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CEQA FILING COVER SHEET

**FILED**

OCT 29 2021

DEAN C. LOGAN  
REGISTRAR-RECORDER/COUNTY CLERK

DEPUTY

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TYPE OR PRINT CLEARLY

**Project Title**

Ordinance to Terminate Nonconforming Oil and Gas Uses ("Oil Termination Ordinance")  
City of Culver City, California

**Check Document being Filed:**

- Environmental Impact Report (EIR)
- Mitigated Negative Declaration (MND) or Negative Declaration (ND)
- Notice of Exemption (NOE)
- Other (Please fill in type):

# Notice of Exemption (NOE)

Document Filed With: <b>County Clerk County of Los Angeles</b> 12400 Imperial Highway, Norwalk, CA 90650			
From (Public Agency):		<b>City of Culver City</b> , 9770 Culver Boulevard, Culver City, CA 90230-0507	
Project Title:		<b>Ordinance to Terminate Nonconforming Oil and Gas Uses (“Oil Termination Ordinance”)</b>	
Project Description (Technical Specifications):		<p>The project is the City of Culver City (“City”) City Council’s adoption of Ordinance No. 2021-016, including the approval of Zoning Code Amendment P2021-0036-ZCA, amending Culver City Municipal Code, Title 17: Zoning Code; Section 17.610.010.D Nonconforming Oil Use (collectively, the “Oil Termination Ordinance”). The Oil Termination Ordinance provides for (i) the termination of all nonconforming oil uses within the City 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. The project is more fully described in the Project Description set forth in the CEQA Exemption Review dated October 11, 2021 (the “Exemption Review”) and the Categorical Exemption Environmental Checklist for the Ordinance to Terminate Nonconforming Oil and Gas Uses dated October 2021 (the “Checklist”), both of which are posted on the City’s website: <a href="https://www.culvercity.org/City-Hall/Get-Involved/Inglewood-Oil-Field">https://www.culvercity.org/City-Hall/Get-Involved/Inglewood-Oil-Field</a>.</p>	
Project Location-Specific:		<b>City of Culver City:</b> Citywide, including the 78-acre surface drilling and production area for the Inglewood Oil field (the “City IOF”). See attached Project Location Map and the Location Vicinity Map showing locations of oil wells in the City (per California Geologic Energy Management Division (“CalGEM”) website public portal, October 1, 2021).	
City Location:	<b>City of Culver City</b>	County Location:	<b>Los Angeles</b>
Description of Nature, Purpose, and Beneficiaries of Project:	<p>The purpose of the Oil Termination Ordinance is to terminate nonconforming oil uses within the City by November 24, 2026. Such termination of non-conforming oil uses 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. Such termination is in the interest of the public health, safety and welfare of the community and is to be performed in a safe and secure manner that facilitates protection of the environment.</p>		
Name of Public Agency Approving Project:		<b>City of Culver City</b>	
Name of Person or Agency Carrying Out Project:		<b>City of Culver City</b>	
Exempt Status:	<p>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).</p>		<b>Exempt Yes</b>
Reasons Why the Project is Exempt:	<p>Consistent with CEQA and the CEQA Guidelines, it has been determined that, based on the whole of the record, including the Exemption Review and the Checklist, 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:</p> <ol style="list-style-type: none"> <li>1. <b>Common Sense Exemption.</b> The Oil Termination Ordinance project is exempt from CEQA in that the Oil Termination Ordinance project is exempt pursuant to 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, including, but not limited to, as demonstrated by the Checklist.</li> <li>2. <b>Classes of Categorical Exemptions.</b> The Oil Termination Ordinance project is exempt from CEQA under CEQA Guidelines Section 15061(b)(2) in that 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:</li> </ol>		

- 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, as defined in the Oil Termination Ordinance (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. 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 one of the exceptions set forth in CEQA Guidelines Section 15300.2 in that there is not substantial evidence in the record that an exception applies, including as follows:
- i. Location. No substantial evidence in the record demonstrates that the Oil Termination Ordinance project will impact an environmental resource of hazardous or critical concern under CEQA Guidelines Section 15300.2(a).

- ii. Cumulative Impact. No substantial evidence in the record demonstrates that the cumulative impact of successive projects of the same type in the same place, over time is significant under CEQA Guidelines Section 15300.2(b).
- iii. Significant Effect. No substantial evidence in the record demonstrates that there are unusual circumstances presented by the Oil Termination Ordinance project under CEQA Guidelines Section 15300.2(c) or that there is a reasonable possibility that the Oil Termination Ordinance project will have a significant effect on the environment due to any such unusual circumstance under CEQA Guidelines Section 15300.2(c).
- iv. Scenic Highways. No substantial evidence in the record demonstrates that the Oil Termination Ordinance may 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 under CEQA Guidelines Section 15300.2(d).
- v. Hazardous Waste Sites. No substantial evidence in the record demonstrates that any 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 under CEQA Guidelines Section 15300.2(e).
- vi. Historical Resources. No substantial evidence in the record demonstrates that the Oil Termination Ordinance may cause a substantial adverse change in the significance of a historical resource under CEQA Guidelines Section 15300.2(f).

Agency Contact Person:	Heather Baker	Contact Telephone No.	(310) 253-5660		
Alternate Agency Contact:	Sol Blumenfeld	Alternate Contact No.	(310) 253-5700		
Signature:		Date:	10/26/21	Title:	Assistant City Attorney

# Location Vicinity Map

## Legend



**Culver City Corporate Limit Boundary**



**Culver City Portion of the Inglewood Oil Field (City IOF) Boundary**



Not to Scale

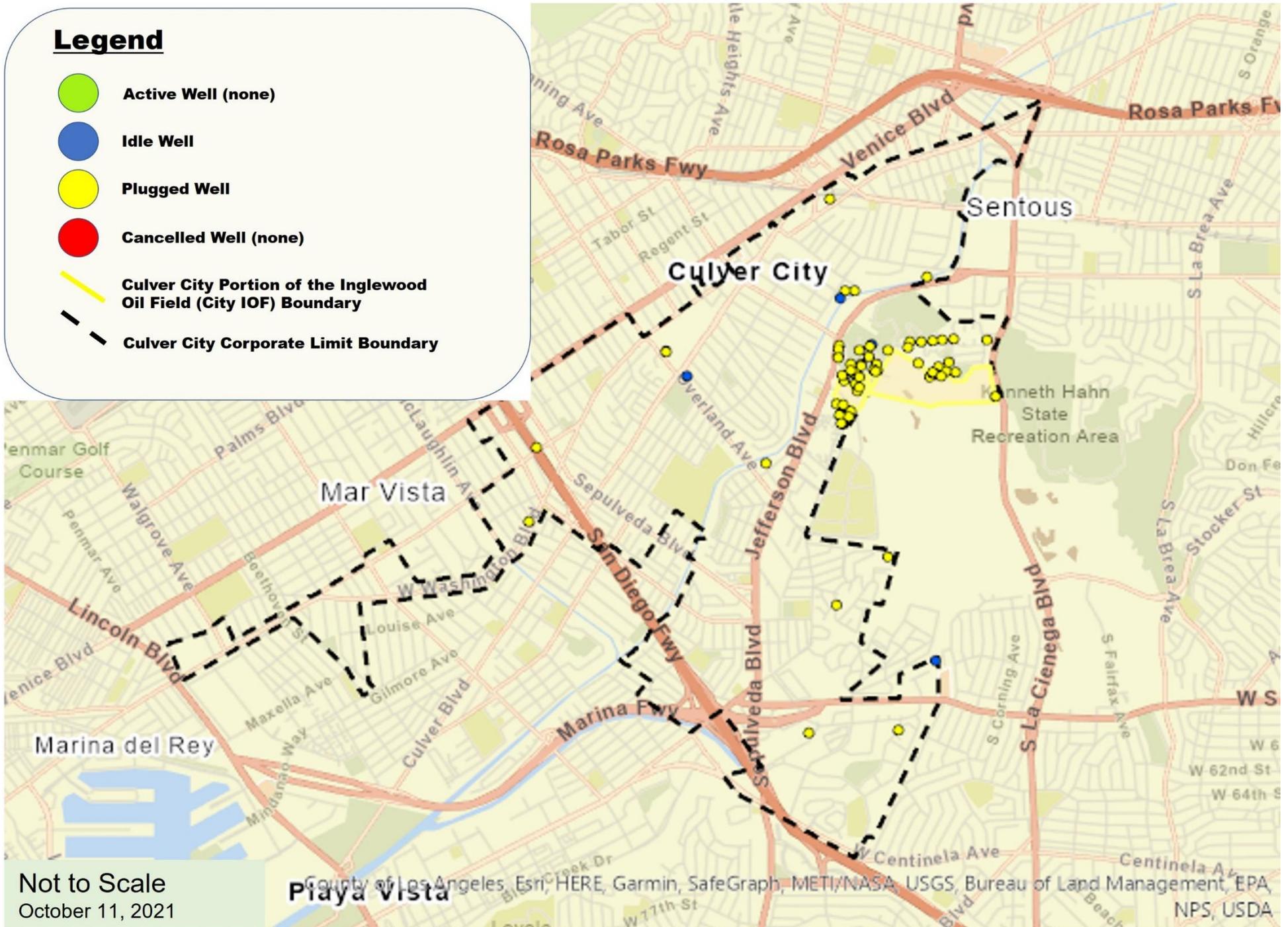
October 11, 2021

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

# Oil Well Locations in Culver City – 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



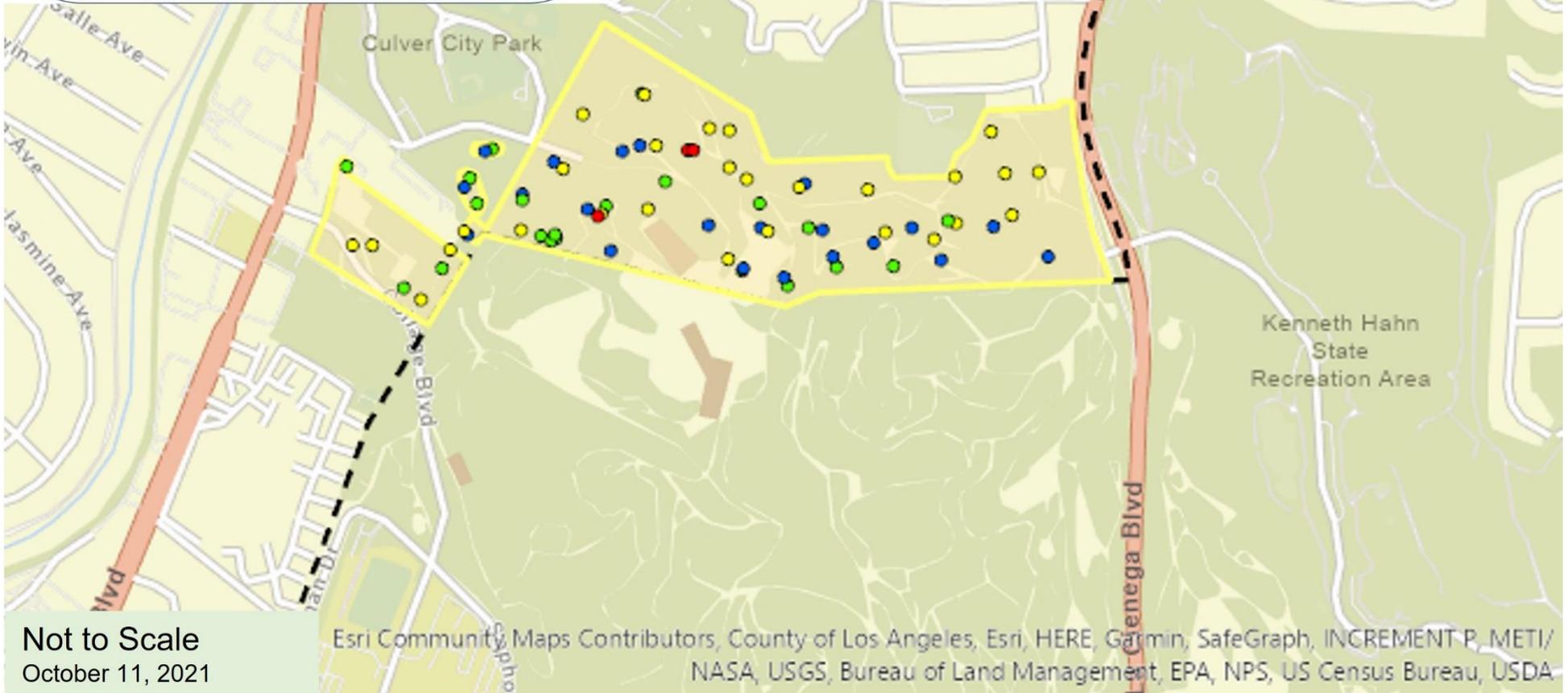
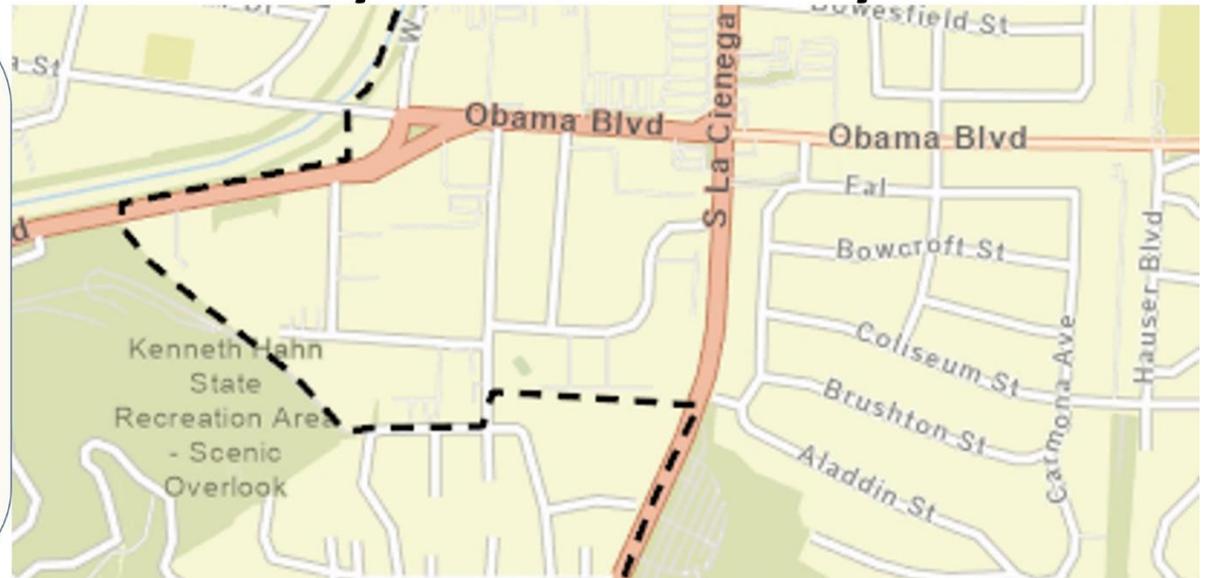
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Not to Scale  
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