Appendix B

Public Scoping Comments

Comment #	Issue Area	Brief Description	Response
CAP-1	Ground Movement	The subsidence and ground movement were issues noted by CAP as an area for discussion in Periodic Review although DOGGR has not provided updated input on the subject to date.	See Periodic Review discussion on CSD requirement 22.310.050.D.5.
CAP-2	Idle Wells	It was recommended that the DOGGR updates to idle well regulations be considered in the review.	See Periodic Review discussion on CSD requirement 22.310.050.EE.
CAP-3	Ground Movement	Recommendation that the operator utilize a separate consultant from the consultant that prepares the annual ground movement reports to perform property damage investigations.	See Periodic Review discussion on CSD requirement 22.310.050.D.5.
EG1-1	Spills	Two oil field incidents between November 2018 and April 2019.	See Periodic Review discussion on CSD requirements 22.310.050.A, 22.310.050.B, and 22.310.050.C.
EG1-2	Air Quality, Health, Environmental Justice	Request to consider a provided list of reports on various aspects of air quality and health issues from other oil fields/areas, the CARB SNAPS Study and the DPH Health Assessment and Environmental Justice Study.	The Periodic Review is a comprehensive review of the provisions of the CSD to determine if the provisions of this section are adequately protecting the health, safety, and general welfare. As such, studies on other oil wells, oil fields and other areas are outside the scope of the Periodic Review. The information in these studies may be helpful to the County as it moves forward with the forthcoming amendment to the County Code for oil and gas operations. The CARB SNAPS project and the DPH Health Assessment and Environmental Justice Study have not been completed to date. Impacts regarding air quality and health issues are discussed in the applicable Periodic Review sections.
EG1-3	Climate Change	Climate Change and fossil fuels.	The CSD does not have a requirement specific to GHG emissions as these pollutants are under the jurisdiction of CARB and the SCAQMD. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.

Comment #	Issue Area	Brief Description	Response
EG1-4	Wildlife Parks	Kenneth Hahn State Park is habitat for wildlife and the Baldwin Hills Master Plan goal is to transform the IOF into park space.	Comment acknowledged, however, analysis of a future park at the IOF is outside the scope of the Periodic Review.
EG1-5	Tribal Cultural Resources	Request the consultation with Tongva Nations regarding any potential impacts to cultural resources.	See Periodic Review discussion on CSD requirement 22.310.050.H.
EG1-6	Information	Access to information.	See Periodic Review discussion on CSD requirements 22.310.100 and note that two web sites have been established and are maintained to provide information to the public on oil field compliance along with monthly CAP meetings whereby information is provided to the public.
KKG-1	Ground Movements	Recommendation that drilling activities be ceased due to earthquakes.	A definitive link between drilling oil wells and earthquakes has not been established. Further, CAP meetings have had earthquake experts, including a CalTech professor, discuss this topic and have provided information on oil drilling not being a significant cause of earthquakes. In addition, this determination is outside the scope of the Periodic Review.
KKG-2	Setbacks	Recommendation for 2,500-foot setback for drilling.	The CSD provides setback distances based on the analysis conducted for the Baldwin Hills CSD EIR. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of that process can be reviewed regarding the CSD when that process is completed.
KKG-3	ECC	Recommendation for a different entity from MRS be the next ECC.	Comment acknowledged. Note that the ECC must be approved by, and report to, the Director of DRP.

Comment #	Issue Area	Brief Description	Response
FFLA-1	Health/Cancer Risk	The CSD EIR Health Risk Assessment and the MATES studies completed by SCAQMD show CSD regulations are not working to protect the public from cancer risk.	The referenced cancer risk information in the comment is not accurate. Page ES-2 of the MATES-IV Final Report states *"The levels of air toxics continued to decline compared to previous MATES studies. The most dramatic reduction is in the level of diesel particulate, which showed 70% reduction in average level measured at the 10 monitoring sites compared to MATES III."* Further, the reports states "*About 90% of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating"';* note that the IOF is not included in this list of primary sources. In addition, the referenced cancer risks noted in the comment were for total risk from all sources in the LA Basin, not the IOF. The mitigated cancer risk for the IOF was calculated at 7.5 and re-calculated by the STI Air Study in 2014 at 6.7, both values are below the 10 in a million criteria threshold.
FFLA-2	Revised Regulations	Revised regulations should include safety risks.	The Periodic Review is an analysis of the existing CSD regulations and does not propose revised regulations unless the analysis determines a need for such a revision. Safety risk was analyzed in the Baldwin Hills CSD EIR and mitigation measures were developed and adopted in the CSD.

Comment #	Issue Area	Brief Description	Response
FFLA-3	Earthquakes	Wastewater injection well cause earthquakes, therefore, their use at the IOF should cease.	The referenced earthquake issues caused by injection wells in the Midwest have been determined to be related to unbalanced extraction/injection practices. Water injection to an area without any fluid extraction activities can cause pressure of the reservoir, and potentially, earthquakes. The wastewater injection practices at the IOF are balanced with the extraction activities and are monitored and approved by DOGGR. In addition, CSD Provision 22.310.050.D.5 provides for ground movement surveys and monitoring. The ground movement reports are reviewed by County Public Works and DOGGR.
FFLA-4	Fire and Explosions	Reference to a list of explosions and fires at various locations.	The referenced incidents involved five high pressure natural gas operations in Pennsylvania and other incidents involving natural gas. The IOF is not a high-pressure gas facility. Note that the referenced April 1, 2019 oil spill at the IOF did not reach Ballona Creek as documented by the LA County Fire Department.
FFLA-5	Earthquakes and Pipeline Safety	Recommendation for testing and inspection of pipelines.	The testing of pipelines and valves at the IOF is part of normal oil field operations and is required by the regulations under the CSD, the DOGGR and the SCAQMD. Encasing such infrastructure in concrete is not feasible because the equipment needs to be accessible for maintenance, inspection and safety testing.
FFLA-6	Bonding Insurance	Bonding, insurance, and indemnification should be required.	See Periodic Review discussion on CSD requirement 22.310.070.G. subsections B, C, D, and E.
FFLA-7	CAN System	Request that the CAN system be implemented, and that evacuation plans be prepared.	The CAN system is fully operational and is tested on an annual basis. Evacuation plans for the public is beyond the scope of the CSD and any such plans would be administered by the applicable Fire and Police agencies. See discussion on CSD requirement 22.310.050.A.

Comment #	Issue Area	Brief Description	Response
FFLA-8	Climate Change	Climate change requires a sunset date for oil field operations and a move to fossil free energy.	Climate change, sea level rise and other associated issues are beyond the scope of the Periodic Review. Instigating a moratorium on the activities at the IOF or a sunset data for operations is a legal issue and beyond the scope of the Periodic Review analysis. The CSD does not have a requirement specific to GHG emissions as these pollutants are under the jurisdiction of CARB and the SCAQMD. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.
SC-1	Oil Field Operations	Ban well stimulation, enhanced oil recovery, and wastewater injection.	Banning of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis.
SC-2	Permitting	End permitting of wells and infrastructure.	Banning of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis.
SC-3	Setbacks	Recommendation for a 2,500-foot setback.	The CSD provides setback distances based on the analysis conducted for the Baldwin Hills CSD EIR. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of that process can be reviewed regarding the CSD when that process is completed.

Comment #	Issue Area	Brief Description	Response
SC-4	Monitoring	Request for monitoring.	The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant, storm water testing, groundwater monitoring, fugitive emissions inspections and ground movement surveys. In addition, the CSD provides for paleontological, noise, and vibration monitoring if determined to be necessary by County DRP or County DPH. Further, the Environmental Compliance Coordinator performs inspections of the oil field and is available to respond as necessary to events or issues at the oil field. Regarding air quality monitoring, the STI Air Quality study, completed in December 2014, provided a site-specific air quality monitoring program for air toxics utilizing four monitoring locations. Each monitoring station included both air quality and meteorological instrumentation. Results of the study were consistent with the air quality impact analysis in the Baldwin Hills CSD EIR and the studies completed by the SCAQMD in the MATES programs. The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019. The County will review the results of the SNAPS monitoring effort to determine the applicability of additional air quality monitoring at the oil field.
SC-5	ECC	Request for public input on oil field monitor.	The current ECC is a third-party contractor approved by the Director of DRP.
SC-6	Spill Plans	Recommendation for site specific spill plans.	As required by the CSD, the IOF has a site-specific Emergency Response Plan (ERP) and a site-specific Spill Prevention, Control, and Countermeasures Plan (SPCC). See discussion on CSD Provisions 22.3010.050 A.2, A.3 and Q.2.

Comment #	Issue Area	Brief Description	Response
SC-7	Community Safety Plan	Request for a community safety plan and notification.	The CAN system for community notification is fully operational and is tested on an annual basis. Evacuation plans for the public is beyond the scope of the CSD and any such plans would be administered by the applicable Fire and Police agencies. See discussion on CSD requirement 22.310.050.A.
SC-8	Financial Safeguards	Request for financial safeguards.	See Periodic Review discussion on CSD requirement 22.310.070.G. subsections B, C, D, and E.
SC-9	Oil Operations	Request to phase out oil operations.	Phasing out of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis.
SC-10	Oil Field Incidents	Reference to several oil field incidents.	Note that this Periodic Review covers the time frame from 2014 through 2018. The two incidents noted in the comment in that time frame are discussed in the Periodic Review in Provisions 22.310.050 C.4 and CC.
SC-11	Setbacks	Recommendation for a 2,500-foot setback.	The CSD provides setback distances based on the analysis conducted for the Baldwin Hills CSD EIR. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of the that process can be reviewed regarding the CSD when that process is completed.
SC-12	Ongoing Studies	Request for SNAPS and DPH Health Assessment and Environmental Justice Study be included in the future.	This Periodic Review covers the time frame from 2014 through 2018, the referenced studies have not been completed. Results of the studies mentioned will be considered in future periodic reviews as appropriate.

Comment #	Issue Area	Brief Description	Response
SC-13	Monitoring	Request for monitoring.	The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant, storm water testing, groundwater monitoring, fugitive emissions inspections and ground movement surveys. In addition, the CSD provides for paleontological, noise, and vibration monitoring if determined to be necessary by County DRP or County DPH. Further, the Environmental Compliance Coordinator performs inspections of the oil field and is available to respond as necessary to events or issues at the oil field. Regarding air quality monitoring, the STI Air Quality study, completed in February 2015, provided a site-specific air quality monitoring program for air toxics utilizing four monitoring locations. Each monitoring station included both air quality and meteorological instrumentation. Results of the study were consistent with the air quality impact analysis in the Baldwin Hills CSD EIR and the studies completed by the SCAQMD in the MATES programs. The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019. The County will review the results of the SNAPS monitoring effort to determine the applicability of additional air quality monitoring at the oil field.
SC-14	Climate Change	Discussion on climate change.	Climate change, sea level rise and other associated issues are beyond the scope of the Periodic Review. The CSD does not have a requirement specific to GHG emissions as these pollutants are under the jurisdiction of CARB and the SCAQMD. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.

Comment #	Issue Area	Brief Description	Response
SC-15	Wildlife Parks	Kenneth Hahn State Park is habitat for wildlife and the Baldwin Hills Master Plan goal is to transform the IOF into park space.	Comment acknowledged, however, analysis of a future park at the IOF is outside the scope of the Periodic Review.
SC-16	Information Transparency	Requests for information transparency and to move the location of the CAP meetings.	See Periodic Review discussion on CSD requirements 22.310.100 and note that two web sites have been established and are maintained to provide information to the public on oil field compliance along with monthly CAP meetings whereby information is provided to the public.
EG2-1	Oil Field Incidents	Reference to several oil field incidents.	The two incidents noted in the comment in that time frame are discussed in the Periodic Review in Provisions 22.310.050 C.4 and CC.
EG2-2	Health and Environmental Justice Studies	Comment provides a list of studies regarding health and environmental justice and the oil industry.	Comment acknowledged. Note that several studies specific to the Inglewood Oil Field have been completed and the SNAPS and DPH Health Assessment and Environmental Justice Study are forthcoming.
EG2-3	Ongoing Studies	Request for SNAPS and DPH Health Assessment and Environmental Justice Study be included in the future.	This Periodic Review covers the time frame from 2014 through 2018, the referenced studies have not been completed.
EG2-4	Climate Change	Discussion on climate change.	Climate change, sea level rise and other associated issues are beyond the scope of the Periodic Review. The CSD does not have a requirement specific to GHG emissions as these pollutants are under the jurisdiction of CARB and the SCAQMD. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.
EG2-5	Wildlife Parks	Kenneth Hahn State Park is habitat for wildlife and the Baldwin Hills Master Plan goal is to transform the IOF into park space.	Comment acknowledged, however, analysis of a future park at the IOF is outside the scope of the Periodic Review.
EG2-6	Tribal Cultural Resources	Request the consultation with Tongva Nations regarding any potential impacts to cultural resources.	See Periodic Review discussion on CSD requirement 22.310.050.H.

Comment #	Issue Area	Brief Description	Response
EG2-7	Information Transparency	Requests for information transparency and to move the location of the CAP meetings.	See Periodic Review discussion on CSD requirements 22.310.100 and note that two web sites have been established and are maintained to provide information to the public on oil field compliance along with monthly CAP meetings whereby information is provided to the public.
SPR-1	Regulatory Oversight	Comment notes the IOF is overseen by numerous Federal, State and local agencies in addition to the CSD which is unique to the IOF.	Comment acknowledged.
SPR-2	CAP	Comment notes the CAP provides information to the public, has met over 100 times, and is a process unique to the CSD.	Comment acknowledged; the CAP is discussed in the Periodic Review Provision 22.310.100.A.
SPR-3	Ground Movement Surveys	Comment describes the ground movement survey process and agency oversite.	Comment acknowledged; the CAP is discussed in the Periodic Review Provision 22.310.050.D.5.
SPR-4	Groundwater Monitoring	Comment describes the groundwater monitoring process and agency oversite.	Comment acknowledged; the CAP is discussed in the Periodic Review Provision 22.310.050.S.
SPR-5	Stormwater Monitoring	Comment describes the stormwater monitoring process and agency oversite.	Comment acknowledged; the CAP is discussed in the Periodic Review Provision 22.310.050.Q.
SPR-6	CSD Provisions	Statement that the CSD meets the goals of the Periodic Review.	Comment acknowledged.
SPR-7	Oil Field Studies	Comment notes recent studies and health assessments on various oil field activities.	Comment acknowledged.
SPR-8	Setbacks	Comment notes that the CSD has setback requirements and that larger setbacks such as a 2,500-foot setback does not provide additional safety and would provide a negative economic impact to the community.	Comment acknowledged. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of the that process can be reviewed regarding the CSD when that process is completed.
CC-1	Well Stimulation	Request the CSD prohibit well stimulation techniques.	Prohibition of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis. It should be noted that no drilling has occurred at the oil field since June 2014 and well stimulation as defined under SB4 is not occurring at the Oil field.

Comment #	Issue Area	Brief Description	Response
CC-2	Landscaping	Request for additional landscaping plans and landscaping for Culver City viewshed.	The landscaping pursuant to CSD Provision has been completed as discussed in the Periodic Review Provision 22.310.050.J. Note that Culver City was a participant in the Settlement Agreement dated July 2011 where an enhanced landscaping plan was approved by the agreement of all participants. In addition, the Culver City Inglewood Oil Field Specific Plan Draft EIR determined that with the implementation of Drilling Regulations, the aesthetic impacts to scenic vistas and aesthetic impacts to the existing visual character of the Culver City IOF would be less than significant and no mitigation was required. No drilling has occurred in the City portion of the IOF since the implementation of the CSD.

Comment #	Issue Area	Brief Description	Response
CC-3	Funding of Compliance Studies	Funding should be increased for various technical studies including the Public Health Study, ground movement and air quality studies.	The Public Health Study is administered and funded by the DPH as stipulated by the Settlement Agreement; the CSD does not fund these studies. The Air Quality study funding amount was determined in the Settlement Agreement at $250,000 as specified in Term 8 of the agreement. Note that Culver City was a participant and agreed to the conditions of the Settlement Agreement. The comment statement *"…that many of the studies conducted under the CSD, including the Public Health, Ground Movement, and Air Quality Studies lacked sufficient funding to produce an accurate and meaningful analysis of these important issues"* is not accurate. These studies have been peer reviewed by issue area experts, for example, the Air Quality Study was reviewed by staff at the SCAQMD and the ground movement studies are reviewed by DPW and DOGGR staff. The reports are accurate and provide important data in the understanding of the potential environmental impacts of oil field operations. The draw down account, Provision 22.310.070.B, is used to pay the costs of review of the technical reports required by the CSD. If review of the subject reports determines additional or expanded studies are necessary, the County can require such reports. The County has not made that determination for any of the studies completed pursuant to CSD requirements for this Periodic Review period.
CC-4	Public Notice/Notifications	The public outreach provisions of the CSD are not sufficient.	Section 22.310.100 of the CSD provides for public outreach to foster communication about ongoing operations at the IOF and allow for public input to the County and the operator. The provisions of Section 22.310.100 include the CAP, community meetings, a newsletter, a web site, and a designated ombudsperson. See section 22.310.100 of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CC-5	Ground Movement Survey	The existing ground movement studies are not adequate and do not provide enough data.	The comment that the County has "…accepted, without clear evidence, the conclusion of the Oil Field Operator" on ground movement at the IOF is not accurate. The ground movement reports are not prepared by the operator nor does the operator provide a determination on same to the County. Per CSD Provision 22.310.050, the ground movement surveys and reports are prepared by a California-licensed surveyor in collaboration by a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The comment that *"This lack of a clear conclusion seems to allow the Oil Field Operator to deny any potential liability for property damage that may originate from operations related to the Oil Field, including conditions of subsidence"* is not accurate. CSD Provision 22.310.050 provide for multiple review by County DRP, County Public Works, and DOGGR all claims or complaints regarding a property damage due to upward or downward movement in the vicinity of the oil field. The comment "*Although this issue has been raised repeatedly through CAP, it does not appear that the County has taken steps to make any progress toward a satisfactory resolution of this issue*" is not accurate. The County has required the operator to provide the geotechnical data required by DOGGR and that data has been submitted to DOGGR. Additional ground movement surveys are required and are completed on an annual basis and DOGGR has not required any other additional information to date.
CC-6	MACC Meetings	Request that the CAP and the MACC meet on an annual basis.	The MACC meeting schedule is determined by MACC members, see Periodic Review discussion on CSD Provision 22.310.070.H.

Comment #	Issue Area	Brief Description	Response
CC-7	Emergency Response	Periodic Review should include review of ERP, discuss neighborhood evacuation plans. Fire Department should do unannounced drills.	The ERP is discussed in CSD Provision 22.310.050.A.3. Neighborhood and/or public evacuation plans are under the jurisdiction of the applicable Fire and Police departments under those agencies incident command system, including the Culver City Fire Department, and therefore not part of the CSD requirements. Annual and unannounced drills by County Fire is provided for in CSD Provision 22.310.060.D. This issue was noted in the first Periodic Review document, see applicable Periodic Review recommendation.
CC-8	Air Quality, GHGs, and Public Health	Request for an updated air quality study and assessment of GHGs. Periodic Review schedule.	An updated air quality/air toxics study was completed in December 2014 and an additional study, the CARB SNAPS Study, is scheduled for 2020. See Periodic Review discussion for CSD Provision 22.310.050.B. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD. See discussion for CSD Provision 22.310.050.B. CSD Provision 22.310.070.G.7.2 allows for the Periodic Review to be conducted more frequently than every 5 years.
CC-9	New Technology	The Periodic Review should include discussions on new technology.	New technology is discussed for every applicable CSD Provision in the Periodic Review.
CC-10	Insurance and Bonding	The Periodic Review should include review of insurance and bonding requirements.	Insurance and bonding issues are discussed in the discussion for CSD Provision section 22.310.070, specifically subsections D and E.

Comment #	Issue Area	Brief Description	Response
CC-11	CAP	CAP, guidelines, management and membership.	Guidelines for the CAP were created and approved by the CAP in June 2009. The Director of the DRP sent a letter out to CAP members in 2014 reminding them of their obligations as a member of the CAP. See Periodic Review discussion for Provision 22.310.100.A.
CC-12	Climate Change DOGGR Regulations	Periodic Review should include updates to DOGGR and GHG regulations.	Updated DOGGR regulations as discussed in applicable sections of the Periodic Review. Current GHG emissions at the IOF are under the SCAQMD's 10,000 metric ton CO2 equivalent per year threshold for industrial facilities as documented on Annual Emissions Reports (AERs) submitted to SCAQMD.
DPH-1	CAP	Request for third party CAP facilitator.	The comment that the County is the facilitator of the CAP meetings is not accurate. The CAP meetings are facilitated by a member of the CAP, which are members of the public, consistent with the CAP bylaws: "*The members of the CAP shall, from time to time, elect members to serve as facilitator and assistant facilitator. The facilitator (or the assistant, in the absence of the facilitator) shall preside over meetings of the CAP.*"
DPH-2	Complaint System	Request for third party audit of complaint system.	See Periodic Review discussion for Provision 22.310.060.G.

Comment #	Issue Area	Brief Description	Response
DPH-3	Health and Safety Plan	Request for a Community Health and Safety Plan and access to such plan by the public. Information about the oil field should be available to the public.	The facility has and Emergency Response Plan (ERP) as required by CSD Provision 22.310.050.A.3. The ERP is submitted to the following agencies: DOGGR, California Department of Fish and Wildlife Office of Spill Prevention and Response (OSPR), U.S. Environmental Protection Agency Region 9, California State Lands Commission Marine Facilities Division Planning Branch, and the U.S. Department of Transportation Office of Pipeline Safety. The ERP is not available to the public for security reasons consistent with County policy. Regarding data on the oil field, the CAP, community meetings, a newsletter, a web site, and a designated ombudsperson as required under CSD Provision 22.310.100.J provide multiple avenues for the public to access oil field information. Contact information for the oil field is available from all the information sources listed above and on the oil field fence and main gates. The Community Alert Notification (CAN) system, requirement under CSD Provision 22.310.050.A.1, provides an alert system for community notification.
DPH-4	Emergency Response Plan	Request for an Emergency Response Plan and that it be made accessible to the public.	See response for DPH-3 above.

Comment #	Issue Area	Brief Description	Response
DPH-5	CAN System	Request to enhance the CAN system.	The comment that the CAN system only notifies residents that "opt in" to the system on issues at the oil field is not accurate. The commenter may be referring to the annual test of the CAN system whereby a select subset of the total notification list is used to test the system. The list for the CAN test includes all government safety and oversight agencies required and several members of the CAP and public that chose to be included. In the event of an actual emergency and use of the CAN system, the entire CAN list would be contacted automatically. The determination to activate the CAN system is not made by the oil field operator alone and requires the input from the applicable Fire Department and other public safety agencies. Regarding the referenced odor incident on November 22, 2018, the incident was reported and responded to by Cal-OES, DOGGR, and local CUPA/Fire Departments. None of these agencies required activation of the CAN system.

Comment #	Issue Area	Brief Description	Response
DPH-6	Monitoring	Request for fence line monitoring.	The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant, storm water testing, groundwater monitoring, fugitive emissions inspections and ground movement surveys. In addition, the CSD provides for paleontological, noise, and vibration monitoring if determined to be necessary by County DRP or County DPH. Further, the Environmental Compliance Coordinator performs inspections of the oil field, which includes spot air monitoring and is available to respond as necessary to events or issues at the oil field. Regarding air quality monitoring, the STI Air Quality study, completed in December 2014, provided a site-specific air quality monitoring program for air toxics utilizing four monitoring locations. Each monitoring station included both air quality and meteorological instrumentation. Results of the study were consistent with the air quality impact analysis in the Baldwin Hills CSD EIR and the studies completed by the SCAQMD in the MATES programs. The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019. The County will review the results of the SNAPS monitoring effort to determine the applicability of additional air quality monitoring at the oil field.

Comment #	Issue Area	Brief Description	Response
DPH-7	Information	Request the CSD include a provision for submitting data to the DPH.	The CSD includes provisions for submittal of certain information, monitoring data, and reports to applicable agencies such as the SCAQMD, DOGGR, and DPW. Most of this data is available on either the oil field website or the DRP Baldwin Hills website. It is not clear from the comment what "operations data" the DPH is requesting; operations data is available in the *Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* which is submitted on an annual basis and available on the web sites. DPH may request additional data from other agencies or the operator, however, the regulatory requirements of other governmental agencies is beyond the scope of the CSD and the Periodic Review.

Comment #	Issue Area	Brief Description	Response
DPH-8	Risk Assessment	Request for a risk assessment matrix.	A health risk assessment was completed as part of the Baldwin Hills CSD EIR (see Section 4.3, Public Health Risk). The setbacks for drilling required by CSD Provision 22.310.050.B.14 are based on the results of that risk assessment. The County has not received any complaints or issues from the existing setback distances for the IOF. No wells have been drilled at the IOF since June 2014. The County is assessing the setback issue as part of the update to the County oil code and results of the that process can be reviewed regarding the CSD when that process is completed. The potential for fires and explosions was analyzed in the Baldwin Hills CSD EIR (see Section 4.1, Safety and Risk of Upset) and seven mitigation measures were developed. These mitigation measures are captured in CSD Provisions 22.310.050 C.1, C.2, C.3, C.4,and 22.310.120.L. Note that the studies referenced above included the emissions and other impacts of drilling and that no well has been drilled at the IOF since June 2014.
DPH-9	City and County Ordinance Update	Request to apply updated oil code ordinances to the CSD.	The CSD, under Provision 22.310.070.G Periodic Review, states: *Such reviews shall, among other things, consider whether additional provisions should be added, appended, or removed. One of the main goals of the Periodic Review shall be to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of this section*. Therefore, additional provisions may be added if the Periodic Review analysis makes such a recommendation.
CCSC-1	CSD and Settlement Agreement	CSD and Settlement Agreement should be integrated for compliance.	The two referenced documents do not need to be integrated for compliance. All requirements of the Settlement Agreement are incorporated into the CSD by reference.

Comment #	Issue Area	Brief Description	Response
CCSC-2	Bonding Indemnification	Request that surface and sub-surface owners be included in the financial indemnification of the oil field.	The CSD provides for indemnification, insurance and performance security as listed in Provision 22.310.070. Financial issues between operators of the oil field and property/mineral rights owners is beyond the scope of the CSD and Periodic Review.
CCSC-3	Document Definitions	Request that the CSD document definitions be revised consistent with other agencies.	The Periodic Review is a process to determine if the provisions are adequately protecting the health, safety, and general welfare of the public. Revisions of definitions or a re-write of the CSD does not assist toward that goal and is therefore not a consideration of the Periodic Review. A table of acronyms is available on Page iv of the Periodic Review.
CCSC-4	Digital Data	Oil field data should be available in digital format.	The provisions of Section 22.310.100 include the CAP, community meetings, a newsletter, a web site, and a designated ombudsperson to provide information to the public. The oil field website and the DRP Baldwin Hills website provide a plethora of information electronically.
CCSC-5	Abandoned Wells	Recommendation to use historical aerial photographs to identify abandoned wells.	The abandoned wells at the IOF were analyzed in the Baldwin Hills CSD EIR (see Section 4.4 Geology). CSD Provision 22.310.050.FF provides for soil vapor testing in the areas of abandoned wells.
CCSC-6	Document Definitions Information Request	Request that the CSD document definitions be revised consistent with other agencies. Information request; rigs and derricks.	Please see response to CCSC-3. Information requests are outside the scope of the Periodic Review.
CCSC-7	Document Definitions Information Request	Request for CSD document language revisions. Information request; drilling.	Please see response to CCSC-3. Please note information requests are outside the scope of the Periodic Review.
CCSC-8	Document Definitions Information Request	Request for CSD document language revisions. Information request; ECC.	Please see response to CCSC-3. Information requests are outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CCSC-9	Document Definitions Information Request	Request for CSD document language revisions. Information request; EQAP.	Please see response to CCSC-3. Information requests are outside the scope of the Periodic Review. Compliance information is available in EQAP and SIMQAP audit documents, the Periodic Review, CAP minutes, and CAP meetings.
CCSC-10	Document Definitions	Request for CSD document language revisions.	Please see response to CCSC-3.
CCSC-11	Document Definitions	Request for CSD document language revisions.	Please see response to CCSC-3.
CCSC-12	SIMQAP	SIMQAP information.	See Periodic Review discussion for Provision CSD 22.310.060.C.
CCSC-13	SIMQAP	SIMQAP information.	See Periodic Review discussion for Provision CSD 22.310.060.C.
CCSC-14	Document Definitions SPCC	Request for CSD document language revisions. SPCC information.	See Periodic Review discussion for Provision CSD 22.310.050.Q.
CCSC-15	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-16	Document Definitions Information Request	Request for CSD document language revisions. Information request; ERP.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-17	Information Request	Request for information on property and mineral rights owners.	Information requested is outside the scope of the Periodic Review.
CCSC-18	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-19	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-20	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-21	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CCSC-22	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. DOGGR has maps of the delineation of the Oil Field for reference.
CCSC-23	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-24	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. DOGGR reviews and permits reinjection of water at the oil field.
CCSC-25	Information Request	Information request.	Information requests is outside the scope of the Periodic Review.
CCSC-26	Document Definitions	Request that the CSD document definitions be revised consistent with other agencies.	Please see response to CCSC-3.
CCSC-27	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Gas busters are used as part of drilling operations. Vapor recovery systems are included for all tanks. Please see Periodic Review discussion for Provision 22.310.050.CC.3 on vapor recovery requirements.
CCSC-28	Document Definitions	Request that the CSD document definitions be revised consistent with other agencies.	Please see response to CCSC-3.
CCSC-29	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Definitions are included in the CSD. Information requested is outside the scope of the Periodic Review.
CCSC-30	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.CC.3 on vapor recovery requirements.
CCSC-31	Information Request	Information request; meteorological station.	Information requested is outside the scope of the Periodic Review.
CCSC-32	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.C.3, C.4 and the Retention Basin Survey for subject information.

Comment #	Issue Area	Brief Description	Response
CCSC-33	CSD and Settlement Agreement	CSD and Settlement Agreement should be integrated for compliance.	The two referenced documents do not need to be integrated for compliance. All requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-34	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.4 and D.5 and the Ground Movement Monitoring Plan for subject information.
CCSC-35	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.1.
CCSC-36	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note that the previous and current operators do not use sumps as documented in the previous Periodic Review and annual EQAP reports.
CCSC-37	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-38	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-39	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-40	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. The Groundwater Monitoring Plan is available on the oil field website.
CCSC-41	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note the Hazardous Materials Business Plan program is administered by County Fire CUPA.

Comment #	Issue Area	Brief Description	Response
CCSC-42	Information Request	Information request. CSD and Settlement Agreement.	Information requested is outside the scope of the Periodic Review. Note the annual drilling plans provide a historical summary of wells drilled and the plans are available on the oil field website.
CCSC-43	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. The two referenced documents do not need to be integrated for compliance. All requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-44	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Data on bottom hole locations and drilling sites are provided every year as part of the Annual Drilling Plan.
CCSC-45	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-46	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Data on bottom hole locations and drilling sites are provided every year as part of the Annual Drilling Plan.
CCSC-47	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-48	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-49	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CCSC-50	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note that no produced water is removed from the oil field and is re-injected after treatment consistent with DOGGR requirements.
CCSC-51	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-52	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note the annual drilling plans provide a historical summary of wells drilled and the plans are available on the oil field website.
CCSC-53	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-54	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-55	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-56	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-57	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-58	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-59	Sumps	Information request; sump closure plan.	Information requested is outside the scope of the Periodic Review. Note that the previous and current operators do not use sumps as documented in the previous Periodic Review and annual EQAP reports.
CCSC-60	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CCSC-61	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requested is outside the scope of the Periodic Review.
CCSC-62	Throughput Review Trigger	Request for derivation of throughput review value of 630 barrels a day.	The derivation of the throughput review trigger in CSD Provision 22.310.050.II was discussed in the initial Periodic Review. See Periodic Review for CSD Provision 22.310.050.II.
CCSC-63	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Financial issues between operators of the oil field and property/mineral rights owners are beyond the scope of the CSD and Periodic Review.
CCSC-64	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-65	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-66	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-67	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-68	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-69	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Note all requirements of the Settlement Agreement are incorporated into the CSD by reference.
CCSC-70	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CCSC-71	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-72	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-73	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-74	Information Request Periodic Review	Information on Periodic Review process and notices.	Information requested is outside the scope of the Periodic Review. Regarding the schedule and noticing of the Periodic Review and Periodic Review process, both are provided on the County DRP website and announced at the monthly CAP meetings.
CCSC-75	Information Request Periodic Review	Information on Periodic Review process.	The Director of Public Health has not required any of the referenced surveys to date.
CCSC-76	Information Request Periodic Review	Information on Periodic Review process.	The draft report will be available to the CAP and operator for comment and will include an appendix with all comments received.
CCSC-77	Document Definitions Information Request	Request for CSD document language revisions. Information request.	Please see response to CCSC-3. Information requests are outside the scope of the Periodic Review. The Periodic Review document will be available to the public.
CCSC-78	Information Request Periodic Review	Information on Periodic Review process.	The Director of Public Health has not required any of the referenced surveys to date. The Periodic Review will contain a discussion of any violations and all recommendations determined by the review analysis.
CCSC-79	Information Request Periodic Review	Information on Periodic Review process.	The Director of Public Health has not required any of the referenced surveys to date.
CCSC-80	Information Request Periodic Review	Information on Periodic Review process.	The draft report will be available to the CAP and operator for comment and will include an appendix with all comments received.
CCSC-81	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-82	Information Request Periodic Review	Information on Periodic Review process.	The initial Periodic Review, completed in 2015, is available on the County DRP website.

Comment #	Issue Area	Brief Description	Response
CCSC-83	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Annual Drilling Plan documents for the requested information.
CCSC-84	Definitions	Request for CSD document language revisions.	County in the CSD refers to the County of Los Angeles.
CCSC-85	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-86	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. The Unused or Abandoned Equipment Removal Plan is available on the oil field website.
CCSC-87	Information Request CAP	Information request.	Information requested is outside the scope of the Periodic Review. Guidelines for the CAP were created and approved by the CAP in June 2009 and is available on the County DRP Baldwin Hills website.
CCSC-88	Information Request Neighborhood Meetings	Information request.	Information requested is outside the scope of the Periodic Review. Notices for the annual meetings are posted on the County DRP Baldwin Hills website, the oil field website and announced at CAP meetings.
CCSC-89	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC-90	Information Request Web Site	Information request.	Information requested is outside the scope of the Periodic Review. See Periodic Review discussion for Provision 22.310.100.B3 for a discussion on the oil field web site.
CCSC-91	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.C.3, C.4 and the Retention Basin Survey for subject information.

Comment #	Issue Area	Brief Description	Response
CCSC-92	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.7 for subject information.
CCSC-93	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.4 and D.5 and the Ground Movement Monitoring Plan for subject information.
CCSC-94	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.D.4 and D.5 and the Ground Movement Monitoring Plan for subject information.
CCSC-95	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.S for subject information.
CCSC-96	Information Request	Information request.	Information requested is outside the scope of the Periodic Review. Please see Periodic Review discussion for Provision 22.310.050.CC for subject information.
CCSC-97	Information Request	Information request.	Information requested is outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CCSC-98	Monitoring Public Notification	Request for drone monitoring and public notification of hazards.	The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant, storm water testing, groundwater monitoring, fugitive emissions inspections and ground movement surveys. In addition, the CSD provides for paleontological, noise, and vibration monitoring if determined to be necessary by County DRP or County DPH. Further, the Environmental Compliance Coordinator performs inspections of the oil field and is available to respond as necessary to events or issues at the oil field. Regarding air quality monitoring, the STI Air Quality study, completed in December 2014, provided a site-specific air quality monitoring program for air toxics utilizing four monitoring locations. Each monitoring station included both air quality and meteorological instrumentation. Results of the study were consistent with the air quality impact analysis in the Baldwin Hills CSD EIR and the studies completed by the SCAQMD in the MATES programs. The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019. The County will review the results of the SNAPS monitoring effort to determine the applicability of additional air quality monitoring at the oil field.
CCSC-99	Subsurface Safety Valves	Request for subsurface safety valves.	Downhole operations are under the jurisdiction of DOGGR.
CCSC-100	DOGGR Regulations	Include DOGGR regulations.	Applicable DOGGR regulations are included in the CSD by reference.