CITY OF CULVER CITY

Notice of Preparation of a Draft Environmental Impact Report And Notice of Scoping Meeting

DATE: October 12, 2015

TO: Responsible and Trustee Agencies, Bordering Municipalities, Organizations

and Interested Parties

FROM: City of Culver City c/o Planning Division

9770 Culver Boulevard, Culver City, CA 90232

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the Proposed

Inglewood Oil Field Specific Plan Project

Notice is hereby given that the City of Culver City ("City") has prepared an Initial Study for the proposed Inglewood Oil Field Specific Plan Project ("Project") and has determined that an Environmental Impact Report ("EIR") is necessary. The City will be the lead agency pursuant to the California Environmental Quality Act ("CEQA") and will prepare the EIR. This Notice of Preparation ("NOP") has been prepared and distributed because the City is seeking input from responsible and trustee agencies, bordering municipalities, other agencies required to receive this notice, interested parties and the State Office of Planning and Research ("OPR"), and is also extending the outreach for early public consultation with other interested parties regarding the scope and content of the environmental information to be addressed in the Draft EIR. The EIR will be the environmental document for responsible and trustee agencies when considering any discretionary approvals.

The City requests that OPR and any potential responsible or trustee agencies responding to this NOP reply in a manner consistent with Section 15082(b) of the CEQA Guidelines, which allows for the submittal of any comments and/or input in response to this notice no later than 30 days after receipt of the NOP. The City will accept comments from these agencies and others regarding this NOP through the close of business, **Friday**, **November 12**, **2015**.

PROJECT LOCATION: The Inglewood Oil Field is located within Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The Project site consists of that portion of the Inglewood Oil Field located within the city limits of the City of Culver City ("Project Site" or "Oil Field"). The Project Site is approximately 80 acres within the larger 1,000 acre Inglewood Oil Field. The Project Site is bound approximately by La Cienega Boulevard to the east, the City of Culver City/Los Angeles County border to the south, Culver City Park and College Boulevard to the west, and the Blair Hills residential area of the City to the north. The Oil Field is located within the Southeastern Sub-Area of the General Plan and in the Focused Special Study area known as the Blair Hills/Baldwin Hills Area.

PROJECT DESCRIPTION SUMMARY: The Inglewood Oil Field Specific Plan Project applies to the areas within the boundaries of the Project Site ("Specific Plan Area"). A link to a figure showing the Specific Plan Area can be found at: (insert link to website). The development of a Specific Plan for the Oil Field is consistent with the goals and intent of the Blair Hills/Baldwin Hills Focused Special Study area. As oil and gas production is such a specialized land use, a Specific Plan would be appropriate and useful to further address the special needs and conditions of the Blair Hills/Baldwin Hills Focused Special Study area. The Specific Plan would update and supersede the City's existing oil drilling regulations. The Specific Plan regulations are intended to address changes in the last decade in oil production-related technology, legislation, and public concern, while establishing standards to safeguard the public health, safety and welfare of the surrounding community and the environment based on site-specific conditions.

The Specific Plan regulations will establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City including, but not limited to: 1) compatibility with adjacent land uses; 2) cooperation and coordination with agencies to implement reasonable measures to reduce impacts to surrounding communities and emergency response; 3) minimization or elimination of potential adverse impacts by implementing area-specific regulations and mitigation measures; 4) ensuring Oil Field activities are in compliance with requirements of the Specific Plan; 5) minimization of Oil Field emergencies; 6) enhancement of the appearance of the Oil Field with landscaping and other property maintenance requirements; and 7) ensuring that new applications for oil and gas Drilling Use Permits address the consolidation of Oil Field facilities to reduce odor, visual, noise, safety, health and environmental impacts from oil operations to surrounding land uses and residents.

POTENTIAL ENVIRONMENTAL EFFECTS: Based on the conclusions of the Initial Study, the Project would result in potential environmental effects in the following topical issues, which will be addressed in the EIR: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Recreation, Transportation and Traffic, Public Services (fire and police only), and Utility and Service Systems. The topical issues for which the Initial Study determines there are no potential impacts, and are therefore proposed not to be addressed in the EIR, are: Agricultural Resources, Mineral Resources, Population and Housing, and Public Services (for schools, parks and other public facilities only). The Initial Study is available for electronic download at http://www.culvercity.org/inglewoodoilfield.aspx and for hardcopy viewing at the City's Planning Division public counter located on the 2nd Floor of City Hall (see address below) and the Julian Dixon Library, temporarily located at the Mayme A. Clayton Museum, 4130 Overland Avenue, Culver City, California, 90230.

Pursuant to Section 15103 of the State CEQA Guidelines, your response <u>must be received no later</u> than Friday, November 12, 2015. Should you have any questions regarding the Project or NOP, please call or email Sherry Jordan at (310) 253-5746 or sherry.jordan@culvercity.org. Please submit your written response to this NOP to the attention of Sherry Jordan by one of the following methods:

- Email to sherry.jordan@culvercity.org;
- 2. Mail to Sherry Jordan, City Attorney's Office, City of Culver City, 9770 Culver Boulevard, Culver City, CA 90232; or
- 3. Fax to the attention of Sherry Jordan at 310-253-5664.

SCOPING MEETING: A scoping meeting will be conducted pursuant to Section 15082(c)(1) of the CEQA Guidelines to provide the public, trustee and responsible agencies, bordering municipalities, other public agencies with jurisdiction and other interested parties with an opportunity to provide comments and/or input relative to environmental issues that should be addressed in the EIR and is scheduled for:

Thursday, October 22, 2015 from 6:00pm to 8:00pm Culver City City Hall Council Chambers 9770 Culver Boulevard, Culver City, CA, 90232

NOTIFICATION: All parties that are interested in receiving information in the future related to the Project may submit their names and mailing addresses to the contact person listed above and/or may sign up for the City's E-Mail Notification System at following link: http://www.culvercity.org/inglewoodoilfield.aspx. Select "Click to subscribe to email notifications" and choose Inglewood Oil Field on the subscriber preferences.



Initial Study

Inglewood Oil Field Specific Plan Project City of Culver City, California

Prepared for: City of Culver City Planning Division 9770 Culver Boulevard Culver City, California 90232

Prepared by:

BonTerra Psomas 225 South Lake Avenue, Suite 1000 Pasadena, California 91101 T: (626) 351-2000 F: (626) 351-2030

October 2015



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SECTION 1.0 ENVIRONMENTAL CHECKLIST FORM

1. Project Title: Inglewood Oil Field Specific Plan Project

2. Lead Agency Name and Address: City of Culver City

9770 Culver Boulevard Culver City, California 90232

3. Contact Person and Phone Number: Sherry Jordan, Project Manager

City of Culver City City Attorney's Office (310) 253-5746

4. Project Location: The Inglewood Oil Field is located within Culver

City and the unincorporated area of Los Angeles County known as Baldwin Hills. The Project site consists of that portion (approximately 80 acres) of the Inglewood Oil Field located within the city limits of the City of Culver City (Project Site or Oil Field). The Project Site is generally bound by La Cienega Boulevard to the east, the City of Culver City/Los Angeles County border to the south, Culver City Park and College Boulevard to the west, and the Baldwin Hills Scenic Overlook park and Blair Hills residential area of Culver City to the north.

5. Project Sponsor's Name and Address: City of Culver City

Attention: Sherry Jordan, Project Manager

City Attorney's Office (310) 253-5746

6. General Plan Designation: "Open Space" and "Industrial" with the majority of

the Project Site located within the Southeastern Sub-Area of the General Plan and in the Focused Special Study area known as the Blair

Hills/Baldwin Hills Area

7. Zoning: R1 (Residential Single Family); OS (Open Space)

and IG (Industrial General) (Oil and gas production use is allowed solely in the Oil Field, regardless of the applicable zoning district, per Zoning Code

Section 17.610.010.D)

8. Description of Project: The Inglewood Oil Field Specific Plan Project (Project) applies to the areas within the boundaries of the Project Site (Specific Plan Area). The development of a Specific Plan for the Oil Field is consistent with the goals and intent of the Blair Hills/Baldwin Hills Focused Special Study area. As oil and gas production is such a specialized land use, a Specific Plan would be appropriate and useful to further address the special needs and conditions of the Blair Hills/Baldwin Hills Focused Special Study area. The Specific Plan would update and supersede the City's existing oil drilling regulations. The Specific Plan regulations are intended to address changes in the last decade in oil production-related technology, legislation, and public concern, while establishing standards to safeguard the

public health, safety and welfare of the surrounding community and the environment based on site-specific conditions.

The *Inglewood Oil Field Specific Plan* regulations will establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City including, but not limited to: 1) compatibility with adjacent land uses; 2) cooperation and coordination with agencies to implement reasonable measures to reduce impacts to surrounding communities and emergency response; 3) minimization or elimination of potential adverse impacts by implementing area-specific regulations and mitigation measures; 4) ensuring Oil Field activities are in compliance with requirements of the Specific Plan; 5) minimization of Oil Field emergencies; 6) enhancement of the appearance of the Oil Field with landscaping and other property maintenance requirements; and 7) ensuring that new applications for oil and gas Drilling Use Permits address the consolidation of Oil Field facilities to reduce odor, visual, noise, safety, health and environmental impacts from oil operations to surrounding land uses and City residents.

The following is a summary of discretionary actions the City of Culver City will consider as part of the proposed Project:

- Adoption of the Inglewood Oil Field Specific Plan, P2015-0086-SP, as described above.
- Adoption of Culver City Zoning Code Amendment (ZCA), P2015-0086-ZCA: It is currently anticipated that the ZCA would (1) amend Zoning Code Section 17.610.010.D to specify that the Specific Plan regulations will apply to oil and gas production uses in the Oil Field; and (2) add a new section to Article 4 to reference the Specific Plan, which would establish the standards for oil and gas production within the Specific Plan Area.
- Adoption of Culver City Municipal Code Amendments: The Project would update and supersede the most recent comprehensive amendments to the City's existing oil drilling regulations, which were adopted in 2003. With the adoption of the Specific Plan, Chapter 11.12, Oil, Gas, and Hydrocarbons would be repealed. Additionally, Section 9.07 (Noise Regulations) would be modified to clarify that noise regulations set forth in the *Inglewood Oil Field Specific Plan* shall apply to noise within the Specific Plan area.
- Certification of an Environmental Impact Report (EIR), P2015-0086-EIR: The City of Culver City will be the lead agency pursuant to the California Environmental Quality Act ("CEQA") and will prepare an EIR.
- 9. Surrounding Land Uses and Setting: The Project area is approximately 80 acres within the larger 1,000 acre Inglewood Oil Field. The Project Site is adjacent to residential development (Blair Hills), parkland, and open space to the north; La Cienega Boulevard and the Kenneth Hahn State Recreational Area to the east; the Inglewood Oil Field to the south; and the Culver City Park and industrial uses to the west.
- 10. Other public agencies whose approval may be required in the implementation of the *Inglewood Oil Field Specific Plan* include, but are not limited to:
 - California Division of Oil, Gas and Geothermal Resources (DOGGR). For approval
 of various types of well permits.

- Los Angeles Regional Water Quality Control Board (LARWQCB). For possible Water Quality Certification Section 401 permits.
- State Water Resources Control Board (SWRCB). For coverage under the Construction General Permit.
- South Coast Air Quality Management District (SCAQMD). For air quality permits to construct and operate equipment.
- California Department of Fish and Wildlife (CDFW). For possible Fish and Game Code requirements such as Streambed Alteration Agreement.
- United States Army Corps of Engineers (USACE). For possible Clean Water Act Section and 404 Permits.
- **11. Additional Topics to be Discussed in the EIR:** The following items will be discussed in the EIR in addition to the items in Appendix G of the CEQA Guidelines:
 - Energy Conservation, Appendix F of the CEQA Guidelines, will be discussed in a Chapter of the EIR titled "Other CEQA Considerations".

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

Aes	sthetics	☐ Agriculture and F	orest Resources
⊠ Air	Quality	⊠ Biological Resou	rces
⊠ Cul	ltural Resources	⊠ Geology and Soi	ls
⊠ Gre	eenhouse Gas Emissions	☐ Hazards and Hazards	zardous Materials
⊠Ну	drology and Water Quality	□ Land Use and PI	anning
☐ Mir	neral Resources	Noise Noise	
☐ Po	oulation and Housing	□ Public Services	
⊠ Re	creation		raffic
∪til	ities and Service Systems		ngs of Significance
DETE	RMINATION		
On the	e basis of this initial evaluation:		
	I find that the Project COULD NOT have a NEGATIVE DECLARATION will be prepa		n the environment, and
	I find that although the Project could have will not be a significant effect in this case become or agreed to by the Project proponent. A be prepared.	ause revisions in the	Project have been made
	I find that the Project MAY have a sign ENVIRONMENTAL IMPACT REPORT is re		e environment, and an
	I find that the Project MAY have a "potential unless mitigated" impact on the environmadequately analyzed in an earlier document (2) has been addressed by mitigation measure on attached sheets. An ENVIRONMENTAL analyze only the effects that remain to be according to the effects of the effec	nent, but at least o t pursuant to applica res based on the earl _ IMPACT REPORT	ne effect (1) has been ble legal standards, and ier analysis as described
	I find that although the Project could have a sall potentially significant effects (a) have be NEGATIVE DECLARATION pursuant to appor mitigated pursuant to that earlier EIR or NI or mitigation measures that are imposed up	een analyzed adequa blicable standards, an EGATIVE DECLARA	itely in an earlier EIR or id (b) have been avoided ΓΙΟΝ, including revisions
Signat	Shove Jordan ure of Lead Agericy Representative		0-6-15
	ry Jordan, Project Manager d name	City Agen	of Culver City
	a name	Agen	∪ y

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

SECTION 2.0 PROJECT DESCRIPTION

2.1 <u>INTRODUCTION</u>

The City of Culver City is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and is responsible for preparing an Environmental Impact Report (EIR) for the proposed Inglewood Oil Field Specific Plan Project (Project). This Initial Study presents a brief description of the Project and a preliminary evaluation of the probable environmental effects that may result from the full buildout of allowable development and implementation of the associated actions identified in the Inglewood Oil Field Specific Plan implementation. This Initial Study identifies the environmental issues that require further analysis in the EIR for the Project. Together with the Notice of Preparation (NOP) and the Environmental Checklist Form, the Initial Study will be distributed to responsible and trustee agencies in compliance with Section 15082 of the State CEQA Guidelines and to other potentially interested parties for early public consultation and scoping.

2.2 PROJECT LOCATION

The Project is located in western Los Angeles County within the City of Culver City. The Project Site is located within that portion (approximately 80 acres) of the Inglewood Oil Field that is located within the city limits of the City of Culver City (Oil Field). The entirety of the Inglewood Oil Field is approximately 1,000 acres, the majority of which is within the unincorporated area of Los Angeles County known as Baldwin Hills. The Project Site is generally bound by La Cienega Boulevard to the east, the City of Culver City/Los Angeles County border to the south, Culver City Park and College Boulevard to the west, and the Baldwin Hills Scenic Overlook park and Blair Hills residential area of Culver City to the north. The Project Site (the area within the proposed Specific Plan boundary) is shown on Exhibit 1, Local Vicinity.

2.3 PROJECT BACKGROUND

The Inglewood Oil Field is located within Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Inglewood Oil Field boundary is approximately 1,000 acres, of which approximately 80 acres are located within Culver City's jurisdiction.

Drilling began in the Inglewood Oil Field in the 1920s. In the late 1990s and early 2000s, Plains Exploration and Production Company (PXP) obtained drilling rights for the Inglewood Oil Field. In 2014, Freeport-McMoRan Oil & Gas (FM) purchased PXP and became the current Inglewood Oil Field Operator.

In October 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills Community Standards District (CSD) establishing regulations for oil and gas production activities in the unincorporated County portion of the Inglewood Oil Field. A CSD is a supplemental district used by the County to address special issues that are unique to certain geographical areas within the unincorporated area of the County. At that time, the County also certified the related EIR analyzing the existing (as of 2007) and future environmental impacts from the operations at the Inglewood Oil Field subject to the CSD.

Following the approval actions of the County Board of Supervisors, Culver City and other parties joined together in a lawsuit challenging the adequacy of the CSD EIR and its mitigation measures. In July 2011, a settlement of the litigation was reached, which provided supplementary mitigation measures for the CSD and provides for enhanced regulations to protect the public health and safety and the environment of the communities surrounding the Inglewood Oil Field. The regulations set forth in the CSD and in the settlement agreement are only applicable to the portion



Proposed Specific Plan Area

Exhibit 1

Inglewood Oil Field Specific Plan Project



of the Inglewood Oil Field within the unincorporated County of Los Angeles, and do not apply to the Project Site.

The last comprehensive amendment to Culver City's oil drilling regulations occurred in 2003. In April 2013, Culver City released to the public the Discussion Draft Regulations Relating to Oil Drilling Operations in the Inglewood Oil Field (Discussion Draft Regulations) for review and comment. Several comment letters were received from the public and private industry. In June 2014, the City Council of the City of Culver City adopted a resolution declaring its intention to initiate preparation of a Specific Plan for the Culver City portion of the Inglewood Oil Field. The draft Specific Plan incorporates the Discussion Draft Regulations as modified in response to comments received to date. The Specific Plan will provide site-specific zoning regulations tailored to the type and intensity of oil drilling operations proposed and occurring on the Oil Field within the jurisdiction of Culver City.

2.4 EXISTING CONDITIONS

2.4.1 EXISTING ON-SITE LAND USES

The Project Site is an operating oil and gas production field. Existing land use on the Project Site includes activities and facilities associated with the larger operation of the Inglewood Oil Field by FM. These activities and facilities include petroleum extraction and storage, as well as transmission pipelines. Existing facilities are dispersed throughout the site with intermittent areas of natural vegetation. A tank farm, several types of wells (active, idle, production, injection), and pipelines to transport the produced oil and gas are located throughout the Project Site.

According to DOGGR records, there are 37 active wells (27 production and 10 injection), 5 wells that are idle, and 29 plugged or abandoned wells within the Project Site (CDC 2015b).

While there are locked gates where access to the Inglewood Oil Field could be obtained (one is near Culver City Park), the main access to the site is located on Fairfax Avenue, south of Stocker Street. The Fairfax/Stocker entrance provides on-site access to the bulk of the Inglewood Oil Field areas through internal roadways and bridges over La Cienega Boulevard.

2.4.2 SURROUNDING LAND USES

Residential, industrial, oil production, and recreational land uses are adjacent to the boundaries of the Specific Plan Area.

Land uses to the north: The area immediately north of the Specific Plan Area includes the single-family residential neighborhood of Blair Hills within Culver City, as well as Blair Hills Park. To the west of the Blair Hills neighborhood is the Baldwin Hills Conservancy public land and the Baldwin Hills Scenic Overlook park, which provides a hilltop vantage point of the surrounding community and Baldwin Hills.

Land uses to the east: The eastern boundary of the Specific Plan Area is generally defined by La Cienega Boulevard. East of La Cienega Boulevard is the Kenneth Hahn State Recreational Area (SRA). The Kenneth Hahn SRA includes landscaped areas, picnic sites, restrooms, tot lots, lotus pond, a variety of footpaths and more than seven miles of existing trails. Active recreation and facilities include playgrounds, a half basketball court, a fishing lake, lighted baseball diamonds, a lit multi-purpose field, and a sand volleyball court. Passive recreation includes picnic rental shelters and picnic tables throughout the park. There are also large and small barbecue pits dispersed throughout the park (CDPR 2015a).

Land uses to the west: West of the Specific Plan Area and southwest of the Baldwin Hills Scenic Overlook is Culver City Park. Culver City Park is approximately 42 acres and includes a skate

park (Culver City Skate Park), a dog park (The Boneyard), playgrounds, recreation huts with restroom facilities and picnic areas, barbeques, softball diamonds, half-court basketball courts, walking trails, a ropes course and soccer fields. The western boundary abuts industrial land which extends to Jefferson Boulevard in Culver City. West Los Angeles College is expanding to include facilities immediately south of College Boulevard.

Land uses to the south: The southern boundary of the Specific Plan area is the border between Culver City and Los Angeles County. South of this boundary is remainder of the Inglewood Oil Field, which includes petroleum extraction, storage, and processing facilities as well as transmission pipelines and access roads.

2.5 **PROJECT DESCRIPTION**

The proposed "Project" is defined as the full buildout of allowable development and implementation of the associated actions identified in the *Inglewood Oil Field Specific Plan*, including all ministerial and discretionary actions required for short-term construction activities and long-term operation activities. The Project would update and supersede the most recent comprehensive amendments to the City's existing oil drilling regulations, which were adopted in 2003. The *Inglewood Oil Field Specific Plan* regulations are intended to address the changes in the last decade in oil production-related technology, legislation, and public concern, while establishing standards to safeguard the public health, safety and welfare of the surrounding community and the environment based on site-specific conditions.

The provisions of the Specific Plan will establish regulations for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within Culver City including, but not limited to: (1) compatibility with adjacent land uses; (2) cooperation and coordination with agencies to implement reasonable measures to reduce impacts to surrounding communities and emergency response; (3) minimization or elimination of potential adverse impacts by implementing area-specific regulations and mitigation measures; (4) ensuring Oil Field activities are in compliance with requirements of the Specific Plan; (5) minimization of Oil Field emergencies; (6) enhancement of the appearance of the Oil Field with landscaping and other property maintenance requirements; and (7) ensuring that new applications for oil and gas Drilling Use Permits address the consolidation of Oil Field facilities to reduce odor, visual, noise, safety, health and environmental impacts from oil operations to surrounding land uses and City residents.

The Specific Plan would establish safeguards and controls for activities related to drilling for and production of oil, gas, and other hydrocarbon substances within the City. The requirements outlined in the Specific Plan include, but are not limited to: the filing of drilling plans, permits, studies, surveys and monitoring plans; a maximum number of 30 wells to be drilled or redrilled through 2031; a prohibition of major facilities; drilling and redrilling setbacks of 400 feet from developed areas and 75 feet from public roadways; a maximum of two wells may be drilled or redrilled on an annual basis for the first two years and, thereafter, a maximum of three wells may be drilled or redrilled on an annual basis; a maximum of one drilling rig may be in place at any one time; a maximum of two rigs used for reworking, maintenance and/or abandonment may be present at any one time.

2.6 ANTICIPATED PROJECT APPROVALS

The City of Culver City, as the Lead Agency, is responsible for preparing the EIR and will review and consider the EIR in its discretion and approve, revise, or deny the Project with findings, as appropriate. The EIR would serve as the primary environmental document for implementation of the Project, including all required discretionary approvals for implementation.

The EIR would provide environmental information to responsible, trustee, and other public agencies that may be required to grant approvals or coordinate with the City of Culver City as a part of Project implementation. These agencies may include, but are not limited to:

- California Division of Oil, Gas and Geothermal Resources (DOGGR). For approval
 of various types of well permits.
- Los Angeles Regional Water Quality Control Board (LARWQCB). For possible Water Quality Certification Section 401 permits.
- State Water Resources Control Board (SWRCB). For coverage under the Construction General Permit.
- South Coast Air Quality Management District (SCAQMD). For air quality permits to construct and operate equipment.
- California Department of Fish and Wildlife (CDFW). For possible Fish and Game Code requirements such as Streambed Alteration Agreement.
- United States Army Corps of Engineers (USACE). For possible Clean Water Act Section and 404 Permits.

2.7 PROJECT SCHEDULE MILESTONES

A Notice of Preparation (NOP) of the EIR will be circulated for a 30-day public review period. Pursuant to Section 15103 of the State CEQA Guidelines, your response <u>must be received no later than Friday, November 12, 2015</u>. Should you have any questions regarding the Project or NOP, please call or email Sherry Jordan at (310) 253-5746 or sherry.jordan@culvercity.org. Please submit your written response to the NOP to the attention of Sherry Jordan by one of the following methods:

- Email to sherry.jordan@culvercity.org;
- Mail to Sherry Jordan, City Attorney's Office, City of Culver City, 9770 Culver Boulevard, Culver City, CA 90232; or
- 3. Fax to the attention of Sherry Jordan at 310-253-5664.

A scoping meeting to provide the public, trustee and responsible agencies, and other interested parties with an opportunity to provide comments and/or input relative to environmental issues that should be addressed in the EIR has been scheduled for: **Thursday, October 22, 2015** from 6:00pm to 8:00pm at Culver City City Hall, Council Chambers, 9770 Culver Boulevard, Culver City, CA, 90232.

Persons interested in receiving information in the future related to the Project may submit their names and mailing addresses to the contact person listed above and/or may sign up for the City's E-Mail Notification System at following link: http://www.culvercity.org/inglewoodoilfield.aspx. Select "Click to subscribe to email notifications" and choose Inglewood Oil Field on the subscriber preferences.

Following receipt of public comments on the NOP, the comments will be addressed in the Draft EIR. It is anticipated that the Draft EIR will be complete and available for a 60-day public review period on December 28, 2015. At the end of the 60-day public review period, responses to comments received will be prepared and incorporated into the Final EIR. It is anticipated that the Project and EIR will be considered by the Culver City City Council on March 28, 2016. (Dates are subject to change.)

SECTION 3.0 ENVIRONMENTAL ASSESSMENT

1.	<u>AESTHETICS</u>	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Have a substantial adverse effect on a scenic vista?	\boxtimes			
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	\boxtimes			
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		\boxtimes		

- 1a. Potentially Significant Impact. A variety of land uses occur adjacent to the Project Site. These include active oil field operations to the south, residential housing to the north, recreational facilities to the north and west, industrial uses to the west, and roadways. The prominent visual features on the Project Site are production/extraction equipment and tanks. There are identified scenic vistas near the Project Site. For example, there is one identified scenic vista immediately adjacent to the Project site: the Baldwin Hills Scenic Overlook (CDPR 2015b). In addition, the current viewshed from the Overlook contains vistas of the surrounding communities and hillside areas, as well as oil production/extraction equipment associated with the Oil Field. Culver City's General Plan, Open Space Element, Objective 6 states that view resources, view corridors, and scenic viewpoints should be protected and Policy 6A of the Open Space Element cites establishment of viewshed guidelines which protect views of and from Culver City Park, Blair Hills, and Culver Crest (City of Culver City 1996). The addition of oil production/extraction equipment within the Project Site could potentially affect the views from the Overlook and views to be protected as outlined in the City's General Plan Open Space Element. Impacts on scenic vistas will be discussed in the EIR.
- **1b. No Impact.** According to information on the California Department of Transportation's California Scenic Highway Mapping System, there are no state scenic highways in the vicinity of the Project Site (Caltrans 2011). Therefore, no impacts to scenic resources along state scenic highways will occur and no additional evaluation of this issue will be discussed in the EIR.
- 1c. Potentially Significant Impact. A variety of land uses occur adjacent to the Project Site. These include active oil field operations to the south, residential housing to the north, recreational facilities to the north and west, industrial uses to the west, and roadways. The prominent visual features on the Project Site are production/extraction equipment tanks. The addition and production/extraction equipment within the Project Site could potentially affect the views from surrounding recreational areas, including parks and trails. Impacts on visual character and quality of the Project Site and surroundings will be discussed in the EIR.

1d. Less Than Significant Impact With Mitigation. Well-drilling activities are required to be attended to and monitored 24 hours a day. As such, night time lighting would be required during drilling operations. These impacts would be short term in duration. Security lighting could also be a factor at night. Night time lighting impacts are expected to be less than significant with mitigation, but will be discussed in the EIR.

2.	AGRICULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	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?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
c)	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])?				
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				
e)	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?				⊠

- 2a. No Impact. According to the California Department of Conservation's Farmland Mapping and Monitoring Program, existing oil and gas activities within the Project Site are not located within areas that have been classified as Prime Farmland, Unique Farmland, and/or Farmland of Statewide Importance (CDC 2012). There would be no impact to Prime, Unique or Farmland of Statewide Importance. This issue will not be discussed in the EIR.
- **2b. No Impact.** The City of Culver City General Plan has the area designated as Open Space and Industrial. The City of Culver City has the area zoned as residential single family, open space, and industrial general. There are no farmlands within the Project Site area; therefore, there are no Williamson Act contracts for within the Project Site. The lands within the Project Site do not conflict with agricultural zoning or a Williamson Act Contract, and there would be no impacts. This issue will not be discussed in the EIR.
- **2c. No Impact.** The City of Culver City has the area zoned as residential single family, open space, and industrial general (City of Culver City 2005). There are no forest lands, timberlands, or timberland zoned Timberland Production areas within the Project Site. There would be no loss of forest lands or timberlands, and there would be no impacts to forest lands or timberlands. This issue will not be discussed in the EIR.
- **2d-e. No Impact.** There are no forest lands within the Project Site. Therefore, there would be no loss of forest land or conversion of forest land to non-forest land uses. There would be no impacts to Farmland or forest land. This issue will not be discussed in the EIR.

3.	AIR QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	\boxtimes			
b)	Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?				
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
d)	Expose sensitive receptors to substantial pollutant concentrations?				
e)	Create objectionable odors affecting a substantial number of people?				

Potentially Significant Impact. The Project would be located within the South Coast 3a. Air Quality Management District (SCAQMD), in the South Coast Air Basin (SoCAB). The SoCAB is classified by the State as a nonattainment area for the 8-hour ozone standard as well as a nonattainment area for the State standards for particulate matter less than 10 microns (PM10) and particulate matter less than 2.5 microns (PM2.5) (CARB 2013). In addition, the SoCAB is classified as extreme nonattainment for the Federal 8-hour ozone standard, moderate nonattainment for PM2.5, and nonattainment for lead for the Los Angeles County portion only. The SoCAB is classified as maintenance for PM10, carbon monoxide, and nitrogen dioxide and is classified as in attainment for sulfur dioxide (USEPA 2015).

> Project construction activities would generate pollutant emissions that could result in significant impacts on regional air quality. Heavy equipment used for excavation and grading, cranes, drilling rigs and on-road motor vehicles for equipment, material deliveries and construction worker vehicles would all be emissions sources. Long-term maintenance, well rework, and operational activities would also be emissions sources. Fugitive PM2.5 and PM10 emissions contributors would be grading and other activities on unpaved roads. Therefore, impacts to air quality are potentially significant. Although the SB 4 Final EIR1 concluded that all South Coast projects do not conflict with or obstruct implementation of the applicable air quality plan, the issue should be analyzed on a local basis. Therefore, further analysis of air quality impacts is needed to determine whether the Project could conflict with or obstruct implementation of the applicable air quality plan and reasonable and feasible mitigation measures that could be adopted to reduce such impacts. These issues will be evaluated in the EIR.

3b. Potentially Significant Impact. Short-term construction emissions and long-term operational emissions could contribute significantly to an existing or projected SoCAB

Pursuant to Senate Bill 4 (Pavley, 2013) the Department of Conservation, Division of Oil, Gas, and Geothermal Resources, under the California Environmental Quality Act, certified on July 1, 2015 a Final Environmental Impact Report (Final EIR) for the project titled: Analysis of Oil and Gas Well Stimulation Treatments in California.

air quality violation requiring the consideration of mitigation measures. This impact is potentially significant and will be evaluated in the EIR.

- **3c. Potentially Significant Impact.** The Project will be located in an area of nonattainment for several criteria pollutants. SCAQMD rules and regulations would apply to all project activities within the SCAQMD. Construction and operational emissions will be analyzed in the EIR as well as long-term operational emissions. Cumulative contributions of emissions to the SCAQMD are potentially significant and will be evaluated in the EIR.
- **3d. Potentially Significant Impact.** Sensitive receptors are located less than 50 feet from the Project Site. Construction and operational-related activities would result in diesel exhaust and fugitive dust emissions that could be affect air quality for sensitive receptors as well as the criteria pollutants and toxic air contaminants. This impact is anticipated to be potentially significant and will be evaluated in the EIR.
- **Potentially Significant Impact.** Several compounds associated with gas and oil production can produce nuisance odors. Also, many volatile compounds found in oil and gas have petroleum or gasoline odors. Well stimulation treatment activities may increase storage tank usage that can release odors from venting or hatch lifting. Also, odors may potentially be indicators of adverse health effects. The potential to create objectionable odors is potentially significant and will be evaluated in the EIR.

4.	BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		\boxtimes		
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		\boxtimes		
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

- **4a. Potentially Significant Impact.** The Project site has potential to support a variety special status species including some listed as threatened or endangered at the state or federal level (CDC 2015a). This impact is anticipated to be potentially significant and will be evaluated in the EIR.
- **4b–4c.** Less Than Significant With Mitigation. The Inglewood Oil Field property may support a variety of sensitive natural communities, such as riparian habitat and may contain streambeds or other waterways protected by State or Federal regulations. These areas may be impacted by Project activities. This impact is anticipated to be less than significant with mitigation and will be evaluated in the EIR.
- **4d. Less Than Significant With Mitigation.** The Project Site may contain important wildlife movement pathways. These areas may be impacted by Project activities. This impact is anticipated to be less than significant with mitigation and will be evaluated in the EIR.
- **4e. Less Than Significant With Mitigation.** Although not expected, the Project Site may contain native oak trees. These areas may be impacted by Project activities. This impact is anticipated to be less than significant with mitigation and will be evaluated in the EIR.

4f. Less Than Significant Impact. While there are no adopted Habitat Conservation Plans or adopted Natural Community Conservation Plans for the Project Site, the Baldwin Hills Park Master Plan does include the Project Site. The Baldwin Hills Park Master Plan is to serve as a guide for future facility development and habitat restoration within the Baldwin Hills, in addition to others (BHC 2002). These goals were further reinforced in the Baldwin Hills Conservancy 2013 Updated Strategic Plan (BHC 2013). This issue will be discussed in the EIR.

5.	CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	\boxtimes			
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	\boxtimes			
d)	Disturb any human remains, including those interred outside of formal cemeteries?				

- **5a–5c. Potentially Significant Impact.** Research conducted for the SB 4 Final EIR (CDC 2015a) determined the geologic units underlying the Inglewood Oil Field have a paleontological resource potential ranging from low-to-high. Also, given the age of the field, there is a potential for some of the infrastructure and equipment to be older than 50 years. Therefore, the potential for impacts on historical, archaeological and paleontological resources is considered potentially significant, and the EIR will address these issues.
- 5d. **Less Than Significant Impact.** There is no indication that human remains are present within on-site areas of the Project. The previous records searches and field surveys have not indicated evidence of human remains on or near the site (CDC 2015). Project-related earth disturbance, however, has the potential to unearth previously undiscovered remains. If human remains are encountered during excavation activities, all work shall halt and the County Coroner shall be notified (California Public Resources Code §5097.98). The Coroner will determine whether the remains are of forensic interest. If the Coroner determines that the remains are prehistoric, s/he will contact the Native American Heritage Commission (NAHC). The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 7050.5 of the California Health and Safety Code. The MLD shall make his/her recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials (California Health and Safety Code §7050.5). If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (California Public Resources Code §5097.98). The potential for impacts on human remains is less than significant and will not be discussed in the EIR.

6.		GEOLOGY AND SOILS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld t	he Project:				
a)	adv	oose people or structures to potential substantial erse effects, including the risk of loss, injury, or death olving:				
	i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
	ii)	Strong seismic ground shaking?	\boxtimes			
	iii)	Seismic-related ground failure, including liquefaction?	\boxtimes			
	iv)	Landslides?	\boxtimes			
b)	Res	sult in substantial soil erosion or the loss of topsoil?		\boxtimes		
c)	that pote	located on a geologic unit or soil that is unstable, or would become unstable as a result of the Project, and entially result in onsite or offsite landslide, lateral eading, subsidence, liquefaction, or collapse?	\boxtimes			
d)	of th	located on expansive soil, as defined in Table 18-1-B ne Uniform Building Code (1994), creating substantial s to life or property?				
e)	sep	re soils incapable of adequately supporting the use of tic tanks or alternative waste water disposal systems are sewers are not available for the disposal of waste er?				

- 6a, 6c. Potentially Significant Impact. The Inglewood Oil Field is crossed by the Newport-Inglewood Fault Zone, which is part of the San Andreas System and is seismically active. According to the California Seismic Hazards Mapping Program, the portion of the Inglewood Oil Field within the Project Site does have soils susceptible to liquefaction and landslides (CDC 2007a). The interplay between well stimulation treatment activities and production water disposal into injection wells and their effects on seismicity are being researched. These activities may induce seismic activity. These issues are considered potentially significant and will be addressed in the EIR.
- **6b.** Less Than Significant With Mitigation. Stormwater runoff from oil and gas production activities has the potential to result in soil erosion. Vegetation clearing and grading activities could result in exposed or stockpiled soils that would be susceptible to stormwater runoff and wind erosion. Impacts associated with soil erosion and loss of top soil are anticipated to be less than significant with mitigation and will be evaluated in the EIR.

- **Potentially Significant Impact.** Soils located within the Project Site contain clayey soils that are subject to significant volume change due to variation in soil moisture content (CDC 2015a). Changes in soil moisture could result from a number of factors, including, but not limited to, rainfall, landscape irrigation, and utility leakage. The pressures associated with soil expansion can damage structures and pipelines. This issue is considered potentially significant and will be addressed in the EIR.
- **No Impact.** Sanitary wastewater facilities for construction and operations personnel would include portable toilets that are required to be maintained on a regular basis. Septic tanks are not anticipated to be used. Therefore, the Project would not impact soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems and will not be discussed in the EIR.

7.	GREENHOUSE GAS EMISSIONS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	ould the Project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	\boxtimes			
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	\boxtimes			

- **7a. Potentially Significant Impact.** Short-term greenhouse gas emissions from construction activities could come from construction equipment, support vehicles, material delivery truck trips, and worker vehicle trips. Operation activities that could contribute to an increase greenhouse gas emissions include drilling equipment and new production equipment along with continued or increased operations of existing equipment. Direct greenhouse gas emissions would come from combustion of diesel fuel, natural gas, and fugitive emissions. Indirect greenhouse gas emissions would be associated with electrical generation and worker and delivery truck transport offsite. Greenhouse gas emissions could have a potentially significant impact and will be discussed in the EIR.
- **7b. Potentially Significant Impact.** California has several bills and executive orders regarding greenhouse gases. In particular, Assembly Bill 32 (California Global Warming Solutions Act of 2006) set the 2020 greenhouse gas emissions reduction goal into law and requires California to maintain and continue reductions beyond 2020 (CARB 2014). The reduction will be accomplished through an enforceable statewide cap on greenhouse gas emissions following a phased-in approach. Project greenhouse gas emissions will need to be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing greenhouse gas emissions. Project emissions are potentially significant and will be discussed in the EIR.

8.	HAZARDS/HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	\boxtimes			
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e)	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, would the Project result in a safety hazard or people residing or working in the Project area?				\boxtimes
f)	For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?				\boxtimes
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	\boxtimes			
h)	Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				

8a–8c. Potentially Significant Impact. There are multiple hazards associated with oil production and well stimulation treatments. Potential accidental conditions could occur through oil field spills that may include crude oil, produced water or both. Other materials that could be spilled during oil field operations include, but are not limited to, acids, ammonia, antifreeze, chlorine, gasoline and diesel fuel, and solvents. Additionally, chemicals used for well stimulation activities may have toxicity concerns as well as chronic and acute exposure risks. (CDC 2015a). Flowback and produced water, collectively known as wastewater, contain contaminants and higher salinity levels that must be disposed of properly. Other potential hazards include the pipeline transport of oil and natural gas throughout the site.

Future oil and gas production activities could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; and emit hazardous emissions or handle

hazardous or acutely hazardous materials, substances, or waste within one-quartermile of an existing or proposed school. These impacts are considered potentially significant and will be discussed in the EIR.

- **8d.** Less Than Significant Impact. The hazardous materials sites compiled pursuant to Government Code Section 65962.5 is also known as the "Cortese" list. This list is maintained by the California Department of Toxic Substances Control. The Department maintains this information in their "Envirostar" database. According to the "Envirostar" database, the Inglewood Oil Field is not located on the "Cortese" list and as such is not a hazardous materials site pursuant to Government Code Section 65962.5. Less than significant impacts are anticipated with a hazardous materials site pursuant to Government Code Section 65962.5. However, this issue will be addressed in the EIR.
- **8e–8f. No Impact.** There are no public airports, public use airports, or private airstrips within two miles of the Project. Therefore, there would be no impacts to public airports, public use airports, or private airstrips, and this issue will not be discussed in the EIR.
- **8g. Potentially Significant Impact.** The Project would generate construction trips with the potential for lane closures. This could temporarily affect an adopted emergency response plan or emergency evacuation plan. This impact is anticipated to be potentially significant and will be discussed in the EIR.
- **8h. Potentially Significant Impact.** According to the City of Culver City Fire Department's Very High Fire Hazard Severity Zone (VHFHSZ) Map, the actual Project Site is not located in a VHFHSZ; however, there are several VHFHSZs near and around the Project Site. Two-thirds of the eastern portion of the Inglewood Oil Field located in the County of Los Angeles, which is immediately south of the Project Site is identified as a VHFHSZ. On the eastern side of La Cienega Boulevard, the Kenneth Hahn State Recreational Area has been identified as a VHFHSZ. Impacts could be potentially significant, and this issue will be discussed in the EIR.

9.	HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Violate any water quality standards or waste discharge requirements?	\boxtimes			
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation onsite or offsite?				
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?				
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff?				
f)	Otherwise substantially degrade water quality?	\boxtimes			
g)	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?				
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				\boxtimes
i)	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?				\boxtimes
j)	Inundation by seiche, tsunami, or mudflow?				

- 9a, 9f. Potentially Significant Impact. The construction and operation of future oil and gas production facilities could impact water quality and violate water quality standards or discharge requirements. As mentioned above in Section 8a through 8c, flowback and produced water contain contaminants and higher salinity levels, which could violate water quality standards if not properly disposed. Well stimulation treatment activities and the possible injection of production water into onsite wells could possibly affect groundwater quality. This impact is anticipated to be potentially significant and will be discussed in the EIR.
- **9b. Potentially Significant Impact.** Conventional oil drilling as well as stimulation treatment activities require varying amounts of water supplies. The Golden State Water Company currently obtains its water supply for the City of Culver City from the

West Basin Municipal Water District which obtains its imported water supply from the Metropolitan Water District of Southern California. The Culver City System has not used groundwater as a supply source since 1998 (GSWC 2010). While future oil and gas production activities may not deplete the local groundwater supply, these activities may deplete groundwater supplies in general. This impact is anticipated to be potentially significant and will be discussed in the EIR.

- **9c–9d.** Less Than Significant Impact. The construction and operation of future oil and gas production activities could potentially result in the alteration of drainage patterns and lead to flooding. This impact is anticipated to be less than significant but will be discussed in the EIR.
- **9e. Potentially Significant Impact.** Future oil and gas production activities could create or contribute to runoff water that could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This is considered a potentially significant impact and will be discussed in the EIR.
- **9g. No Impact.** Residential housing is not part of the Project description. Therefore, no residential housing would be placed 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. There would be no impacts, and this issue will not be discussed in the EIR.
- **9h–9j. No Impact.** The Project Site is not located within a 100-year flood hazard area so no structures would be placed within a 100-year flood hazard area, and no flood flows would be impeded or redirected. The Project is not located in an area where flooding from the failure of a levee or dam would impact the people working within the Project Site or the equipment located within the Project Site (City of Culver City 2007). There would be no impacts, and these issues will not be discussed in the EIR.

10	. LAND USE AND PLANNING	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	ould the Project:				
a)	Physically divide an established community?				\boxtimes
b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	\boxtimes			
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?			\boxtimes	

- **No Impact.** The existing land use on the Project Site is an active oil field. While residential uses are immediately adjacent to the Project Site, the boundaries of the Project Site are not changing or altering any other off-site uses. The Project Site currently does not contain any residential development and the Project would not divide an established community. There would be no impacts. This issue will not be discussed in the EIR.
- 10b. Potentially Significant Impact. The Project Site is located within the city boundaries of the City of Culver City. The two plans that cover the Project Site include the City of Culver City General Plan (and its various Elements), and the Baldwin Hills Conservancy Baldwin Hills Park Master Plan. Conflicts with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect may occur. An example of an applicable policy to be discussed includes the City of Culver City's General Plan Land Use Element Policy 1.B which states "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)." An evaluation of consistency with General Plan goals and policies will be conducted. The impacts could be potentially significant and will be discussed in the EIR.
- 10c. Less Than Significant Impact. While there are no adopted Habitat Conservation Plans or adopted Natural Community Conservation Plans for the Project Site, the Baldwin Hills Park Master Plan does include the Project Site. The Baldwin Hills Park Master Plan is to serve as a guide for future natural open space and parkland acquisition and improvements, facility development and habitat restoration within the Baldwin Hills, and for connections to trails, parks, and other public facilities (BHC 2002). These goals were further reinforced in the Baldwin Hills Conservancy 2013 Updated Strategic Plan (BHC 2013). This issue will be discussed in the EIR.

11	. MINERAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				\boxtimes

11a–11b. No Impact. The Specific Plan allows for the continued use of an existing and active oil production field. There would be no loss of availability of a known and/or locally-important mineral resource because the proposed Project would allow for continued oil production activities and the continued recovery of hydrocarbon resources.

The California Geological Survey conducted a series of mineral land classification studies under the authority of the Surface Mining and Reclamation Act of 1975. The Project Site is located in a Mineral Resource Zone of MRZ-1 (CDC 1979). MRZ-1 indicates that no significant mineral resources are present or it is judged that little likelihood exists for their presence. Therefore, there would be no impacts to mineral resources, and this issue will not be discussed in the EIR.

12.	NOISE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project result in:				
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				
c)	A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?				
d)	A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	\boxtimes			
e)	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, would the Project expose people residing or working in the Project area to excessive noise levels?				\boxtimes
f)	For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?				

- **12a–12d. Potentially Significant Impact.** The City of Culver City's Municipal Code (Section 9.07.035) prohibits construction activity except between the hours of:
 - 8:00 a.m. and 8:00 p.m. Mondays through Fridays
 - 9:00 a.m. and 7:00 p.m. Saturdays
 - 10:00 a.m. and 7:00 p.m. Sundays

Construction activities, including well pad preparation, drilling, completion and testing of new wells, construction of associated infrastructure, activities at existing wells, general maintenance activities and geophysical surveys could all result in temporary or periodic increases in noise and groundborne vibration. Well drilling operations are required to occur for 24-hour periods. Oil and gas production activities could result in temporary and periodic increases in ambient noise levels during operations. These impacts are considered potentially significant and will be discussed in the EIR.

12e–12f. No Impact. There are no public airports, public use airports, or private airstrips within two miles of the Project. Therefore, there would be no impacts, and this issue will not be discussed in the EIR.

13	POPULATION AND HOUSING	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	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)?				\boxtimes
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				\boxtimes

No Impact. FM is the primary owner/operator within the Inglewood Oil Field and operates its oil and gas wells 24 hours per day, seven days per week, and 365 days per year, and has approximately 90 permanent on-site employees. According to information provided in the SB 4 Final EIR, the maximum number of daily on-site personnel, which is anticipated to occur approximately 130 days per year, is 775 people, including service company and temporary employees. In addition to FM, there are several other independent field operators. (CDC 2015a). Assuming the number of daily on-site personnel is proportional to the amount of acreage located within the City of Culver City, this would equate to approximately a maximum of 78 workers associated with oil field activities on the Project Site. Based on 2014 Census data, the population of the City of Culver City was 38,949 (CDC 2015a). The estimated 78 workers is equivalent to about 0.2 percent of the population of City of Culver City.

During a standard hydraulic fracturing operation, only eight to 15 additional employees are needed per day (above the estimated 78 workers). If all of these workers relocated to the City of Culver City, the increase in population would be considered negligible when compared to the existing population of Culver City. This potential growth in population would not be considered substantial. There would be no impacts, and this issue will not be discussed in the EIR.

13b–13c. No Impact. The Project considers the construction of new oil and gas production facilities, which will not displace people and will not necessitate construction of replacement housing elsewhere. There would be no impacts to housing, and this will not be discussed in the EIR.

14.	PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	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:				
	Fire protection?				
	Police protection?	\boxtimes			
	Schools?				\boxtimes
	Parks?				\boxtimes
	Other public facilities?				

Potentially Significant Impact - Fire and Police. Based on anticipated negligible population growth associated with Project implementation, as discussed in Section 13a above, the potential growth in population would be negligible and would not result in a need for the construction of additional fire and police protection facilities. However, increased hazards associated with an increase in the oil field activities and associated potential for accidental spills, gas releases, fires, and other upsets could potentially create a safety hazard on-site requiring emergency response or blocking response routes. As a result, potential significant impacts could occur for fire and police protection. These issues will be discussed in the EIR.

No Impact – Schools, Parks and Other Public Facilities. Based on anticipated negligible population growth associated with Project implementation, as discussed in Section 13a above, additional schools, parks and other public facilities like libraries would not be required. Therefore, there would be no impacts to schools, parks and other public facilities and this will not be discussed in the EIR.

15	. <u>RECREATION</u>	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	ould/does the Project:				
a)	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?				\boxtimes
b)	Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

- **No Impact.** The Project considers the construction of new oil and gas production facilities. Based on the anticipated negligible population growth associated with Project implementation, as discussed in Section 13a above, population increases would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration could occur or be accelerated. There would be no impacts, and this issue will not be discussed in the EIR.
- 15b. Potentially Significant Impact. The Project considers the construction of new oil and gas production facilities within an existing and secured oil field and does not include recreational facilities. However, the Baldwin Hills Conservancy's Baldwin Hills Park Master Plan has identified a park concept description called One Big Park (BHC 2002). This concept would create an over two square mile zone within Los Angeles' urban core and includes the area in which the Project is located. If the area in which the Project is located cannot be used or converted to park land as the Baldwin Hills Park Master Plan has identified, then this could cause construction or expansion of recreational facilities elsewhere than could have an adverse physical effect on the environment. This impact is potentially significant and will be discussed in the EIR.

16.	TRANSPORTATION/TRAFFIC	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system. Including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				
b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand established by the county congestion management agency for designated roads or highways?				
c)	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?				
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				\boxtimes
e)	Result in inadequate emergency access?				
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreased the performance or safety of such facilities?	⊠			

- 16a.-b, f. Potentially Significant Impact. Future oil and gas drilling operations would add vehicle trips to area roadways throughout construction and operation activities. This may include the use of oversized vehicles. These vehicles may travel at lower speeds than other traffic, and because of their size, intrude into adjacent travel lanes. These trips may decrease the existing level of service on area roadways and at intersections. This could cause a conflict with an applicable congestion management plan or program. Impacts on the local roadways are considered potentially significant and will be discussed in the EIR.
- **No Impact.** There are no public airports, public use airports, or private airstrips within two miles of the Project. Therefore, there would be no impacts to air traffic patterns, and this issue will not be discussed in the EIR.
- **No Impact.** Access to wells in the Project site could be obtained via a network of existing roadways or new earth or gravel roadways that would provide access to the individual wells. These roadways would not have general public access and would be designed for oil production support equipment. Therefore, there would not be a substantial increase in hazards due to a design feature or incompatible use. This would result in no impacts, and this issue will not be discussed in the EIR.

Potentially Significant Impact. The Project would generate construction trips with the potential for lane closures. This could temporarily affect an adopted emergency response plan or emergency evacuation plan. This impact is anticipated to be potentially significant and will be discussed in the EIR.

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17.	UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
c)	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		\boxtimes		
d)	Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?	\boxtimes			
e)	Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?				
f)	Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?			\boxtimes	
g)	Comply with federal, state, and local statutes and regulations related to solid waste?				

- 17a.–17b. Potentially Significant Impact. Future oil and gas production activities may require water treatment facilities with additional capacity which could involve the construction of new facilities, expansion of existing facilities, modifications to increase the pumping capacity, pipeline or distribution systems, as well as converting existing wells from production to injection, or drilling new wells for disposal. The construction of new wastewater treatment facilities or the expansion of existing facilities could result in potentially significant environmental effects. This issue will be discussed in the EIR.
- 17c. Less Than Significant with Mitigation. Future oil and gas production activities could result in the construction of new stormwater drainage facilities or expansion of existing facilities. This impact is anticipated to be less than significant with mitigation and will be evaluated in the EIR.
- 17d. Potentially Significant Impact. The Golden State Water Company currently obtains its water supply for the City of Culver City from the West Basin Municipal Water District which obtains its imported water supply from the Metropolitan Water District of Southern California. The Culver City System has not used groundwater as a supply source since 1998 (GSWC 2010). So, while future oil and gas production activities may not deplete the local groundwater supply, these activities may deplete groundwater supplies in general. While new or expanded entitlements are not anticipated for the Project, this impact is anticipated to be potentially significant and will be discussed in the EIR.

- 17e. Less Than Significant Impact. Future oil and gas production activities are not expected to result in a determination by the wastewater treatment provider that serves the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Wastewater is typically handled in three ways: (1) injection (with or without treatment) into disposal wells; (2) recycled (with or without treatment) for use in future oil and gas operations; or (3) trucked or piped off-site to a private or municipal wastewater treatment plant. Based on available information, it is projected that injection into disposal wells would remain the primary method of disposal (CDC 2015a). Impacts are expected to be less than significant, but will be discussed in the EIR.
- 17f–17g. Less Than Significant Impact. Future oil and gas production activities are not anticipated to generate significant amounts of non-hazardous wastes. The amount of non-hazardous solid waste generated is not expected to exceed the capacity of local landfills. The Project would comply with the 1989 California Integrated Waste Management Act and the California Solid Waste Reuse and Recycling Access Act of 1991. The impacts to local landfills and federal, state, and local statutes and regulations related to solid waste are expected to be less than significant, but this issue will be discussed in the EIR.

18.	MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Do	es the Project:				
a.	Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
b.	Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?				
C.	Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

- **Potentially Significant Impact.** The EIR's biological resources section will discuss specific Project impacts on plants and wildlife. The EIR's cultural resources section will discuss specific Project impacts on important examples of California history and prehistory. Impacts may be potentially significant and will be discussed in the EIR.
- **Potentially Significant Impact.** The Project has the potential to contribute to cumulative impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation and traffic, and utilities and service systems. The EIR will evaluate the Project's contribution to cumulative impacts in these areas as well as other areas as further impacts are identified.
- **Potentially Significant Impact.** The Project could result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. These impacts will be discussed in the EIR.

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