

4.12 PUBLIC SERVICES AND FACILITIES

4.12.1 METHODOLOGY

This Draft Environmental Impact Report (EIR) section discusses the potential impacts of the implementation of the Inglewood Oil Field Specific Plan (Project) to fire and police protection services within the City of Culver City. Information was provided by the Culver City Fire Department (CCFD) and Culver City Police Department (CCPD) regarding the resources, facilities, and potential impacts of the Project, as well as measures that would reduce the identified impacts. In addition, available reports and statistics were also reviewed. Direct, indirect, and cumulative impacts are addressed for each threshold criteria below, and growth-inducing impacts are described in Sections 6.0, CEQA-Mandated Analyses, of this Draft EIR.

The Initial Study for the Project states that no impacts on schools and other public facilities (e.g., libraries) would occur with the implementation of the Project. Thus, these other public services are not analyzed below.

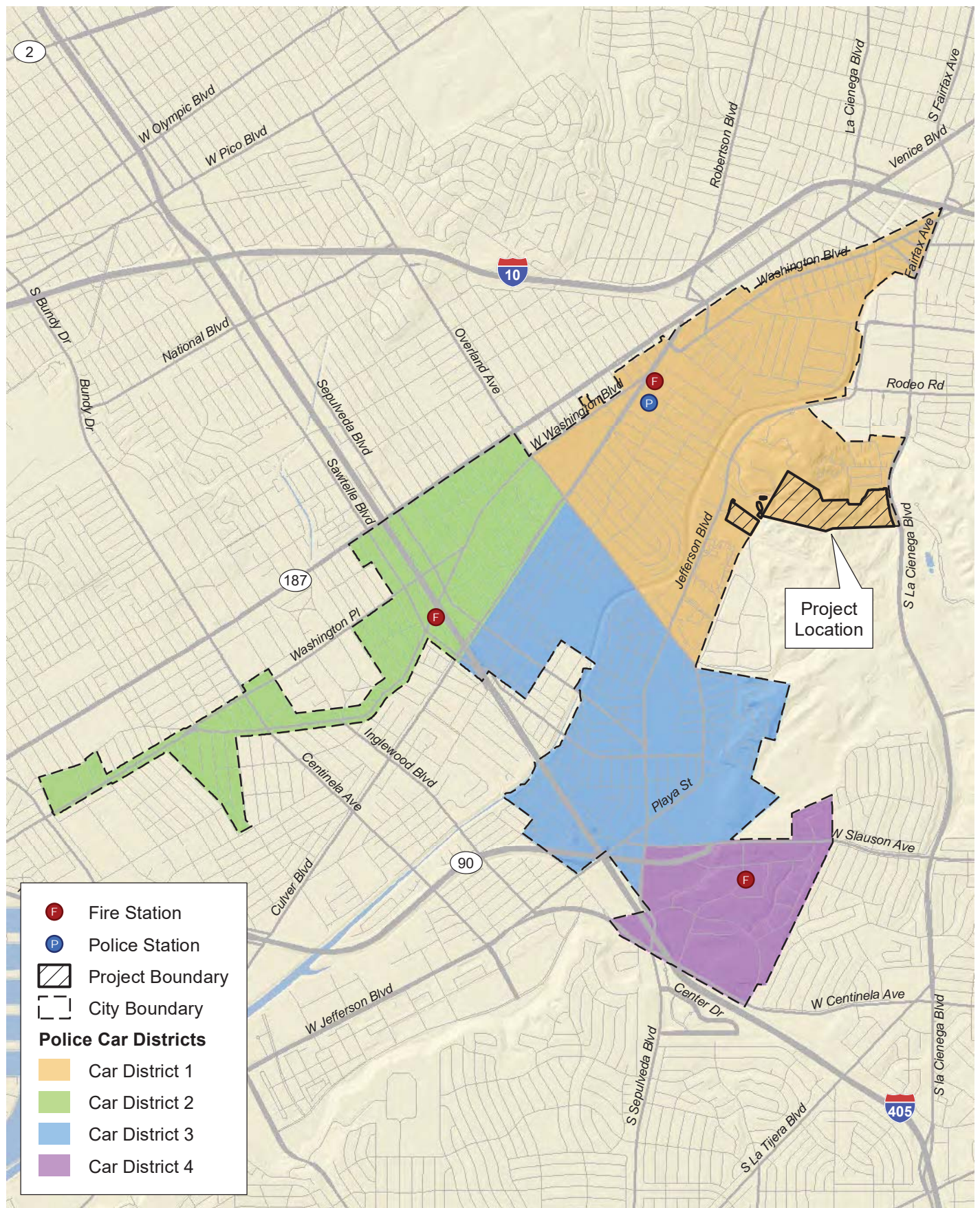
Throughout this Draft EIR, the City's portion of the Inglewood Oil Field (77.8 acres) is referred to as the "Project Site" or the "City IOF". The entire surface boundary limits of the Inglewood Oil Field, including lands within both the City and County, is referred to as "Inglewood Oil Field". The off-site portion of the Inglewood Oil Field that is within the jurisdiction of the County of Los Angeles is referred to as the "County IOF".

4.12.2 ENVIRONMENTAL SETTING

Fire Protection Services

Fire protection and emergency response services in the City of Culver City are provided by CCFD. CCFD serves the community of Culver City with various core emergency response services, such as fire suppression, emergency medical services (EMS), technical rescue, and hazardous materials mitigation. In addition to these core services, CCFD also provides several other community supportive functions, such as fire prevention and emergency preparedness services.

CCFD has 3 fire stations and 72 employees (61 uniformed personnel and 11 civilian personnel). The Department maintains a minimum staffing of 18 fire suppression personnel at all times on three shifts working under the 48-hour on/96-hour off schedule. Table 4.12-1 lists the fire stations, equipment and staffing at each station, and fire station distance from the Project Site. Exhibit 4.12-1 shows the location of the fire stations in relation to the Project Site.



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- F Fire Station
- P Police Station
- Project Boundary
- City Boundary
- Police Car Districts**
- Car District 1
- Car District 2
- Car District 3
- Car District 4

Police Patrol Districts and Fire Department Station Locations

Exhibit 4.12-1

Inglewood Oil Field Specific Plan Project



**TABLE 4.12-1
CULVER CITY FIRE STATIONS**

Fire Station and Address	Equipment	Staffing	Distance from Site
Fire Station #1 9600 Culver Blvd. (Headquarters and Emergency Operations Center)	Engine 1 Rescue 1 Battalion Chief Command Vehicle	3 firefighters 2 firefighters/paramedics 1 Battalion Chief	0.74 mile west
	<u>Reserve Apparatus*</u> Engines 4 and 5 Battalion Command Vehicle 2 Ladder Truck 1		
Fire Station #2 11252 Washington Blvd.	Engine 2 Ladder Truck 2	3 firefighters 4 firefighters	1.61 miles southwest
Fire Station #3 6030 Bristol Parkway	Engine 3 Rescue 3	3 firefighters 2 firefighters/paramedics	2.23 miles south
	<u>Reserve Apparatus*</u> Engine 6 Rescue 2		
Total		18 firefighters per shift	

* Reserve apparatus are used when online apparatus are subject to periodic maintenance and repair; during large scale emergencies; and when online apparatus are used to assist outside agencies.
Source: Culver City 2017b.

In addition to the fire stations, CCFD has a training facility located on Jefferson Boulevard and a telecommunications shop located behind Fire Station #1. Additional staffing for major emergencies or community disasters is available through the response of executive and staff officers. CCFD also has the ability to request mutual aid or recall off-duty personnel.

CCFD has automatic aid and mutual aid agreements with the fire departments of the County of Los Angeles and the cities of Los Angeles, Santa Monica and Beverly Hills, as well as an emergency mutual aid plan with the State of California (under the California Disaster and Civil Defense Master Mutual Aid Agreement and the California Fire Service and Emergency Mutual Aid Plan). A mutual aid agreement is an agreement through which participating agencies provide resources upon request, if available, to another jurisdiction. An automatic aid agreement provides for the routine exchange of services across jurisdictional boundaries under pre-defined conditions. These services are reciprocal and balanced in nature but limited in scope.

Thus, while Fire Station #1 is located closest to the Project Site (0.74 mile to the west), other fire stations in the City may also respond to fire and emergency incidents at the Project Site. Table 4.12-2 lists other nearby fire stations. The Inglewood Oil Field is not part of any of the response areas within Culver City jurisdiction that activates automatic aid from any other agencies through an automatic aid agreement. However, CCFD has the option to request mutual aid from other agencies for assistance in handling emergencies within any portion of Culver City's jurisdiction, including any incident that might occur at the Project Site.

**TABLE 4.12-2
 NEARBY FIRE STATIONS**

Facility	Address	Distance from Site
County Fire Station #58	5757 S Fairfax Ave, Los Angeles	1.75 miles southeast
County Fire Station #171 and Battalion 20 Headquarters	141 W Regent St, Inglewood	3.6 miles southeast
County Fire Station #38	3907 W 54 th St, Los Angeles	2.4 miles southeast
Los Angeles City Fire Station #43	3690 Motor Ave, Los Angeles	1.3 miles west
Source: LACFD 2017.		

In 2015, CCFD responded to 5,644 incidents. Of these incidents, 101 were fire calls; 16 were explosions; 4,337 were rescue and emergency medical service calls; 102 were hazardous material incidents; and the remaining calls were relating to other matters. Response time for the 90th percentile of all emergencies was 8 minutes and 45 seconds. In 2016, CCFD responded to 5,744 incidents. Of these incidents, 82 were fire calls; 11 were explosions; 4,358 were rescue and emergency medical service calls; 106 were hazardous material incidents; and the remaining calls were relating to other matters. Response time for the 90th percentile of all emergencies was 8 minutes and 25 seconds (Culver City 2017a).

CCFD is meeting its response time standards and continues to work to improve them. CCFD has also indicated that existing facilities, staffing, and equipment are adequate to meet the needs of the City. There are over 1,029 fire hydrants in the City, located at distance intervals of 300 feet in commercial areas and 500 feet in single-family residential areas. Water is provided by Golden State Water Company within five pressure zones. All areas of the City have adequate fire flows (supplies and pressures) for emergencies (CFAI 2014).

Generally, oil and gas drilling operations and storage tanks are inspected by the California Department of Conservation's Department of Oil, Gas and Geothermal Resources (DOGGR) and CCFD inspects the oil wells and facilities and issues operating permits for the equipment that is located within the jurisdictional boundaries of the City. CCFD also responds to fire and emergency incidents at or near the Project Site. Previous calls for service to or near the Project Site are presented in Table 4.12-3.

**TABLE 4.12-3
CALLS FOR SERVICE AT OR NEAR THE PROJECT SITE
BY THE CULVER CITY FIRE DEPARTMENT**

Incident Address	Incident Date	Notes
9930 Jefferson Blvd.	January 2011	Edison liquid eliminator line stuck check valve; roadway leading to oil fields
9800 Jefferson Blvd.	March 2011	Report of smoke coming from the oil fields; nothing on arrival
9800 Jefferson Blvd.	June 2011	Brush fire behind West LA College
9800 Jefferson Blvd.	August 2011	Reported possible smoke in oil fields; nothing on arrival
9910 Jefferson Blvd.	July 2012	Grass fire in the park near baseball field
9910 Jefferson Blvd.	July 2012	Dog walker noticed gas smell at Culver City Bone Yard Dog Park; nothing on arrival
7009 Wrightcrest Dr.	April 2013	Brush fire at base of radio tower
5913 Stoneview Dr.	October 2013	Brush fire behind 5913 Stoneview Dr
6030 Wright Terrace	October 2013	Brush fire at top of Hetzler Rd; electrical arcing blown transformer (Edison pole #0671)
9800 Jefferson Blvd.	October 2013	½-acre fire 150 yards SW of the Botts Field entrance of oil field
9800 Jefferson Blvd.	January 2015	Brush fire in park
9800 Jefferson Blvd.	January 2015	Brush fire in park
9800 Jefferson Blvd.	May 2015	Reported possible brush fire in oil fields; nothing on arrival

Police Protection Services

Police protection and law enforcement services in the City of Culver City are provided by the CCPD. CCPD is a full service police agency located at 4040 Duquesne Avenue, approximately 0.71 mile west of the Project Site. CCPD provides professional police services 24 hours per day, 365 days a year to the City’s residents, businesses, and visitors. It consists of three bureaus: Operations, Traffic, and Administration and Investigations. CCPD is staffed by 109 sworn personnel, 21 reserve officers, and 50 non-sworn staff members (CCPD 2017). Exhibit 4.12-1 shows the location of the Culver City Police Station and the Department’s Car Districts. The Project Site is located within Car District 1, which generally includes the northern section of the City north of Overland Avenue.

CCPD responded to 55,496 calls for service in 2014 and to 55,564 calls for service in 2013. Part 1 crimes (violent crimes and property crimes) in the City from 2012 to April 2015 are provided in Table 4.12-4.

**TABLE 4.12-4
CRIME INCIDENCES**

Part 1 Crime*	2012	2013	2014	2015 to April
Homicide	1	0	1	0
Rape	6	7	6	0
Robbery	96	88	70	30
Assault	157	180	214	43
Burglary	193	174	249	72
Theft	1,465	1,327	1,335	530
Motor Vehicle Theft	102	115	109	29
Total	2,020	1,891	1,984	704
* refers to violent crimes and property crimes Source: CCPD 2015.				

The average response time in April 2015 was 2 minutes and 45 seconds for emergency calls and 6 minutes and 58 seconds for non-emergency calls (CCPD 2015).

CCPD is assigned to Area “A” within Los Angeles County for mutual aid assistance. This area includes the Beverly Hills Police Department, Santa Monica Police Department, and the Los Angeles County Sheriff’s Department - West Hollywood Station. Neighboring agencies include the Los Angeles Police Department’s Pacific Division, California Highway Patrol’s West Los Angeles Station, and the University of California, Los Angeles (UCLA) Police Department.

The Inglewood Oil Field is fenced to prevent public access (in accordance with DOGGR regulations) and gates are provided at various locations for restricted entry, emergency access, and other specific purposes. Unmanned entrances are equipped with sliding gates that remain closed unless vehicles are entering or exiting the facility. One of these unmanned entrances is located on the west side of the Project Site in Culver City Park. A 24-hour guard is stationed at the entrance gate on Stocker Street, and a guard is stationed at the entrance on South Fairfax Avenue. All vehicles and visitors are required to sign in with the guard and to obtain clearance prior to entering the Inglewood Oil Field (LACDRP 2015).

Calls for police protection and law enforcement services to CCPD have not been directly to the Project Site, but the surrounding areas and have included over 2000 various calls for service from 2009–2015, including addresses at or near 9910 and 9800 Jefferson Boulevard.

4.12.3 REGULATORY SETTING

Federal

National Fire Protection Association

The National Fire Protection Association (NFPA), established in 1896, publishes numerous codes and standards that cover issues ranging from foam systems to dry cleaning facilities. Several NFPA codes and standards, as referenced in the California Fire Code, are applicable to the Project and are described below.

NFPA Standard 11 addresses foam application to protect outdoor atmospheric storage tanks containing flammable and combustible liquids. Fire-fighting foam is an aggregate of air-filled

bubbles formed from aqueous solutions and is lower in density than flammable liquids. It is used principally to form a cohesive floating blanket on flammable and combustible liquids and prevents or extinguishes fire by excluding air and cooling the fuel. It also prevents re-ignition by suppressing formation of flammable vapors. Foam is prepared by utilizing a water supply along with a foam concentrate. Foam for tank fires can be applied through fixed foam discharge outlets permanently fixed to the tank top, by portable hose streams using foam nozzles, or by large-capacity monitor nozzles close to the tank. Foam can be applied to a liquid spill into a dike to suffocate a fire or prevent ignition of the flammable material spill, utilizing either fixed systems, portable systems, or monitors. NFPA 11 also requires that fixed foam systems have automatic fire detection (thermal and hydrocarbon detection) and alarms.

NFPA 15, Standard for Water Spray Fixed Systems for Fire Protection, addresses water spray systems and issues such as installation requirements; design requirements, including hydraulic calculations; water supplies; and maintenance. NFPA 22 addresses the installation of private firewater tanks to supply firewater to a facility. NFPA 24 address the installation of private fire service equipment, including service mains and fire hydrants, as well as inspection, testing, and maintenance. NFPA 30 addresses flammable and combustible liquids, including fire prevention and risk control, electrical systems, storage in containers, processing facility issues, aboveground storage tanks requirements, and piping systems. NFPA 30 also addresses separation distances from vessels and tanks to property lines and to buildings and structures.

American Petroleum Institute

The American Petroleum Institute (API) develops petroleum and petrochemical equipment and operating standards and represents the oil and gas industry. API 2610, Design, Construction, Operation, Maintenance, and Inspection of Terminal and Tank Facilities, addresses issues related to terminals and tank facilities, including site selection, tank spacing requirements, waste management, operations, fire prevention, piping systems, and other issues. API 2610 generally refers to NFPA 11 and 30 for fire protection issues. Fire water supplies “should be based on consideration of the specific risks involved”. Fire water supply can be from “any source that is capable of providing the required flow-rate and for sufficient duration”. API 2610 also indicates that each facility should develop a written emergency plan for the event of a fire in the facility.

Center for Chemical Process Safety

The American Institution of Chemical Engineers formed the Center for Chemical Process Safety (CCPS) in 1985 in response to the 1984 industrial accident in Bhopal, India. Since then, CCPS has published more than 100 process safety guidebooks. “Guidelines for Fire Protection in Chemical, Petrochemical and Hydrocarbon Processing Facilities” and “Facility Siting and Layout” address several issues related to the proposed Project facilities, including fire protection strategies, fire prevention, hazards analysis and risk assessment, equipment spacing, and design guidelines.

Industrial Risk Insurers

Industrial Risk Insurers (IRI) provides guidance for facilities to address property loss prevention. IRI Guideline 17 indicates that fire water supplies should be capable of supplying at least 500 gallons per minute (gpm) for four hours for pumping stations (IRI 17.3.3), and 3,000 gpm for 4 hours to all areas of an oil storage terminal (IRI 17.3.4). IRI IM2.5.2 also provides guidelines for the overall oil and chemical plant’s layout. The most important guidelines include (1) at least two entrances to the plant; (2) subdivision of the site into general areas (blocks) with a maximum size of 300 by 600 feet; (3) access roadways between the blocks to allow access to each block from

at least two directions; and (4) road widths and clearances sized to handle large moving equipment and emergency vehicles.

Chemical Facility Anti-Terrorism Standards

The *Code of Federal Regulations* includes Chemical Facility Anti-Terrorism Standards (Title 6, Part 27), which establish the security risks of chemical facilities based on the amount and type of chemicals at the facility. It requires high-risk chemical facilities (like the Inglewood Oil Field) to prepare Security Vulnerability Assessments and Site Security Plans. The Security Vulnerability Assessment shall include an asset characterization, threat assessment, security vulnerability analysis, risk assessment, and countermeasures analysis. The Site Security Plan shall address the vulnerabilities identified in the Security Vulnerability Assessment and identify how security measures will address and meet risk-based performance standards in the regulations and address potential modes of terrorist attack. The risk-based performance standards cover perimeter security, site assets, access control, personnel identification, introduction of substances and devices, attack and other crime deterrents, emergency response plan, monitoring and warning systems, training, personnel surety, reporting and investigation procedures and records.

State

2013 California Fire Code

The California Fire Code (*California Code of Regulations*, Title 24, Part 9) is designed to be adopted by reference into local ordinances. The purpose of the Code is to ensure the safeguarding of life and property from fire and explosion hazards arising from the storage, handling, and use of hazardous substances, materials, and devices and from conditions hazardous to life or property.

California Health and Safety Code

The *California Health and Safety Code* (Title 19, Public Safety) has been prepared and adopted for the purpose of establishing minimum standards for the prevention of fire and fire protection of life and property against fire, explosion, and panic. The provisions are enforced by the State Fire Marshall and the City Fire Chief and it requires that all buildings comply with the applicable building, electrical, mechanical, and plumbing codes; mandates management of vegetation for fuel modification; and includes standards for fire alarms/exits, hazards storage, testing/maintenance of emergency equipment, among other safety-related topics.

Local

City of Culver City General Plan

Public Safety Element

The *City of Culver City General Plan Public Safety Element* contains policies that address fire and geologic hazards. Listed below are the policies that address these concerns:

Public Safety Element Policy 1. Establish and enforce standards and criteria to reduce unacceptable levels of fire and geologic risk.

Public Safety Element Policy 4. Encourage improved fire protection for multi-story structures and high-hazard industrial facilities.

Public Safety Element Policy 5. Develop stringent site criteria for construction in areas with fire and/or geologic problems and prohibit construction if these criteria are not met.

Public Safety Element Policy 6. Encourage continued research in the fields of geologic and fire safety.

Public Safety Element Policy 7. Strengthen existing codes and ordinances pertaining to fire and geologic hazards.

Public Safety Element Policy 9. Require all new development and selected existing development to comply with established fire and geologic safety standards.

Public Safety Element Policy 13. Review and improve disaster preparedness and emergency response capabilities.

Culver City Municipal Code

The Culver City Municipal Code (CCMC) contains the City's regulations and ordinances, which include general and traffic regulations enforced by the appropriate Departments of the City of Culver City, including, but not limited to, the Culver City Police Department, the Community Development Department (Enforcement Services and Building Divisions) and the Public Works Department (Environmental Programs and Operations Division). In addition, Chapter 9.02 of the CCMC contains the City's fire prevention regulations. CCMC Section 9.02.005 states that the City has adopted the 2013 California Fire Code and 2012 International Fire Code by reference, as the "Fire Code of the City of Culver City". CCMC Sections 9.02.015 through 9.02.075 provide the amendments, additions, deletions, and substitutions of the California Fire Code.

Chapter 11.12, Oil, Gas and Hydrocarbons, of the Municipal Code contains the City's existing regulations for the continuation of nonconforming oil and gas drilling and associated activities. The regulations address permit requirements, operational requirements, and other requirements for the filing of directional surveys, notices, inspections, and others. Chapter 11.12 would be repealed and updated and superseded by the Drilling Regulations in the Inglewood Oil Field Specific Plan.

Brush Clearance Requirements

CCFD has established brush clearance requirements to ensure that all vegetation is maintained so as not to constitute a fire hazard or public nuisance and to prevent brush fires in the City. These requirements include provisions that the area within 30 feet around or adjacent to any structure to be free from native brush or hazardous vegetation, with the exception of specimen native shrubs, and that native brush or hazardous vegetation between 30 and 100 feet of any structure be no more than 18 inches high nor less than three inches above the ground level in order to maintain an adequate fire break. Specimen native shrubs shall not be closer than 18 feet from other native shrubs, brush, or structures and spaced at least 3 times their diameter from other specimen native shrubs. They shall also be free of dead wood and litter and trimmed up at least two feet from the ground or $\frac{1}{3}$ of their height. All native brush within 10 feet of any usable road surface shall be maintained at a height of not more than 18 inches but not less than three inches above the ground level. The City also requires that trees be no closer than ten feet from a chimney and weeds and dry grass within ten feet from any roadway or combustible fence shall not exceed a maximum height of three inches. Trees, shrubs, bushes, or other vegetation adjacent to or overhanging any structure shall be maintained free of dead limbs and other combustible matter. Similarly, roof surfaces shall be maintained free of leaves, needles, twigs and other combustible matter. All cut vegetation and debris shall be removed and legally disposed.

4.12.4 SPECIFIC PLAN AND REGULATORY REQUIREMENTS

Specific Plan Drilling Regulations

- Section 12.**
- A. Operating Permit.** Operator shall obtain an Annual Operating Permit, in accordance with the California Fire Code.
 - B. On Site Fire Equipment.** Fire extinguishing equipment shall comply with all applicable fire and safety regulations, including, but not limited to, NFPA Standards, IRI guidelines, American Petroleum Institute Industrial Labor Relations and shall be maintained in accordance with the requirements of the Fire Chief.
 - C. Fire Training and Equipment.** Operator shall be responsible for costs and expenses incurred by the City, up to \$25,000 annually (to be adjusted annually each July 1st to reflect the increase in the Consumer Price Index for all Urban Consumers, Los Angeles/Riverside/Orange County Area, as established by the U.S. Department of Labor for the period from March of the preceding year through March of the current year), for training and equipment, including hazardous materials training, oil well fire suppression and spill containment training, and other related specialized training and equipment as requested by the Fire Department. In accordance with the provisions of Section 9.A of the Specific Plan, the Draw-Down Account shall be used to fund such training and equipment when requested by the Fire Chief and approved by the City's Chief Financial Officer.
 - D. Fire Prevention.**
 - 1. The Fire Chief may require the immediate cessation of all operations within the Oil Field whenever, in his or her judgment, a fire hazard exists, as defined in Title 19, Division 1 of the California Fire Code.
 - 2. The Fire Chief may also require the emptying, transfer, or removal of petroleum and/or flammable materials from any tank or sump to such location as he or she deems advisable while such hazard exists.
 - 3. It shall be unlawful for the Operator to allow flammable liquids or waste materials to flow or remain on the surface of the ground, whether on the permitted premises or any other premises, public or private.
 - 4. It shall be unlawful for any person to smoke or throw a burning object within 25 feet of any derrick, loading rack, tank, or sump containing petroleum or any products thereof, or any flammable liquids.
 - E. Audit of Fire Protection Systems and Equipment.** The Fire Chief shall require the Operator to prepare, at its sole cost and expense, a review and third-party audit of fire protection systems and equipment as per the most recent NFPA requirements, California Fire Code, City Fire Code and Regulations, California Code of Regulations and API requirements. The third-party auditor shall be selected by the Operator and approved by the Fire Chief. Issues addressed shall include, but not be limited to fire monitor placements, fire-related water capabilities, fire detection capabilities, and fire foam requirements. The audit shall also include a list of any current violations on record and a corrective action plan, which shall identify each non-compliance item or other matter to be addressed, describe the

corrective action to be taken, and provide a timeline for the completion of each such corrective action. The audit results and corrective action plan shall be submitted to the Fire Chief for approval within 90 days of the date of approval of the Comprehensive Drilling Plan, or at such later date as may be approved by the Fire Chief for good cause shown. Thereafter review and audits shall be required every five years. The Operator shall submit to the Fire Chief monthly updates on the corrective action plan until such time as all corrective actions have been completed. The Operator shall complete any corrective action within the approved time limits called for in the plan.

F. Spill Containment Response Personnel, Training and Equipment.

1. The Operator shall conduct within the Inglewood Oil Field annual spill containment response training and shall at all times have available sufficiently trained personnel with an adequate amount of properly maintained equipment and/or facilities so that a spill of the entire contents from the largest oil tank on the Oil Field can be responded to and contained immediately to reduce the likelihood that the spill reaches a catch basin. The content of the spill containment response training shall, at a minimum, include training for the recording of spill events (e.g., date and location of spill, estimated size of spill, all substances involved, resources deployed to respond, and containment timeframe). The spill containment equipment shall comply with the requirements of the Local California Unified Program Agency and the U.S. Environmental Protection Agency (USEPA) and be inspected by the Fire Chief to ensure that it will be effective in the event of a spill.
2. This spill containment response training and equipment required by this subsection shall be in place no later than 90 days following the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the Community Development Director in consultation with the Fire Chief, for good cause shown.

G. Emergency Response Plan.

1. Within 180 days of the date of approval of the Comprehensive Drilling Plan, the Operator shall submit an Emergency Response Plan (ERP) to the Fire Chief. The ERP shall include measures to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities (see Section 29, Biological Resources). The Operator shall also ensure that the ERP satisfies all rules and regulations of the USEPA, California Code of Regulations, the Spill Prevention Control and Countermeasures Plan (SPCCP), the California Office of Spill Prevention and Response, and the U.S. Department of Transportation relating to onshore pipeline spills. Any modifications to the ERP shall be submitted to the Fire Chief. Operator shall fully implement and comply with all provisions of the ERP within 30 days following submittal of the ERP or at such later date as may be approved by the Fire Chief, for good cause shown. The Operator shall review and update the plan at least every two years to ensure the ERP is in compliance with this Section.

2. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Fire Chief, that an ERP is being implemented and has been approved for other parts of the Oil Field and can conclusively show that the ERP applies to the Oil Field within the jurisdiction of the City. Additional information may be required by the Fire Chief to demonstrate compliance with this Section.

H. Community Alert Notification System.

1. The Operator shall establish, maintain and test on an annual basis, a proposed Community Alert Notification System for automatic notification of area residents and businesses in the event of an emergency associated with Oil Operations that could require residents or inhabitants to take shelter, evacuate, or take other protective measures. The proposed Community Alert Notification System shall be reviewed and approved by the City's Fire and Police Chiefs.
2. The Community Alert Notification System required by this subsection shall be in place no later than 90 days following the date of approval of the Comprehensive Drilling Plan or at such later date as may be approved by the City's Fire and Police Chiefs, for good cause shown.

- I. **Annual Emergency Response Drills.** Annual Emergency Response Drills shall include the Culver City and Los Angeles County Fire Department. The Operator shall demonstrate the effectiveness of the ERP by responding to one planned emergency response drill per year which shall be conducted in conjunction with the Culver City and Los Angeles County Fire Department. Emergency response drills required by other agencies that involve Culver City and Los Angeles County Fire Departments can be used to satisfy this provision. In addition, the Operator shall demonstrate the effectiveness of the ERP by responding to not more than two unannounced drills each year, which may be called by the Fire Chief at the Inglewood Oil Field in coordination with Los Angeles County Fire Department, such that no more than two announced drills are conducted between both jurisdictions. If critical operations are then underway at the Oil Field, the Operator need not respond to an unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case, the Operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.

- J. **Site Assessment.** In the event of a spill, leak or discharge from a tank system, pipelines or any other facility, the Fire Chief and Community Development Director shall be immediately notified. A site assessment shall be completed to determine the nature and extent of the release and provided to the Community Development Director and the Fire Chief. If the Fire Chief determines that a potential fire or explosion hazard exists, the Site Assessment will be and submitted to the Fire Chief within 60 days of the spill leak or discharge, in accordance with the requirements of the California Fire Code. If the spill, leak or discharge presents a potential threat to the environment, including groundwater, or human health, then the Operator shall promptly notify all appropriate local, state and federal agencies.

Regulatory Requirements

- RR PUB-1** Oil and gas exploration, production storage and associated activities on the site must comply with the California Fire Code and pertinent regulations and guidelines of the NFPA, American Petroleum Institute (API), Industrial Risk Insurers (IRI), and the Center for Chemical Process Safety (CCPS).
- RR PUB-2** There are several Culver City Municipal Codes that would continue to apply after adoption of the Project:
- Land use and development in the City must comply with the City's Fire Code, as contained in Chapter 9.02, Fire Prevention, of the City's Municipal Code.
 - Oil and gas exploration, production storage and associated activities on the site must comply with the CCFD's brush clearance requirements.

4.12.5 THRESHOLDS OF SIGNIFICANCE

Thresholds Addressed in the Initial Study

The Initial Study prepared for the Project (included in Appendix A-1) concludes that the Project would have no impact on the following threshold, and further analysis of this threshold is not required in the Draft EIR:

- Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
 - Schools?
 - Parks?
 - Other public facilities?

Thresholds Addressed in this Environmental Impact Report

The Initial Study for the Project concludes that additional project-level analysis of the following thresholds of significance is required in this Draft EIR. According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would generally have a significant adverse environmental impact on public services if the following questions are answered in the affirmative:

- Threshold 12-1:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
- i) Fire protection?
 - ii) Police protection?

4.12.6 IMPACT ANALYSIS

Threshold 12-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i) Fire protection?

Oil and gas is generated at the Project Site 24-hours per day, 7 days per week and 365 days per year. As of 2015, there are 41 active/potentially active oil wells within the City IOF, and the Specific Plan permits the development of up to 30 new wells under the Maximum Buildout Scenario. Previous calls for Fire Department services to or near the Project Site are presented in Table 4.12-3 above. The majority of the calls were related to brushfires. Future buildout of the City IOF may result in an increase in vegetation on the Project Site due to landscaping requirements set forth in the Specific Plan. This landscaping would be maintained in accordance with Specific Plan requirements and the Brush Clearance Requirements outlined by the City. There are no existing habitable structures on the Project Site. While new habitable structures are not expressly proposed at this time, pursuant to Section 19 of the Specific Plan, sanitary toilet and washing facilities must be installed at any site where personnel are permanently stationed. Therefore, there is potential for sanitary facilities to be constructed within the City IOF in the future. Thus, there would be some potential for structure fires on the Project Site. Also, the future increase in the number of wells, pipelines, tanks, and well drilling/maintenance equipment at the Project Site would result in a greater potential for fire and associated demand for fire protection services from CCFD. Future wells and associated facilities would likely result in an increase in hazardous material storage and use in the City IOF, and may result in an increase in spills or other incidents from oil and gas exploration and drilling activities, as discussed in greater detail in Section 4.7, Hazards and Hazardous Materials.

Emergency medical services in the City IOF would be limited to employee accidents or medical emergencies, and rescue operations could be required. Compliance with California Occupational Safety and Health Administration (CalOSHA) regulations on employee safety would reduce hazards to workers and the need for emergency medical transport services. The closest hospital to the Project Site is Southern California Hospital Culver City (SCHCC), located approximately one mile west of the Project Site. The Kaiser Permanente Medical Center is another hospital approximately two miles north of the Project Site.

CCFD's response time to calls for rescue or emergency medical services will largely be influenced by ease of access to the incident site. Access to the Project Site is provided on South Fairfax Avenue via Stocker Avenue and on Duquesne Avenue through Culver City Park. As mentioned before, while Fire Station #1 is located closest to the Project Site (0.74 mile to the west), other fire stations in the City may also respond to fire and emergency incidents at the Project Site. Also, CCFD has automatic aid and mutual aid agreements with the fire departments of the County of Los Angeles and the cities of Los Angeles, Santa Monica, and Beverly Hills, as well as an emergency mutual aid plan with the State of California (under the California Disaster and Civil Defense Master Mutual Aid Agreement and the California Fire Service and Emergency Mutual Aid Plan). Thus, in the event of a large fire or incident at the site, all CCFD resources would be available, as well as, other fire departments with which CCFD has automatic aid and mutual aid agreements (if their services are requested).

Oil and gas exploration, production, storage and associated activities on the Project Site must comply with the California Fire Code and pertinent regulations and guidelines of DOGGR and CalOSHA (as discussed in in Section 4.7, Hazards and Hazardous Materials) and the NFPA, API, IRI, and CCPS (RR PUB-1). Compliance with the City Fire Code (RR PUB-2) would also be needed in terms of fire access, evacuation, fire flows, and other fire safety and fire prevention regulations in the City's Fire Code. The Oil Field Operator would also have to obtain construction permits and provide on-site fire equipment. In addition, the City has brush clearance requirements that would have to be followed as part of the Project.

Section 12 of the Specific Plan includes a number of guidelines that would have to be implemented by the Oil Field Operator related to reduction of fire hazards. These include an annual operating permit, on site fire equipment, funds for Fire Department training and equipment, fire prevention measures, a third-party audit of fire protection systems and equipment, Spill Containment Response personnel, training and equipment, an Emergency Response Plan, a Community Alert Notification System, annual emergency response drills, and a Site Assessment in the event of a spill, leak, or discharge from a tank system. Compliance with the Specific Plan requirements and existing regulations would reduce the potential for fire incidents and the demand for fire protection services at the Project Site. This compliance would also allow efficient Fire Department response to an on-site incident; reduce the potential for personal injury and property damage; and facilitate evacuation of the Project Site and surrounding areas. CCFD also has numerous policies, procedures and standards in place that will be utilized during emergency response and mitigation for incidents at the Project Site.

Hazards inherent to oil field activities may require a greater supply of water to satisfy fire-flow demand. In the event of a fire at the Project Site, any increased demand for water to satisfy fire-flow needs is expected to be available on or near the Project Site or would require use of water onboard fire fighting vehicles. On-site fire-fighting equipment specific to oil and gas wells and associated facilities would also be provided by the Oil Field Operator, as required under Section 12 of the Specific Plan.

Increases in Project Site inspections and permitting by CCFD may occur with new or redrilled wells and other facilities allowed by the proposed Specific Plan, but these services will be paid for by the Oil Field Operator in accordance with the City's adopted fee schedule.

There is an Emergency Response Plan for the entire Inglewood Oil Field that has been prepared and maintained by the current Oil Field Operator. Annual emergency response drills have taken place from 2009 to 2015. Hazards, fire protection, and emergency response provisions have been implemented and the likelihood of spills has been substantially reduced. An emergency response exercise held November 6, 2013 included representatives from the CCFD (LACDRP 2015). Thus, these efforts have included the Project Site and coordination with the CCFD, as required in the CSD. Therefore, available emergency response to the Project Site is expected to be adequate. Future increases in oil and gas activities on the Project Site would be required to be made part of the Emergency Response Plan pursuant to the proposed Specific Plan. No significant adverse impacts are expected.

CCFD has indicated that the increase in activities at the Project Site in compliance with the requirements of the Specific Plan would not adversely affect their services and that no facility improvements or mitigations are needed. The City regularly reviews their fire service levels as part of the annual budgeting process and adequate fire protection services are expected to be available throughout the City, including the Project Site. No new facilities are needed to provide adequate fire protection services to the Project Site. Impacts on fire protection services would be less than significant.

Thus, with compliance with existing fire regulations and implementation of the standards and requirements in the Specific Plan, impacts on CCFD would be less than significant, and no further mitigation is required.

Threshold 12-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

ii) Police protection?

The future increase in the number of wells and associated facilities at the Project Site would bring an increase in the number of people and the number of equipment and vehicles to the Project Site.

As outlined in Section 3.0, Project Description, of this Draft EIR, approximately seven workers are estimated to be on site during well pad construction. These 7 workers would be replaced by a total of 28 workers who would be involved in new well drilling activities during both the day and night shifts. Oil well rework activities are estimated to require a maximum of four workers. During well stimulation activities, there would be 8 to 15 workers for no more than 1 shift per day. Additional personnel from the Oil Field Operator may be on-site to observe and run ancillary equipment, as necessary.

It is estimated that on the peak day there would approximately 20 workers commuting to and from the site during the day shift on weekdays, with 1 worker during the night shift on weekdays and 2 workers during the day shift on weekends and 1 worker during the night shift on weekends. A total of four workers are anticipated to come to the Project Site for well workover and/or abandonment operations during the weekday day shift. Other vehicles that may come to the Project Site include two trucks for General Facility Operations and two trucks for well workover and/or abandonment operations.

This increase in workers and vehicles on the Project Site would bring in a greater potential for crime and associated demand for police protection services from CCPD. Due to the terrain of the Project Site, CCPD has indicated that assistance would likely be requested from neighboring agencies for additional resources in the event of an incident. CCPD also stated that it is unlikely that the increase in activities at the Project Site would adversely affect police protection services; however, depending on the location of equipment ingress and egress, local traffic could be negatively impacted, which could have a negative impact on CCPD response times (CCPD 2015). Traffic impacts are discussed in Section 4.14, Transportation and Traffic.

The Inglewood Oil Field must comply with Chemical Facility Anti-Terrorism Standards; therefore, the Security Vulnerability Assessment and Site Security Plan (Site Security Plan), which must be prepared by the Oil Field Operator, would cover the City IOF. On-site security measures, as set forth in the Site Security Plan, would reduce the incidence of crime and the demand for police protection and law enforcement services that may occur with the increase in the number of workers and vehicles on the site. On-site security personnel would provide the necessary services to deter crime and reduce the need for police protection and law enforcement services.

The Specific Plan's requirements for an ERP, Community Alert Notification System, and Annual Emergency Response Drills (Specific Plan Section 12) would allow on-site personnel, adjacent

residents, employees, individuals, and CCPD to improve emergency response and evacuation near the Project Site.

CCPD also has departmental policies and procedures in place that would be followed depending on the nature of the incident. Safe access for police personnel to the Project Site location would be necessary and important in the event of an incident that would require an emergency response and evacuation. The coordination of other resources that may be required to facilitate a safe response would also be considered (CCPD 2015).

The CCPD has indicated that it would not likely require any improvements due to this Project (CCPD 2015). Impacts to police protection resources would be less than significant with the Project. No mitigation is required.

4.12.7 CUMULATIVE IMPACTS

The extent of the cumulative analysis for fire protection and police protection services is based on the service areas of the CCFD and CCPD. These agencies primarily serve the City of Culver City, with automatic aid and mutual aid agreements with the fire departments of the County of Los Angeles and the Cities of Los Angeles, Santa Monica, and Beverly Hills that allow for the use of the resources of these agencies in the City and a mutual aid agreement with the State of California. The Los Angeles County Fire Department (LACFD) serves the unincorporated County area and 58 cities in the County and provides automatic aid to 33 other cities in Los Angeles County. The Los Angeles County Sheriff's Department (LACSD) serves the unincorporated County area and 40 contract cities in the County.

Under the mutual aid agreements, CCFD and CCPD provide mutual aid to incidents at the Inglewood Oil Field in the unincorporated area of Los Angeles County and surrounding areas. In addition, the cumulative projects listed on Table 2-5, Cumulative Projects, in Section 2, Environmental Setting, of this Draft EIR are Culver City projects that would all use the same police and fire protection resources as the Project. Also, future growth and development within Culver City, the Cities of Los Angeles and Beverly Hills, and the Westside Cities of Los Angeles County (including Ladera Heights, Culver City, Marina del Rey, and Santa Monica) would obtain fire protection and police protection services from CCFD and CCPD, and other public service agencies that have automatic aid and mutual aid agreements with Culver City.

Fire Protection and Emergency Services

Future intensification of oil field activities, as allowed by the Project, and in the entire Inglewood Oil Field is expected to be similar to the type of activities that have been occurring at the Inglewood Oil Field in the past. Planned and future commercial and residential developments would intensify urbanization near the Project Site. The resulting increase in the local population and introduction of new structures that would create a demand for fire protection and emergency services. This cumulative demand for fire protection services would require additional personnel and resources at CCFD, the Los Angeles County Fire Department, and other fire departments that provide automatic aid and/or mutual aid to CCFD.

However, compliance with the proposed Specific Plan and pertinent provisions of the California Fire Code, as adopted by local jurisdictions would be required by individual projects, as pertinent. Plan review of individual development projects by the respective fire departments would (1) prevent the creation of fire safety hazards from oil field activities and/or development; (2) require that fire prevention measures are incorporated into oil field activities and/or individual projects; and (3) facilitate fire emergency response by providing adequate access and fire alarm

systems. Compliance with Specific Plan requirements and all other applicable regulations would mitigate cumulative demands for fire protection services.

CCFD and individual fire departments also regularly review their services and the needed increases in staffing, fire stations, and equipment, as necessary, to keep response times acceptable and to adequately serve their respective service areas. These evaluations are expected to balance demand with available services and to prevent any significant cumulative adverse impacts on fire protection and emergency medical service levels. Impacts would be less than significant and no mitigation is required.

Police Protection and Law Enforcement Services

Increased oil field activities and future development near the Project Site would increase the local population and introduce new structures that would increase the demand for police protection and law enforcement services. This cumulative demand for police protection services would require additional personnel and resources at CCPD, the Los Angeles County Sheriff's Department, and police agencies that provide mutual aid to CCPD.

However, security measures at the Project Site, the Inglewood Oil Field and at individual development projects are expected to reduce the potential for crime incidence and the need for police protection and law enforcement services. CCPD also regularly reviews the adequacy of their police protection services as part of the annual budget process. This evaluation is expected to balance demand and CCPD services and would prevent any significant cumulative adverse impacts on police protection and law enforcement service levels. Impacts would be less than significant and no mitigation is required.

4.12.8 MITIGATION MEASURES

With the implementation of Section 12 of the Specific Plan and compliance with existing regulations (RR PUB-1 and RR PUB-2), impacts on fire protection and police protection services would be less than significant and no mitigation is required.

4.12.9 LEVEL OF SIGNIFICANCE

All potential impacts to fire protection and police protection services would be less than significant. Table 4.12-5 below summarizes the significance finding of each threshold addressed in this section before and after mitigation, where applicable.

**TABLE 4.12-5
SIGNIFICANCE SUMMARY**

Threshold	Project Level of Significance	Mitigation Measure(s)	Level of Significance after Mitigation
12-1 Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:			
i) Fire protection?	Less than Significant	N/A	Less than Significant
ii) Police protection?	Less than Significant	N/A	Less than Significant
N/A: not applicable			

4.12.10 REFERENCES

California Department of Conservation (DOC). 2015a (June). *Final Environmental Impact Report, Analysis of Oil and Gas Well Stimulation Treatments in California*. Sacramento, CA: DOC.

———. 2015b (July). *Draft Mitigation Policy Manual for Well Stimulation Treatment Permits* (Prepared Pursuant to Senate Bill 4 (2013 Pavley)). Sacramento, CA: DOC. ftp://ftp.consrv.ca.gov/pub/oil/CEQA/Oil%26Gas/Mitigation_Policy_for_WST-Draft.pdf.

Commission on Fire Accreditation International (CFAI). 2014 (July 7). Re-Accreditation Report – Culver City Fire Department. Chantilly, VA: CFAI. <http://www.culvercity.org/home/showdocument?id=494>.

Culver City, City of. . 2017a (March, access date). Culver City Fire Department – Activity 2016. Culver City, CA: the City. <http://www.culvercity.org/live/public-safety/fire/about-the-department/statistics>.

———. 2017b (March, access date). Stations and Facilities. Culver City, CA: the City. <http://www.culvercity.org/live/public-safety/fire/about-the-department/stations-and-facilities>.

———. 2017c (September). *Oil Drilling Regulations for the Culver City Portion of the Inglewood Oil Field* (“Inglewood Oil Field Specific Plan”). Culver City, CA: the City.

———. 2016b (current through). *The Municipal Code of the City of Culver City, California*. Cincinnati, OH: American Legal Publishing Corporation for the City. [http://library.amlegal.com/nxt/gateway.dll/California/culver/themunicipalcodeofthecityofculvercityca?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:culvercity_ca](http://library.amlegal.com/nxt/gateway.dll/California/culver/themunicipalcodeofthecityofculvercityca?f=templates$fn=default.htm$3.0$vid=amlegal:culvercity_ca).

———. 2015 (October). *Initial Study Inglewood Oil Field Specific Plan Project*. Culver City, CA: the City.

- . 1973 (as amended through 2014). *Culver City General Plan*. Culver City, CA: the City. <http://www.culvercity.org/work/building-culver-city/culver-city-general-plan>.
- Culver City Police Department (CCPD). 2016 (December 1, access date). *Culver City Police Department Homepage*. Culver City, CA: CCPD. <http://www.culvercitypd.org/>.
- . 2015. *Culver City Police Department – Monthly Report for April 2015*. Culver City, CA: CCPD.
- Los Angeles County Department of Regional Planning (LACDRP). 2015 (September 10). *Baldwin Hills Community Standards District Periodic Review – Final Report*. Los Angeles, CA: LACDRP. http://www.inglewoodoilfield.com/res/docs/baldwin_hills_community_standards_district_final_eir%20.pdf.
- Los Angeles County Fire Department (LACFD). 2017 (March, access date). *Find Services in Los Angeles County – Public Safety (Fire Stations)*. Los Angeles, CA: LACFD. <http://www.fire.lacounty.gov/fire-station-listings/>.

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