

SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.) states that the purpose of an environmental impact report (EIR) is to identify the significant effects on the environment of a project, to indicate the manner in which those significant impacts can be reduced, mitigated or avoided, and to identify feasible alternatives to the project (PRC Section 21002.1). A detailed description of the proposed Inglewood Oil Field Specific Plan Project (Project) is provided in Section 3.0, Project Description, of this Draft EIR.

The Project requires approval of certain discretionary actions by the City of Culver City (City) and other governmental agencies. Therefore, in accordance with PRC Section 21080, the Project is subject to environmental review under CEQA. For purposes of complying with CEQA, the City is identified as the Lead Agency for the Project.

In accordance with Section 15121(a) of the CEQA Guidelines (Title 14, California Code of Regulations [CCR] Section 15000 et seq.), this Draft EIR is an informational document that will inform public agency decision makers (including responsible and trustee agencies), bordering municipalities, interested parties and the general public of: (1) the significant environmental effects of the Project; (2) possible ways to minimize or avoid the significant effects; and (3) the definition of and analysis of alternatives to the Project that would reduce or avoid significant impacts. This Draft EIR will be used by decision makers when considering whether or not to approve, deny, or modify the proposed Project.

This Draft EIR has been prepared in conformance with CEQA and the CEQA Guidelines. Section 15151 of the CEQA Guidelines defines the standards of adequacy for an EIR:

“An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”

This Draft EIR is intended to serve as a Project EIR under CEQA. Section 15161 of the CEQA Guidelines states that a Project EIR should focus primarily on changes in the environment that would result from development of the project or, in the case of a land use regulation such as a Specific Plan, the full buildout of allowable development and implementation of associated actions identified in the Specific Plan. A Project EIR must examine all phases of a project, including planning, construction and operation. This Project EIR is intended to provide the environmental information necessary for the City to make a final decision on the requested discretionary actions to be considered as part of the proposed Project. This Draft EIR is also intended to support discretionary reviews and decisions by other agencies.

1.2 **ORGANIZATION OF THE ENVIRONMENTAL IMPACT REPORT**

This Draft EIR is organized into seven sections and the Executive Summary. A list of the Draft EIR sections and a brief description of their contents is provided below to assist the reader in locating information.

- **Executive Summary:** This section provides a summary of the Project Description, Alternatives to the proposed Project, environmental impacts, mitigation measures, and determination of significance.
- **Section 1.0, Introduction:** This section briefly discusses the purpose of the Draft EIR, identifies the environmental issues assessed in the Draft EIR, and describes the environmental review process and organization of the EIR. This section summarizes the scoping period and the comments received by the City on the Notice of Preparation (NOP) during the scoping process.
- **Section 2.0, Environmental Setting:** This section was prepared in accordance with Section 15125 of the State CEQA Guidelines and includes the Project location, a description of the Project Site, and a general overview of the existing environmental setting of the Project Site and the surrounding area. This section provides an overview of the regulatory setting and a discussion of related projects considered in the cumulative impact analysis.
- **Section 3.0, Project Description:** In accordance with Section 15124 of the State CEQA Guidelines, this section outlines the City's underlying purpose and objectives for the Project; includes a summary of the components of the Specific Plan; and discusses a potential Maximum Buildout Scenario for the City's portion of the Inglewood Oil Field (City IOF) allowed within the parameters of the Specific Plan. A discussion of discretionary actions needed to approve the Project and a list of other public agencies expected to use the EIR in their decision making are also included.
- **Section 4.0, Impact Analysis:** This section contains subsections 4.1 Aesthetics through 4.15 Utilities/Service Systems. Each subsection includes the following: methodology, environmental setting, regulatory setting, regulatory requirements, thresholds of significance, impact analysis, cumulative impacts, mitigation measures (if any), level of significance after mitigation, and references, as discussed in Section 4.0. Section 4.0 includes the following subsections:

Section 4.1: Aesthetics

Section 4.2: Air Quality

Section 4.3: Biological Resources

Section 4.4: Cultural and Tribal Resources

Section 4.5: Geology, Soils, and Seismicity

Section 4.6: Greenhouse Gas Emissions

Section 4.7: Hazards, Hazardous Materials, and Risk of Upset

Section 4.8: Hydrology and Water Quality

Section 4.9: Land Use and Planning

Section 4.10: Mineral Resources

Section 4.11: Noise

Section 4.12: Public Services and Facilities

Section 4.13: Recreation

Section 4.14: Transportation and Traffic

Section 4.15: Utilities and Service Systems

- **Section 5.0, Alternatives:** Pursuant to Section 15126.6 of the State CEQA Guidelines, this section includes an analysis of a reasonable range of feasible alternatives to the Project. Alternatives are analyzed that would feasibly attain most of the basic objectives of the Project, but would avoid or reduce any of the significant effects of the Project. The comparative merits of each alternative are evaluated when compared to the proposed Project, and an environmentally superior alternative is identified in compliance with Section 15126.6(e)(2).
- **Section 6.0, CEQA Mandated Analyses:** This section contains a summary discussion of any significant unavoidable impacts, potential growth-inducing impacts, energy impacts, and any significant irreversible environmental changes that would be caused by the Project.
- **Section 7.0, Preparers and Acronyms:** This section lists the persons that directly contributed to preparation of the Draft EIR and includes a listing of Acronyms used throughout the Draft EIR.

1.3 ISSUES ADDRESSED IN THIS ENVIRONMENTAL IMPACT REPORT

The Initial Study for the Project determined that most environmental factors, or issue areas, in the State CEQA Guidelines Appendix G environmental checklist should be addressed in the EIR, except for Agriculture and Forestry Resources, Mineral Resources, and Population and Housing. Regarding Agriculture and Forestry Resources, there are no agricultural uses or designated farmlands, forests or timberlands at or near the Project site. Regarding Mineral Resources, the Specific Plan allows for the continued use of an existing and active oil production field, and there would be no loss of availability of a known and/or locally-important mineral resource. Regarding Population and Housing, it is estimated that potential new workers would only account for 0.2 percent of the population of City of Culver City, which would not require new housing to be constructed, would not displace people, and would not necessitate construction of replacement housing elsewhere.

Thus, it was determined that the proposed Project would have no impacts related to these issues, and no further analysis is required in the Draft EIR. However, due to comments received during the Notice of Preparation (NOP) public review and Scoping Period, it was decided to provide further analysis of the potential impacts related to Mineral Resources, as such, Section 4.10 of the Draft EIR addresses this topic.

In compliance with Section 15064 of the State CEQA Guidelines, the determination of significance for each impact analysis question is based on the application of significance thresholds. Specifically, the significance standards are used to determine whether the impacts of the Project would be significant and unavoidable; would be less than significant with mitigation; would be less than significant; or would have no impact. Significance standards are either (1) qualitative and are presented through substantiation of the impact determination provided in the "Impact Analysis" for each environmental issue area or (2) quantitative and are derived from regulatory standards or directives from the Lead Agency. Where regulatory standards apply, they are specified within that issue area in the related Draft EIR section.

The significance thresholds set forth in this Draft EIR are based on the State CEQA Guidelines Appendix G environmental checklist; however, additional thresholds of significance have been added to certain Draft EIR sections that address the Lead Agency's environmental concerns. Thresholds of significance addressed in this Draft EIR that are in addition to the State CEQA Guidelines Appendix G environmental checklist include:

- Threshold 5-5:** Cause an induced seismic event including ground shaking and ground failure?
- Threshold 7-7:** Cause deterioration of components of oil field infrastructure due to corrosion, weathering, fatigue, or erosion that could reduce structural stability?
- Threshold 8-7:** Adversely impact groundwater quality through surface or subsurface spills or leaks during well stimulation?
- Threshold 8-8:** Cause migration of well stimulation fluids or formation fluids including gas to protected groundwater through non-existent or ineffective annular well seals?
- Threshold 8-9:** Cause migration of well stimulation fluids or formation fluids including gas to protected groundwater through damaged or improperly abandoned wells?
- Threshold 8-10:** Cause improper disposal of flowback in injection wells that could potentially impact groundwater quality?
- Threshold 8-11:** Cause an inability to identify specific impacts to groundwater quality from well stimulation activities?

1.4 PUBLIC REVIEW PROCESS

1.4.1 INITIAL STUDY/NOTICE OF PREPARATION

The City has complied with the State CEQA Guidelines by providing opportunities for early responsible and trustee agency participation in the environmental review process, as well as opportunity for early public consultation with bordering municipalities and interested organizations and individuals. Specifically, in accordance with Section 15082(a) of the State CEQA Guidelines, the City circulated an Initial Study (IS) and a Notice of Preparation (NOP) for a 30-day public review. The IS/NOP was sent to the State Clearinghouse, public agencies, special districts, responsible and trustee agencies, and other interested parties for a public review period that began on October 12, 2015 and ended on November 12, 2015 (CEQA Public Review and Scoping Period). The purpose of the IS/NOP is to formally convey that the City, as the lead agency, solicited input regarding the scope and proposed content of the Draft EIR.

A notice announcing the availability of the IS/NOP was also published in the *Culver City News* on October 8, 2015. Copies of the IS/NOP were made available at the Julian Dixon Library, temporarily located at the Mayme A. Clayton Museum - at 4130 Overland Avenue, Culver City, California, 90230; the Culver City Planning Division located at 9770 Culver Boulevard, Culver City, California, 90232; and were available for electronic download on the City's website at www.culvercity.org/inglewoodoilfield.

The NOP included a description of the Project; identification of potential environmental effects associated with Project approval and implementation; and an invitation to agencies and the public to review and comment on the IS/NOP, which are provided in Appendix A-1 of this Draft EIR. Comments on the IS/NOP were received from 10 agencies, 37 letters/emails from individuals or

groups, and two comment cards from the Scoping Meeting, which are provided in Appendix A-2. The Scoping Period comment letters, which contain environmental concerns, are listed in Table 1-1 below, along with a summary of the environmental issues raised and the Draft EIR section where the environmental topics are addressed. Only comment letters with environmental concerns are listed in Table 1-1.

**TABLE 1-1
SUMMARY OF WRITTEN COMMENTS ON THE
INITIAL STUDY/NOTICE OF PREPARATION
RECEIVED DURING THE SCOPING PERIOD**

Commenting Agency/Group (Date of Comment Letter)	Issue(s) Raised	Primary EIR Section(s) with Relevant Analysis
Letters Received from Agencies		
California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) – Division 1 (November 10, 2015)	DOGGR Permitting Considerations	Sections 4.1 through 4.15
California Department of Transportation (Caltrans), District 7 (October 13, 2015)	Traffic Concerns	Section 4.13
California Department of Transportation (Caltrans), District 7 (November 23, 2015)	Finding of Minimum Traffic Impact	Section 4.13
Culver City Unified School District (November 6, 2015)	Two Well Limitation	Section 3.0
County of Los Angeles Fire Department (November 2, 2015)	Erosion Control Watershed Management Rare and Endangered Species Vegetation Fuel Modification Cultural Resources County Oak Tree Ordinance	Section 4.5, Section 4.8 Section 4.8 Section 4.3 Section 4.3 Section 4.7 Section 4.4 Section 4.3
County of Los Angeles Department of Regional Planning (November 12, 2015)	Proper Reference to CSD Exhibit with Entire IOF and City IOF	Section 2.0 Section 3.0
County of Los Angeles Department of Public Works, Land Development Division (November 12, 2015)	Geology and Soils Hydrology/Water Quality Transportation	Section 4.5 Section 4.8 Section 4.14
Los Angeles Community College District, (November 12, 2015)	Cumulative Considerations Aesthetics Air Quality/Dust/Odor Geology/Soils – increased seismicity Greenhouse Gas Emissions Hazards and Accidents Hydrology and Water Quality Land Use and Planning Noise and Vibration Public Services Transportation and Traffic	Sections 4.1 through 4.15 Section 4.1 Section 4.2 Section 4.5 Section 4.6 Section 4.7 Section 4.8 Section 4.9 Section 4.11 Section 4.12 Section 4.14
South Coast Air Quality Management District (SCAQMD), (November 12, 2015)	Air Quality Analysis	Section 4.2
State of California Department of Fish and Wildlife (November 10, 2015)	Biological Impacts Oil Spill Prevention and Response Project Description Alternatives	Section 4.3 Section 4.7 Section 3.0 Section 5.0

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Letters Received from Individuals or Groups		
Glen Y. Arakawa, (November 12, 2015)	General Environmental Concerns	Sections 4.1 through 4.15
Jan Aura	Noticing in Carlson Park Community Comment Period Extension	N/A
J.E. Brockman (October 26, 2015)	Fracking Induced Air and Water Contamination Public Health Concerns Fracking Induced Seismicity	Section 4.2, Section 4.8 Section 4.2 Section 4.5
Tom Canarella, CCDC (October 26, 2015)	Risk of Upset Air Quality Health Concerns	Section 4.7 Section 4.2
Anthony Ciancola, (November 12, 2015)	Aesthetics Air Quality Geology Hazard Material Water Quality	Section 4.1 Section 4.2 Section 4.5 Section 4.7 Section 4.8
Baldwin Stocker, LLC (November 13, 2015)	References to "One Big Park", "Open Space", and Baldwin Hills Master Plan" Private Property Rights	Section 4.13
Citizens Coalition for a Safe Community (November 12, 2015)	Risk of Methane Gas Explosion	Section 4.7
Cone Fee Trust (November 12, 2015)	Land Use Fault Lines	Section 4.9, 4.12 Section 4.5
Charles Davis, (November 12, 2015)	Land Use Public Health	Section 4.9, 4.12 Section 4.2
Suzanne De Benedittis, (November 13, 2015)	Oil and Gas Related Health Risks	Section 4.2
Suzanne De Benedittis, (November 13, 2015) (Second Submittal)	Toxic Air Contaminants Health Study	Section 4.2 Section 4.2
Nancy Fiero, (November 11, 2015)	Public Health Seismic Activity and Aging Infrastructure	Section 4.2 Section 4.5
Freeport-McMoran Oil and Gas (November 12, 2015)	Project Description Mineral Resources Parks and Recreation Public Safety Traffic Hazards Air Quality Public Services Public Health	Section 3.0 Section 4.10 Section 4.13 Section 4.7 Section 4.14 Section 4.7 Section 4.2 Section 4.12 Section 4.2
Roberta Frye, (November 11, 2015)	Air Pollution Water Pollution Fracking Induced Seismicity	Section 4.2 Section 4.8 Section 4.5
Kevin R. Gallagher (November 9, 2015)	Seismic Activity Concern Seismic Retrofit for Old Infrastructure	Section 4.5 Section 4.7
Iain Gulin and Anne Lefton, (November 11, 2015)	Health Concerns – Fracking Air Quality – Fracking Water Quality – Fracking Soils – Fracking Ground Stability – Fracking	Section 4.2 Section 4.2 Section 4.8 Section 4.5 Section 4.5

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Commenting Agency/Group (Date of Comment Letter)	Issue(s) Raised	Primary EIR Section(s) with Relevant Analysis
David Haake, (October 26, 2015)	Objectives Alternatives Land Use (Zoning)	Section 3.0 Section 5.0 Section 4.9
David Haake, (November 12, 2015)	Groundwater – Fracking Risks Benzene – Air Quality – Fracking Air Pollution Radioactive Material in Groundwater and Surface Water from Fracking Health Effects Hazards/Accidents Earthquakes and Seismicity Noise Pollution Light Pollution Climate Change Land Use (Zoning)	Section 4.8 Section 4.2 Section 4.2 Section 4.8 Section 4.2 Section 4.7 Section 4.5 Section 4.11 Section 4.1 Section 4.6 Section 4.9
Andrea M. Hyman, (November 11, 2015)	Recreational Uses Greenhouse Gas Emissions Aesthetics Geologic Instability	Section 4.13 Section 4.6 Section 4.1 Section 4.5
itisarah@aol.com, (November 12, 2015)	Aesthetics	Section 4.1
Bronwyn Jamrok, (November 8, 2015)	Health Risks - Schools Seismic Retrofit for Old Infrastructure	Section 4.2 Section 4.7
Greg Jamrok, (November 8, 2015)	Health Risks - Schools Seismic Retrofit for Old Infrastructure	Section 4.2 Section 4.7
James (Jim) W. Lamm, (November 12, 2015)	Public health Aging Infrastructure Seismic Risks	Section 4.2 Section 4.7 Section 4.5. Section 4.7
Heather Larimer, (November 8, 2015)	Public Health	Section 4.2
Barbara Markoe, (November 12, 2015)	Public Health Safety	Section 4.2 Section 4.7
Joe Melvin (November 10, 2015)	City Attendance at Blair Hills Meeting	N/A
Mary McGrath, (November 9, 2015)	Water Quality Fracking Induced Seismicity	Section 4.8 Section 4.5
Stephen Murray, (November 13, 2015)	Subsidence Groundwater	Section 4.5 Section 4.8
Chris Paine, (November 9, 2015)	Public Health Fracking Induced Seismicity Water Demand	Section 4.2 Section 4.5 Section 4.15
Pekka Rautionmaa (November 1, 2015)	Oil Field Operator Extent of Proposed Drilling Area Effects on Blair Hills Use of Baldwin Hills Overlook Park Oil Drilling Regulations Use of Fracking or Slant Drilling Subsidence Health Risk	Section 2.0 Section 3.0 Section 4.2 Section 4.5 Technical Appendix B Section 4.5 Section 4.5 Section 4.2
Pekka Rautionmaa (Petition), (November 7, 2015)	Subsidence Earthquakes Health Risks	Section 4.5 Section 4.5 Section 4.2

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Commenting Agency/Group (Date of Comment Letter)	Issue(s) Raised	Primary EIR Section(s) with Relevant Analysis
Carolyn Strauss (November 10, 2015)	Requests No Fracking	Section 4.5
Lori Tritel, (November 9, 2015)	Groundwater - Fracking Earthquakes – Fracking	Section 4.8 Section 4.5
Sean Veder, (November 9, 2015)	Soil Contamination - Fracking Groundwater Contamination - Fracking Air Quality - Fracking Earthquakes - Fracking	Section 4.7 Section 4.8 Section 4.2 Section 4.5
Aura Walker, (October 20, 2015)	Water Demand – Fracking	Section 4.15
Teresa Ann Ward, (November 9, 2015)	Public Health Odors Fault Lines	Section 4.2 Section 4.2 Section 4.5
Tom Williams, (November 12, 2015)	Alternatives Land Use Mineral Resources Odors Greenhouse Gases Methane Oil Field Spills Groundwater Quality Cumulative Impacts	Section 5.0 Section 4.9 Section 4.10 Section 4.2 Section 4.6 Section 4.7 Section 4.7 Section 4.8 Sections 4.1 through 4.15

1.4.2 SCOPING MEETING

Pursuant to Section 21083.9 of the CEQA Statutes and Section 15082(c) of the State CEQA Guidelines, the lead agency is required to conduct at least one scoping meeting for all projects of State-wide, regional, or area-wide significance as outlined in Section 15206 of the State CEQA Guidelines. The scoping meeting is for jurisdictional agencies and interested persons or groups to provide comments regarding, but not limited to, the range of actions, alternatives, mitigation measures, and environmental effects to be analyzed. The City hosted one Scoping Meeting that was held on Thursday, October 22, 2015 from 6:00 pm to 8:00 pm at Culver City City Hall, Council Chambers, at 9770 Culver Boulevard, in Culver City, CA, 90232.

The City received two comment letters with environmental concerns at the Scoping Meeting. The comments are summarized in Table 1-2.

**TABLE 1-2
SUMMARY OF WRITTEN COMMENTS FROM THE SCOPING MEETING**

Commenting Agency/Group (Date of Comment Letter)	Issues Raised	EIR Section with Relevant Analysis
Daryl Gale (October 22, 2015)	Methane Health Risks	Section 4.6 Section 4.2
Suzanne De Benedittes (October 22, 2015)	Public Health Study	Section 4.2

1.4.3 PUBLIC REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

Upon completion, the Draft EIR was distributed to responsible and trustee agencies, other affected agencies, bordering municipalities, interested parties, and all parties who requested a copy of the Draft EIR in writing in accordance with CEQA. A notice announcing the availability (NOA) of the Draft EIR was published in the *Culver City News*. The 60-day public review period of the Draft EIR begins on Friday, September 15, 2017 and ends on Tuesday, November 14, 2017. Comments on the Draft EIR from public agencies (including responsible and trustee agencies), bordering municipalities, interested parties and the general public will be accepted during the 60-day public review period. The City provided a voluntary extension beyond the mandatory 45-day public review period to provide ample opportunity and time for the public to review the Draft EIR.

Written comments would need to be received by the City on or before November 14, 2017 at 5:30 PM. Written comments could be provided via email to IOFSpecificPlanProject@culvercity.org, by fax to (310) 253-5664, or by mail to:

City Attorney's Office
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232
Attention: Heather Baker, Assistant City Attorney
Subject: Inglewood Oil Field Specific Plan Project

The Draft EIR can be viewed or downloaded at the City's website at www.culvercity.org/inglewoodoilfield. A hardcopy of the Draft EIR is available for viewing at the following locations:

Draft EIR- Hardcopy Technical Appendices- Hardcopy & CD	Draft EIR- Hardcopy Technical Appendices- Hardcopy & CD
Julian Dixon Library County of Los Angeles Public Library 4975 Overland Avenue Culver City, CA 90230 (310) 559-1676	City of Culver City Planning Division 9770 Culver Boulevard, 2 nd Floor Culver City, CA 90232 (310) 253-6000

1.5 KNOWN ENVIRONMENTAL ISSUES OF INTEREST

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, which include the choices among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved regarding a project include decisions by the lead agency as to whether or not:

- The Draft EIR adequately describes the environmental impacts of the project;
- The recommended mitigation measures should be adopted or modified;
- The alternatives evaluated should be adopted or rejected; or
- Additional mitigation measures need to be required.

1.6 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

As set forth in Section 15124(d) of the State CEQA Guidelines, the City of Culver City is the Lead Agency for the proposed Project, and the responsible and trustee agencies listed below are expected to use the information in this Draft EIR for consideration of approvals related to and involved in implementing the Project. The Project's primary discretionary actions include adoption of the Inglewood Oil Field Specific Plan; approval of the Project's EIR; and adoption of zoning code and municipal code amendments necessary for the implementation of the Specific Plan. Because there is not a "project applicant" and therefore, there is not a specific proposal or articulation of proposed activities, the responsible and trustee agencies listed below will not need to issue permits for the primary Project approval, but rather potentially issue permits for future implementation of development subject to the Specific Plan.

- U.S. Army Corps of Engineers (USACE)
- U.S. Department of Transportation, Pipeline Hazardous Materials Safety Administration (PHMSA)
- California Department of Fish and Wildlife (CDFW)
- California Department of Oil, Gas, and Geothermal Resources (DOGGR)
- California Department of Transportation (Caltrans)
- California Department of Toxic Substances Control (DTSC)
- California Division of Occupational Safety and Health (CalOSHA)
- California Fire Marshal Pipeline Safety Division (CalFire)
- California Public Utilities Commission (CPUC)
- California Water Resources Control Board (SWRCB)
- Los Angeles Regional Water Quality Control Board (RWQCB)
- Los Angeles County Fire Department (LACFD)/Certified Unified Program Agency (CUPA)
- South Coast Air Quality Management District (SCAQMD)
- Southern California Edison (SCE)

1.7 **REFERENCES**

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

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

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