

CEQA EXEMPTION REVIEW

Ordinance to Terminate Nonconforming Oil and Gas Uses in Culver City

Completed By: City of Culver City, Project Manager
Reviewed By: City of Culver City, City Attorney
Date Prepared: October 11, 2021

Pursuant to California Public Resources Code §§ 21080(b)(9) and 21084, the California Environmental Quality Act of 1970, as amended (“CEQA”) does not apply to the City of Culver City (“City”) City Council’s adoption of the Ordinance to Terminate Nonconforming Oil and Gas Uses, as more fully defined and described in the Project Description below and the Categorical Exemption Environmental Checklist for the Ordinance to Terminate Nonconforming Oil and Gas Uses (the “Checklist”), if found to be exempt from CEQA under CEQA Guidelines Section 15061(b). This CEQA Exemption Review identifies and evaluates certain exemptions applicable to this project under CEQA Guidelines Section 15061(b), and establishes and determines that this project is exempt from the provisions of CEQA including, without limitation, requirements for CEQA review and preparation of environmental documents.

PROJECT DESCRIPTION

The project is the City Council’s adoption of a City-wide ordinance, Ordinance No. 2021-____, approving Zoning Code Amendment P2021-0036-ZCA, amending Culver City Municipal Code, Title 17: Zoning Code; Section 17.610.010.D Nonconforming Oil Use, as set forth in Exhibit A attached to and made a part of such ordinance (collectively, the “Oil Termination Ordinance”). Note that while this project description provides a summary of certain aspects of the Oil Termination Ordinance, the text of the Oil Termination Ordinance, including the Zoning Code Amendment text, controls (see Oil Termination Ordinance).

The Oil Termination Ordinance provides for (i) the termination of all nonconforming oil uses over a five-year period ending November 24, 2026; and (ii) effective November 24, 2021, the prohibition of new or expanded oil and gas activity (such as the drilling of new wells, the redrilling or deepening of existing wells, or the erection of any derrick, structure or equipment related to oil or gas production), except as required to facilitate termination of the nonconforming oil uses and existing oil and gas activities and operations allowed to continue until termination. Specifically, during the period after November 24, 2021 until the termination of all nonconforming oil uses in accordance with the Oil Termination Ordinance by November 24, 2026, production from existing oil wells, water injection to existing injection wells and permitted routine maintenance of existing wells and facilities shall be allowed to continue in compliance with Chapter 11.12 of the Culver City Municipal Code and the Oil Termination Ordinance, including the time frames established in an approved Termination Program and Schedule (as defined in the Oil Termination Ordinance). The Oil Termination Ordinance is not applicable to (i) common carrier oil pipelines intended for regionally-coordinated transport of hydrocarbons; (ii) injection wells that are permitted and demonstrated to be active and necessary as determined by the California Geologic Energy Management Division (“CalGEM”); (iii) service stations or like uses; and (iv) oil and injection wells verified plugged in accordance with all applicable local, state and federal laws, rules and regulations, including the California Statutes and Regulations overseen by CalGEM, and for which the well pad has been restored and revegetated to as near a natural state as practicable. The Oil Termination Ordinance does not change any existing City zoning or General Plan designations.

The Oil Termination Ordinance governs the entirety of the land surface within the City that has been used for the drilling, production, storage or transport of oil, gas or other hydrocarbons, or for injection or water flooding in connection with oil and gas activity (the "Oil Use Premises"). See the Project Location Map, Attachment A, which shows the locations and status of wells within the City as presented on the CalGEM website, public portal (October 1, 2021). The principal location of the project is the land and surface drilling facilities for the Inglewood Oil Field located within the City boundaries (the "City IOF"). (For ease of reference, oil well locations within the City IOF and oil well locations outside the City IOF are shown separately in Attachment A.) Based on available data from CalGEM, as of October 1, 2021, there are a total of 41 active or potentially active wells having top-hole locations within the City and an estimated 28 previously plugged wells, all within the City IOF. An additional approximately 70 previously plugged and closed wells are located within the remainder of the City. No active or potentially active wells are known to be located within the City that are outside the City IOF. As of October 1, 2021, the CalGEM public portal indicates five potential "idle" wells located outside the City IOF on properties that are developed with other uses. These five wells, which are non-operational and capped, are likely previously plugged. The number and status of all existing wells within the City will be confirmed in coordination with CalGEM as an initial step to implement the Oil Termination Ordinance. Those sites with previously closed oil or injection wells that are verified to have been properly plugged in accordance with all applicable local, state and federal laws, rules and regulations, including the California Statutes and Regulations and all other requirements overseen by CalGEM, for which well pads have been restored and revegetated to as near a natural state as practicable, may not require further closure and restoration activities under the Oil Termination Ordinance.

The City IOF is a small 78-acre portion of the entire approximately 1,000-acres of surface drilling and production areas for the Inglewood Oil Field (the "IOF") established during the 1920s (See the Location Vicinity Map, attached as Attachment B). The City IOF's 41 existing wells, comprised of 31 producing wells and 10 water flooding injection wells, were drilled between 1925 and 2002. Only six production wells were drilled between 1977 and 2002, and no new wells have been drilled in the City IOF in nearly 20 years. The City IOF contains less than 10 percent of the IOF's producing wells and produces less than five percent of the IOF's total oil production. None of the core processing or transport facilities for the IOF are located within the City IOF.

The Oil Termination Ordinance requires completion of the termination of nonconforming oil uses by November 24, 2026. The termination and restoration activities include (i) the cessation of production and drilling operations, (ii) the closure and plugging of all oil and gas wells, including water flooding injection wells, except injection wells as permitted and demonstrated to be active and necessary by CalGEM; (iii) the dismantling and removal of all surface facilities associated with the nonconforming oil use, including storage tanks, above-ground pipelines, equipment, debris and other physical operational components; (iv) the plugging/capping of subsurface pipelines; and (v) the remediation, restoration and revegetation of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable, free from all oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. Internal road and access ways and storm water retention and drainage features and facilities shall remain in place.

These oil use termination and restoration activities will be performed in accordance with all applicable local, state and federal laws, regulations, rules and standards, including the California Statutes and Regulations and all other requirements overseen by CalGEM as the

principal regulatory authority for the closure of oil and gas production sites. Closure, removal and restoration activities will occur within previously disturbed and developed areas of the Oil Use Premises.

The closure of production wells entails plugging the wells in place in accordance with the California Statutes and Regulations and all other applicable requirements as overseen by CalGEM. Generally, the upper five to 10 feet of well casing and all surface well site appurtenances are removed and disposed of in accordance with applicable regulations. The production zone of the well is plugged with concrete, the remainder of the borehole up to five to 10 feet below ground surface is filled with concrete or mud, and the uppermost segment of the borehole is filled with soil. The well plugging materials do not constitute hazardous materials.

Each well closure is anticipated to require use of a workover rig for approximately two weeks during allowed daytime work hours and will include associated deliveries and work crews (i.e., six deliveries of concrete or mud over the course of two weeks, and a two- to four-person work crew per day). During the plugging of each well, an average of 10 passenger vehicle trips per day for two weeks is assumed, in addition to two trips per day by a concrete/mixing truck and the operation of a truck-mounted workover rig.

The surface facilities to be dismantled and removed include tanks and above-surface pipelines within the City IOF. The five tanks (three 5,000-barrel tanks, one 3,000-barrel tank, and one 1,000 barrel-tank) are clustered on a graded pad near the center of the City IOF, known as the T-Vickers Tank Farm. Gravity settling tanks separate the oil and water and the oil is routed to holding tanks. The produced oil and water are pumped from storage tanks to other facilities centralized within the IOF but outside the boundary of the City IOF. Various above-surface pipelines are used to convey oil, produced water and gas from City IOF wells to the tanks and to the other IOF facilities outside the boundary of the City IOF for processing and distribution.

One storm water retention basin, known as the Dabney Lloyd Basin, is located near the northern end of the City IOF. It receives runoff from the northwest portion of the IOF, and it will remain in place.

The purpose of the Oil Termination Ordinance is to remove nonconforming oil uses in an expedited manner, balancing the protection of the public health, safety and welfare, while concurrently considering important logistical issues to ensure that the termination of oil uses is completed in a thoughtful, safe and secure manner that facilitates protection of the environment. Among the objectives of the Oil Termination Ordinance are: (1) eliminating obsolete, industrialized nonconforming oil-production uses established a century ago that are determined to be incompatible with the current urban context and the character of the surrounding community uses; (2) enhancing public health, welfare and safety, and protection of the environment with the closure of wells and removal of ancillary equipment that is aging and vulnerable to failure and poses a threat to public safety and damage to the environment; (3) addressing growing concern and lack of continuity resulting from a succession of changes in City IOF operators, as experienced most recently in 2017, that may have a limited interest to invest in achieving compliance with City standards; (4) prioritizing the public health, safety and welfare of the community and developing a strategy for the safe and responsible closure of the City IOF; and (5) providing for the betterment, restoration and protection of the environment by, among other things, improved air quality and climate change conditions associated with the cessation of oil use operations within the City, and improved visual effects and aesthetics by the restoration of areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable.

FINDINGS AND CONCLUSIONS

The potential for environmental effects associated with the Oil Termination Ordinance project has been reviewed under the Checklist in connection with the determination as to whether the City Council's adoption of the Oil Termination Ordinance is exempt from CEQA under CEQA Guidelines Section 15061(b)(3), the common sense exemption, in that it can be seen with certainty that there is no possibility that the Oil Termination Ordinance project may have a significant effect on the environment. In addition, the Checklist has been prepared in connection with the determination as to whether application of any of the classes of categorical exemptions applicable to the Oil Termination Ordinance project under CEQA Guidelines Section 15300 is barred by certain exceptions under CEQA Guidelines Section 15300.2. Specifically, the Checklist addresses whether, under CEQA Guidelines Section 15300.2(b), the cumulative impact of successive projects of the same type in the same place, over time is significant and, under CEQA Guidelines Section 15300.2(c), whether there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The Checklist concludes that the Oil Termination Ordinance project would have no impact as to any environmental issues, as documented in the review of environmental issues in Section C of the Checklist, and that it can be seen with certainty that there is no possibility that the Oil Termination Project may have a significant effect on the environment. The Checklist thereby supports the determination, as concluded in 1 and 2(a) below, that the Oil Termination Ordinance project is exempt from CEQA as to all applicable categorical and statutory exemptions, including but not limited to the common sense exemption under CEQA Guidelines Section 15061(b)(3) and the following categorical exemption classes under CEQA Guidelines Section 15061(b)(2): Class 1 – Existing Facilities (CEQA Guidelines Section 15301); Class 4 – Minor Alterations to Land (CEQA Guidelines Section 15304); and Class 8 – Actions by Regulatory Agencies for the Protection of the Environment (CEQA Guidelines Section 15308). In addition, as documented in the review of the applicability of certain exemptions under CEQA Guidelines Section 15300.2 presented in Section D of the Checklist, the application of the classes of categorical exemptions applicable to the Oil Termination Ordinance project under CEQA Guidelines Section 15300 is not barred by either of those exceptions under CEQA Guidelines Section 15300.2. Specifically, under CEQA Guidelines Section 15300.2(b), the cumulative impact of successive projects of the same type in the same place, over time is not significant and, under CEQA Guidelines Section 15300.2(c), there is not a reasonable possibility that the Oil Termination Ordinance project will have a significant effect on the environment due to unusual circumstances, as concluded in 2(b) below.

Consistent with CEQA and the CEQA Guidelines, it is concluded that the Oil Termination Ordinance project is exempt from the provisions of CEQA, including, without limitation, requirements for CEQA review and preparation of environmental documents. Such determination includes, but shall not be limited to, the following:

1. **Common Sense Exemption.** The Oil Termination Ordinance project is exempt from CEQA because the Oil Termination Ordinance is exempt pursuant to Section 15061(b)(3), the common sense exemption, in that it can be seen with certainty that there is no possibility that it may have a significant effect on the environment, as documented in the Checklist.
2. **Classes of Categorical Exemptions.** The Oil Termination Ordinance project is exempt from CEQA under CEQA Guidelines Section 15061(b)(2) because the Oil Termination

Ordinance project is exempt pursuant to classes of categorical exemptions as provided in CEQA Guidelines Section 15300, which have been determined not to have a significant effect on the environment and, therefore, have been declared to be categorically exempt from the provisions of CEQA; and the application of classes of categorical exemptions to the Oil Termination Ordinance project is not barred by any of the exceptions set forth in CEQA Guidelines Section 15300.2:

a. The classes of categorical exemptions applicable to the Oil Termination Ordinance project include, but shall not be limited to, the following:

- i. Class 1 (CEQA Guidelines Section 15301) – Existing Facilities. The Oil Termination Ordinance constitutes a City regulatory action as to the operation, maintenance, permitting and licensing of existing private facilities within the City, namely the Oil Use Premises, in that it requires the cessation of such nonconforming oil uses within a five-year period ending on November 24, 2026 and prohibits any increase or expansion of existing facilities for the nonconforming oil uses by November 24, 2021, as specified in the Oil Termination Ordinance. The purpose of the Oil Termination Ordinance is to terminate existing nonconforming oil uses within the City by requiring the plugging and removal of the existing facilities on Oil Use Premises and the remediation, restoration and revegetation of areas within the Oil Use Premises affected by the plugging and removal activities in accordance with applicable laws and regulatory requirements within the specified five-year period. Thus, there can be no expansion of the existing nonconforming oil use within any Oil Use Premises within the City, and the project involves no expansion of the existing oil uses on Oil Use Premises within the City.
- ii. Class 4 (CEQA Guidelines Section 15304) – Minor Alterations to Land. The Oil Termination Ordinance requires minor private alterations in the condition of land and vegetation which do not involve the removal of healthy, mature, or scenic trees. The Oil Use Premises are previously disturbed and developed oil use sites within the City. The short-term plugging, removal and restoration activities for the termination of oil uses will involve previously developed and disturbed areas of Oil Use Premises. The Oil Termination Ordinance requires the restoration of areas within the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable in compliance with all applicable laws and regulatory requirements. This may involve activities such as the plugging of previously existing boreholes with earth, concrete and mud, and remediation, restoration and revegetation involving minimal refinishing of surface soil contours and similar minor alterations in the condition of the land and vegetation. The Oil Termination Ordinance project does not involve the removal of healthy, mature, scenic trees.
- iii. Class 8 (CEQA Guidelines Section 15308) – Actions by Regulatory Agencies for Protection of the Environment. The Oil Termination Ordinance constitutes a regulatory action by the City, as authorized by state and local law, to assure the maintenance, restoration, enhancement and protection of the environment where the regulatory process involves procedures for the protection of the environment. Specifically, the City

has the authority to terminate nonconforming uses through amortization procedures, such as the Oil Termination Ordinance, and has determined that requiring the termination of all nonconforming oil uses in the City within a five-year period ending on November 24, 2026, and prohibiting new or expanded facilities for such oil and gas activities, effective November 24, 2021, will in the short-term reduce and, ultimately, will eliminate such incompatible industrial uses for the enhancement and protection of the environment. The termination of the nonconforming oil uses includes the closure of oil wells, the removal of surface facilities, including storage tanks, above-ground pipelines and equipment, the plugging of subsurface pipelines as well as the remediation, restoration and revegetation of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable in accordance with all applicable laws and regulatory requirements. Such termination and closure activities and the standards under the Oil Termination Ordinance applicable to such termination and closure activities will not allow environmental degradation, as more fully described in the Checklist. The Oil Termination Ordinance would eliminate existing nonconforming oil use facilities and activities that pose a risk to the public health, safety and welfare and to the environment, thereby providing for the betterment, restoration and protection of the environment.

- b. **No Exceptions Apply.** The application of classes of categorical exemptions to the Oil Termination Ordinance project is not barred by any of the exceptions set forth in CEQA Guidelines Section 15300.2:
- i. Location. As to Class 4, the Oil Termination Ordinance project relates to disturbed and previously developed Oil Use Premises within the City, and none of the Oil Use Premises contains an environmental resource of hazardous or critical concern that has been designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. Consequently, the Oil Termination Ordinance project will not impact an environmental resource of hazardous or critical concern.
 - ii. Cumulative Impact. No cumulative impact of successive projects of the same type in the same place, over time, is significant. The Oil Termination Ordinance encompasses all Oil Use Premises within the City. Consequently, no successive projects addressing the termination of Oil Use Premises within the City will occur over time. No cumulative impact will result from the prohibition of new and expanded facilities for oil use on the Oil Use Premises, effective November 24, 2021, or the termination of all nonconforming oil uses within the City by November 24, 2026. As documented in the Checklist, including Sections C and D, the Oil Termination Ordinance project could not have a cumulative impact under CEQA Guidelines Section 15300.2(b).
 - iii. Significant Effect. As documented in the Checklist, including Section D, there are no unusual circumstances related to the Oil Termination Ordinance project, and, as documented in the Checklist, including Sections C and D, there is not a reasonable possibility that the Oil

Termination Ordinance project will have a significant effect on the environment due to unusual circumstances.

- iv. Scenic Highways. The Oil Termination Ordinance will not result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. Instead, the Oil Termination Ordinance requires restoration of areas of the Oil Use Premises affected by plugging and removal activities to as near a natural state as practicable.
- v. Hazardous Waste Sites. None of the Oil Use Premises is a site which is included on any list of hazardous waste sites compiled pursuant to Section 65962.5 of the Government Code.
- vi. Historical Resources. None of the Oil Use Premises constitutes an historical resource and the implementation of the Oil Termination Ordinance and the remediation, restoration and revegetation of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable will not cause a substantial adverse change in the significance of a historical resource.

ATTACHMENTS:

- A. Project Location Map
- B. Location Vicinity Map

Oil Well Locations in Culver City – Outside the City IOF

Legend

- Active Well (none)
- Idle Well
- Plugged Well
- Cancelled Well (none)
- Culver City Portion of the Inglewood Oil Field (City IOF) Boundary
- - - Culver City Corporate Limit Boundary



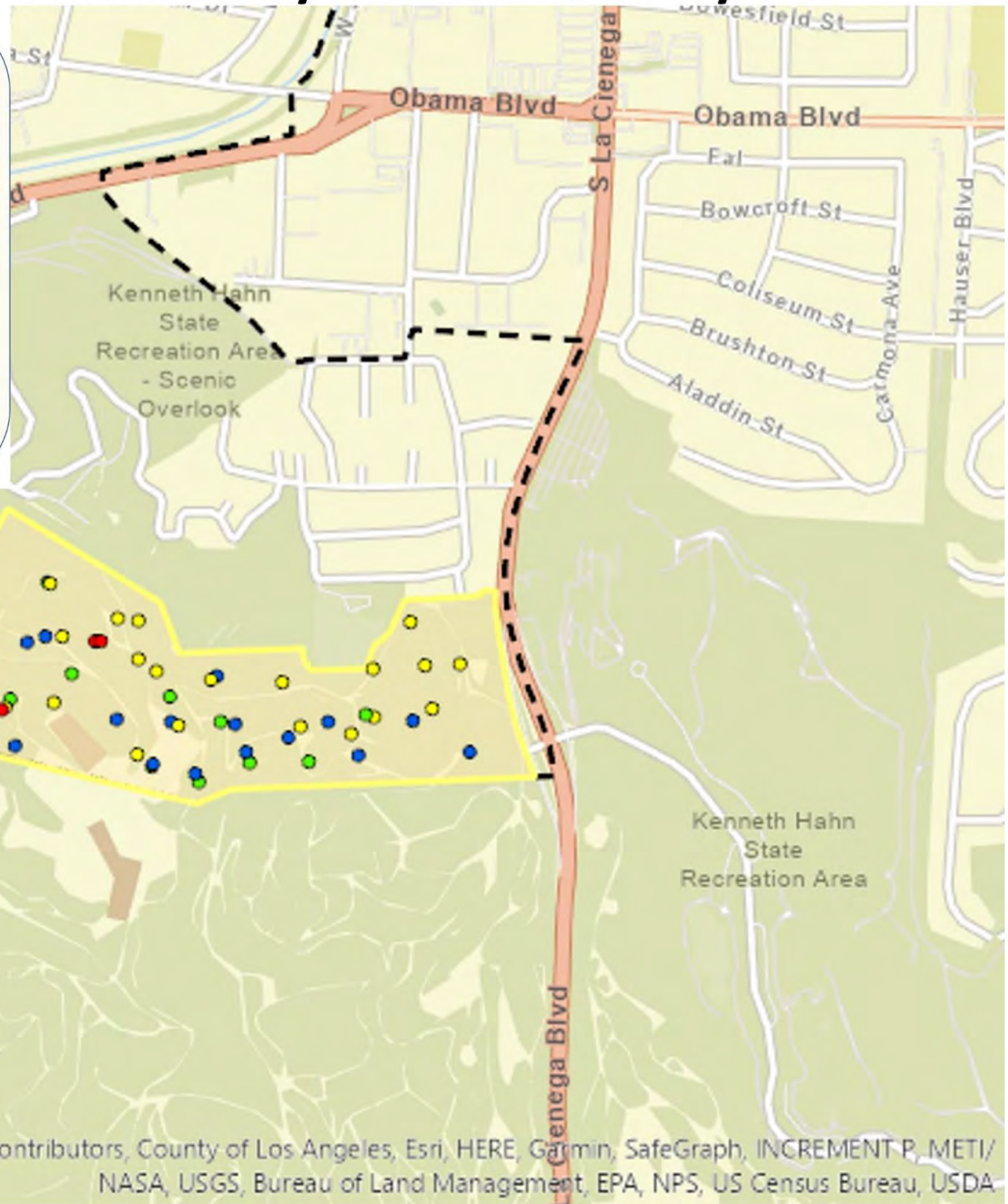
Not to Scale
October 11, 2021

County of Los Angeles, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Oil Well Locations in Culver City – Within the City IOF

Legend

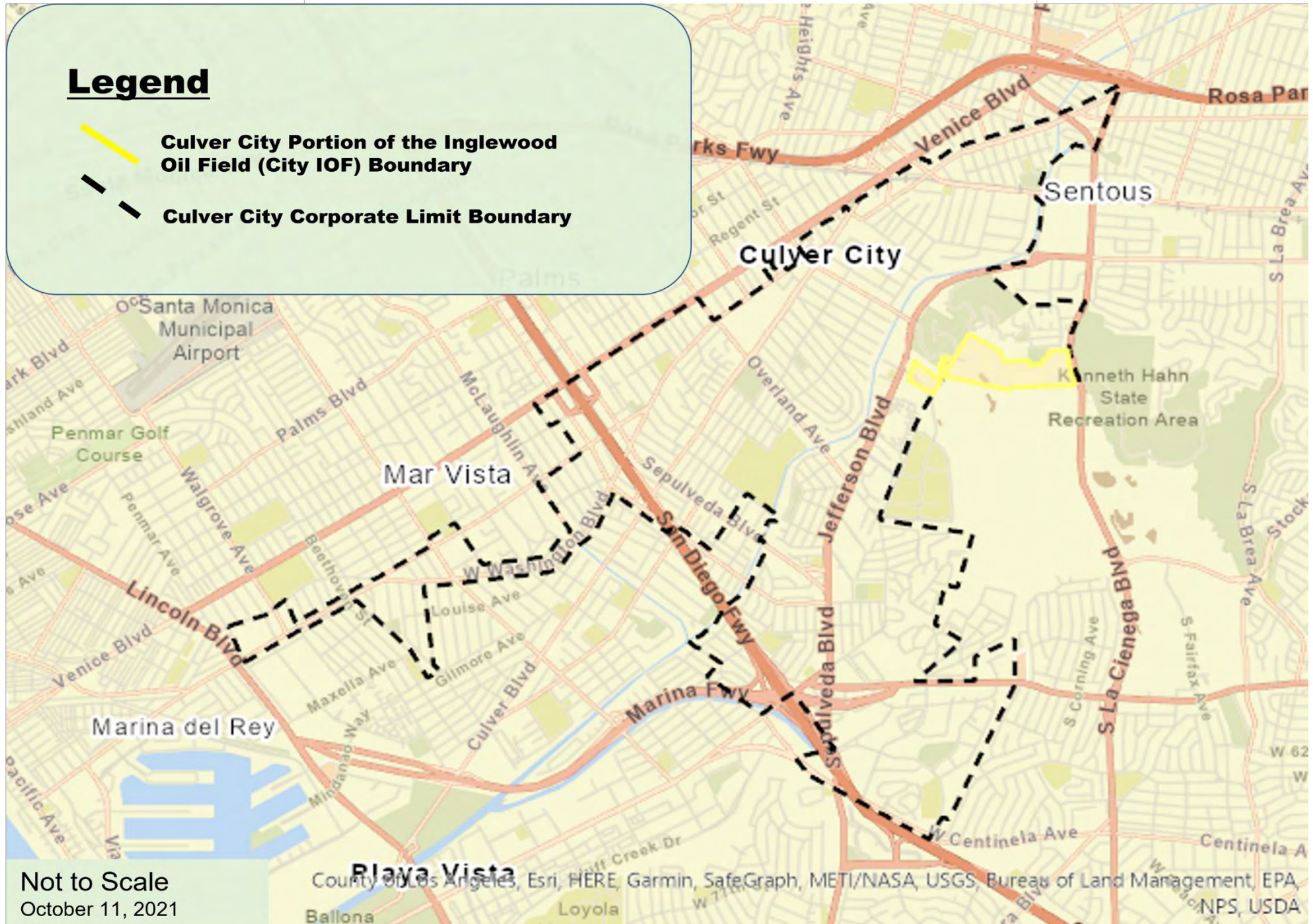
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- Culver City Portion of the Inglewood Oil Field (City IOF) Boundary
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Not to Scale
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Esri Community Maps Contributors, County of Los Angeles, Esri, HERE, Garmin, SafeGraph, INCREMENT P, METI/
NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA

City IOF – Location Vicinity Map



**CATEGORICAL EXEMPTION ENVIRONMENTAL CHECKLIST
FOR THE
ORDINANCE TO TERMINATE NONCONFORMING OIL AND GAS USES**

A. PROJECT INFORMATION:

1. PROJECT TITLE:

Ordinance to Terminate Nonconforming Oil and Gas Uses

2. LEAD AGENCY NAME AND ADDRESS:

City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

3. CONTACT PERSON AND PHONE NUMBER:

Contact: Heather Baker, Assistant City Attorney
310.253.5660
heather.baker@culvercity.org

4. PROJECT LOCATION:

See Project Location Map, Attachment A

5. PROJECT SPONSOR'S NAME AND ADDRESS:

City of Culver City – 9770 Culver Boulevard, Culver City, CA 90232

6. EXISTING AND SURROUNDING LAND USES AND SETTING:

The City of Culver City ("City") is an urban city, home to a population of approximately 39,000 residents and a wide range of retail and service commercial uses, including quasi-industrial uses and studio/entertainment uses. The City is surrounded primarily by City of Los Angeles neighborhoods to the north, south and west, and by unincorporated Los Angeles County and the Kenneth Hahn State Recreation Area to the east. Land south and east of the City IOF contains the approximately 920-acre Inglewood Oil Field drilling and production facilities located within Los Angeles County (the "County IOF"). Land north of the City IOF contains open space lands managed by the California Baldwin Hills Conservancy, the Stoneview Nature Center and the Stoneview residential neighborhood. Land west of the City IOF contains the Culver City Park and several industrial buildings along Jefferson Boulevard.

B. PROJECT DESCRIPTION

The project is the City Council's adoption of a City-wide ordinance, Ordinance No. 2021-____, approving Zoning Code Amendment P2021-0036-ZCA, amending Culver City Municipal Code, Title 17: Zoning Code; Section 17.610.010.D – Nonconforming Oil Use, as set forth in Exhibit A attached to and made a part of such ordinance (collectively, the "Oil Termination Ordinance"). Note that while this project description provides a summary of certain aspects of the Oil Termination Ordinance, the text of the Oil Termination Ordinance, including the Zoning Code Amendment text, controls (see Oil Termination Ordinance).

The Oil Termination Ordinance provides for (i) the termination of all nonconforming oil uses over a five-year period ending November 24, 2026; and (ii) effective November 24, 2021, the prohibition of new or expanded oil and gas activity (such as the drilling of new wells, the redrilling or deepening of existing wells, or the erection of any derrick, structure or equipment related to oil or gas production) except as required to facilitate termination of the nonconforming oil uses and existing oil and gas activities and operations allowed to continue until termination. Specifically, during the period after November 24, 2021 until the termination of all nonconforming oil uses in accordance with the Oil Termination Ordinance by November 24, 2026, production from existing oil wells, water injection to existing injection wells and permitted routine maintenance of existing wells and facilities shall be allowed to continue in compliance with Chapter 11.12 of the Culver City Municipal Code and the Oil Termination Ordinance, including the time frames established in an approved Termination Program and Schedule (as defined in the Oil Termination Ordinance). The Oil Termination Ordinance is not applicable to (i) common carrier oil

pipelines intended for regionally-coordinated transport of hydrocarbons; (ii) injection wells that are permitted and demonstrated to be active and necessary as determined by the California Geologic Energy Management Division (“CalGEM”); (iii) service stations or like uses; and (iv) oil and injection wells verified plugged in accordance with all applicable local, state and federal laws, rules and regulations, including the California Statutes and Regulations overseen by CalGEM, and for which the well pad has been restored and revegetated to as near a natural state as practicable. The Oil Termination Ordinance does not change any existing City zoning or General Plan designations.

The Oil Termination Ordinance governs the entirety of the land surface within the City that has been used for the drilling, production, storage or transport of oil, gas or other hydrocarbons, or for injection or water flooding in connection with oil and gas activity (the “Oil Use Premises”). See the Project Location Map, Attachment A, which shows the locations and status of wells within the City as presented on the CalGEM website, public portal (October 1, 2021). The principal location of the project is the land and surface drilling facilities for the Inglewood Oil Field located within the City boundaries (the “City IOF”). (For ease of reference, oil well locations within the City IOF and oil well locations outside the City IOF are shown separately in Attachment A.) Based on available data from CalGEM, as of October 1, 2021, there are a total of 41 active or potentially active wells having top-hole locations within the City and an estimated 28 previously plugged wells, all within the City IOF. An additional approximately 70 previously plugged and closed wells are located within the remainder of the City. No active or potentially active wells are known to be located within the City that are outside the City IOF. As of October 1, 2021, the CalGEM public portal indicates five potential “idle” wells located outside the City IOF on properties that are developed with other uses. These five wells, which are non-operational and capped, are likely previously plugged. The number and status of all existing wells within the City will be confirmed in coordination with CalGEM as an initial step to implement the Oil Termination Ordinance. Those sites with previously closed oil or injection wells that are verified to have been properly plugged, in accordance with all applicable local, state and federal laws, rules and regulations, including the California Statutes and Regulations and all other requirements overseen by CalGEM, for which well pads have been restored and revegetated to as near a natural state as practicable, may not require further closure and restoration activities under the Oil Termination Ordinance.

The City IOF is a small 78-acre portion of the entire approximately 1,000-acres of surface drilling and production areas for the Inglewood Oil Field (the “IOF”) established during the 1920s (see the Location Vicinity Map, attached as Attachment B). The City IOF’s 41 existing wells, comprised of 31 producing wells and 10 water flooding injection wells, were drilled between 1925 and 2002. Only six production wells were drilled between 1977 and 2002, and no new wells have been drilled in the City IOF in nearly 20 years. The City IOF contains less than 10 percent of the IOF’s producing wells and produces less than five percent of the IOF’s total oil production. No core processing or transport facilities for the IOF are located within the City IOF.

The Oil Termination Ordinance requires completion of the termination of nonconforming oil uses by November 24, 2026. The termination and restoration activities include (i) the cessation of production and drilling operations, (ii) the closure and plugging of all oil and gas wells, including water flooding injection wells, except injection wells as permitted and demonstrated to be active and necessary by CalGEM; (iii) the dismantling and removal of all surface facilities associated with the nonconforming oil use, including storage tanks, above-ground pipelines, equipment, debris and other physical operational components; (iv) the plugging/capping of subsurface pipelines; and (v) the remediation, restoration and revegetation of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable, free from all oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. Internal roads and access ways and storm water retention and drainage features and facilities shall remain in place.

These oil use termination and restoration activities will be performed in accordance with all applicable local, state and federal laws, regulations, rules and standards, including the California Statutes and Regulations and all other requirements overseen by CalGEM as the principal regulatory authority for the closure of oil and gas production sites. Closure, removal and restoration activities will occur within previously disturbed and developed areas of the Oil Use Premises.

The closure of production wells entails plugging the wells in place in accordance with the California Statutes and Regulations and all other applicable requirements as overseen by CalGEM. Generally, the

upper five to 10 feet of well casing and all surface well site appurtenances are removed and disposed of in accordance with applicable regulations. The production zone of the well is plugged with concrete, the remainder of the borehole up to five to 10 feet below ground surface is filled with concrete or mud, and the uppermost segment of the borehole is filled with soil. The well plugging materials do not constitute hazardous materials.

Each well closure is anticipated to require use of a workover rig for approximately two weeks during allowed daytime work hours and will include associated deliveries and work crews (i.e., six deliveries of concrete or mud over the course of two weeks, and a two- to four-person work crew per day). During the plugging of each well, an average of 10 passenger vehicle trips per day for two weeks is assumed, in addition to two trips per day by a concrete/mixing truck and the operation of a truck-mounted workover rig.

The surface facilities to be dismantled and removed include tanks and above-surface pipelines within the City IOF. The five tanks (three 5,000-barrel tanks, one 3,000-barrel tank, and one 1,000 barrel-tank) are clustered on a graded pad near the center of the City IOF, known as the T-Vickers Tank Farm. Gravity settling tanks separate the oil and water and the oil is routed to holding tanks. The produced oil and water are pumped from storage tanks to other facilities centralized within the IOF but outside the boundary of the City IOF. Various above-surface pipelines are used to convey oil, produced water and gas from City IOF wells to the tanks and to the other IOF facilities outside the boundary of the City IOF for processing and distribution.

One storm water retention basin, known as the Dabney Lloyd Basin, is located near the northern end of the City IOF. It receives runoff from the northwest portion of the IOF, and it will remain in place.

The purpose of the Oil Termination Ordinance is to remove nonconforming oil uses in an expedited manner, balancing the protection of the public health, safety and welfare, while concurrently considering important logistical issues to ensure that the termination of oil uses is completed in a thoughtful, safe and secure manner that facilitates protection of the environment. Among the objectives of the Oil Termination Ordinance are: (1) eliminating obsolete, industrialized nonconforming oil-production uses established a century ago that are determined to be incompatible with the current urban context and the character of the surrounding community uses; (2) enhancing public health, welfare and safety, and protection of the environment with the closure of wells and removal of ancillary equipment that is aging and vulnerable to failure and poses a threat to public safety and damage to the environment; (3) addressing growing concern and lack of continuity resulting from a succession of changes in City IOF operators, as experienced most recently in 2017, that may have a limited interest to invest in achieving compliance with City standards; (4) prioritizing the public health, safety and welfare of the community and developing a strategy for the safe and responsible closure of the City IOF; and (5) providing for the betterment, restoration and protection of the environment by, among other things, improved air quality and climate change conditions associated with the cessation of oil use operations within the City, and improved visual effects and aesthetics by the restoration of areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable.

This Categorical Exemption Environmental Checklist for the Ordinance to Terminate Nonconforming Oil and Gas Uses (the "Checklist") has been prepared in connection with the determination as to whether the City Council's adoption of the Oil Termination Ordinance is exempt from the California Environmental Quality Act of 1970, as amended ("CEQA") under CEQA Guidelines Section 15061(b)(3), the "common sense exemption," in that it can be seen with certainty that there is no possibility that it may have a significant effect on the environment. In addition, the Checklist has been prepared in connection with the determination as to whether application of the classes of categorical exemptions applicable to the Oil Termination Ordinance project under CEQA Guidelines Section 15300 is barred by certain exceptions under CEQA Guidelines Section 15300.2. Specifically, the Checklist addresses whether under CEQA Guidelines Section 15300.2(b), the cumulative impact of successive projects of the same type in the same place, over time is significant and, under CEQA Guidelines Section 15300.2(c), whether there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

C. CHECKLIST OF ENVIRONMENTAL ISSUES FOR THE COMMON SENSE EXEMPTION UNDER CEQA GUIDELINES SECTION 15061(b)(3):

<u>I. AESTHETICS</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project will not have a significant adverse effect on any aesthetic resources or result in visual degradation of the project area. The project will not result in damage to any scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. The project will not introduce new sources of light or glare. The Oil Termination Ordinance prohibits the drilling of any new wells and the redrilling of existing wells, effective November 24, 2021. The Oil Termination Ordinance provides for the termination of all nonconforming oil uses over a five-year period ending November 24, 2026, resulting in the closure of oil wells, the removal of above-ground surface facilities, including storage tanks, pipelines and equipment and the restoration of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable. These activities will improve the visual character of Oil Use Premises, including areas visible from the Baldwin Hills Scenic Overlook, the Kenneth Hahn State Recreation Area and other public vantage points, which would have a beneficial effect related to aesthetics. In addition, the Oil Termination Ordinance's prohibition of the erection of new or expanded surface facilities related to oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, will prevent the installation of additional facilities visible from such areas.				

<u>II. AGRICULTURE AND FORESTRY RESOURCES</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project is located in an urbanized setting and will not affect any agricultural or forest/timberland resources or result in the conversion of lands in agriculture or forest/timberland use to non-agricultural or forest uses. There are no areas that have been classified as Prime Farmland, Unique Farmland or Farmland of Statewide Importance, there are no farmlands within the Oil Use Premises and there are no forestlands, timberlands or timberland zoned areas within the Oil Use Premises as defined in the California Public Resources Code.				

III. AIR QUALITY	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Explanation: The project will not result in the generation of any significant quantities of air pollutant emissions or have a significant impact on air quality resources. The project will not conflict with or obstruct implementation of applicable air quality plans. The Oil Termination Ordinance project will not result in the cumulatively considerable net increase of any criteria pollutant, and the project will not expose sensitive receptors to substantial pollutant concentrations or create objectionable odors. See Attachment C, Memorandum prepared by Psomas, dated October 11, 2021 (the "Psomas Memorandum"), which presents an analysis of air pollutant emissions levels associated with short-term closure activities and the cessation of long-term City IOF operations. The Psomas Memorandum concludes that the Oil Termination Ordinance project's short-term activities for well closures would not generate air pollutant emissions, either directly or indirectly, that may have a significant impact on the environment and that the associated emissions would be substantially below any South Coast Air Quality Management District significance thresholds. The Psomas Memorandum also provides a comparison of annual emissions associated with well closures over a four-year period as compared to the emissions that would not occur and would be avoided as the wells are closed. The net differences in emissions over a 20-year time frame show cumulative reductions, which are determined to have a beneficial impact on local and regional air quality. The Psomas Memorandum concludes that the long-term cessation of nonconforming oil uses under the Oil Termination Ordinance would incrementally reduce the air pollutant burden locally and would assist the region in meeting clean air goals. The Psomas Memorandum also determines that the Oil Termination Ordinance project would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing air pollution emissions and, specifically, that the termination of oil uses would reduce air pollutant exposure consistent with regional and State air quality goals and plans.				

IV. BIOLOGICAL RESOURCES	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project will not have a substantial adverse impact 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. It will not 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 US Fish and Wildlife Service. It will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. It will not 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. It will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance or with the provisions of an adopted Habitat Conservation Plan or similar local, regional or state habitat protection plan. Oil Use Premises governed by the Oil Termination Ordinance are previously developed and disturbed sites in urbanized areas within the City that have been used for decades for oil and gas production. The existing internal roads and access ways within the City IOF will remain as will the Dabney Lloyd Basin storm water retention facility and other storm water retention and drainage features and facilities. Short-term closure and restoration activities within the Oil Use Premises will take place over the designated five-year period and will be limited to previously developed and disturbed areas consisting of existing well pads, tank sites and locations where existing surface oil use facilities and equipment are to be removed and where the capping of subsurface pipelines will occur. Those affected areas are required to be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. In sum, closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas and will not involve significant new excavations or deepening of existing excavations. In addition, the Oil Termination Ordinance's prohibition on the installation of new or expanded surface facilities related to oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil				

Termination Ordinance, will protect the Oil Use Premises from encroachment by expanded facilities into previously undisturbed areas.

<u>V. CULTURAL RESOURCES</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Explanation: The project will not have a significant impact on any cultural resources, including historic, archaeological or paleontological resources or sites or unique geological features, nor will the project disturb any human remains. No such historical resources, archaeological resources or paleontological resources or sites are known to have been designated or determined to exist on the Oil Use Premises, and no unique geologic features are known to have been identified. The Oil Use Premises governed by the Oil Termination Ordinance are previously developed and disturbed sites in urbanized areas within the City that have been used for decades for oil and gas production. Short-term closure and restoration activities within the Oil Use Premises will be limited to previously disturbed and developed areas consisting of existing well pads, tank sites and locations where existing surface oil use facilities and equipment are to be removed and where the capping of subsurface pipelines will occur. Subsurface activities will involve the plugging of existing and excavated well boreholes with concrete, mud and soil and the capping in place of previously excavated pipelines at specified points. Above-surface activities, such as the removal of surface facilities, including tanks, above-ground pipelines and equipment, will not involve significant new excavations or earth removal. Those affected areas are required to be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. In sum, closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas and will not involve significant new excavations or deepening of existing excavations. In addition, the Oil Termination Ordinance's prohibition on the installation of new or expanded surface facilities for oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, will protect the Oil Use Premises from new or deepened excavations for expanded facilities within previously undisturbed areas.				

<u>VI. ENERGY</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state of local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Explanation: The project will not have a significant impact on energy resources and will not conflict with plans for renewable energy or energy efficiency. Short-term closure and restoration activities under the Oil Termination Ordinance project will not result in inefficient, wasteful or unnecessary consumption of energy resources. In addition, long-term energy use levels may be reduced due to the Oil Termination Ordinance's prohibition on the installation of new or expanded surface facilities for oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue				

under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, as well as the long-term cessation of existing oil use operations within the City.

VII. GEOLOGY AND SOILS	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Finding: The project will not have a significant impact related to geological resources or hazards. The project would not expose people or structures to substantial adverse effects involving geologic conditions, including earthquake faults, ground failure from seismic-induced groundshaking, seismic-related ground failure, soil erosion, landslides unstable geologic units or soil, expansive soil creating substantial risks to life or property or use of septic systems. The project does not involve the use of septic tanks. Short-term closure activities will have no effect on geological resources or hazards. Short-term closure and restoration activities within the Oil Use Premises will be limited to previously disturbed and developed areas consisting of existing well pads, tank sites and locations where existing surface oil use facilities and equipment are to be removed and where the capping of subsurface pipelines will occur. Internal roads and access ways and storm water retention and other drainage features and facilities shall remain in place. Subsurface activities will involve the plugging of existing and excavated well boreholes with concrete, mud and soil and the capping in place of previously excavated pipelines at specified points. Above-surface activities, such as the removal of surface facilities, including tanks, above-ground pipelines and equipment, will not involve significant new excavations or earth removal. Those affected areas are required to be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. In sum, closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas and will not involve significant new excavations or deepening of existing excavations. The Oil Termination Ordinance will result in the cessation of oil use operations within the City. In addition, the Oil Termination Ordinance's prohibition on the installation of new or expanded surface facilities for oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, will protect the Oil Use Premises from encroachment by expanded facilities into previously undisturbed areas. The long-term cessation of nonconforming oil uses within the City may result</p>				

in reduced exposure to risk of upset, in particular as to seismic safety, by eliminating and safely plugging and removing aged and outdated oil use facilities in accordance with all applicable laws and regulatory requirements under the supervision of CalGEM.

VIII. GREENHOUSE GAS EMISSIONS	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The Oil Termination Ordinance project will not result in the generation of greenhouse gas ("GHG") emissions that may have a significant impact on the environment and would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. See Attachment C, Memorandum prepared by Psomas, dated October 11, 2021 (the "Psomas Memorandum"), which presents an analysis of GHG emissions associated with short-term closure activities and the cessation of long-term City IOF operations. The Psomas Memorandum concludes that short-term activities for well closures would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and that the associated GHG emissions would be substantially below South Coast Air Quality Management District significance thresholds. The Psomas Memorandum also provides a comparison of annual GHG emissions associated with well closures over a four-year period as compared to the GHG emissions that would not occur and would be avoided as the wells are closed. The net differences in GHG emissions over a 20-year time frame show cumulative reductions which are determined to have a beneficial impact due to a reduced global contribution of GHGs. The Psomas Memorandum concludes that the long-term cessation of nonconforming oil uses under the Oil Termination Ordinance would reduce contributions to global emissions from GHGs. The Psomas Memorandum determines that the Oil Termination Ordinance project would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions and, specifically, that long-term cessation of oil uses under the Oil Termination Ordinance would reduce the contribution of GHGs consistent with the State of California's goals and plans for the reduction of GHGs and contributions to climate change.				

IX. HAZARDS AND HAZARDOUS MATERIALS	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a safety hazard for people residing or working in a project area 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

f) Result in a safety hazard for people residing or working in a project area within the vicinity of a private airstrip?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Finding: The project will not have a significant impact relative to hazards and hazardous materials. Specifically, the Oil Termination Ordinance project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The Oil Use Premises are not located on any site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. The Oil Termination Ordinance project will not result in a safety hazard for any people residing or working in a project area located within an airport land use plan, within two miles of an airport or in the vicinity of a private airstrip. Further, the Oil Termination Ordinance project will not impair an adopted emergency evacuation or response plan, or expose people or structures to significant risk of wildland fires. Internal roads and access ways and storm water retention and other drainage features and facilities will remain in place. Short-term closure and restoration activities within the Oil Use Premises will be limited to previously disturbed and developed areas consisting of existing well pads, tank sites and locations where existing surface oil use facilities and equipment are to be removed and where the capping of subsurface pipelines will occur. Subsurface activities will involve the plugging of existing and excavated well boreholes with concrete, mud and soil and the capping in place of previously excavated pipelines at specified points. Well plugging and subsurface pipeline capping materials do not involve use of hazardous materials or otherwise risk the release of hazardous materials into the environment. Above-surface activities, such as the removal of surface facilities, including tanks, above-ground pipelines and equipment, will not involve significant new excavations or earth removal. Those affected areas are required to be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. In sum, closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas, will not involve significant new excavations or deepening of existing excavations and will not involve the handling or release of hazardous materials. All short-term closure and restoration activities, including disposal of materials removed from Oil Use Premises, will be performed in compliance with all applicable laws and regulatory requirements. In addition, the Oil Termination Ordinance's prohibition on the installation of new or expanded surface facilities for oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, , will protect the Oil Use Premises from the expansion of oil use facilities, and the long-term cessation of nonconforming oil uses within the City may incrementally reduce exposure to risk of upset, including risks associated with accidental release of hazardous materials arising from oil and gas facilities due to seismic events, by safely plugging and removing aged and outdated oil use facilities in accordance with all applicable laws and regulatory requirements under the supervision of CalGEM.</p>				

X. HYDROLOGY AND WATER QUALITY	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project will not have a significant impact on hydrology, water quality, groundwater supplies or recharge, substantial alteration of drainage patterns resulting in substantial erosion or siltation or flooding, result in water runoff exceeding the capacity of stormwater and flood management resources or substantial polluted runoff, place structures in flood hazard areas or expose people or structures to risk of loss due to flooding. The Oil Use Premises are not located within a 100-year flood hazard area and will not expose people or structures to significant risks involving flooding or inundation. The Dabney Lloyd Basin stormwater retention facility and other storm water retention and drainage features and facilities will remain in place. Short-term closure and restoration activities within the Oil Use Premises will be limited to previously disturbed and developed areas consisting of existing well pads, tank sites and locations where existing surface oil-use facilities and equipment are to be removed and where the capping of subsurface pipelines will occur. Subsurface activities will involve the plugging of existing and excavated well boreholes with concrete, mud and soil and the capping in place of previously excavated pipelines at specified points. Above-surface activities, such as the removal of surface facilities, including tanks, above-ground pipelines and equipment, will not involve significant new excavations or earth removal. Those affected areas are required to be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. In sum, closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas,				

will not involve new excavations or deepening of existing excavations, will not involve the handling or release of hazardous materials. and will not substantially alter drainage patterns or affect water supply, water quality, hydrology, groundwater, runoff or potential flooding. Well plugging and the capping of subsurface pipelines under the supervision of CalGEM is designed to protect aquifer zones. Well plugging and pipeline capping/plugging materials do not involve use of hazardous materials or otherwise risk the release of hazardous materials into the environment. All materials removed from Oil Use Premises will be disposed of in compliance with all applicable laws and regulatory requirements. In addition, the Oil Termination Ordinance's prohibition on the installation of new or expanded surface facilities for oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, will protect the Oil Use Premises from the expansion of oil use facilities, and the long-term cessation of nonconforming oil uses within the City will result in reduced exposure to risk of upset arising from oil and gas facilities due to seismic events, in particular as to water resources and aquifers, by safely plugging and removing aged and outdated oil use facilities in accordance with all applicable laws and regulatory requirements under the supervision of CalGEM. For example, the closure of wells may incrementally reduce risks associated with accidental release of hazardous materials, which could affect surface and/or groundwater quality if such uses were to remain.

<u>XI. LAND USE AND PLANNING</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Finding: The project will not divide or disrupt an established community. The project will neither conflict with any applicable adopted land use plan, policy or regulation adopted for the purpose of mitigating environmental effect, nor conflict with any applicable habitat or natural community conservation plan. The Oil Termination Ordinance does not change any existing zoning or General Plan designations. The Oil Termination Ordinance terminates nonconforming oil uses that are inconsistent and incompatible with the surrounding community. The Oil Termination Ordinance will improve the Zoning Code's implementation of the goals, objectives, and policies of the General Plan because it will resolve a nonconforming land use that reflects neither the goals, policies or strategies of the General Plan nor the provisions of the underlying zoning categories, and which is obsolete in the context of current urban uses experienced in 2021. Existing Zoning Code language prohibits oil drilling and oil and gas activities under all zone categories, except to the extent that current Culver City Municipal Code ("CCMC") Section 17.610.010.D makes an exception for pre-existing oil and gas uses, which previously could continue as nonconforming oil uses. Although oil and gas uses have existed in Culver City for almost 100 years, these have operated as nonconforming uses for at least 60 years. The Oil Termination Ordinance modifies the provision that currently allows for the continuation of nonconforming oil uses in order to clearly establish that the expansion or intensification of nonconforming oil uses with the installation of new or expanded surface facilities for oil drilling is prohibited, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, and all nonconforming oil uses must be terminated within a specified five-year period ending November 24, 2026. The Oil Termination Ordinance is consistent with General Plan Goals and Policies that call for a transition away from oil and gas uses and does not conflict with the goals, policies, and strategies of any elements of the General Plan, nor create any inconsistencies. For example, the Oil Termination Ordinance will help further Land Use Element (LUE) Policy 1.B, to "<i>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...</i>" and LUE Policy 27.B, to "<i>protect the visible and useable open space resources within Blair Hills by establishing land use definitions for visual resources and natural areas...</i>" and LUE Policy</p>				

16.H, to “*improve Zoning Code enforcement Citywide...*” because nonconforming and incompatible oil uses will be terminated and removed, thus reducing the potential for risk of upset and related environmental hazards and establishing a suitable visual buffer between vulnerable residential neighborhoods and other ongoing oil operations just beyond the City’s corporate limit.

XII. MINERAL RESOURCES	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project will not result in the loss of availability of a known mineral resource of value to the region and state residents or result in loss of availability of locally important mineral recovery site delineated on a land use plan. The Oil Termination Ordinance will terminate oil use as a long-standing nonconforming use within the City and will result in the cessation of oil use operations within the City IOF, the site of all active operations within the City, by November 24, 2026. The 78-acre City IOF contains 41 existing wells, 31 of which are production wells, while the remaining 10 are water flooding injection wells. The City IOF facilities are aged and outdated. Only six of the production wells were drilled between 1977 and 2002, and no new wells have been drilled within the City IOF in nearly twenty years. The City IOF’s average annual production is just one-twentieth of the annual oil production volume from the County IOF facilities. The City IOF contains none of the core processing or transport facilities for the IOF. All of the oil and gas produced within the City IOF is processed and transported at the central infrastructure located within the County IOF facilities. As of October 1, 2021, the County IOF facilities contain more than 20 times the number of producing oil wells than is established within the City IOF. The City IOF is not delineated on the City General Plan, any City specific plan or any other City land use plan as a locally-important mineral resource recovery site. Closure of the City IOF’s 41 existing active or potentially active wells will not result in the loss of a known mineral resource of value to the region or the residents of the state and would not affect the availability of oil and gas within the Inglewood Oil Field to the adjacent approximately 920-acre County IOF facilities.				

XIII. NOISE	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Exposure of people residing or working in a project area, which is 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, to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

f) Exposure of people residing or working in the project area, which is within the vicinity of a private airstrip, to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Finding: The project will not result in significant increases in noise levels. The Oil Termination Ordinance prohibits the installation of new or expanded surface facilities for oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance. During the five-year period after November 24, 2021 until the termination of all nonconforming oil uses in accordance with the Oil Termination Ordinance by November 24, 2026, production from existing oil wells, water injection to existing injection wells and permitted routine maintenance of existing wells and facilities is allowed to continue in compliance with Chapter 11.12 of the Culver City Municipal Code and the Oil Termination Ordinance, including the time frames established in an approved Termination Program and Schedule. Those activities are conducted 24 hours a day, seven days a week. During the five-year period ending on November 24, 2026, short-term closure and restoration activities within the Oil Use Premises will be performed in compliance with the Oil Termination Ordinance and will be limited to between the hours of 8:00 a.m. and 8:00 p.m. on weekdays and between 9:00 a.m. and 7:00 p.m. on Saturdays and between 10:00 a.m. and 7:00 p.m. on Sundays. The short-term closure and restoration activities will be limited to previously disturbed and developed areas consisting of existing well pads, tank sites and locations where existing surface oil-use facilities and equipment are to be removed and where the capping of subsurface pipelines will occur. Subsurface activities will involve the plugging of existing and excavated well boreholes with concrete, mud and soil and the capping/plugging in place of previously excavated pipelines at specified points. Surface activities will entail the removal of surface facilities, including tanks, above-ground pipelines and equipment, which will not involve significant new excavations or earth removal. Those affected areas will be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. Closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas, will not involve new excavations or deepening of existing excavations. These activities will not result in excessive ground-borne vibration or noise levels and will not expose people residing or working in the project area located within an airport land use plan, within two miles of an airport or within the vicinity of a private airstrip to excessive noise levels. The short-term closure and restoration activities will not result in a substantial permanent increase in ambient noise levels in the vicinity of the Oil Use Premises and will not result in temporary or periodic increases in ambient noise levels in the vicinity of Oil Use Premises above levels without such short-term closure and restoration activities. As to the City IOF, the distance between the closest existing wells and the nearest residential receptor is approximately 650 feet. Low noise levels from the equipment limited to daytime hours and vibration from such short-term closure and restoration activities would not be perceptible at such distances. In addition, the cessation of oil use operations by November 24, 2026 will eliminate oil use activities as a noise source, potentially reducing ambient noise levels that may affect sensitive receptors, such as residents. Long-term and ongoing operational noise, including periodic noise events from well drilling, well workovers and other oil use activities will be eliminated, resulting in an overall beneficial effect.</p>				

<u>XIV. POPULATION AND HOUSING</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would 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 extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Finding: The project will not result in substantial population growth or new housing. The Oil Termination Ordinance project will not result in the displacement of existing housing or people, or result in the need for construction of replacement housing. The Oil Termination Ordinance will not induce substantial population</p>				

growth. The Oil Termination Ordinance will terminate nonconforming oil uses within the City over a five-year period, ending on November 24, 2026, and will result in the restoration of affected areas of the Oil Use Premises to as near to a natural state as practicable. The Oil Termination Ordinance does not change the existing City zoning or General Plan designations for the Oil Use Premises and, therefore, planning policies and development standards that address population and housing densities would remain unchanged.

<u>XV. PUBLIC SERVICES</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project will not result in substantial adverse impacts related to the provision of public services, including fire, police, schools, parks or other public facilities and does not involve the construction or physical alteration of any government facility providing public services. The Oil Termination Ordinance will terminate nonconforming oil uses within the City over a five-year period, ending on November 24, 2026, and will result in the restoration of affected areas of the Oil Use Premises to as near to a natural state as practicable. The Oil Termination Ordinance does not change the existing City zoning or General Plan designations for the Oil Use Premises and, therefore, changes to land uses or population densities that determine the demand for public services would remain unchanged.				

<u>XVI. RECREATION</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project will not have a significant impact on recreational facilities or result in a substantial increase in the use of existing recreation facilities. The Oil Termination Ordinance will terminate nonconforming oil uses within the City over a five-year period, ending on November 24, 2026, and will result in the restoration of affected areas of the Oil Use Premises to as near to a natural state as practicable. The Oil Termination Ordinance does not change the existing City zoning or General Plan designations for the Oil Use Premises and, therefore, changes to land uses or population densities that determine the demand for parks and recreational services would remain unchanged.				

XVII. TRANSPORTATION AND TRAFFIC	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project will not result in substantial increases in traffic or result in significant changes to traffic patterns or traffic congestion or otherwise conflict with a plan, ordinance or policy establishing effectiveness measures for circulation system performance. The project will not conflict with any applicable congestion management program or standards or any adopted policies, plans, or programs supporting public transit, bicycle transit or pedestrian facilities. The project will not result in any change of air traffic patterns or substantially increase traffic hazards. The project will not hinder emergency access or evacuation routes. The Oil Termination Ordinance's short-term closure and restoration activities will be limited to previously disturbed and developed areas consisting of existing well pads, tank sites and locations where existing surface oil-use facilities and equipment are to be removed and where the capping of subsurface pipelines will occur. Subsurface activities will involve the plugging of existing and excavated well boreholes with concrete, mud and soil and the capping in place of previously excavated pipelines at specified points. Surface activities will entail the removal of surface facilities, including tanks, above-ground pipelines and equipment, which will not involve significant new excavations or earth removal. Those affected areas will be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. Closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas, and will not involve new excavations or deepening of existing excavations. Well plugging and appurtenant equipment removal are anticipated to generate an average of 10 passenger vehicle trips per day and two trips per day by heavier truck/equipment vehicles. Other short-term closure and restoration activities during the five-year period are anticipated to similarly involve limited vehicular trips and vehicle miles travelled at volumes that will not result in substantial increases in traffic, significant changes in traffic patterns or circulation, or conflicts with plans and policies establishing effectiveness measures for circulation system performance or congestion management programs.				

<u>XVIII. TRIBAL CULTURAL RESOURCES</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The project will not cause a substantial adverse change or have a significant impact on any tribal cultural resources, including historical resources or resources known to be significant to a California Native American tribe. The Oil Use Premises governed by the Oil Termination Ordinance are previously developed and disturbed sites in urbanized areas within the City that have been used for decades for oil and gas production. Earth disturbance during closure and restoration activities will be surficial, will be limited to previously disturbed areas and will not involve significant new excavations or deepening of existing excavations. Short-term closure and restoration activities within the Oil Use Premises will be limited to previously disturbed and developed areas consisting of existing well pads, tank sites and locations where existing surface oil-use facilities and equipment are to be removed and where the capping/plugging of subsurface pipelines will occur. Subsurface activities will involve the plugging of existing and excavated well boreholes with concrete, mud and soil and the capping/plugging in place of previously excavated pipelines at specified points. Above-surface activities, such as the removal of surface facilities, including tanks, above-ground pipelines and equipment, will not involve significant new excavations or earth removal. Those affected areas are required to be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. In sum, closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas and will not involve significant new excavations or deepening of existing excavations. In addition, the Oil Termination Ordinance's prohibition on the installation of new or expanded surface facilities for oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, will protect the Oil Use Premises from the expansion of oil use facilities, including new or deepened excavations for such expanded facilities within previously undisturbed areas.				

<u>XIX. UTILITIES AND SERVICE SYSTEMS</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Finding: The Oil Termination Ordinance Project's short-term closure and restoration activities will not result in substantial demand related to the provision or adequacy of public utilities and services systems, including wastewater, water supplies, storm water and solid waste. The Oil Termination Ordinance project does not involve the construction or physical alteration of any service system components.				

D. REVIEW OF THE APPLICABILITY OF CERTAIN EXCEPTIONS UNDER CEQA GUIDELINES SECTION 15300.2 THAT WOULD BAR THE APPLICABILITY OF CLASSES OF CATEGORICAL EXEMPTIONS UNDER CEQA GUIDELINES SECTION 15300 APPLICABLE TO THE OIL TERMINATION ORDINANCE

I. CUMULATIVE IMPACT UNDER CEQA GUIDELINES SECTION 15300.2(b)

Is the cumulative impact of successive projects of the same type in the same place, over time significant?

Finding: No. There will be no successive projects of the same type in the same place, over time that could result in cumulative impacts. The Oil Termination Ordinance encompasses all nonconforming oil uses and all Oil Use Premises within the City and terminates all such uses over a five-year period ending on November 24, 2026. Accordingly, there can be no future projects of the same type in the City to generate cumulative impacts. In addition, the Oil Termination Ordinance prohibits the installation of new or expanded facilities to expand the existing oil uses, effective November 24, 2021, thereby preventing the expansion of oil uses within the City and the occurrence of cumulative impacts related to such expansions.

II. SIGNIFICANT EFFECT UNDER CEQA GUIDELINES SECTION 15300.2(c)

Is there a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances?

Finding: No. Section C of this Checklist establishes that the Oil Termination Ordinance project could not have a significant effect on the environment, due to unusual circumstances or otherwise.

Short-term closure and restoration activities within the Oil Use Premises will be limited to previously disturbed and developed areas consisting of existing well pads, tank sites and locations where existing surface oil-use facilities and equipment are to be removed and where the capping of subsurface pipelines will occur. Subsurface activities will involve the plugging of existing and excavated well boreholes with concrete, mud and soil and the capping in place of previously excavated pipelines at specified points. A

total of 41 active or potentially active wells, all within the City IOF, will be plugged. Above-surface activities, such as the removal of surface facilities, including tanks, above-ground pipelines and equipment, will not involve significant new excavations or earth removal. Those affected areas are required to be restored to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations. In sum, closure and earth and soil-related restoration activities will be limited and surficial, within previously disturbed areas and will not involve significant new excavations or deepening of existing excavations.

In addition, the Oil Termination Ordinance's prohibition on the installation of new or expanded surface facilities for oil drilling, effective November 24, 2021, excepting those existing oil and gas activities and operations allowed to continue under the Oil Termination Ordinance or as required to facilitate termination of nonconforming oil uses under the Oil Termination Ordinance, will protect the Oil Use Premises from the expansion of existing oil use facilities, and the long-term cessation of nonconforming oil uses within the City will result in beneficial environmental effects, due to the avoidance of detrimental environmental activities that would otherwise occur due to the continuation of such oil uses.

There are no unusual circumstances relating to the Oil Termination Ordinance. The Oil Termination Ordinance provides for the termination of all nonconforming oil uses within the City over a five-year period ending November 24, 2026, resulting in the closure of oil wells, the removal of above-ground surface facilities, including storage tanks, pipelines and equipment, and the restoration of the areas of the Oil Use Premises affected by the plugging and removal activities to as near a natural state as practicable, free from oil, rotary mud, oil-soaked earth, asphalt, concrete, litter, debris and other substances associated with oil operations, all in accordance with all applicable laws and regulatory requirements under the supervision of CalGEM. Such closures of oil and gas facilities are typical, ministerial projects that take place within oil fields throughout the state and are administered primarily by CalGEM under an established, standard set of regulatory requirements.

E. CONCLUSION

This Categorical Exemption Environmental Checklist concludes that, for purposes of the evaluation of the applicability of the common sense exemption under CEQA Guidelines Section 15061(b)(3) to the Oil Termination Ordinance project, it is determined that the Oil Termination Ordinance project would have no impact as to any environmental issues, as documented in the review of environmental issues presented in Section C of this Checklist, and that it can be seen with certainty that there is no possibility that the Oil Termination Ordinance project may have a significant effect on the environment and, therefore, the Oil Termination Ordinance project is exempt from CEQA under CEQA Guidelines Section 15061(b)(3). The determination that the Oil Termination Ordinance project would have no impact as to any environmental issues, as documented in the review of environmental issues presented in Section C of this Checklist, also supports the determination that the Oil Termination Ordinance project is exempt from CEQA as to all other applicable categorical and statutory exemptions, including but not limited to the following categorical exemption classes under CEQA Guidelines Section 15061(b)(2): Class 1 – Existing Facilities (CEQA Guidelines Section 15301); Class 4 – Minor Alterations to Land (CEQA Guidelines Section 15304); and Class 8 – Actions by Regulatory Agencies for the Protection of the Environment (CEQA Guidelines Section 15308). In addition, this Checklist concludes that the application of the classes of categorical exemptions applicable to the Oil Termination Ordinance project under CEQA Guidelines Section 15300 is not barred by certain exceptions under CEQA Guidelines Section 15300.2, as documented in Section D of this Checklist. Specifically, under CEQA Guidelines Section 15300.2(b), the cumulative impact of successive projects of the same type in the same place, over time is not significant and, under CEQA Guidelines Section 15300.2(c), there is not a reasonable possibility that the Oil Termination Ordinance project will have a significant effect on the environment due to unusual circumstances.

ATTACHMENT:

- A. Project Location Map
- B. Location Vicinity Map
- C. Psomas Memorandum

Oil Well Locations in Culver City – Outside the City IOF

Legend

- Active Well (none)
- Idle Well
- Plugged Well
- Cancelled Well (none)
- Culver City Portion of the Inglewood Oil Field (City IOF) Boundary
- - - Culver City Corporate Limit Boundary



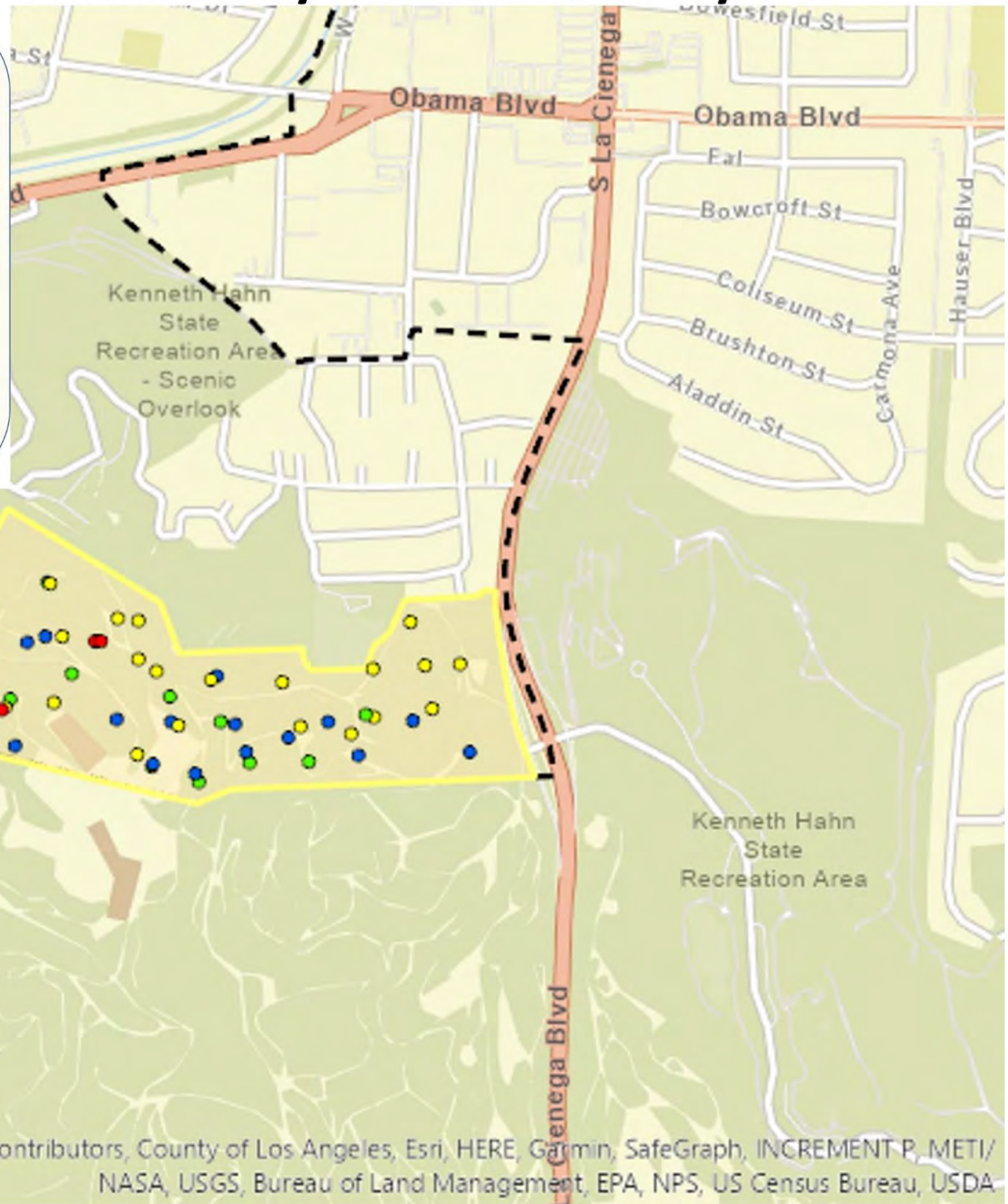
Not to Scale
October 11, 2021

County of Los Angeles, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Oil Well Locations in Culver City – Within the City IOF

Legend

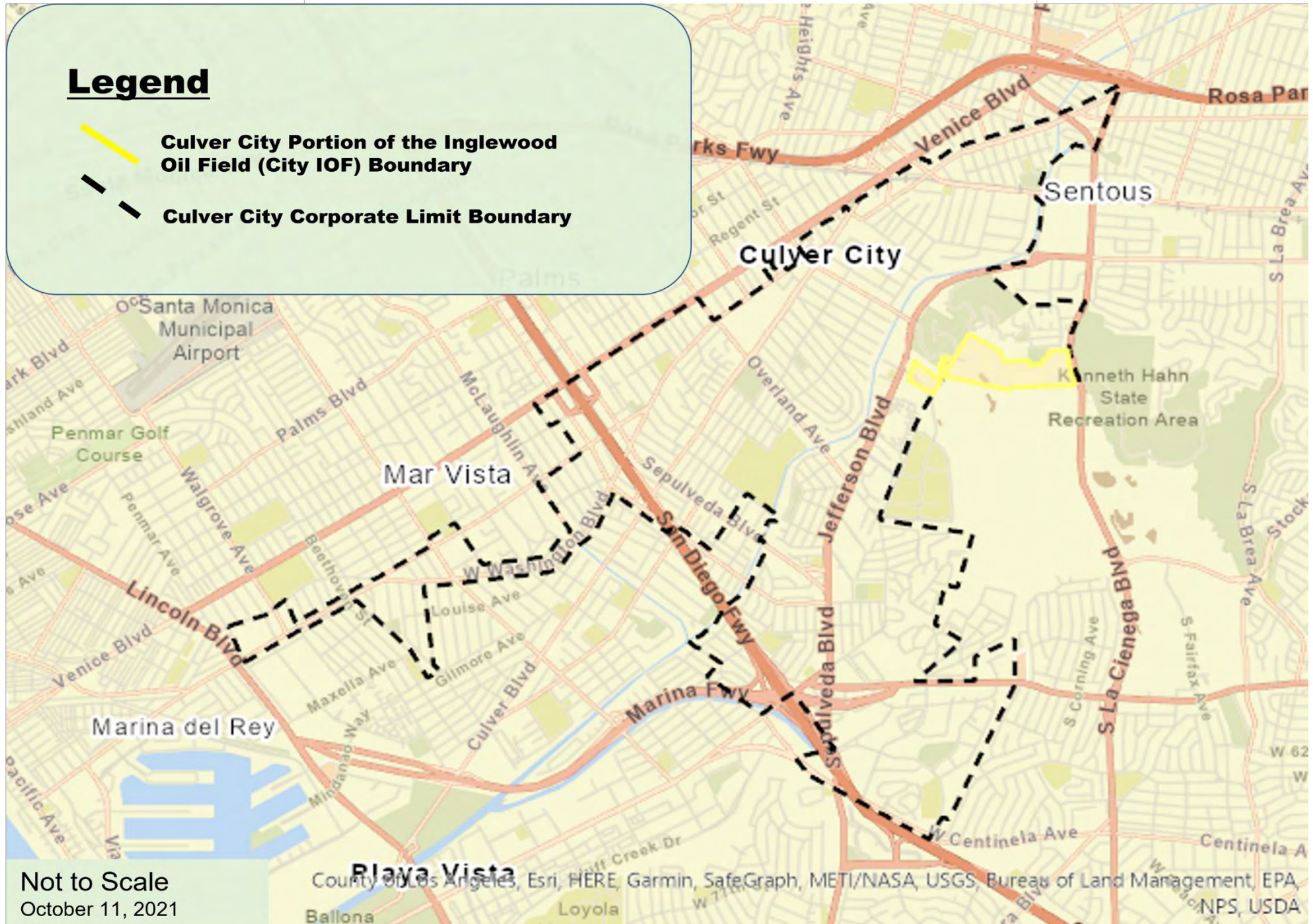
- Active Well
- Idle Well
- Plugged Well
- Cancelled Well
- Culver City Portion of the Inglewood Oil Field (City IOF) Boundary
- - - Culver City Corporate Limit Boundary



Not to Scale
October 11, 2021

Esri Community Maps Contributors, County of Los Angeles, Esri, HERE, Garmin, SafeGraph, INCREMENT P, METI/
NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA

City IOF – Location Vicinity Map



P S O M A S

Balancing the Natural and Built Environment

October 11, 2021

Heather Baker
 City of Culver City
 Assistant City Attorney
 9770 Culver Boulevard
 Culver City, CA 90230-0507

VIA EMAIL
heather.baker@culvercity.org

Subject: Air Pollutant and Greenhouse Gas Emissions Associated with 41 Oil Well Closures in the Culver City Inglewood Oil Field

Dear Ms. Baker:

This Memorandum presents an analysis of air pollutant and greenhouse gas (GHG) emissions associated with a scenario where there would be a closure of 41 oil wells occurring within the City's portion of the Inglewood Oil Field (77.8-acres). The analysis includes (1) the emissions attributable to the activities related to the closure of these wells, called closure emissions and (2), the emissions that would not occur as would normally be the case during ongoing production operations, i.e. be avoided, after closure of these wells. These data are compared on a short- and long-term basis to determine the net increase or reduction in emissions.

EMISSIONS ANALYSIS

The U.S. Environmental Protection Agency defines seven "criteria" air pollutants: ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter with a diameter of 10 microns or less (PM₁₀), fine particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), and lead. O₃ is not directly emitted but is formed in the atmosphere by a combination of emitted reactive organic gases (ROG) and nitrogen oxides (NO_x). Elevated O₃ concentrations cause eye and respiratory infection; reduce resistance to lung infection; and may aggravate pulmonary conditions in persons with lung disease. CO is formed by the incomplete combustion of fossil fuels. It is a colorless, odorless gas that can cause dizziness, headaches, and fatigue. NO₂ (a "whiskey brown"-colored gas) and nitric oxide (NO) (a colorless, odorless gas) are formed from combustion devices. The severity of health effects of NO₂ depends primarily on the concentration inhaled. Acute symptoms can include coughing, difficulty breathing, vomiting, headache, and eye irritation. Respiratory symptoms may also increase in severity after prolonged exposure. Particulate Matter is the term used for a mixture of solid particles and liquid droplets found in the air. Respirable particulate matter (i.e., PM₁₀) derives from a variety of sources including road dust from paved and unpaved roads; diesel soot; combustion products; tire and brake abrasion; construction operations; and fires. Fuel combustion and certain industrial processes are primarily responsible for fine particle (i.e., PM_{2.5}) levels. Coarse particles (PM₁₀) can accumulate in the respiratory system and aggravate health problems such as asthma. PM_{2.5} can deposit itself deep in the lungs and may contain substances that are harmful to human health.

225 South Lake Avenue
 Suite 1000
 Pasadena, CA 91101

Tel 626.351.2000
 Fax 626.351.2030
www.Psomas.com

GHG emissions associated with the well closure activities are from fossil fuel use (gasoline and diesel) from worker commutes and work-site vehicles. GHG emissions generated from the operations of the wells are from electricity usage for pumping operations, maintenance activities, and fugitive methane gas emissions. Closure of the wells would result in closure-related GHG emissions but would end long-term emissions normally associated with ongoing operation of the oil wells.

Would the Project generate air pollutant and greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

TABLE 1
ESTIMATED EMISSIONS FROM – WELL CLOSURES

Project Activity	ROG (lbs./day) ¹	NO _x (lbs./day) ¹	CO (lbs./day) ¹	PM ₁₀ (lbs./day) ¹	PM _{2.5} (lbs./day) ¹	GHG (MTCO ₂ e/yr) ²
Truck Emissions	0.02	0.50	0.13	0.04	0.01	8
Non-Truck Emissions	0.63	2.58	21.90	0.15	0.07	283
Total Emissions for Well Closure	0.65	3.08	22.03	0.19	0.08	291
SCAQMD Thresholds	75	100	550	150	150	10,000
Exceeds Threshold?	No	No	No	No	No	No

ROG: reactive organic gases; NO_x: nitrogen oxide; CO: carbon monoxide; PM₁₀: Respirable Particulate Matter 10; PM_{2.5}: Fine Particulate Matter 2.5; GHG: greenhouse gas, yr: year; SCAQMD: South Coast Air Quality Management District; MTCO₂e: metric tonnes of carbon dioxide equivalent

¹ SCAQMD emissions thresholds established on a lbs./day basis for ROG, NO_x, CO, PM₁₀ and PM_{2.5}. Only one well will be closed on a daily basis.

² SCAQMD emissions threshold established on a metric tonnes of carbon dioxide equivalent/year basis for GHGs. GHG emissions shown for the closure of up to 11 wells annually.

Source: SCAQMD 2019 (thresholds). Detailed calculations in Attachment A, Emissions Calculations Data.

Because the vehicle and vehicle miles traveled (VMT) component represents such a minor part of the emissions tied to each well closure, even substantial increases (such as tripling) in the VMT assumptions would have little notable effect and the emissions from a single well closure would fall substantially below the SCAQMD threshold levels (Table 1).

The operations of wells would result in air pollutant and GHG emissions from vehicle trips, electricity generation to power the well as well as fugitive ROG and methane emissions from leaks in the pipes. Closure of 41 wells within the Inglewood Oil Field would eliminate these well operations emissions that would otherwise occur without their closure. To provide a comparison of the emissions that would occur from activities associated with the well closures and the emissions from the operations of the wells that would not occur (avoided) by their closure, the net differences in emissions from these activities are shown in Table 2, Estimated Total Annual Net Emissions.

TABLE 2
ESTIMATED TOTAL ANNUAL NET EMISSIONS

Source	Year	Well Closures	ROG (tons/yr) ^a	NOx (tons/yr) ^a	CO (tons/yr) ^a	PM10 (tons/yr) ^a	PM2.5 (tons/yr) ^a	GHG (MTCO ₂ e/yr) ^{a, b, c}
Well Closure	1	11	0.04	0.17	1.21	0.01	0.00	291
Avoided Operating Well Emissions (11 wells)			2.54	0.02	0.12	0.13	0.01	2,046
Net Difference^d			-2.51	0.15	1.09	-0.12	-0.01	-1,755
Well Closure	2	11	0.04	0.17	1.21	0.01	0.00	291
Avoided Operating Well Emissions (22 wells)			5.09	0.04	0.24	0.25	0.03	4,093
Net Difference^d			-5.05	0.13	0.97	-0.24	-0.02	-3,802
Well Closure	3	11	0.04	0.17	1.21	0.01	0.00	291
Avoided Operating Well Emissions (33 wells)			7.63	0.06	0.36	0.38	0.04	6,139
Net Difference^d			-7.60	0.11	0.85	-0.37	-0.04	-5,848
Well Closure	4	8	0.03	0.12	0.88	0.01	0.00	212
Avoided Operating Well Emissions (41 wells)			9.48	0.07	0.44	0.47	0.05	7,628
Net Difference^d			-9.45	0.05	0.44	-0.46	-0.05	-7,416
Well Closure	5 (also for each year following)	0	0.00	0.00	0.00	0.00	0.00	0
Avoided Operating Well Emissions (41 wells)			9.48	0.07	0.44	0.47	0.05	7,628
Net Difference^d			-9.48	-0.07	-0.44	-0.47	-0.05	-7,628

^a Totals may not add due to rounding.
^b MTCO₂e/yr: metric tonnes of carbon dioxide equivalent per year
^c Does not take into account GHG reductions associated with the Renewable Portfolio Standards.
^d Net difference calculated by subtracting the Avoided Operating Well Emissions from Well Closure Emissions.

Closure of 41 wells are assumed to occur over four consecutive years within the five-year phase-out period to provide a worst-case analysis of well closure emissions. Well closures occurring over a longer time period would have lower annual emissions due to the smaller number of well closures. As shown in Table 2, there would be a net reduction in emissions of ROG, PM10, PM2.5 and GHG and an increase in NO_x and CO emissions for years 1-4 during well closure activities. This is due to closure-related emissions from diesel exhaust emitting more NO_x and CO than well operations activities. After closure activities have ceased in year 4, there would be the emissions reductions of all pollutants in that year following and subsequent years associated with closure of the 41 wells. As shown in Table 2, well closure emissions were subtracted by the avoided operating well emissions to obtain the net difference in emissions. This net difference shows the change in emissions that would occur for each year with year 5 showing the annual reduction in emissions associated with no well operations.

While Table 2 shows the changes in emissions that would occur on an annual basis for specific years, Table 3, Cumulative Emissions provides the cumulative emissions differences that would occur over a 20-year period with the closure of the wells and cessation of closure activities. This cumulative emissions total shows the combined year over year emissions reductions attributable to the 41 well closures in addition to the emissions from activities needed to close the wells. Because emissions from the closure of the wells would not continue past year 4, the cumulative closure-related emissions remain the same for the entire 20-year period after year 4 while avoided well emissions would continue to accumulate. As shown in Table 3, closure of the 41 wells would result in a cumulative reduction of ROG, PM10, PM2.5 and GHG emissions at the beginning of the closures and cumulative reduction of all analyzed pollutants would occur between the 10th and 15th year. Future years beyond the 15th year would experience a continued reduction in all criteria air pollutants and GHGs. This reduction in emissions would result in less pollution within the city and region as well as a reduced global contribution of GHGs due to the closure of the 41 wells as compared to having those wells in operation. With respect to O₃ formation, the relatively small increase in NO_x emissions during the first ten years would be more than offset by the large reductions in ROG, thereby contributing to O₃ reduction. Based on the above data and discussion, it is concluded that the closing of 41 wells would not generate air pollutant and greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The reduction in these emissions would actually have a beneficial impact on local and regional air quality as well as reduce contributions to global emissions from GHGs.

**TABLE 3
CUMULATIVE EMISSIONS**

Source	Year	ROG (tons/yr) ^a	NOx (tons/yr) ^a	CO (tons/yr) ^a	PM10 (tons/yr) ^a	PM2.5 (tons/yr) ^a	GHG (MTCO ₂ e/yr) ^{a, b, c}
Well Closure	5	0.1	0.6	4.5	0.0	0.0	1,086
Avoided Operating Well Emissions		34.2	0.3	1.6	1.7	0.2	27,535
Net Difference^d		-34.1	0.4	2.9	-1.7	-0.2	-26,449
Well Closure	10	0.1	0.6	4.5	0.0	0.0	1,086
Avoided Operating Well Emissions		81.6	0.6	3.8	4.1	0.5	65,674
Net Difference^d		-81.5	0.0	0.7	-4.0	-0.5	-64,588
Well Closure	15	0.1	0.6	4.5	0.0	0.0	1,086
Avoided Operating Well Emissions		129.0	1.0	6.0	6.4	0.7	103,813
Net Difference^d		-128.9	-0.3	-1.5	-6.4	-0.7	-102,727
Well Closure	20	0.1	0.6	4.5	0.0	0.0	1,086
Avoided Operating Well Emissions		176.4	1.3	8.3	8.8	1.0	141,952
Net Difference^d		-176.3	-0.7	-3.7	-8.7	-1.0	-140,867

^a Totals may not add due to rounding.
^b MTCO₂e/yr: metric tonnes of carbon dioxide equivalent per year
^c Does not take into account GHG reductions associated with the Renewable Portfolio Standards.
^d Net difference calculated by subtracting the Operating Well Emissions from Well Closure Emissions.

Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of air pollutants and greenhouse gases?

No, the closure of 41 wells would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of air pollutants and greenhouse gases. The closure of the 41 wells would reduce air pollutant exposure and GHG emissions locally, regionally and globally consistent with regional and State of California air quality and GHG goals and plans. The well closure activities would result in air pollutant and GHG emissions which are below the SCAQMD's thresholds for potential impacts (Table 1). As such, less than significant air quality and GHG impacts would occur associated with the oil well closure activities. The emissions that would have otherwise occurred if the oil wells had continued to operate would result in short- and long-term contributions of air pollution to the local communities proximate to 41 oil wells, on a regional basis for air pollutants, and a global basis for GHG. As mentioned previously, ROG and NO_x are ozone precursors which contribute to smog formation within the South Coast Air Basin for which the Basin is in nonattainment of the health-protective State and federal Ambient Air Quality Standards. As stated above, the relatively small increase in NO_x emissions during the first ten years would be more than offset by the large reductions in ROG, thereby contributing to O₃ reduction. PM10 and PM2.5 are airborne solid particulate matter which contributes to asthma, bronchitis, decreased lung capacity and other respiratory problems. Closure of the oil wells and cessation of the activities associated with the operation of the oil wells would eliminate this source of air pollution and would incrementally reduce the air pollutant burden both locally and regionally in addition to assisting the region with meeting clean air goals.

City of Culver City
October 11, 2021
Page 6

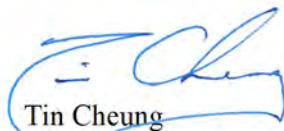
GHG emissions and their role in causing climate change has become a major issue related to global atmospheric and oceanic temperature increases, sea level rise, Arctic and Antarctic glacier melt and other effects. In California, climate change has been considered by scientists to result in additional wildfires, exacerbating drought by decreasing the snowpack in the Sierra Nevada mountains, and increasing temperatures and extreme heat events. The State of California has enacted numerous legislative regulations to address climate change by reducing our dependence on fossil fuels to minimize and eliminate GHG emissions. California's Renewable Portfolio Standards established by Senate Bill 1078 requires that 60% of our electricity generation be produced from clean renewable sources by 2030 and become carbon-free by 2045. This has contributed to California's move away from electricity powered by coal and natural gas and a progressive increase in the use of solar and wind energy sources. This has occurred for both utility scale energy generation as well as for new single-family residential uses which are required to meet their electricity needs by installing solar panels under the State of California's 2019 Title 24 building standards. For passenger vehicles, Executive Order N-79-20 establishes a goal for the ban on the sales of new gasoline and diesel passenger vehicles and requiring that only new zero-emission vehicles be sold by 2035. This Executive Order is consistent with the California Air Resources Board's adopted regulations for the transition from diesel trucks and vans to zero emission trucks beginning in 2024 and a full transformation in two decades as well as a requirement that the entire public bus fleet be electric vehicles by 2040. California has adopted numerous regulations to transition away from the use of fossil fuels for both transportation and energy generation which would substantially improve our region's air quality and reduce the State's contribution to climate change.

The closure of the 41 oil wells is consistent with the State of California's goal of transitioning away from the use of fossil fuels which contributes to climate change. As mentioned previously, closure of the oil wells would incrementally reduce the air pollutant burden for local communities proximate to the oil field, reduce the regional contribution of smog-forming emissions as well as the contribution of GHGs and climate change. It is concluded that the closure of 41 wells would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of air pollutants and greenhouse gases.

If you have any questions or comments, please contact me at (626) 351-2000.

Sincerely,

P S O M A S



Tin Cheung
Director of Air Quality, Climate Change, and Noise Services

Enclosures: Attachment A – Emissions Calculation Data

ATTACHMENT A
EMISSIONS CALCULATION DATA

Annual Emissions Difference Between Well Closure Emissions and Emissions Precluded from Well Decommissioning

Annual Well Closure Comparison

				ROG	Nox	CO	SO2	PM10 Total	PM2.5 Total	GHGs
	Year	Well Closures/year	Cumulative Wells Decommissioned	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	MT/yr
Well Closure Emissions	1	11	11	0.04	0.17	1.21	0.00	0.01	0.00	291
Operations Phase Emissions	1	11	11	2.54	0.02	0.12	0.00	0.13	0.01	2,046
Net Difference (Operations minus Well Closure Emissions)	1	11	11	-2.51	0.15	1.09	0.00	-0.12	-0.01	-1,755
Well Closure Emissions	2	11	22	0.04	0.17	1.21	0.00	0.01	0.00	291
Operations Phase Emissions	2	11	22	5.09	0.04	0.24	0.00	0.25	0.03	4,093
Net Difference (Operations minus Well Closure Emissions)	2	11	22	-5.05	0.13	0.97	0.00	-0.24	-0.02	-3,802
Well Closure Emissions	3	11	33	0.04	0.17	1.21	0.00	0.01	0.00	291
Operations Phase Emissions	3	11	33	7.63	0.06	0.36	0.00	0.38	0.04	6,139
Net Difference (Operations minus Well Closure Emissions)	3	11	33	-7.60	0.11	0.85	0.00	-0.37	-0.04	-5,848
Well Closure Emissions	4	8	41	0.03	0.12	0.88	0.00	0.01	0.00	212
Operations Phase Emissions	4	8	41	9.48	0.07	0.44	0.00	0.47	0.05	7,628
Net Difference (Operations minus Well Closure Emissions)	4	8	41	-9.45	0.05	0.44	0.00	-0.46	-0.05	-7,416
Well Closure Emissions	5	0	41	0.00	0.00	0.00	0.00	0.00	0.00	0
Operations Phase Emissions	5	0	41	9.48	0.07	0.44	0.00	0.47	0.05	7,628
Net Difference (Operations minus Well Closure Emissions)	5	0	41	-9.48	-0.07	-0.44	0.00	-0.47	-0.05	-7,628

Cumulative Well Closure Comparison

				ROG	Nox	CO	SO2	PM10 Total	PM2.5 Total	GHGs
	Year	Well Closures	Cumulative Wells Decommissioned	tons/year	tons/year	tons/year	tons/year	tons/year	tons/year	MT/yr
Well Closure Emissions	5	41	41	0.1	0.6	4.5	0.0	0.0	0.0	1,086
Operations Phase Emissions	5		41	34.2	0.3	1.6	0.0	1.7	0.2	27,535
Net Difference (Operations minus Well Closure Emissions)	5	0	41	-34.1	0.4	2.9	0.0	-1.7	-0.2	-26,449
Well Closure Emissions	10	41	41	0.1	0.6	4.5	0.0	0.0	0.0	1,086
Operations Phase Emissions	10		41	81.6	0.6	3.8	0.0	4.1	0.5	65,674
Net Difference (Operations minus Well Closure Emissions)	10	0	41	-81.5	0.0	0.7	0.0	-4.0	-0.5	-64,588
Well Closure Emissions	15	41	41	0.1	0.6	4.5	0.0	0.0	0.0	1,086
Operations Phase Emissions	15		41	129.0	1.0	6.0	0.0	6.4	0.7	103,813
Net Difference (Operations minus Well Closure Emissions)	15	0	41	-128.9	-0.3	-1.5	0.0	-6.4	-0.7	-102,727
Well Closure Emissions	20	41	41	0.1	0.6	4.5	0.0	0.0	0.0	1,086
Operations Phase Emissions	20		41	176.4	1.3	8.3	0.0	8.8	1.0	141,952
Net Difference (Operations minus Well Closure Emissions)	20	0	41	-176.3	-0.7	-3.7	0.0	-8.7	-1.0	-140,867

Well Closure Emissions								11 wells
	ROG	Nox	CO	SO2	PM10	PM2.5	GHGs	GHGs
Daily Emissions	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	MT/yr	MT/yr
Truck Emissions	0.016	0.504	0.132	0.002	0.036	0.01	0.755	8
Non-Truck Emissions	0.63	2.58	21.90	0.05	0.15	0.07	26	283
Single Well (Unmitigated)	1.7	14.1	10.2	0.1	0.6	0.5	26	291
Single Well (Mitigated)	0.65	3.08	22.03	0.05	0.19	0.08	26	291
SCAQMD Thresholds	75	100	550	150	150	55		10,000
Exceeds	No	No	No	No	No	No		No
Total Cumulative Emissions	lbs/total	lbs/total	lbs/total	lbs/total	lbs/total	lbs/total		
All Wells (Mitigated)	266	1263	9033	21	77	33	1086	
Source	CalEEMod	CalEEMod	CalEEMod	CalEEMod	Calc	Calc	CalEEMod	

Total cumulative emissions for all wells calculated by multiplying single well emissions with 41 wells and 10 days of well closure activities.

Operations Phase Emissions for 30 Wells												
	ROG	Nox	CO	SO2	PM10	Exhaust	Fugitive Dust	PM2.5	Exhaust	Fugitive Dust	GHGs	CO2e
	lbs./day	lbs./day	lbs./day	lbs./day	Total lbs./day	lbs./day	lbs./day	Total lbs./day	lbs./day	lbs./day	CO2 MT/Yr	CH4 MT/Yr
Worker Trips	0.21	0.28	1.78	0.01	1.89	0.00	1.89	0.22	0.00	0.22		
Fugitive Gas	37.8											
Electricity Usage												
Total (lbs/day)	38.01	0.28	1.78	0.01	1.89	0.00	1.89	0.22	0.00	0.22		
Source	CalEEMod	CalEEMod	CalEEMod	CalEEMod	Calc	CalEEMod	Yorke	Calc	CalEEMod	Yorke		
Fugitive gas from Yorke, peak day operations												
Emissions for a Single Well												
Worker Trips	0.00706	0.00935667	0.05933333	0.00017267	0.06299867	0.000132	0.06286667	0.00732533	0.000132	0.00719333		
Fugitive Gas	1.26											
Electricity Usage												
Total	1.2671	0.0094	0.0593	0.0002	0.0630	0.0001	0.0629	0.0073	0.0001	0.0072		