



Special Status Species Compliance Annual Report 2014

Baldwin Hills CSD Sections E.7.b.
through E.7.h

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Prepared by:

Freeport-McMoRan Oil & Gas

5640 South Fairfax Avenue

Los Angeles, CA 90056

With assistance from:

ENVIRON

707 Wilshire Blvd., Suite 4950

Los Angeles, CA 90017

SPECIAL STATUS SPECIES COMPLIANCE ANNUAL REPORT FOR 2014

1.0 BACKGROUND

Freeport-McMoRan Oil & Gas operates the Inglewood Oil Field in the Baldwin Hills of Los Angeles County. On November 27, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (CSD) to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and production of oil and gas within the oil field located in the Baldwin Hills area of Los Angeles County (County).

2.0 CSD REQUIREMENT

CSD Section E.7 requires FM O&G to develop and implement the following: Biological Resources - All oil operations on the oil field shall be conducted in a manner that minimizes impacts to biological resources and shall comply with the following provisions:

b. Special Status Species and Habitat Protection. *The operator shall comply with all provisions of a special status species and habitat protection plan that has been approved by the director. The operator shall make changes to the plan if requested by the director. Any modifications to the plan shall be submitted to the director for review and approval. The special status species and habitat protection plan shall include any measures requested by the director.*

c. Habitat Restoration and Revegetation Plan. *Prior to any disturbance of sensitive natural habitat areas, as identified in the special status species and habitat protection plan, the operator shall hire a biologist, approved by the county to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the operator shall have a county-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a habitat restoration and revegetation plan. The plan shall be submitted to the director for review and approval. The director shall make best efforts to complete the review of the plan as expeditiously as possible and shall then either approve the plan or provide the operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the plan has been approved by the director. The habitat restoration and revegetation plan shall include any measures requested by the director.*

d. Pre-Construction Surveys. *The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the special status species and habitat protection plan.*

i. *The operator shall hire a county-approved ecologist/botanist to conduct sensitive plant surveys.*

- ii. The operator shall hire a county-approved biologist to conduct sensitive wildlife surveys in habitat areas that could support sensitive wildlife species.
 - iii. The operator shall hire a county-approved biologist to conduct breeding and nesting bird surveys if the construction activities would occur during the breeding season (February 1 to August 31 for raptors, and March 15 to September 15 for sensitive/common birds).
 - iv. The operator shall hire a county-approved wetland delineator to delineate any wetlands that would be affected by construction.
- e. Listed Plant or Wildlife Species. If federal- or State-listed plant or wildlife species are found, then the operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulations.
- f. Construction Monitoring. If the pre-construction surveys find sensitive plant, wildlife species, or nesting birds, a biological monitor hired by the operator, and approved by the County, shall be on site during construction to monitor the construction activities. The biological monitor shall be responsible for the following:
- i. Establishing a 300-foot buffer around any active breeding bird nests.
 - ii. Assuring that vegetation removal does not harm sensitive wildlife species.
 - iii. Monitoring the construction area for sensitive wildlife species and relocating them to suitable habitat outside of the construction area.
 - iv. Ensuring that exclusionary fencing is installed around the construction area to prevent sensitive wildlife species from entering the construction area.
- g. Tree and Riparian Scrub. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a county-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the operator shall provide written documentation to the director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.
- h. Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the operator shall begin habitat restoration consistent with the approved native habitat restoration and revegetation plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The operator shall replace any significant loss of sensitive natural habitat at the following ratios:
- i. 1:1 for each acre of coastal sagebrush or coyote bush

scrub.

ii. 2:1 for each acre of riparian scrub or oak woodland.

3.0 PURPOSE OF THE SPECIAL STATUS SPECIES AND HABITAT PROTECTION PLAN

The Special Status Species and Habitat Protection Plan (Plan) for the FM O&G Inglewood Oil Field was first approved in 2010 in accordance with the requirements of the CSD Ordinance (Los Angeles County 2008) Section L.6.a. Implementation of the Plan is provided via Section E.7.b of the CSD. The Plan ensures the preservation and protection of special status species and vegetation resources that may be present within the Inglewood Oil Field. The Plan addresses any activities resulting in disturbances to native vegetation or habitat supporting sensitive species occurring within the CSD boundary, and the primary provisions are as follows:

- 1) At all vegetated locations on the field prior to construction, surveys for nests of migratory birds are required, if construction is to occur between February 1 and September 15 (nesting season).
- 2) Prior to the start of new construction activities (grading or vegetation removal) pre-construction biological surveys may be required. Table 3-1 presents a list of all vegetation community types, and which pre-construction biological surveys are necessary. Coyote bush scrub (CBS), coastal sagebrush scrub (CS), native grassland (NG), interior live oak woodland (O), riparian scrub (RS), willows (W), disturbed riparian scrub (dRS) are the sensitive vegetation communities that require some type of preconstruction survey.
- 3) The Plan also describes the prioritization of areas that could be restored in order to mitigate the loss of sensitive habitats summarized in Table 3-1. Mitigation ratios are also specified for these areas.

Table 3-1. Pre-Construction Surveys Required for each Vegetation Community

Vegetation Community	Pre-Construction Survey			
	Nesting Bird Survey (Feb. 1 – Sept. 15 only) ¹	Sensitive Plant Surveys	Sensitive Wildlife Surveys	Wetland Delineation ²
Developed Areas	No Survey Required			
Vegetated Areas				
Eucalyptus Naturalized Forest (E)	Yes	No	No	No
Ice Plant (IP)	No Survey Required			
Man-Made and Maintained Pond (PD)	Yes	No	No	Maybe ³
Pine Trees (PT)	Yes	No	No	No
Weed Dominated (WD)	Yes	No	No	No
Disturbed Coyote Brush Scrub (dCBS)	Yes	No	No	No
Disturbed California Sagebrush Scrub (dCS)	Yes	No	No	No
Sensitive Vegetation Communities				
Coyote Bush Scrub (CBS)	Yes	Yes	Yes	No
Coastal Sagebrush Scrub (CS)	Yes	Yes	Yes	No
Cottonwood Trees (CW)	Yes	No	No	No
Native Grassland (NG)	Yes	Yes	Yes	No
Interior Live Oak Woodland (O)	Yes	Yes	Yes	Yes
Riparian Scrub (RS)	Yes	Yes	Yes	Yes
Willows (W)	Yes	No	Yes	Yes
Disturbed Riparian Scrub (dRS)	Yes	No	No	Yes

Table Notes:

1 – Nesting bird surveys are required for all vegetated areas, and only for construction between February 1 to August 31 for raptors and from March 15 to September 15 for all other bird species. If project work occurs outside these times, no nesting bird surveys are required.

2 – Wetland delineation is required prior to soil disturbance (i.e., grading or discharge of fill). Current vegetation maintenance does not require delineation.

3 – Determinations regarding whether wetland delineation is required for work in these areas would be made following a preliminary investigation to determine if the area represents a historic, natural watershed area.

Section E.7.c of the CSD requires the preparation of a Habitat Restoration and Revegetation Plan if the county approved biologist (biologist) determines that significant disturbance of sensitive natural habitat will occur. Step 5 of the Special Status Species

and Habitat Protection Plan further clarifies this requirement by providing recommended mitigation ratios based upon each acre of sensitive habitat lost. Accordingly, FM O&G implements the following restoration guidelines:

- 1). If impacts to sensitive habitat are < 1 acre and not considered by the biologist to be “significant,” follow guidelines in Step 5 of the Special Status Species and Habitat Protection Plan (approved guidelines for restoration). If onsite restoration is not feasible, mitigation for such impacts should be tallied. When 1 acre of sensitive vegetation removal that hasn’t already been mitigated onsite has occurred, a Habitat Restoration and Revegetation Plan, in accordance with CSD Section E.7.c and Step 5 of the Special Status Species and Habitat Protection Plan will be prepared and implemented to mitigate impacts to sensitive habitat.
- 2) If impacts to sensitive habitat are < 1 acre but are considered significant by the biologist, a Habitat Restoration and Revegetation Plan will be prepared and implemented.
- 3) If impacts to sensitive habitat are equal to or > 1 acre, a Habitat Restoration and Revegetation Plan will be prepared and implemented.

4.0 ANNUAL REPORT COMPONENTS

The Special Status Species Compliance Annual Report is comprised of two parts:

1. A narrative summary of the CSD compliance status in 2014; and
2. 2014 Inglewood Special Status Species Survey Compliance Matrix (Appendix A).

4.2 Compliance Matrix

The 2014 Special Status Species Survey Compliance Matrix (Compliance Matrix) (Appendix A) is at the core of the biological compliance tracking system. For any wells drilled or re-drilled in 2014 and other construction activities involving vegetation removal, FM O&G has tracked if pre-construction biological surveys would be required, the dates of completion of surveys conducted, acreages of sensitive vegetation communities removed, and compliance details.

4.1 Compliance Status

All pre-construction surveys were performed by a County approved ENVIRON biologist within one week of the initiation of construction activities or vegetation removal per the Special Status Species and Habitat Protection Plan (PXP 2010).

Pre-construction nesting bird surveys were conducted for twelve (12) work locations between January 1, 2014 and December 15, 2014, as shown in the compliance matrix in Appendix A (2014 Inglewood Special Status Species Survey Compliance Matrix). None of the nesting bird surveys resulted in observations of active nests within 500-feet of the construction area. None of the activities resulted in removal of sensitive vegetation communities, nor required additional pre-construction biological surveys beyond the nesting bird survey.

In summary, in 2014, there were no instances of CSD non-compliance related to sensitive wildlife, plants, or vegetation communities.

APPENDIX A
2014 SPECIAL STATUS SPECIES SURVEY
COMPLIANCE MATRIX

2014 Inglewood Special Status Species Survey Compliance Matrix

Construction Project	Will Sensitive Vegetation be cut?	Will Sensitive Habitat be cut?	Pre-construction Nesting Bird Surveys Required?	Pre-construction Sensitive Wildlife Surveys Required?	Pre-construction Sensitive Plant Surveys Required?	Notes
Well pad modification for LAI 5534 and LAI 5651	No	No	Yes - survey conducted 2/13/14	No	No	No nesting birds observed
Well pad modification for BC 6526	No	No	Yes - survey conducted 2/13/14	No	No	No nesting birds observed
Well pad modification for STK 6971/6884	No	No	Yes - survey conducted 2/20/14	No	No	No nesting birds observed
Well pad modification for LAI 5512	No	No	Yes - survey conducted 2/20/14	No	No	No nesting birds observed
Well pad modification for LAI - 1 VIC 1 4453	No	No	Yes - survey conducted 4/15/14	No	No	No nesting birds observed
Well pad modification for LAI-1 5531	No	No	Yes - survey conducted 4/15/14	No	No	No nesting birds observed
Well pad modification for LAI-1 5662	No	No	Yes - survey conducted 4/15/14	No	No	No nesting birds observed
Well pad modification for VIC 1 - 3372	No	No	Yes - survey conducted 4/28/14	No	No	No nesting birds observed
Well pad modification for LAI-1 5513	No	No	Yes - survey conducted 4/28/14	No	No	No nesting birds observed

2014 Inglewood Special Status Species Survey Compliance Matrix

Construction Project	Will Sensitive Vegetation be cut?	Will Sensitive Habitat be cut?	Pre-construction Nesting Bird Surveys Required?	Pre-construction Sensitive Wildlife Surveys Required?	Pre-construction Sensitive Plant Surveys Required?	Notes
Well pad modification for BC-5581	No	No	Yes - survey conducted 4/28/14	No	No	No nesting birds observed
Well pad modification for VRU-4441	No	No	Yes - survey conducted 4/28/14	No	No	No nesting birds observed
Transfer Pipeline Construction T-11a and T-11b	No.	No.	Yes- survey conducted 8/21/2014	No	No	No nesting birds observed