

CHAPTER 4

Other CEQA Considerations

4.1 Introduction

Consistent with *CEQA Guidelines* Section 15126.2, this section summarizes the significant and unavoidable environmental impacts, growth-inducing impacts, and significant irreversible environmental changes associated with development of the project. Cumulative impacts are separately discussed in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*.

4.2 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. As evaluated in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*, and summarized below, implementation of the proposed project would result in a significant and unavoidable impact related to air quality.

4.2.1 Air Quality

As discussed in Section 3.2, *Air Quality*, the proposed project would result in significant and unavoidable air quality impacts with regards to the violation of the quality standards for criteria pollutants during construction. The likely worst-case scenario with respect to the generation of nitrogen oxides (NO_x) emissions during construction of the proposed project would occur when five construction phases are underway; specifically, during construction of well cellars, process equipment construction, tank construction, off-site construction, and office/warehouse construction. The NO_x emissions during this time period would total 224.5 pounds per day, which would violate the South Coast Air Quality Management District's (SCAQMD) NO_x threshold of 100 pounds per day. Mitigation Measures AQ-2 and AQ-3 would reduce NO_x emissions by requiring the use of construction equipment that meets the most stringent emissions standards for off-road equipment; however, even with implementation of these measure measures, the NO_x emissions during construction would still exceed the construction regional NO_x threshold. Therefore, regional NO_x emissions for construction of the proposed project would be significant and unavoidable.

Additionally, the project is located within the South Coast Air Basin (SCAB), which is considered the cumulative study area for air quality. Because the SCAB is currently classified as nonattainment area for ozone, respirable or breathable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀), and fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less (PM_{2.5}), cumulative development consisting of the proposed project along with other reasonably foreseeable future projects in the SCAB as a whole could violate an air quality standard or contribute to an existing or projected air quality violation. Based on SCAQMD's cumulative air quality impact methodology, SCAQMD

recommends that if an individual project results in air emissions of criteria pollutants (volatile organic compounds [VOCs], carbon monoxide [CO], NO_x, sulfur oxides [SO_x], PM₁₀, and PM_{2.5}) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. Therefore, the short-term construction NO_x emissions would also result in a cumulatively considerable net increase, and impacts would be significant and unavoidable.

4.3 Growth-Inducing Impacts

CEQA Guidelines Section 15126(d) requires that an EIR include a discussion of whether the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Projects that remove obstacles to population growth (for example, a major expansion of a wastewater treatment plant that may allow for more construction in its service area, or a new freeway that may allow growth at freeway exits) and/or cause an influx of workers from outside the region are also considered growth inducing. *CEQA Guidelines* Section 15126.2(d) also requires a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the *CEQA Guidelines* also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment (Section 15126(d)).

As described in Chapter 2, *Project Description*, existing oil operations on the Synergy Oil Field and City Property sites would be phased out over time, and new oil production facilities would be constructed and operated on the Pumpkin Patch and LCWA sites. The northern portion of the Synergy Oil Field site would be remediated, if necessary, and restored to a natural wetland area. This restored area would provide new public access opportunities to a portion of the Los Cerritos Wetlands. The project would repurpose an existing office building as a visitors center, constructing a new parking lot, an overlook terrace, and a perimeter trail on the Synergy Oil Field site. Also, the proposed project includes the construction of a new office building and storage structure to support the oil operations on the Pumpkin Patch site.

As discussed in more detail in Section 3.12, *Population and Employment*, the proposed project would not result in the construction of any residential uses (or any other types of uses) that could directly induce population growth in the City of Long Beach or the surrounding vicinity.

The proposed project would result in increased temporary employment at the project site by up to 160 construction workers. Given that there are over 250,000 construction workers in Los Angeles County (U.S. Census Bureau 2013) and that recent overall unemployment estimates show unemployment rates of approximately 4.1 percent for Los Angeles County (EDD 2017), it is likely that construction jobs would be filled from the local and/or regional (County) labor force. Additionally, because construction assignments would be temporary, it is assumed that workers would commute daily to the site, and would not relocate to live near the project site. Therefore, construction activities associated with the proposed project would not induce substantial indirect population growth.

The proposed project would relocate oil production facilities within the project site and would include a visitors center and public access trail, which would result in increased visitors and a slight increase in permanent employment opportunities in the Southeast Area Development and Improvement Plan (SEADIP)

area. There are currently 15 full-time employees associated with the existing oil production facilities at the Synergy Oil Field site, with operations occurring 24 hours per day, 7 days a week. The proposed project would create up to 30 new permanent employment positions for the oil operations, in addition to the 15 existing employees. The visitors center would also generate 5 additional employees, including 3 full-time employees and 2 volunteers. Therefore, the proposed project is anticipated to increase the existing employment within the City by providing approximately 5 new permanent jobs at the visitors center. Given that recent overall unemployment estimates show unemployment rates of approximately 4.1 percent for Los Angeles County (EDD 2017), it is likely that these positions would be filled from the local and/or regional (County) labor force; however, in the event that five families relocated to the project area, indirect growth impacts would be negligible. No expansion of municipal infrastructure or public services would be required to accommodate the project.

As described in Section 3.12, *Population and Employment*, it anticipated that the City would have 181,700 available jobs by 2040, an increase of 23,470 jobs from the total number of available jobs in 2013. Because the proposed project construction employment and operational employment would be with the anticipated Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) growth projections, the project could be considered growth accommodating and not growth inducing. Furthermore, future employment would also include existing employees that would be relocated to the new operations site, and a majority of employment opportunities that would be generated by the proposed project are anticipated to be filled by the local employment pool and, therefore, would not induce substantial population growth in an area, either directly or indirectly. Operation of the proposed project, including ongoing operation of the oil production facilities and the new visitors center and public access trail, would not induce substantial population growth, and impacts would be less than significant.

4.4 Significant Irreversible Environmental Changes

CEQA Guidelines Sections 15126(c) and 15126.2(c) require that an EIR address any significant irreversible environmental changes that would occur should the project be implemented. Resources irreversibly or irretrievably committed to a proposed action are those used on a long-term or permanent basis. This includes the use of non-renewable resources such as metal, certain types of wood, fossil fuels, aggregate, and other non-renewable natural resources. These resources are considered irretrievable in that they would be used for a proposed action when they could have been conserved or used for other purposes. Another irreversible or irretrievable commitment of resources is the unavoidable destruction of natural resources that could limit the range of potential uses of that particular environment.

The proposed project would require the consumption of non-renewable resources during the construction phase. Project development would include the following commitment of resources: fossil fuels, building materials, fuel and operational materials/resources, and transportation of goods and people to the project site. Several non-renewable resources, or renewable resources may renew so slowly as to be considered non-renewable, would be required during project construction; aggregate materials contained in concrete and asphalt including sand, gravel and stone; metals such as steel, copper, and lead; and petrochemical construction materials such as plastics. Additionally, non-renewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the project site.

Because the project would result in a small addition of permanent workers as discussed above, project operation would increase the amount of nonrenewable resources that are currently consumed within the City. These resources would include fossil fuels, such as natural gas and petroleum, energy use for visitors and employees, and petroleum-based fuel for vehicle trips to and from the site. Fossil fuels would be considered the primary energy source associated with both construction and ongoing operation of the proposed project, and the existing, finite supplies of these natural resources would be incrementally reduced.

In addition, the proposed project would continue to extract a non-renewable fossil fuel—oil—and, as such, would reduce the supply of this resource irreversibly in this area. By modernizing the facilities, the project would achieve the following project objectives related to energy: (1) reduce the footprint of oil production operations on both privately owned and City-owned portions of the Los Cerritos Wetlands to less than 10 acres; (2) improve the efficiency of oil production operations through the eventual phase-out of early-20th-century oil production equipment and replacement with more efficient and modern equipment and operations that would utilize the latest technology and operational advancements related to safety, energy, and production efficiency and concentrate production; and (3) reduce energy use environmental impacts, efficiently use project-sourced natural gas, and increase project reliability/safety with a microgrid that integrates multiple on-site energy sources with high-efficiency controls.

It is likely that the gained energy efficiencies that are expected to result from implementation of the proposed project would help offset the slight increase in the amount of nonrenewable resources that would be consumed by visitors and employees of the visitors center. Additionally, as discussed in Section 3.18, *Energy Consumption*, the project would utilize equipment and haul trucks that are certified to current, stringent emissions standards, which ensures that the diesel-powered workover drill rigs are equipped with Tier 4 certified engines that are clean and fuel efficient. Implementation of the project would also require compliance with the CARB anti-idling airborne toxic control measure (ATCM), which prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than 5 minutes at any given time. While intended to reduce air pollutant emissions, compliance with these anti-idling and emissions standards would also result in efficient use of energy and the minimization or elimination of wasteful and unnecessary consumption of non-renewable fossil fuels.

Furthermore, continued use of non-renewable resources during project construction and operation on a relatively small scale would be consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. The proposed project is intended to increase efficiency of oil production operations in the project site and through its phasing process would not affect access to existing resources, nor interfere with the production or delivery of such resources. Energy resources the project site contains would not be precluded from future use through project implementation.