a well, as gases may migrate beyond the immediate well location.
- Parks and electric vehicle charging stations may present fewer long-term exposure considerations in some cases due to lower hours of occupation and the absence of enclosed residential structures. However, residential and other occupied uses may still be feasible where remediation standards are met and appropriate engineering controls are incorporated into site design.

In all cases, site designs should maintain appropriate access to abandoned oil wells to allow for inspection, monitoring, and any future maintenance or corrective actions.

In parallel with efforts to remediate and reuse former oil well sites, there has been increasing discussion within the industry and among regulators about the potential reuse of oil wells and associated subsurface infrastructure themselves. Recent conferences and industry forums, including those focused on orphan, idle, and marginal wells, have explored concepts such as gravity-based energy storage, monitoring applications, geothermal or subsurface thermal uses, and other emerging approaches intended to derive value from existing well infrastructure. While these concepts continue to evolve and may hold long-term potential in certain contexts, they remain highly site-specific, technically complex, and subject to regulatory uncertainty. As a result, this Study focuses on the safe abandonment of oil wells to current standards, the need for continued access and long-term stewardship, and the reuse of the surface land rather than on the reuse of the wells themselves.

7.3 Cost of Reuse

Each of the privately owned sites evaluated in this Study appear to have viable operators who would remain responsible for well abandonment or re-abandonment under applicable regulatory requirements. As discussed earlier, a key factor in enabling reuse is reaching agreement that operators will complete well abandonment and associated environmental remediation to standards acceptable to a prospective buyer or public entity. Regulatory requirements, declining economic returns from oil production, and evolving policy expectations may collectively create pressures that encourage operators and property owners to pursue abandonment and transition toward reuse.

Although site-specific costs were not estimated as part of this Study, plugging and abandonment of oil wells typically represents a substantial component of overall site reuse costs. Current planning-level estimates for onshore oil well plugging and abandonment in LA County commonly range from approximately \$175,000 to \$750,000 per well, with costs potentially exceeding \$1 million per well for deeper, older, or more complex wells, particularly in urban settings or where re-abandonment is required. Actual costs depend on well construction, depth, site access, regulatory requirements, and subsurface conditions. These ranges are provided for contextual purposes only and are not intended to represent site-specific cost estimates.

Beyond well abandonment and remediation, the overall cost of redevelopment varies significantly depending on site conditions, ownership structure, regulatory requirements, and the intended reuse. Public agencies may influence the feasibility and cost of redevelopment through a combination of regulatory authorities—such as land use and zoning controls, permitting, and development review—as well as financial, policy, and programmatic tools, including tax incentives, grants, transaction assistance, or technical support. Together, these mechanisms can help shape the timing, sequencing, and viability of site transitions from oil production to reuse. Non-profit organizations may play a leading or supporting role by initiating or facilitating transactions, community engagement, site acquisition, or pursuit of external funding opportunities.

The total cost of transitioning a site from oil production to a new community-serving use—including well abandonment, environmental remediation, site preparation, land acquisition (where applicable), and vertical development—varies significantly by reuse type. Reuses that involve long-term occupancy, extensive building construction, or deep subsurface disturbances—such as affordable or market-rate housing—generally entail higher total project costs and more complex risk management considerations.

Lower-intensity uses such as electric vehicle charging or open space typically involve lower overall development costs and fewer structural requirements. At the same time, higher-intensity uses—such as market-rate housing—may offer greater revenue-generating potential, which can make them more financially viable or attractive for private property owners in cases where public-sector funding or involvement is limited.

In addition to upfront costs associated with land acquisition, well abandonment, remediation, and site development, long-term operations and maintenance (O&M) funding represents an important consideration across a range of potential reuse types. Ongoing costs may include landscape maintenance, irrigation, security, utilities, inspections, and periodic monitoring related to site conditions. These recurring obligations can influence both the feasibility and sustainability of reuse projects and should be considered early in planning discussions, alongside strategies for identifying dedicated funding sources or partnerships to support long-term stewardship.

7.4 Interim and Transitional Uses

Given the complexity, cost, and extended timelines often associated with remediation and reuse of former oil well sites, particularly for higher-intensity uses, interim or transitional uses may play an important role in advancing site transitions. Such uses can allow initial well abandonment or remediation activities to occur while generating limited site activation, community benefit, and/or revenue without precluding future reuse options.

Examples of interim or transitional uses may include surface parking, electric vehicle charging, temporary open space, test plots, or other low-intensity activities that minimize soil disturbance and do not require long-term occupancy. In some cases, interim uses may also include limited-duration infrastructure or energy-related uses that generate revenue and support site transition, provided they are compatible with site conditions and do not preclude future reuse options. These uses should be developed with opportunities for community input to ensure alignment with local priorities and concerns. When designed intentionally, these uses can support sequencing by offsetting holding costs, maintaining site access, building community familiarity, and informing future design decisions.

For the purposes of this Study, interim uses are not viewed as final outcomes but as potential tools to support phased implementation, learning, and flexibility as funding, regulatory approvals, and long-term reuse plans evolve.

7.5 Community Health and Safety Plans

In addition to interim and transitional uses, community health and safety considerations remain critical during well abandonment, remediation, and early reuse phases. As described in a recent Department of Public Health (DPH) report to the Board of Supervisors, Community Health and Safety Plans (CHSPs) are intended to provide nearby residents with clear, accessible information about site activities, regulatory oversight, potential hazards, and appropriate response actions (County of Los Angeles, 2025b).

CHSPs are designed to address longstanding community concerns by documenting when site work is occurring, which agencies are responsible for oversight, how communities will be notified of planned activities or incidents, and what measures are in place to protect public health. While CHSPs will soon be

required for active oil and gas operations, they are also intended to apply during plugging and abandonment activities, when site conditions and risks may change. Additional site activities during transition—such as re-abandonment, environmental remediation, and monitoring—can similarly present temporary risks or disruptions, reinforcing the importance of clear communication and coordinated oversight.

Extending CHSP coverage across these phases helps ensure continuity in communication and protection, particularly as sites move from active use toward closure and reuse. In these contexts, CHSPs can help ensure that nearby residents are informed about ongoing work, understand potential hazards, and know how to report and respond to concerns or incidents. Effective implementation will require coordination with DPH and other regulatory agencies to align requirements, clarify roles, and ensure that CHSPs remain responsive to changing site conditions over time. These plans can complement interim uses and help bridge the gap between remediation activities and longer-term stewardship, while improving transparency, supporting interagency coordination, and building community confidence as sites move from oil production toward reuse.

7.6 Long-Term Stewardship

Depending on site conditions and regulatory requirements, long-term stewardship of former oil well sites may represent a significant and ongoing responsibility. Stewardship considerations may include continued environmental monitoring, maintenance of engineered controls, inspection of well abandonment features, and coordination with regulatory agencies over extended time horizons.

A particular long-term consideration for many sites is the presence of abandoned oil wells. Even when wells are abandoned in accordance with current standards, there remains the potential for future degradation of abandonment materials over time. As a result, additional well abandonment or corrective work may be required within a 50- to 100-year timeframe, particularly if site conditions change or new information emerges.

Effective stewardship planning therefore requires early consideration of how long-term liabilities and responsibilities will be managed, including identification of the entity or entities responsible for monitoring, reporting, and maintenance. In some cases, stewardship obligations may be addressed through ownership structures, deed restrictions, access agreements, or financial mechanisms such as escrow accounts or dedicated reserves.

Long-term stewardship is not a barrier to reuse, but a critical factor in determining which reuse options are appropriate and how they should be designed. Reuse concepts that limit long-term exposure pathways, avoid construction over abandoned wells, and preserve access to monitoring infrastructure may be better aligned with long-term stewardship considerations.

8 FINDINGS AND LESSONS LEARNED

This section summarizes key findings and lessons learned from the feasibility analysis, drawing insights across the sites evaluated and identifying common barriers, enabling conditions, and areas for alignment and improvement.

8.1 Synthesis Across Site Types

The feasibility analysis demonstrates that oil well sites vary widely in ownership, scale, environmental conditions, and surrounding context, highlighting the need for flexible and differentiated approaches to remediation and reuse. The specific sites evaluated reflect conditions commonly encountered in unincorporated areas and are intended to inform broader implementation strategy. The significant factors identified include:

- The sites evaluated exhibit a range of well conditions. Some sites contain wells with varying operational statuses, including active, idle, and previously abandoned wells, while others consist entirely of either plugged wells or idle wells. This variation in well status influences both reuse feasibility and cost considerations, particularly where mixed conditions require coordination of ongoing operations, well abandonment, and redevelopment planning.
- Site transition and reuse is a multi-year process dependent on operator actions, regulatory approvals, funding availability, and site-specific conditions.
- No single reuse pathway applies across all site types; feasibility is driven by the interaction of technical, regulatory, financial, and community factors.
- Countywide mapping tools are effective for identifying areas of potential concern, but parcel-level analysis is essential to understand actual constraints and opportunities.

Taken together, these findings suggest that future efforts will benefit from adaptable screening frameworks and site-specific evaluation, rather than uniform reuse assumptions.

8.2 Common Barriers

Oil well sites are challenging for redevelopment. Key barriers identified through this Study include:

- Potentially high and uncertain costs associated with well abandonment, re-abandonment, and environmental remediation.
- Ownership and acquisition challenges, including privately held parcels, split estates, and unwilling sellers.
- Existing oil and gas infrastructure, including pipelines and associated facilities, may extend beyond individual parcels and introduce additional coordination and feasibility considerations.
- Regulatory complexity involving multiple agencies and sequential approvals.
- Limited availability of funding that can be applied across all phases of well abandonment, acquisition, remediation, and redevelopment.
- Long timelines required to address environmental conditions before reuse can be considered.
- Community expectations for reuse that may exceed what is feasible given site conditions and/or funding constraints.

These barriers highlight the importance of realistic sequencing, early coordination, and expectation management when pursuing reuse of oil well sites.

8.3 Enabling Conditions

Certain aspects of these sites were identified that facilitate the reuse process, including:

- County ownership or control of land, which can simplify acquisition and planning processes.
- Early coordination with State regulators to clarify technical requirements and sequencing.
- Use of County and State planning and equity tools (e.g., PNA, PNA+, CalEnviroScreen) to focus attention on high-need areas.
- Strong community leadership and organizational capacity, particularly where trusted local partners are involved.
- Availability of targeted funding programs that support well abandonment, remediation, or community-serving reuse.
- Clear framing of sites as pilot or illustrative projects to manage expectations and support learning.

These enabling conditions suggest that strategic site selection and early coordination can meaningfully influence feasibility outcomes, even in complex contexts.

8.4 Alignment and Gaps

This Study reinforces the narrative that transformation and reuse of oil well and oil production sites in LA County can deliver net community benefits, but also highlights areas of alignment, as well as key gaps and challenges that remain:

- There is strong alignment between environmental remediation objectives, equity priorities, and community interest in beneficial reuse.
- Additional incentives—both positive and negative—may be needed to encourage operators and landowners to transition uses. Gaps remain in funding mechanisms that can bridge the transition from well abandonment to site acquisition and reuse.
- Existing policies provide a foundation for action, but additional guidance or coordination may be needed to address cross-cutting issues such as liability management and long-term stewardship.
- Reuse planning should be integrated earlier in oil well abandonment discussions, rather than being introduced later in the process.

Lessons identified here can help inform future County efforts to align regulatory, planning, and equity goals as opportunities for reuse arise.

9 RECOMMENDATIONS AND IMPLEMENTATION ROADMAP

This section summarizes the key recommendations of the Study and outlines an implementation roadmap for advancing remediation and reuse of oil well sites in unincorporated areas of Los Angeles County. Together, these recommendations are intended to guide near-term actions while establishing a flexible framework that can adapt as conditions, funding, and regulatory contexts evolve.

9.1 Site Identification, Screening, and Tracking Framework

The high-level evaluation tools used in this Study are most effective as an initial screening step to identify potential opportunity areas. As the status of oil sites across the region continues to change over time, the County may need to periodically re-assess and re-prioritize among sites for potential reuse. To ensure effective implementation, the County should:

- Apply the two-tier screening framework tested in this Study, clearly distinguishing between (1) higher-level mapping indicators used to identify areas of need and (2) parcel-level feasibility factors used in subsequent evaluation phases.
- Apply tools such as CalEnviroScreen, the PNA, and PNA+ to identify priority areas, while reserving site-specific environmental, ownership, and well-status evaluation for later phases.
- Continue to prioritize sites within or adjacent to DACs, High park need areas, and PRAs, while balancing site-level feasibility considerations such as ownership, well status, regulatory sequencing, and funding readiness.
- Develop a standardized documentation template to record screening outcomes, assumptions, and constraints to ensure transparency, repeatability, and defensibility of future site evaluations.
- Develop and maintain a dynamic Countywide tracking system for oil well sites that integrates available datasets to support ongoing site monitoring, prioritization, and identification of candidate sites for future site-specific feasibility analysis. Online geospatial tools, such as ArcGIS Online, would be an ideal platform to provide interactive, cloud-hosted mapping and data management with role-based access for county staff, regulators, and stakeholders.
- Use the screening criteria as guidance to inform future site-specific feasibility studies and pilot site identification, rather than as a prescriptive or automatic site selection formula.

9.2 Identification of Priority Pilot Sites for Near-Term Action

The specific sites evaluated in this Study illustrate the range of ownership, well status, environmental conditions, and reuse contexts the County may encounter. To move from feasibility to implementation, the County should:

- Use the refined screening framework to identify a limited number of candidate pilot sites for further technical, legal, and financial evaluation, with the intent of advancing at least one County-owned site and one privately owned site. For the privately owned site, include evaluation of both potential County acquisition and privately led redevelopment as pathways for delivering community-serving uses, including how such uses could be incorporated through incentives or requirements.
- Advance at least one County-owned site and one privately owned site as pilot projects, leveraging County control for near-term implementation while using the privately owned site to test both potential County acquisition and privately led redevelopment approaches.

- Advance the Fairfax site as a nearer-term pilot opportunity, given its urban context, proximity to residential neighborhoods and sensitive land uses, and potential to test remediation and reuse approaches in a high-visibility setting. This would require continuing to coordinate with CalGEM and Public Works regarding the seven previously plugged wells, which do not meet current plugging and abandonment requirements; completing the necessary environmental investigation and any cleanup or remediation determined to be necessary; engaging the community in planning the park; and securing sufficient funding to support these activities and eventual park development.
- Conduct further evaluation of the Castaic site to determine whether it may be suitable as a pilot opportunity. The evaluation should address well status, environmental conditions, remediation needs, logistical considerations, site constraints, and potential costs..
- Frame pilot site advancement as iterative and conditional, subject to regulatory coordination, funding availability, and updated site-specific feasibility findings.
- Use pilot projects to test technical approaches, clarify interagency roles, and refine funding and implementation sequencing prior to broader scaling. Pilot projects may also help demonstrate pathways for transitioning sites that are often overlooked or excluded by land bank/acquisition programs due to environmental and regulatory complexities associated with oil wells.

9.3 Policy, Funding, and Partnership Strategies

Advancing remediation and reuse beyond feasibility will require coordinated policy alignment, funding sequencing, and interagency collaboration. To establish a practical foundation for implementation, the County should:

- Establish early coordination among relevant agencies and departments during pilot implementation to confirm roles, align responsibilities, and coordinate sequencing for well abandonment, environmental remediation, land use coordination, and potential site reuse.
- Integrate land reuse planning considerations during early site evaluation and prior to Phase II Environmental Site Assessment (ESA) and well abandonment planning to better align regulatory sequencing with long-term land use objectives.
- For sites containing active wells, establish a coordinated approach for engaging operators and relevant regulatory agencies to support timely cessation of production and well abandonment, including review of applicable lease obligations, bonding requirements, and compliance pathways to facilitate safe and orderly site transition.
- Develop a phased funding framework that distinguishes between (1) well abandonment funding, (2) environmental remediation funding, (3) acquisition funding, (4) reuse development funding, and (5) long-term operations and maintenance (O&M) funding, recognizing that these phases may require different funding sources and timing and that long-term stewardship requires sustained funding beyond initial project delivery.
- Identify and pursue alignment with State and federal well abandonment programs, including opportunities to coordinate with CalGEM and the State Well Abandonment Program where sites may be eligible.
- Evaluate whether existing County policies and guidance adequately support the transition from oil well abandonment to site remediation and reuse, and identify targeted adjustments informed by pilot project experience.

- Identify opportunities through the implementation of pilot projects to improve coordination and streamline local and state regulatory processes, particularly between well abandonment and environmental remediation phases, where existing requirements may create sequencing, timing, and/or other challenges.
- Establish a structured interdepartmental coordination pathway among the CSO, Public Works, Regional Planning, Public Health, and Parks to streamline implementation of pilot projects.
- Pursue strategic partnerships with State agencies, community-based organizations, land trusts, and philanthropic entities where such partnerships may support acquisition, remediation, and/or long-term stewardship.
- Explore partnerships with nonprofit and philanthropic organizations that support well plugging, particularly where no financially viable operator exists or where additional work is needed to support redevelopment (e.g., re-abandonment to meet current standards). These models may provide technical assistance and/or supplemental funding to accelerate well abandonment and complement public programs, as demonstrated by organizations like the Well Done Foundation.
- Where redevelopment of oil well sites is led by the private sector, explore mechanisms-such as incentives, development agreements, community benefits agreements, or targeted funding programs-to support incorporation of community-serving uses, including affordable housing units and publicly accessible open space.
- Position policy and funding adjustments as incremental and informed by pilot experience, rather than undertaking broad structural changes in advance of implementation.

9.4 Roadmap for Scaling Remediation and Reuse in Unincorporated LA County

Building from feasibility and pilot implementation, the County should take the following steps to position itself for broader scaling of remediation and reuse efforts:

- Implement pilot projects as structured learning platforms, documenting challenges, regulatory coordination needs, funding gaps, and interdepartmental roles to inform future scaling.
- Apply the refined screening framework on a rolling basis, incorporating updated well status data, ownership changes, and evolving community priorities to maintain an adaptive inventory of candidate sites.
- Develop internal guidance that translates lessons from pilot projects into standardized procedures for future site evaluation, abandonment coordination, remediation oversight, and reuse planning.
- Identify clear readiness milestones for scaling efforts, such as confirmed funding sources, defined departmental roles, regulatory coordination pathways, and demonstrated pilot outcomes.
- Maintain flexibility in sequencing, recognizing that site advancement will vary based on ownership, well status, environmental conditions, and funding availability.
- Coordinate with CalGEM so that as wells are identified for the State Well Abandonment Program, the County assesses whether and how those sites may support remediation and community-serving reuse.
- Periodically reassess the County's inventory of inactive and transitioning oil well sites to identify additional candidates that may become viable for remediation and reuse as site conditions evolve.

- Ensure that any broader scaling of efforts remains contingent upon demonstrated pilot success, funding availability, regulatory alignment, and departmental capacity.

9.5 Ongoing Consultation, Accountability, and Just Transition Alignment

Advancing remediation and reuse of oil well sites as part of a just transition will require continued coordination, transparency, and alignment beyond the feasibility stage. To support accountable implementation, the County should:

- Consult with the Just Transition Task Force (JTTF), including the Site Remediation and Reuse subgroup, as part of the process of identifying and advancing pilot sites.
- Provide periodic updates to the JTTF regarding pilot progress, regulatory coordination, funding pathways, and implementation barriers.
- Consider themes and priorities identified through the Department of Regional Planning's workshops and surveys on future land uses in communities with existing oil wells when advancing pilot site selection and reuse planning.
- Ensure that site advancement decisions reflect both technical feasibility and community-identified priorities related to health protection, land use compatibility, and long-term stewardship. This includes recognizing that communities historically impacted by oil extraction may require targeted public-sector support to facilitate long-term site transition and reuse.
- Maintain transparency regarding site selection criteria, funding sources, regulatory timelines, and long-term responsibilities associated with remediation and reuse.

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