# 4.1 <u>AESTHETICS</u>

## 4.1.1 METHODOLOGY

This Environmental Impact Report (EIR) section describes the aesthetic conditions at the Project Site and in the immediate surrounding areas, and it discusses potential aesthetic impacts that could result from implementing the Project. The Initial Study for the Project states that no impacts on scenic highways would occur with the Project. Thus, scenic highway impacts are not analyzed below. Information presented in this section is based on field reconnaissance of both on-site and surrounding areas; review of aerial photographs; topographic elevations; and computergenerated visual simulations prepared for the Project at maximum buildout. 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.

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."

The intensity of aesthetic impacts can be assessed in consideration of both the objective visual resource change created by the Project and the subjective viewer response to that change. Various factors contribute to the viewer's perception of visual quality and include, but are not limited to, distance from the Project Site, frequency of the view, length of the view, viewer activity, viewer preferences, and viewing conditions. Based on overall Project Site visibility from surrounding areas, it was determined that the locations that would be most affected by aesthetic changes to the Project Site are within Kenneth Hahn State Recreation Area (KHSRA), which would have the most comprehensive views of not only the City IOF, but also portions of the County IOF. This is in large part due to topography, because portions of the KHSRA near ridgelines and public trails are approximately 500 feet above mean sea level (msl), while the Project Site generally ranges from 90 to 420 feet above msl.

The second most sensitive viewpoint for aesthetic changes to the Project Site was determined to be generally within the parking lot area for the Baldwin Hills Scenic Overlook, which is approximately 375 above msl. In contrast, the majority of residences located east of Blair Hills Park and to the northeast of the Project site are approximately 200 feet above msl, and have views that are obscured by vegetation. Therefore, the primary sensitive viewers of the aesthetic changes to the Project Site were determined to be recreational users of the nearby public parks and trail systems (i.e., hikers, bicyclists, equestrian users, sporting event attendees) to the north and east of the Project Site.

The analysis of impacts to aesthetics is based on the changes to the physical environment. The City's General Plan is the guiding document for determining designated areas within the City that are considered visual resources worthy of protection. Once the inventory of the baseline of visual conditions is discussed, then the type of change and intensity/significance of the change in aesthetics to the important public views of the Project Site is evaluated.

Oil field development activities would occur continually, culminating in the full buildout of the City IOF in compliance with the restrictions set forth in the Specific Plan's Drilling Regulations. This aesthetic analysis assumes that the most conservative aesthetics analysis is the Maximum Buildout Scenario, as defined in Section 3.0, Project Description. In summary, the Maximum Buildout Scenario assumes the following activities occurring simultaneously: 66 operational well

pumps, 2 maintenance/redrill rigs, 1 well drilling rig, new tanks, 1 well pad under development, and 1 well stimulation activity occurring in the year 2027 (see Table 3-2, Annual Maximum New Wells, in Section 3.0, Project Description).

## 4.1.2 ENVIRONMENTAL SETTING

#### Visual Character of the Surrounding Area

A series of hills trend northwest to southeast through the lowland plain of the Los Angeles Basin from the Santa Monica Mountains to Newport Beach. These hills align with the Newport-Inglewood earthquake fault zone, as further discussed in Section 4.5, Geology, Soils and Seismicity. The Baldwin Hills, which contains the Inglewood Oil Field, are the most prominent. The Project Site is approximately 300 feet higher in elevation than Ballona Creek, which is a major drainage located approximately 0.13-mile to the west of the Project Site. The Project Site features rolling terrain, with on-site elevations ranging from approximately 90 feet above mean sea level (msl) along the western edge of the site to 420 feet above msl in the center. As such, the Project Site is elevated and can be seen by much of the surrounding community.

The City of Culver City is relatively flat, except for the Culver Crest and Blair Hills areas. Blair Hills is a hillside area at the northwestern end of the Baldwin Hills that is at a higher elevation than the rest of Culver City. An aerial photograph of the Project Site is provided in Exhibit 2-3, Specific Plan Boundary and Adjacent Land Uses, in Section 2.0, Environmental Setting, which shows the locations of facilities and tanks throughout the Project Site, as well as the developed land uses adjacent to the Project Site.

The area immediately north of the Project Site includes the single-family residential neighborhood of Blair Hills in Culver City, a multi-family development, Blair Hills Park, Baldwin Hills Scenic Overlook, and the Overlook's retention basin. The Baldwin Hills Scenic Overlook is a 68-acre State-owned park that has a visitor center and provides a hilltop vantage point of the surrounding communities and the Los Angeles Valley.

The eastern boundary of the Project Site is generally defined by La Cienega Boulevard. East of La Cienega Boulevard is the KHSRA, which is a 319-acre State-owned park that contains the rolling terrain of the Baldwin Hills and is developed with large open grass areas and walking trails.

West of the Project Site is Culver City Park, a 41.6-acre City park that is developed with a skate park (Culver City Skate Park), the Culver City Bone Yard Dog Park, playgrounds, softball diamonds, half basketball courts, walking trails, and soccer fields. Vacant land, industrial properties, multi-family residential development and the West Los Angeles College are located to the southwest, along with Ballona Creek traversing through the City from north to south.

The southern boundary of the Project Site is the border between Culver City and Los Angeles County. South of this boundary is the remainder of the Inglewood Oil Field, which includes oil and gas exploration; production, processing, storage, and associated facilities; and transmission pipelines and access roads maintained and operated by the Oil Field Operator.

In summary, the area surrounding the Project Site contains a mix of open space and parks, industrial land uses, residences and the County IOF. Grading for oil field operations and development have modified the natural topography, resulting in flat pads and access roads for well and tank equipment throughout the Inglewood Oil Field.

### Visual Character of the Project Site

The approximate 77.8-acre Project Site is industrial in character and is currently being used for oil and gas production, with numerous visible oil wells, storage tanks, pipelines and other associated equipment scattered across the Project Site. One area near the center of the Project Site, contains a higher concentration of more readily visible equipment, the T-Vickers Tank Farm, consisting of five aboveground storage tanks and appurtenant facilities, as shown in Exhibit 2-3 located in Section 2.0, Environmental Setting of this Draft EIR. The remainder of the Project Site is dotted with operational well pumps, as well as idle and plugged/abandoned wells that are not visible from a distance.

The landscape has been heavily altered through the removal of vegetation and the construction of access roads, well pads, pipelines, and a tank farm, although areas of vegetation and mature trees still remain on slopes and between the graded pads and access roads. Views of the Project Site can be obscured by vegetation and may be limited by topography, but generally include views of typically vegetated hillsides, graded pads and access roads, equipment associated with the T-Vickers Tank Farm, and well pumps and pipelines throughout the Project Site. The oil production equipment is mostly painted a color called "licorice" to reduce glare and visibility.

#### Views of the Project Site

Portions of the Project site are visible from various vantage points, including residences to the north; parks and open space areas to the north, northwest, east and west; motorists on La Cienega, Jefferson and College Boulevards; and other areas of the Inglewood Oil Field. As discussed above, the most prominent views of the City IOF are from the KHSRA and the Baldwin Hills Scenic Overlook.

The Baldwin Hills Scenic Overlook and Stoneview Nature Center are located immediately north of the Project Site. The Overlook is located between Culver City Park and the Blair Hills neighborhood. The highest vista point on the overlook offers a 360-degree panoramic view that includes the Santa Monica Bay, the Los Angeles Basin, and the Baldwin Hills. The Inglewood Oil Field, which includes the Project Site, is clearly visible from the Overlook. Graded ridge-top and hillside oil drilling sites, connecting dirt roads, and the T-Vickers Tank Farm and injection area are visible from the Overlook.

The KHSRA is located east of the Project Site, across La Cienega Boulevard. Mature trees located throughout the KHSRA may obstruct views of the City IOF; however, there are trails at the northern end of the park that rise to the highest elevations of the Baldwin Hills and offer views of the Los Angeles Basin. Portions of the Inglewood Oil Field, including the Project Site, are visible at a distance from the KHSRA.

Other areas with views of the Project Site include portions of the Blair Hills neighborhood of Culver City located immediately to the north of the Project Site. Views of the Project Site from the backyards of residences are partially blocked by fencing and vegetation along the property line. Unpaved access roads on the Project Site are adjacent to the property line, with oil field operations visible from the second-story windows of residential uses at the southern end of this neighborhood.

The Culver City Park is located west of the Project Site. Views of operating oil production well pumps are visible from portions of the Culver City Park. Several producing wells are located near the primary roadway (Duquesne Avenue) near the Boneyard, and other producing well sites are visible immediately adjacent to the park's boundaries.

La Cienega Boulevard is located along the eastern boundary of the Project Site. The oil field operations on the Project Site are visible from La Cienega Boulevard and the bridge that crosses over La Cienega Boulevard toward KHSRA. The view of the Project Site from this location is dominated by well pumps, dirt roads and perimeter security fencing. However, this view is only visible for a few seconds as vehicles travel on La Cienega Boulevard and cross the bridge.

Jefferson Boulevard is located less than 0.1 mile from the western portion of the Project Site. Views of the Project Site are available from the intersections of Jefferson Boulevard and Duquesne Avenue, Hetzler Road, and College Boulevard. Several production well pumps are visible on a ridgeline on the Project Site from these intersections. While moving vehicles on Jefferson Boulevard and College Boulevard near the Project Site may see the Project Site for a few seconds, people in vehicles that stop at the traffic signals at these intersections have longer views of the wells pumps, dirt roads and other equipment on the Project Site.

The Park to Playa Trail is a planned 13-mile multi-modal regional trail that will connect the Baldwin Hills parklands to the Pacific Ocean. The western portion of the Park to Playa Trail consists of the existing Ballona Creek Bike Path in Culver City and the Marvin Braude Bike Path in Playa del Rey. The eastern portion of the Park to Playa Trail is an approximate 7.0-mile system of walking, hiking, and bicycle trails running east-southeasterly through parks and open space areas in the Baldwin Hills (including existing trails in Culver City Park, the Baldwin Hills Scenic Overlook, the Kenneth Hahn State Recreation Area, and along the Stocker Street Corridor). The proposed Segment C of the eastern portion of the Park to Playa Trail will run from the KHSRA to the Baldwin Hills Scenic Overlook, as shown in Exhibit 4.12-1, Adjacent Recreational Areas, located in Section 4.12, Recreation of this Draft EIR, and will pass near the northeastern edge of the Project Site and immediately north of the central and western sections of the Project Site. Future trail users would see City IOF from the proposed Segment C of the Park to Playa Trail.

### Photographs of the Site

Exhibit 4.1-1, Existing Site View Locations, shows the location of photographs of the existing Project Site conditions, which are provided in Exhibits 4.1-2a through 4.1-2f, Existing Site Views. The photographs were taken June 25, 2015 and October 19, 2015. A description of each photograph is provided below:

**Location 1:** This photograph was taken along College Boulevard, looking north-northeasterly at the Project Site. This is the view of individuals in vehicles or on sidewalks along College Boulevard. Prominent visual features in this view include well pumps, electrical power poles, street lights, chain link fencing, mature trees, nearby warehouse buildings, and the roadway pavement and sidewalk. The Project Site has a rugged slope that rises up toward the northeast to form a hill. Scattered trees and shrubs are found throughout the slopes. Several production well pumps are visible near the street, as well as along the ridgeline. Portions of the Project Site farther east of the ridgeline are not visible from this view.

**Location 2:** This photograph was taken at the intersection of Duquesne Avenue and Leash Lane, looking easterly at Areas 2 and 3 of the Project Site. This is the view of individuals in vehicles on Duquesne Avenue and of users of the Culver City Bone Yard Dog Park. The foreground views show the dog park (including covered benches, trees and pole lights) on a relatively flat area. East of the dog park, the ground elevation rises and security fencing runs across the slopes in the middle ground. Beyond the fence are several production well pumps and additional well pumps on the ridgeline. Power lines on poles also run along the ridgeline. Views of the Project Site are partially obscured by trees at the dog park and on the slopes.







Location 1 - Looking northeast at the site from College Boulevard

# Existing Site View - Location 1

Inglewood Oil Field Specific Plan Project

# Exhibit 4.1-2a



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# Existing Site View – Location 2

Inglewood Oil Field Specific Plan Project

# Exhibit 4.1-2b



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**Location 3:** This photograph was taken from within Culver City Park at the eastern end of Duquesne Avenue. This is the view of the western edge of the Project Site boundary as seen by individuals in vehicles and Culver City Park visitors on Duquesne Avenue. The security gate serves as the access point to the Project Site, with chain link fencing topped with barbed wire as security fencing on both sides of the gate. A dirt road leads into the Project Site as it winds between two hills that are north and south of the road. Trees and brush cover the hillside slopes, with a production well pump visible along the ridgeline. Power lines on poles and a communications antenna dot the top of the hills. Portions of the Project Site beyond the hills are not visible from this view.

**Location 4:** This photograph was taken from the softball field at Culver City Park at the northernmost end of Duquesne Avenue, looking southeast. This is the view of park visitors at and near the softball field. Foreground views are dominated by the softball field, with fences and trees lining the edges of the field and views of oil production pumps visible just above the tree tops. The communication tower visible on the left side of the photograph, while not in the Project Site and not oil field related equipment, is a prominent feature in the viewshed. This tower is adjacent to the northwestern corner of the Project Site. Due to ground elevations and vegetation, the Project Site is not readily visible from this location.

**Location 5:** This photograph was taken near the northern boundary of the Project Site, looking south at the Project Site. This is one of the views visitors of the Baldwin Hills Scenic Overlook see of the Project Site. The foreground view is the parking lot of the Scenic Overlook. Beyond the parking lot, the Project Site features a hilly terrain and is covered with scattered trees and shrubs. On the left portion of the photograph, the T-Vickers Tank Farm can be seen on top of a hill, with the nearby communication tower, utility poles, structures, and chain link fencing. In the middle are several oil production pumps on a graded hill top. Another communication tower is present at the right portion of the photograph. Views of urban development farther south are visible in the background.

**Location 6:** This photograph was taken from within the northern end portion of KHSRA, looking southwest at the Project Site. This is the view of park visitors at and near the trail that leads to Inspiration Point. Foreground views are dominated by the slopes of KHSRA but distant views of the Project Site and the Inglewood Oil Field are visible from this vantage point. Scattered production oil pumps, storage tanks, utility lines and poles, and communication towers are present on the hilly terrain that is heavily marked by graded pads and dirt roads.

### Light and Glare

Light and glare from the Project Site is currently limited to lighting fixtures at each active well Project Site and security lighting around the City IOF. With the hilly terrain, all on-Project Site lights are not readily visible from any one location. The area surrounding the Project Site has nighttime lighting sources that include exterior lights at residences, businesses, West LA College, parks, streetlights, and passing traffic along La Cienega, Jefferson, and College Boulevards. Glare is limited because most on- and off-site uses in the area are constructed of non-reflective materials. Oil production equipment is mostly painted a color called "licorice", which greatly reduces glare.



# Existing Site View – Location 3

Inglewood Oil Field Specific Plan Project

# Exhibit 4.1–2c



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Location 4 - Looking southeast from the softball field at Culver City Park

# Existing Site View - Location 4

Inglewood Oil Field Specific Plan Project

# Exhibit 4.1-2d



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Location 5 - Looking south from north of the parking lot at the Baldwin Hills Scenic Overlook

# Existing Site View - Location 5

Inglewood Oil Field Specific Plan Project

# Exhibit 4.1–2e



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Location 6 - Looking west at the site from Kenneth Hahn State Recreation Area

# Existing Site View – Location 6

Inglewood Oil Field Specific Plan Project

# Exhibit 4.1–2f



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## 4.1.3 REGULATORY SETTING

### <u>Federal</u>

There are no federal plans or policies identified related to aesthetics/visual resources on the Project Site.

## <u>State</u>

There are no State plans or policies identified related to aesthetics/visual resources on the Project Site because the City IOF is not located near or within the viewshed of any eligible or designated California Scenic Highway Program scenic highways (Caltrans 2016). The nearest eligible State Scenic Highway is the portion of State Route (SR) 1, also known as Pacific Coast Highway, which becomes eligible at its intersection with SR-187/Venice Boulevard. The Project Site is located approximately 3.9 miles northeast of the intersection of SR-1 with SR-187.

### <u>Local</u>

#### Culver City General Plan

The Culver City General Plan serves as the policy document for land use and development in the City. It consists of nine elements: Land Use, Circulation, Housing, Open Space, Noise, Conservation, Recreation, Seismic Safety, and Public Safety. The intent of the General Plan is to provide for the physical, social, and economic needs of the City and its community. The General Plan was built around goals for the creation of an urban design, urban forest, and open space network that links neighborhoods and businesses and instills civic pride and a community that protects its natural resources, among others. The Land Use Element itself contains a number of policies that address the preservation of views:

**Policy 1.B** Protect the City's residential neighborhoods from the encroachment of incompatible land uses and environmental hazards which may have negative impacts on the quality of life (such as traffic, noise, air pollution, building scale and bulk, and visual intrusions).

**Policy 16.F** Establish noise, safety, aesthetic and access criteria for areas impacted by existing incompatible land uses.

**Policy 27.B** Protect the visible and usable open space resources within Blair Hills by establishing land use definitions for visual resources and natural areas that include guidelines for use.

Policy 27.D Protect views of and from Blair Hills by establishing viewshed guidelines.

**Policy 27.F** Prepare a feasibility study and a Focused Special Study for the undeveloped portions of the Blair Hills/Baldwin Hills Area to identify scenic views and viewsheds to be preserved and enhanced as part of any future development.

The Open Space Element seeks to protect and enhance existing open space in the City and to provide additional open space through land acquisition and expansion. Adjacent to the Project Site contains both publicly and privately owned parcels of land that function as visual amenities. Open space resources are to be safe, aesthetically pleasing, and accessible to all. There is one policy in this Element that addresses scenic resources:

**Policy 6.A** Establish viewshed guidelines, which protect views of and from Culver City Park, Blair Hills, and Culver Crest.

### Culver City Municipal Code

The Culver City Municipal Code (CCMC) contains the adopted ordinances and regulations of the City. Chapter 9.12 of the CCMC outlines view preservation rights for property owners in the City, which serve to preserve and seek restoration of preexisting views of property owners from unreasonable obstruction due to the growth of one or more trees ("trees" include shrubs, hedges, bushes and other vegetation). The regulations call for restoration actions through trimming; thinning; crown reduction; topping; and/or removal of trees in hillside areas (including Hetzler/Tompkins, Blair Hills, and Culver Crest).

CCMC Section 17.300.040 sets forth general standards for outdoor lighting. Exterior lighting shall comply with the following requirements:

- All lighting fixtures shall be architecturally integrated with the character of the structure.
- All lighting shall be energy-efficient, and shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the Project Site, and shall be directed downward and away from adjoining properties and public rights-of-way.
- Permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness.
- Timers, where acceptable, shall be used to turn off lights during hours when they are not needed.
- Uniformity or, where appropriate, compatibility of lighting type (i.e., height, wattage, energy efficiency, base support, finish material, texture, color and style of poles and luminaires) shall be provided.
- Landscaping and pedestrian walkway lights shall be low profile.
- Freestanding light poles and luminaires shall not exceed a maximum height of 18 feet, or a lesser height determined by the Director, to mitigate any impacts to adjoining properties.
- Security lighting shall be provided at all entrances/exits, except in a residential zone.

Title 17 of the CCMC is the City's Zoning Code, which includes setback requirements for different zoning districts and requires that setback areas be landscaped.

## 4.1.4 SPECIFIC PLAN AND REGULATORY REQUIREMENTS

#### Specific Plan Drilling Regulations

- Section 11.B. Proven reasonable and New Technology. feasible technological improvements which are capable of reducing the environmental impacts of drilling and redrilling to surrounding uses and the environment, shall be promptly implemented to the extent such technology is commercially available. As part of the Annual Drilling Plan, in accordance with Section 31, Operator shall submit a Clean Technology Assessment identifying technologies which have been achieved in practice in North America which are capable of reducing impacts in the following areas: air quality (including without limitation electrified and natural gas-powered drill rigs), groundwater quality, spill and upset prevention and containment, odors, aesthetic, noise and climate change. Such technology shall be implemented in connection with wells identified in the Annual Drilling Plan unless Operator demonstrates the technology is not technologically feasible or is not commercially available.
- **Section 21.J.1. Drilling and Redrilling Setbacks.** The following setbacks shall apply within the Oil Field for drilling or redrilling:
  - 1. Drilling.
    - a. At least 400 feet from Developed Areas
    - b. At least 75 feet from any public roadway
    - c. The well hole setbacks prescribed in this subsection may be reduced at the discretion and approval of the City Council if it can be determined the setback reduction will not be detrimental to the public health, safety or welfare, or the environment.
    - d. As part of the Annual Consolidation and Drilling Plan (Section 31.B) the Operator shall provide an inventory of existing wells that encroach into the setback area specified above. Said inventory shall also include an estimated schedule for properly abandoning the wells encroaching into the setback area, based upon their respective current productive life without redrilling.
- **Section 16.C.** No new storage tank shall be constructed closer than 500 feet from any Developed Area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any oil storage tank. New tanks shall be located such that they are not visible from residences, parks or other public areas and shall not be placed on ridgelines, unless the tank can be fully screened through the use of mature landscaping in accordance with an approved Landscaping Plan (Section 37.A).

# Section 31.B. Annual Consolidation and Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan.

**1.** The maximum number of wells to be drilled or redrilled on an annual basis, which shall be no more than two wells per year for the first two years; if in any year thereafter, the Community Development Director determines that this

Specific Plan is protective of the public health, safety and welfare, and the environment, then three wells per year may be drilled, until such time that the Community Development Director determines otherwise or the maximum number of allowed new or redrilled wells is reached (as set forth in Section 21.J.1).

**2.** No more than one drilling or redrilling rig erected at any one time.

**3.** Approximate location and estimated construction dates of all wells proposed to be drilled or redrilled over the following calendar year. This information shall also include wells proposed or permitted to be drilled or redrilled and existing wells in active of potentially active operation in the Los Angeles County portion of the Inglewood Oil Field to the extent such wells may result in impacts to Culver City neighborhoods. Impacts from the Los Angeles County portion of the Oil Field shall be taken into account in planning the location and timing of drilling in the IOF.

**4.** Approximate location of all proposed new well pads, including their size and dimensions.

**11.** A topographic vertical profile showing proposed location of new wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed wells and other production facilities from areas outside the Oil Field.

**12.** Location of specific landscaping and/or fencing used to visually screen the Oil Operations and related equipment from residential, recreational, and institutional land uses or adjacent public streets, and to improve the visual appearance of existing Oil Field operations. If no landscaping is proposed, an explanation as to the infeasibility of screening particular operations and/or equipment.

**Section 36.** Outdoor lighting shall be restricted to only those lights that are required by the CCMC and other applicable federal, state and local regulations for the lighting of building exteriors, drilling, and redrilling rigs and for safety and security needs. In addition, the Operator shall comply with the following provisions:

**A. Screening.** All new point lighting sources within the Oil Field shall be screened and directed to confine direct rays to the Oil Field and to prevent offsite spillover of lighting to surrounding residential, recreational, and other Sensitive Developed Areas.

**B. Lighting Plan.** A detailed Lighting Plan shall be prepared for each new permanent structure and submitted to the Community Development Director for review and approval. No work may be commenced on such permanent structure until the Lighting Plan has been approved by the Community Development Director. The Lighting Plan shall include any measures requested by the Community Development Director.

- Section 37.A. Landscaping Plan. Concurrently with the submission of the Comprehensive Drilling Plan, or at such later date as may be approved by the Community Development Director, for good cause shown, Operator shall submit a Landscaping Plan to be reviewed and approved or conditionally approved by the Community Development Director. The Plan shall be designed to: (1) specify landscaping and fencing that will be used to visually screen the Oil Operations and related equipment and facilities from Developed Areas or adjacent public streets; (2) improve the visual appearance of the existing Oil Field; and (3) ensure compatibility with the surrounding environment. The Plan shall be reviewed by the Operator in conjunction with the Annual Drilling Plan to determine if modifications to the Plan are required and report its findings to the Community Development Director. Such findings and proposed modifications to the Plan shall be submitted to the Community Development Director for review and consideration of approval. Operator shall comply with all provisions of the approved Plan.
- **Section 41.D. Painting.** Within two years of the date of approval of the Comprehensive Drilling Plan, or at such later date as may be approved by the Community Development Director for good cause shown, all Oil Operations-related structures visible from public roadways and surrounding properties shall be painted or otherwise surfaced or textured with a color that is compatible with Developed Areas and has been approved by the Community Development Director. The painting or other surfacing of structures shall be maintained in good condition. This requirement may be satisfied if the Operator can demonstrate, to the satisfaction of the Community Development Director, that such Oil Operations-related structures have been painted or otherwise surfaced or textured with a color that meets the requirements for other parts of the Inglewood Oil Field and also meets the intent of this Section. Additional information may be required by the Community Development Director to demonstrate compliance with this Section.

# **Regulatory Reguirements**

**RR AES-1** Exterior lighting at the Project Site shall comply with Section 17.300.040 of the Culver City Municipal Code.

# 4.1.5 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 substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

### 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 have a significant adverse environmental impact on aesthetics if it would:

- **Threshold 1-1:** Have a substantial adverse effect on a scenic vista.
- **Threshold 1-2:** Substantially degrade the existing visual character or quality of the Project Site and its surroundings.
- **Threshold 1-3:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

#### 4.1.6 IMPACT ANALYSIS

#### Threshold 1-1: Would the project have a substantial adverse effect on a scenic vista?

The Open Space Element of the *Culver City General Plan*, under the "Privately Owned Natural Areas and Visual Open Space" category, states that within Culver City there are approximately 190 acres of privately-owned large parcels of land that function as visual amenities. These include undeveloped areas of Blair Hills (103 acres) and two cemeteries which are partially or wholly in Culver City. A portion of Blair Hills is currently an operating oil field.

The Project Site is adjacent to the Baldwin Hills Scenic Overlook, which provides views of the Los Angeles Basin and the Inglewood Oil Field. Existing views from this vista point include various types of oil and gas production equipment and appurtenant facilities, such as well pumps, storage tanks, aboveground pipelines, power lines, security fencing, and security lighting. Also visible from this Overlook are non-oil production equipment including communication towers and accessory buildings. Viewers at the adjacent Blair Hills residential neighborhood and Culver City Park would also see the Project Site but these views would be limited to areas of the Project Site that are directly in front of the viewers, due to intervening topography and vegetation. Thus, while farther from the Project Site, the Baldwin Hills Scenic Overlook would provide the largest expanse of views of the Project Site.

Oil field development activities would occur continually for a period of 15 years, culminating in the full buildout of the City IOF in compliance with the restrictions set forth in the Specific Plan's Drilling Regulations. This aesthetic analysis is assuming that the most conservative analysis for aesthetics is the Maximum Buildout Scenario, as defined in Section 3.0, Project Description. However, an important component of an aesthetics analysis is the duration of the visual impacts. Therefore, context is provided below to inform about the temporal duration of anticipated activities that would be occurring at the same time.

There are several phases to constructing an oil production or water injection well. Construction activities begin with well pad preparation. The well pad site is cleared of vegetation and graded to level the surface area. Equipment used for this operation typically consists of a bulldozer or backhoe. Site preparation typically takes seven to ten days with crews ranging from two to five people. Use of existing roads and development of temporary access roads may also be needed to access the well pad. If an existing road cannot be used, a new road is constructed from adjacent existing roads.

Drilling equipment and materials are brought to the Project Site once the well pad has been completed. This equipment may include a drilling rig, which is approximately 100 to 180 feet in height (depending on the depth of the well), diesel powered mud pumps, trailers for drill workers, storage racks for drill pipes and casings, oil storage tanks, water tanks, and drilling mud tanks.

The most prominent visual piece of equipment is the drilling rig, which would be a temporary component in the skyline due to its height. An exploratory well can require approximately 15 to 30 days to drill, and deeper wells can require several months. The well is then tested to determine if it has the potential to be productive, which requires an additional 30 to 90 days. As such, the total drilling operation (site preparation, drilling and testing) can take as much as six months to complete (DOC 2015a).

In the Specific Plan, the maximum number of wells allowed to be drilled or redrilled through 2032 is no more than 30 wells. The maximum number of wells to be drilled or redrilled on an annual basis, after the first two years, is three wells. However, no more than one drilling or redrilling rig can be in place at any one time. Thus, the drill rig would be present on the Project Site at different locations for 60 to 90 days each year until 2028 (see Table 3-2 in Section 3.0, Project Description). This drill rig would be visible to nearby residents, park users, and motorists that pass on adjacent streets.

The Drilling Regulations require a setback of 400 feet from any Developed Area (including residential and recreational spaces) and 75 feet from a public roadway for any drilling and redrilling of new wells. Thus, the nearest area for a drill rig would be at least 400 feet from the Blair Hills neighborhood, limiting the intrusions in their foreground views of residents. Passing motorists would have limited views of the drill rigs as they commute via La Cienega, Jefferson and College Boulevards; however, the drilling rig could be up to 180 feet high and would be visible to residents, motorists, and users of the adjacent parks, as well as visible from various points in Culver City looking up towards the Baldwin Hills.

Exhibit 4.1-3a, View Simulation Overview, provides an aerial view of the assumed placement of wells, drill rigs, tanks, well pad construction, and locations of well stimulation activities in the Maximum Buildout Scenario. In addition, two visual simulations have been prepared to depict the views of the Project Site from key vantage points during the Maximum Buildout Scenario (Exhibits 4.1-3b and 4.1-3c). As depicted in Exhibit 4.1-3a, the locations of facilities for the purposes of providing a conservative analysis of visual impacts at full buildout of the City IOF are the locations shown in the two visual simulations. Exhibits 4.1-3b, Visual Impact Simulation - Baldwin Hills Scenic Overlook, depicts the Maximum Buildout Scenario when viewed from the north, looking southerly toward the western portion of the City IOF. Exhibit 4.1-3c, Visual Impact Simulation-KHSRA, depicts the Maximum Buildout Scenario when viewed from the east, looking westerly towards the eastern portion of the City IOF.

The visual simulations show potential changes in views of the Project Site that could occur under Maximum Buildout Scenario. These depictions are considered to be conservative because they do not depict locations for new landscaping that would be required by the Landscaping Plan, as set forth in Drilling Regulations Section 37. The presence of landscaping for the purpose of screening particular operations and/or equipment would help reduce the visibility of oil field operations. Due to the required 400-foot setback and the distance from the Project Site, changes in views would not occur in the foreground but would be confined to the middle ground from the Baldwin Hills Scenic Overlook and background views from the KHSRA.

The visual simulations show that the Maximum Buildout Scenario would intensify development in the City IOF, but only in the areas outside of the 400-foot buffer area. The number of well pumps would approximately double when compared to the current condition; however, not all of these wells would be visible within one single viewshed. New tanks would be visible at the T-Vickers Tank Farm and new grading would be underway. Trucks, Baker tanks for fluid storage, equipment staging areas for maintenance and drill rig equipment, and employee vehicles would also be visible. Some of these areas would be obscured from view by the requirement to install







**Current Conditions** 



Maximum Buildout Conditions

#### Exhibit 4.1-3b Visual Impact Simulation – Baldwin Hills Scenic Overlook

Inglewood Oil Field Specific Plan Project

PSOMAS

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**Current Conditions** 



Maximum Buildout Conditions

# Visual Impact Simulation – Kenneth Hahn State Recreation Area

Inglewood Oil Field Specific Plan Project

# Exhibit 4.1-3c

PSOMAS

landscaping for visual shielding of the City IOF equipment, per the Drilling Regulations. The drill rig would be the most prominent feature in the viewshed due to its height of 100 - 180 feet. The drill rig, in combination with the two maintenance rigs and other existing communication towers in, or adjacent to, the Project Site, would contribute to the visual impact of the Maximum Buildout Scenario and would not be obscured by landscaping or topography.

Although the impact to views from the Baldwin Hills Scenic Overlook and from the KHSRA would be adverse, with implementation of the Drilling Regulations, the Maximum Buildout Scenario would not substantially adversely affect a scenic vista.

The existing setting of the Project Site is industrial looking in nature and has been substantially altered by historic and current oil field operations. It is anticipated that the majority of the future well pumps would be placed on existing graded pads, which is likely due to the ability of the Oil Field Operator to utilize directional drilling to access subterranean portions of the Inglewood Oil Field reserves. Therefore, although the intensity of the current land use would be increased, the types of facilities would be very similar to those already on the Project Site, which have been operational for decades.

Since the drilling/redrilling rig would be situated at one location for approximately 30 days and since towers of similar height and design are currently "permanently" located within the viewshed of the Blair Hills residential neighborhood, the Baldwin Hills Scenic Overlook, and the Culver City Park, the addition of a temporary drilling rig and maintenance rigs would be adverse but would be temporary and not out of character for the historic or existing uses on the Project Site.

Once a well is constructed and operational, the most prominent equipment that would be visible is the well pump, in addition to any supporting equipment such as storage tanks and pipelines. New well pumps would be similar to existing well pumps found throughout the Project Site, and tanks would be required to avoid ridgelines or other prominent areas in the viewshed.

The Drilling Regulations set forth numerous requirements that are not in place today and would serve to reduce future visual impacts. For example, (1) the required 400-foot setback would prohibit oil and gas activities adjacent to Developed Areas; (2) a Landscaping Plan is required to visually screen and obscure views of the well pads, drilling rig, well pumps, pipelines, and storage tanks from Developed Areas; and (3) no new storage tanks may be constructed closer than 500 feet from any Developed Area, or closer than 200 feet from a public road, or placed on ridgelines, unless the tank can be fully screened through the use of landscaping.

Importantly, the majority of the City IOF is not readily visible from the surrounding areas due to topography. The City IOF is higher in elevation than much of the surrounding areas, with the exception of the KHSRA as previously discussed. Therefore, only portions of the City IOF would be visible at any one time from the majority of public viewsheds.

With implementation of the Drilling Regulations, the aesthetic impacts to scenic vistas of the Project Site would be adverse, but less than significant. No mitigation, beyond the requirements set forth in the Drilling Regulations, is required.

# Threshold 1-2: Would the project substantially degrade the existing visual character or quality of the Project Site and its surroundings?

A variety of land uses occur adjacent to the Project Site. These include residential uses to the north; recreational facilities to the north, east and west; active oil field operations to the south; industrial uses to the west, and roadways both to the east and west. The addition of new oil

production/extraction equipment within the Project Site could potentially affect the views from surrounding streets, residential and recreational areas, including parks and trails. These include the Baldwin Hills Scenic Overlook, KHSRA, Culver City Park, the Blair Hills residential neighborhood, and the proposed Segment C of the Park to Playa Trail.

The visual character of the Project Site would not substantively change with implementation of the Project's Maximum Buildout Scenario. The oil and gas operations and associated new facilities (e.g., new wells, new graded pads, new tanks, drilling wells) are activities that have been occurring on the Project Site for decades and would not be substantively changed due to the Specific Plan. Full buildout of the City IOF in compliance with the Drilling Regulations would intensify the existing visual character of the Project Site, which is generally considered industrial in nature and not an aesthetically pleasing land use. The intensification of a visually unappealing land use would further degrade the visual quality of the Project Site, but the degradation would not be substantial because it would not result in the conversion of an aesthetically pleasing land use. The overall character of the Project Site would remain consistent. The Project Site would have no off-site components and would not impact the surrounding areas.

As discussed under the analysis for Threshold 4.1a, the Drilling Regulations set forth numerous requirements that are not in place today and would serve to reduce future visual impacts. For example, (1) the required 400-foot setback would prohibit oil and gas activities adjacent to Developed Areas; (2) a Landscaping Plan is required to visually screen and obscure views of the well pads, drilling rig, well pumps, pipelines, and storage tanks from Developed Areas; and (3) a requirement that no new storage tanks may be constructed closer than 500 feet from any Developed Area, or closer than 200 feet from a public road, or placed on ridgelines, unless the tank can be fully screened through the use of landscaping.

There is a mitigation measure in DOGGR's Draft Mitigation Policy Manual prepared pursuant to the SB4 EIR, which is included in Appendix B-2 of this Draft EIR that is applicable to the analysis of visual quality, as listed below (DOC 2015b):

• SB4 AES-1a: Prepare and Implement a Site Plan to Reduce Visual Impacts to Sensitive Receptors

The intent of this DOGGR SB4 measure is already incorporated into requirements set forth in the Drilling Regulations, and no new or additional measures related to these SB4 MMs are required. With implementation of the Drilling Regulations, the aesthetic impacts to the existing visual character or quality of the Project Site would be adverse, but less than significant levels. No mitigation is required.

# Threshold 1-3: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The Project Site is located in an area where nighttime lighting is present from surrounding residential land uses and the remainder of the Inglewood Oil Field south of the Project Site. Temporary and permanent lighting that would facilitate a safe working environment could be installed at new well sites and would add to existing lighting levels. These new light sources would include lights on drilling rigs, storage tanks, and well pumps. The drilling site is lit at night to allow for 24-hour operation of the drill rig, and the rig mast is lit for aircraft safety.

The Drilling Regulations state that rework operations, and construction of permanent structures, are not allowed between 7:00 PM and 7:00 AM nor on Saturdays, Sundays or legal holidays. Depending on the season, rework operations may be occurring in the dawn or dusk hours and may require illumination of the well site (e.g., the sun sets around 5:00 PM during the winter months).

As required by the Drilling Regulations, lighting would be limited to the immediate areas of activity and would be screened and directed to confine direct rays to the Inglewood Oil Field and to prevent off-site spillover of lighting to surrounding residential, recreational, and other Sensitive Developed Areas. The CCMC also requires exterior lighting to be shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the Project Site, and shall be directed downward and away from adjoining properties and public rights-of-way; permanently installed lighting cannot blink, flash, or be of unusually high intensity or brightness; and freestanding light poles and luminaires must be 18 feet or lower (see RR AES-1). Thus, impacts would be less than significant.

The Project would result in new truck trips that may occasionally need to turn on vehicle headlights to increase nighttime visibility. Light emitted by transitory vehicle headlights is temporary in nature and would be at a considerable distance from residential land uses, and would not substantially affect nighttime views.

Glare is caused by light reflections from reflective and polished surfaces, including glass. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare resulting from reflective building materials can be a nuisance to on- and off-site viewers of the Project Site and therefore would be considered an adverse aesthetic effect. As required by the Drilling Regulations, all Oil Operations-related structures visible from public roadways and surrounding properties shall be painted or otherwise surfaced or textured with a color that is compatible with Developed Areas and has been approved by the Community Development Director. Oil Operations-related structures are currently painted "licorice," which is basically a black/charcoal color that does not reflect light. Therefore, the Project's Maximum Buildout Scenario would not result in substantial glare that would adversely affect day or nighttime views in the area.

There is a mitigation measure in DOGGR's Draft Mitigation Policy Manual prepared pursuant to the SB4 EIR, which is included in Appendix B-2 of this Draft EIR that is applicable to the analysis of light and glare, as listed below (DOC 2015b):

• SB4 AES-1b: Minimize Lighting Visibility Offsite

The intent of this DOGGR SB4 measure is already incorporated into requirements set forth in the Drilling Regulations, and no new or additional measures are required. With implementation of the Drilling Regulations, impacts would be less than significant. No mitigation is required.

# 4.1.7 CUMULATIVE IMPACTS

In order for a cumulative aesthetic impact to occur, the proposed elements of the cumulative projects would need to be seen either simultaneously or in close succession, and would need to be in close proximity to each other. If the projects are not in proximity to each other, the viewer is not likely perceive them at the same time or in the same viewshed.

Cumulative projects that could impact the current analysis include some of the commercial, industrial, and residential projects listed in Table 2-5, Cumulative Projects, in Section 2.0 of this EIR. However, most of the cumulative projects are located away from the Project Site and would not be visible within the same viewshed as the Project Site. The expansion of the West Los Angeles College may be visible from areas to the south. Importantly, the increase in oil production activities on the County IOF would contribute to the cumulative aesthetic impacts of the Project. In addition, future growth and development may also occur in the Cities of Culver City and Los Angeles and the unincorporated area of Ladera Heights over the years when wells are drilled or redrilled on the Project Site.

As discussed in Section 2.7.1, in Section 2.0, Environmental Setting, the Settlement Agreement and Mutual Release between the parties involved for the Baldwin Hills Community Standards District (CSD) Final Environmental Impact Report allow a maximum of two drill rigs in use at any one time on the County IOF. Also, no more than 500 new wells (inclusive of bonus wells and wells drilled since approval of the CSD) shall be drilled through October 1, 2028, or during the remaining life of the CSD, whichever is later (LACDRP 2008). In addition, due to the passage of time since the date of the Agreement, no more than 53 wells (35 wells plus 18 Bonus Wells) may be drilled or redrilled per year on the County IOF. The cumulative visual impacts of the Project would primarily be visible by the presence of three drill rigs at any one time at various locations in the Inglewood Oil Field, resulting in two in the County IOF and one at the Project Site; the addition of a maximum of 530 new well pumps; and the construction of new well pads, storage tanks, pipelines and associated facilities. The Project's Maximum Buildout Scenario would contribute to the overall aesthetic change within the Inglewood Oil Field.

However, the Inglewood Oil Field is approximately 1,000 acres, of which only 77.8 (approximately 8 percent) are located within the City. There are few vantage points where the entire Inglewood Oil Field is visible at one time. These would include the KHSRA and Baldwin Hills Scenic Overlook. However, due in large part to distance, intervening vegetation, and occasional haze or other weather conditions that could impede views of the entire Inglewood Oil Field, it is not anticipated that the Project's Maximum Buildout Scenario would result in a cumulatively considerable contribution to degradation of a scenic vista or to the visual character of the area.

The proposed commercial, industrial or residential projects in Culver City and other regional growth and development would increase urbanization in the surrounding area but, when added to the potential future oil field operations in the City IOF, are not likely to meaningfully impact views in the area. New lighting sources are not anticipated to cumulatively contribute to substantial light or glare in the cumulative project area.

Full buildout of the entire Inglewood Oil Field would look similar to the existing oil and gas operations and the Project's incremental cumulative contribution to visual impacts would be less than significant, after implementation of the Drilling Regulations.

### 4.1.8 MITIGATION MEASURES

No mitigation is required.

## 4.1.9 LEVEL OF SIGNIFICANCE

With the implementation of the Drilling Regulations, the Project's Maximum Buildout Scenario would have a less than significant impact related to aesthetics. No mitigation, beyond the Drilling Regulations set forth in the Specific Plan, is required. Table 4.1-1 below summarizes the significance finding of each threshold addressed in this section before and after mitigation, where applicable.

#### TABLE 4.1-1 SIGNIFICANCE SUMMARY

	Threshold	Project Level of Significance	Mitigation Measure(s)	Level of Significance after Mitigation
1-1	Have a substantial adverse effect on a scenic vista.	Less than Significant	N/A	Less than Significant
1-2	Substantially degrade the existing visual character or quality of the Project Site and its surroundings.	Less than Significant	N/A	Less than Significant
1-3	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Less than Significant	N/A	Less than Significant
N/A: not applicable				

### 4.1.10 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.
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