

SECTION 4.0 ENVIRONMENTAL ANALYSIS

Section 4.0 analyzes the potential environmental impacts associated with approval and implementation of the Inglewood Oil Field Specific Plan Project. The environmental analyses in this section of the Environmental Impact Report (EIR) focus on the impacts from development of the proposed Project's oil and gas production activities. This section of the Draft EIR also addresses the Project's potential direct, indirect, and cumulative environmental impacts.

The following environmental issues are subject to analysis:

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 Gases

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.

For each environmental issue analyzed in Section 4.0, the chapter is structured into the subsections described below:

Methodology: This section includes information about the methodology used to determine impact significance of the CEQA thresholds. If specific technical reports or analyses were prepared and included in the Technical Appendices for the Draft EIR, they are listed in this section. Each topic area has a different approach to analyzing significance. This section provides details to the approach used.

Environmental Setting: Section 15125 of the CEQA Guidelines states that “[a]n EIR must include a description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the Notice of Preparation is published from both a local and regional perspective.” The existing conditions are used as the baseline physical conditions the City will use to determine whether an environmental impact is significant or not. A discussion of the regional setting is included, as appropriate, and the analysis identifies environmental resources that are rare or unique to the region and that would be affected by the Project.

Regulatory Setting: This section includes information about policies and regulations that would be applicable to the Project and relevant to the environmental issue(s) being analyzed. Although

not an exhaustive listing, this includes regulatory requirements that would be applied to the Project. This information is listed in order of decreasing jurisdictional authority (i.e., federal, state, regional, county, and local), if an applicable requirement from that jurisdiction is included. For instance, not all environmental issues are subject to applicable federal requirements and, therefore, a listing for federal regulations is not always included.

Specific Plan and Regulatory Requirements: Applicable components of the Specific Plan that are germane to each environmental topical section are itemized. The entirety of the Specific Plan is located in Appendix A-2 of this Draft EIR. There are local, State, and federal regulations, laws, and ordinances that are required, whether or not a project is subject to CEQA. Such regulations must be complied with, and also serve to avoid or reduce potential environmental impacts such as the City of Culver City Municipal Code, South Coast Air Quality Management District (SCAQMD) Rules, the Clean Water Act, etc. As all public and private projects are required to comply with these regulations, they are not listed as mitigation measures but are identified as Regulatory Requirements (RRs).

Thresholds of Significance: This section includes a list of the CEQA thresholds of significance as presented in Appendix G of the State CEQA Guidelines. These thresholds and any other agency thresholds applicable to that environmental issue (e.g., South Coast Air Quality Management District air quality thresholds) are used as a basis for environmental analysis. Thresholds of significance provide an identifiable quantitative, qualitative, or performance standard for evaluating the significance of a project's particular environmental effect.

Impact Analysis: This section presents the analysis of direct, indirect, and cumulative environmental impacts associated with implementation of the Maximum Buildout Scenario; the analysis is based on the thresholds of significance for that issue analyzes the Project, assuming implementation of the Drilling Regulations and compliance with applicable RRs. Because the Project would allow for activities to occur in the Oil Field over time at an unknown rate of implementation from 2018 through 2032 (15 years), construction, maintenance, and operational activities will likely be occurring at the same time. Therefore, there would not be a defined short-term and finite construction period and a long-term operational period, like there is for most land development projects. As such, the impact analyses rely on the Maximum Buildout Scenario to set forth a conservative development scenario for activities in the City's portion of the Oil Field for the purposes of assessing environmental impacts. Under an accelerated drilling schedule (i.e., drilling three wells per year) as envisioned under the Maximum Buildout Scenario, it is possible that the span of development could be as short as 11 years, rather than 15 years as otherwise allowed under the Specific Plan. Once the maximum cap on new wells has been met, no further drilling would be allowed. In Sections 4.1 through 4.15 of this Draft EIR, the environmental impact analysis for each threshold of significance is based on the Maximum Buildout Scenario, unless otherwise stated in the section.

Cumulative Impacts: Pursuant to the Section 15130 of the State CEQA Guidelines, "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." As defined in Section 15065(a)(3) of the CEQA Guidelines, an effect may be cumulatively considerable if "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

The analyses of cumulative impacts in this Draft EIR complies with Section 15130 (b)(1) of the CEQA Guidelines, which states that the analysis of cumulative impacts may consider either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan, another related planning document, or in a previously adopted EIR. Section 2.5 of

this EIR contains a discussion of the overall methods used to determine the scope of cumulative projects considered in the cumulative impact analysis.

Mitigation Measures (MMs): If implementation of the Project would cause an environmental issue to exceed the threshold of significance for a topic area, then mitigation is required to avoid or reduce the impact. MMs are incorporated into the Draft EIR when a significant environmental impact has been identified. Project-specific mitigation measures are recommended to minimize the significant impacts of the Project, although incorporation of mitigation measures does not always ensure that Project impacts would be considered less than significant.

Level of Significance after Mitigation: This section summarizes the level of significance of impacts that would result from the Project after implementing any identified mitigation measures (MMs). Section 15126.4(a) of the California Environmental Quality Act (CEQA) Guidelines requires lead agencies to consider feasible MMs to avoid or substantially reduce a project's significant environmental impacts. MMs are required when a potentially significant environmental effect has been identified that cannot be reduced to a level considered less than significant through the implementation of Specific Plan Drilling Regulations and RRs. A summary of the significance of environmental impacts after compliance with the Specific Plan Requirements and RR and after implementation of the MMs, if any, are then stated for each environmental issue. The level of significance would be either no impact, less than significant, less than significant with mitigation, or significant and unavoidable.

References: This section provides a complete list of information sources used in the preparation of the specific topical analysis.

4.0.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

According to Section 15128 of the State CEQA Guidelines, an EIR must "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR".

The City of Culver City has engaged the public in the Draft EIR scoping process. The contents of this Draft EIR were established based on an Initial Study/Notice of Preparation (NOP) prepared in accordance with the CEQA Guidelines and based on public and agency comments received during the public scoping period. 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 Draft 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, estimated 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

During the IS/NOP preparation, direct and indirect impacts of the oil and gas development and operational activities associated with the implementation of the Specific Plan would have no impact or be less than significant for the following issue areas:

- Aesthetics
 - 1b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Agricultural Resources
 - 2a) Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
 - 2b) Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?
 - 2c) Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code, Section 12220[g]), timberland (as defined by Public Resources Code, Section 4526), or timberland zoned Timberland Production (as defined by Government Code, Section 51104[g])?
 - 2d) Would the Project result in the loss of forest land or conversion of forest land to non-forest use?
 - 2e) Would the Project involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?
- Cultural Resources
 - 5d) Would the Project disturb any human remains, including those interred outside of formal cemeteries?
- Geology and Soils
 - 6e) Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?
- Hazards/Hazardous Materials
 - 8e) Would the Project result in a safety hazard or people residing or working in the Project area for a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport?
 - 8f) Would the Project result in a safety hazard for people residing or working in the Project area for a Project within the vicinity of a private airstrip?
- Hydrology and Water Quality
 - 9g) Would the Project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

- 9h) Would the Project place within a 100-year flood hazard area structures which would impede or redirect flood flows?
 - 9i) Would the Project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?
 - 9j) Would the Project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?
- Land Use Planning
 - 10a) Would the Project physically divide an established community?
- Noise
 - 12e) Would the Project expose people residing or working in the Project area to excessive noise levels for a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport?
 - 12f) Would the Project expose people residing or working in the Project area to excessive noise levels for a Project within the vicinity of a private airstrip?
- Population and Housing
 - 13a) Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)?
 - 13b) Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
 - 13c) Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?
- Public Services
 - 14a) 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?
- Recreation
 - 15a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- Transportation/Traffic
 - 16c) Would the Project result in a change in air traffic patterns, including either an increase in traffic levels or change in location that results in substantial safety risks?

- 16d) Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

4.0.2 REFERENCES

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