Appendix A

Public Draft Comments

Comment #	Issue Area	Brief Description	Response
GRP-1	Setbacks	Recommends 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.
GRP-2	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	Phasing out of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis. In addition, instigating a moratorium on the activities at the IOF or a sunset date for operations is a legal issue and beyond the scope of the Periodic Review analysis. That said, the CSD and Settlement Agreement documents do include specific requirements and an end date regarding the drilling or re-drilling of new wells. However, neither the CSD nor the Settlement Agreement contain language about the CSD expiring.

Comment #	Issue Area	Brief Description	Response
GRP-3	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 or emergency guidance from the operator to the public are beyond the scope of the CSD and any such plans would be administered by the applicable Fire and Police first responder agencies. Note that the CAN system is not initiated by the operator and requires input from the Fire Department, the agency that makes the determination on notification to residents. As such, the Fire Department, along with other first responder agencies, is therefore the proper entity to provide the public with appropriate direction in the event of an emergency. See discussion on CSD requirement 22.310.050.A.
GRP-4	Climate Change	Discussion on climate change and wildfires.	Climate change 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.
CAP-1	Gas Pipeline Emissions	Discussion at September 2019 CAP regarding nationwide 3% fugitive emissions loss from gas transmission lines.	Gas transmission lines are outside the scope of the Periodic Review, however, fugitive emissions from pipelines and components are addressed under SCAQMD Rule 1173 requirements.
CAP-2	Public Outreach Web Site	CAP discussion recommended a Frequently Asked Questions (FAQ) section be added to IOF website to facilitate answers to commonly asked questions at the CAP and general public.	The referenced recommendation has been added to the admin. final draft of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
CAP-3	Public Outreach Web Site	Recommendation that an oil and gas primer be added to the web site to facilitate answers to commonly asked questions at the CAP and general public.	The referenced recommendation has been added to the admin. final draft of the Periodic Review.
CAP-4	Public Outreach Web Site	Recommendation that the IOF complaint system respond back to the complainant in a timelier fashion including for night and weekend complaints.	The referenced recommendation has been added to the admin. final draft of the Periodic Review.
CAP-5	Electrical Maintenance	Recommendation that the SIMQAP document include electrical infrastructure maintenance to document operator wildfire prevention measures.	The referenced recommendation has been added to the admin. final draft of the Periodic Review.
MTC-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
MTC-2	Economy	CSD protects the public and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.
RRUT-1	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
RRUT-2	Sustainability Plan	CSD not consistent with the County Sustainability Plan.	Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.
RRUT-3	Public Health	CSD does not protect the public and should be revised.	The Periodic Review discusses potential impacts to the environment and public from the Project.
CONTEK-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
CONTEK-2	Safety	Existing CSD regulations accomplish what they intended for safe operation of the oilfield.	Comment noted in support of the CSD/Periodic Review.
RAIN A-1	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
SCS-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
SCS-2	Economy	CSD protects the public and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.
INTR A-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
INTR A-2	Economy	CSD protects the public and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.
INTR A-3	Open Space Habitat	Inglewood IOF provides habitat for native plants and animals.	Comment noted in support of the CSD/Periodic Review.

Comment #	Issue Area	Brief Description	Response
INTR A-4	Periodic Review	Recommends approval of the Periodic Review document.	Comment noted in support of the CSD/Periodic Review.
FFLA-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
FFLA-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
FFLA-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
TWIL-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
TWIL-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
TWIL-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
JMEL-1	Oilfield Project Life	Request that the County phase out all IOF operations as soon as possible.	See group response GRP-2.
JMEL-2	Safety	Safety concern over pipelines to refineries and the Playa Del Rey gas facility.	Gas transmission lines and pipelines outside the boundaries of the IOF are outside the scope of the Periodic Review. Safety issues at the IOF are discussed in various sections of the Periodic Review including Section 22.310.050.A.
JMEL-3	Community Safety Plan	Request for community safety plan information and training for the public.	See group response GRP-3.
JMEL-4	Sustainability Plan	CSD not consistent with the County Sustainability Plan.	Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.
JMEL-5	Climate Change	Discussion on climate change and wildfires.	See group response GRP-4.
NSTO-1	Climate Change	Discussion on climate change and wildfires.	See group response GRP-4.
NSTO-2	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
NSTO-3	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
NSTO-4	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
CHER-1	Oilfield Project Life	Request that the County require IOF operations to cease as they harm the environment.	See group response GRP-2.
RBRI-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
RBRI-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.

Comment #	Issue Area	Brief Description	Response
RBRI-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
BJAM-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
BJAM-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
BJAM-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
PATS-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
PATS-2	Economy	CSD protects the public and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.
PGLO-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
PGLO-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
PGLO-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
KEUB-1	Climate Change	Discussion on climate change and wildfires.	See group response GRP-4.
KEUB-2	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
KEUB-3	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
KEUB-4	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
AMSS A-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
ERM-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
JJOH-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
JJOH-2	Public Outreach	CSD public outreach provisions provide a wealth of information to stakeholders.	Comment noted in support of the CSD/Periodic Review.
PLS-1	Safety Environment	Inglewood IOF is operated in a safe manner consistent with the CSD regulations and the environment.	Comment noted in support of the CSD/Periodic Review.
PLS-2	Economy	CSD and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.

Comment #	Issue Area	Brief Description	Response
INTR B-1	Safety Environment	Inglewood IOF is operated in a safe manner consistent with the CSD regulations and the environment.	Comment noted in support of the CSD/Periodic Review.
INTR B-2	Economy	CSD and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.
MAQS-1	Air Quality	SPR staff are familiar with SCAQMD Leak Detection and Repair (LDAR) program and exceed maintenance and repair requirements.	Comment noted in support of the CSD/Periodic Review.
MAQS-2	Air Quality	SPR staff are familiar with SCAQMD Leak Detection and Repair (LDAR) program and exceed compliance requirements.	Comment noted in support of the CSD/Periodic Review.
NCUR-1	Sustainability Plan	CSD should be consistent with the County Sustainability Plan.	Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.
NCUR-2	Climate Change	Discussion on climate change and wildfires.	See group response GRP-4.
NCUR-3	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
NCUR-4	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
JMAN-1	Sustainability Plan	CSD should be consistent with the County Sustainability Plan.	Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.
JMAN-2	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
JMAN-3	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
JMAN-4	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
AMSS B-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
DHAU-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
DHAU-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
DHAU-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
SBRO-1	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
SBRO-2	Sustainability Plan	CSD should be consistent with the County Sustainability Plan.	Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.

Comment #	Issue Area	Brief Description	Response
SBRO-3	Climate Change	Discussion on climate change and wildfires.	See group response GRP-4.
SBRO-4	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
SBRO-5	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
MSUL-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
MSUL-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
MSUL-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
THAU-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
NALCO-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
NALCO-2	Economy	CSD and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.
KPOP-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
KPOP-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
KPOP-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
KPOP-4	Transition from Fossil Fuels	CSD should work to move workers to transition from the fossil fuel industry.	Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.
VMIR-1	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
VMIR-2	Sustainability Plan	CSD should be consistent with the County Sustainability Plan.	Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.
VMIR-3	Climate Change	Discussion on climate change and wildfires.	See group response GRP-4.
VMIR-4	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
VMIR-5	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
VMIR-6	Safety	IOF is unsafe due to wildfire and earthquakes.	Comment noted.
JLUE-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2. Instigating a moratorium on the activities at the IOF or a sunset date for operations is a legal issue and beyond the scope of the Periodic Review analysis.

Comment #	Issue Area	Brief Description	Response
JLUE-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
JLUE-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
ERUZ-1	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
ERUZ-2	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
ERUZ-3	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
RZEL-1	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.
RZEL-2	Sustainability Plan	CSD should be consistent with the County Sustainability Plan.	Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.
RZEL-3	Climate Change	Discussion on climate change and wildfires.	See group response GRP-4.
RZEL-4	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
RZEL-5	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
TGAD-1	Safety	Recommend qualified staff work on disaster preventative measures.	The CSD contains multiple preventative measure requirements such as an Emergency Response Plan (ERP) and a Spill Prevention Control and Countermeasure Plan (SPCC). These and other preventative measures are reviewed by qualified staff on an annual basis. In addition, the IOF conducts annual emergency drills which are attended by experts from the County and various State agencies.
TGAD-2	Permitting of New Infrastructure	Comment notes that existing infrastructure is not sufficient to handle current population and that additional infrastructure and residents are not warranted.	Comment noted.
TGAD-3	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
TGAD-4	Setbacks	Recommends setbacks from populated areas.	See group response GRP-1.
TGAD-5	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.

Comment #	Issue Area	Brief Description	Response
JAGU-1	Air Quality/Odors	Comment is a list of posts from the Nextdoor App regarding odor issues.	Comment noted; odor complaints should be called into the IOF 1-800 number and the SCAQMD 1-800 CUT SMOG number.
SEC-1	Environmental Compliance and Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
HALB-1	Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
HALB-2	Economy	CSD and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.
C&J-1	Environmental Compliance	Inglewood IOF is operated consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
C&J-2	Economy	CSD and the Project supports local jobs and the local economy.	Comment noted in support of the CSD/Periodic Review.
JSHE-1	Noise	Comment notes noise issues and noise complaint.	The County followed up on the subject noise complaint on December 12, 2019.
JSHE-2	General	Comment notes issues with air, noise, ground movement and water pollution.	Comment noted.
JSHE-3	Water	Comment states tap water is polluted.	Groundwater from the IOF is not pumped or used in any manner nor does it come in contact with any other aquifer. Contact your water supplier for issues with your water supply.
JSHE-4	Earthquakes	Comment states IOF hydraulic fracking has caused earthquakes and when the fracking stopped the earthquakes stopped.	The IOF does not use the hydraulic fracking well completion technology and has not drilled a well since June 2014.
JSHE-5	Noise	Request for sound walls to lower noise levels.	The County checked noise levels in the referenced area on December 12, 2019.
SC-1	Well Work Oil Operations	Request to ban wastewater injection and certain well stimulations techniques and to phase out oil operations. Reference: Sierra Club cover letter dated November 21, 2019.	See group response GRP-2. It should be noted that no drilling has occurred at the IOF since June 2014 and well stimulation as defined under SB4 is not occurring at the IOF.

Comment #	Issue Area	Brief Description	Response
SC-2	Setbacks	Recommends 2,500-foot setback. Requests enforcement of the CSD existing 400-foot setback. Reference: Sierra Club cover letter dated November 21, 2019.	See group response GRP-1. The 400-foot setback requirement in the CSD is included in Section 22.310.050B.14.a and included below: *14. Drilling and Redrilling Setbacks. The following setbacks shall apply within the IOF for drilling or redrilling:* *a. At least 400 feet from developed areas.* *b. At least 20 feet from any public roadway.* The County enforces this requirement through review of the *Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* required under CSD Provision 310.050.Z.3. Every proposed drilling or redrilling location is checked and mapped by the County during review of these annual plans. No drill or redrill location has been proposed or completed in either the 400 feet from developed areas or 20 feet from any public roadway setback as documented and confirmed by the County in the 2009 through 2020 annual drilling plans.

Comment #	Issue Area	Brief Description	Response
SC-3	Air Monitoring	Request for continuous air monitoring. Reference: Sierra Club cover letter dated November 21, 2019.	The CSD requires a variety of monitoring programs including air quality/odor monitoring around the gas plant. In addition, 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 IOF. Further, the Environmental Compliance Coordinator performs inspections of the IOF and is available to respond as necessary to events or issues at the IOF.

Comment #	Issue Area	Brief Description	Response
SC-4	Emergency Response	Request to update ERP and CAN system and develop a community safety plan and system for notification of IOF activities and spills. Reference: Sierra Club cover letter dated November 21, 2019.	The ERP, most recently updated in June 2019, 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. See also group response GRP-3. 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. The CAN system for community notification is fully operational and is tested on an annual basis. Evacuation plans for the public are 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. The Admin Final Draft of the Periodic Review contains several recommendations regarding public outreach and public information. See the discussion for recommendations for CSD 22.310.100.B or the summary recommendation table in Section 1.8 of the document.
SC-5	Financial Safeguards	Financial safeguards. Reference: Sierra Club cover letter dated November 21, 2019 dated November 21, 2019.	See Periodic Review discussion on CSD requirement 22.310.070.G. subsections B, C, D, and E. As discussed in those sections, insurance requirements were evaluated in August 2017 and bonding requirements in January 2017.

Comment #	Issue Area	Brief Description	Response
SC-6	Oversight of IOF	Oversight of the IOF should be independent and include public input. Reference: Sierra Club cover letter dated November 21, 2019.	Oilfield oversight and compliance with the CSD is conducted by the County DRP with the assistance of an independent consultant with expertise in oil and gas operations and permit compliance. In addition, the IOF is subject to the regulatory requirements and oversight of 9 Federal and 17 State agencies. Regarding public input, 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. The Admin Final Draft of the Periodic Review contains several recommendations to improve the public outreach and public information requirements of the CSD. See the discussion for recommendations for CSD 22.310.100.B or the summary recommendation table in Section 1.8 of the document.
SC-7	Setbacks	Request for a 2,500-foot setback signed by 2,024 residents from throughout Los Angeles County and surrounding areas. Each request included additional statements on the importance of the setback request and/or general anti-drilling or anti-oil industry comments. Reference: Sierra Club Box A Contents.	See group response GRP-1. The County notes and acknowledges the fact that 2,024 residents provided comment and input to the Periodic Review process.
SC-8	SC Comments 1-6	Comment consists of various graphics and a repeat of Sierra Club comments label SC-1 through SC-6. Reference: Sierra Club Box A Labels.	See response to comments SC-1 through SC-6.

Comment #	Issue Area	Brief Description	Response
SC-9	Setbacks Neighborhood Drilling	Input consists of 382 comment cards requesting the 2,500-foot setback and statements documenting concern about "drilling in my neighborhood". Reference: Sierra Club Box B Contents.	See group response GRP-1. The County notes and acknowledges the fact that 382 residents provided comment and concerns about neighborhood drilling. The County also notes that no drilling has occurred at the IOF since June 2014 and the operator has publicly stated numerous times that SPR has no plans to drill any new wells at this time.
SC-10	SC Comments 1-6	Comment consists of various graphics and a repeat of Sierra Club comments label SC-1 through SC-6. Reference: Sierra Club Box B Labels.	See response to comments SC-1 through SC-6.
SC-11	Setbacks Neighborhood Drilling	Input consists of 427 comment cards requesting the 2,500-foot setback and statements documenting concern about "drilling in my neighborhood". Reference: Sierra Club Box C Contents.	See group response GRP-1. The County notes and acknowledges the fact that 427 residents provided comments and concerns about neighborhood drilling. The County also notes that no drilling has occurred at the IOF since June 2014 and the operator has publicly stated numerous times that SPR has no plans to drill any new wells at this time.
SC-12	Various	Comment consists of various graphics and environmental group logos. Reference: Sierra Club Box C Labels.	No response necessary.
SC-13	SC Comments 1-6	Comment consists of various graphics and a repeat of Sierra Club November 21, 2019 letter with comments labeled SC-1 through SC-6. Reference: Monica Embry Sierra Club email and attached November 21, 2019 letter.	See response to comments SC-1 through SC-6.

Comment #	Issue Area	Brief Description	Response
SC-14	Setbacks Neighborhood Drilling	Input consists of a single comment card requesting the 2,500-foot setback and a statement documenting concern about "drilling in my neighborhood". Reference: Monica Embry Sierra Club November 23, 2019 email and attached comment card.	See group response GRP-1. The County also notes that no drilling has occurred at the IOF since June 2014 and the operator has publicly stated numerous times that SPR has no plans to drill any new wells at this time.
CC-1	Reference to Previous Comments	Request the County provide additional response to previous Culver City Periodic Review correspondence.	Response to the Culver City scoping comments are included in Attachment A of the Periodic Review Public Draft document.
CC-2	Draft Review Recommendations	Request that the County provide additional detail on the recommendations in the Draft review.	Additional detail on certain recommendations in the review will be coordinated with the operator once the final recommendations are approved. Certain details will require input with the operator to finalize efficient and feasible action items.
CC-3	Complaint Process	Request that the County provide additional recommendation input on the complaint process.	The County has been working with the current, and past, operators to improve the complaint process independent of the Periodic Review process. Based in public and CAP input, the review contains a recommendation to further the improvement of the complaint process. The County notes, with regard to CAP input, that individual complaints, complaints in general, and the complaint process itself is discussed at CAP meetings on a continuous basis. Therefore, the CAP is in fact involved in both the review of complaints and the improvement of the complaint process.
CC-4	Public Outreach	Request that the County provide additional input on the IOF website update recommendation.	Additional detail on the web site update recommendation in the review will be coordinated with the operator once the final recommendations are approved. Certain details will require input with the operator to finalize efficient and feasible action items.

Comment #	Issue Area	Brief Description	Response
CC-5	New Technologies	Request that the review include additional research on new technologies.	The draft review includes a discussion on new technologies for each CSD provision as applicable. The County notes that no drilling is occurring, nor is planned, for the IOF at this time and that all IOF pumps are already powered by electricity. In addition, the maintenance rigs used at the IOF are under the CARB diesel exhaust reduction program which requires engine replacement or the installation of emission control devices at specific time schedule intervals.
CC-6	IOF Operations Project Life	Request that the County provide additional detail on the CSD requirements for IOF project life.	The CSD and Settlement Agreement documents include specific requirements and an end date regarding the drilling or re-drilling of new wells. Neither the CSD nor the Settlement Agreement contain language about the CSD expiring.
LGEO-1	Environmental Compliance and Safety	Inglewood IOF is operated in a safe manner consistent with the CSD regulations.	Comment noted in support of the CSD/Periodic Review.
CFBD-1	IOF Operations Project Life	Request that the County end permitting for new wells or infrastructure.	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 IOF since June 2014 and well stimulation as defined under SB4 is not occurring at the IOF.

Comment #	Issue Area	Brief Description	Response
CFBD-2	Setbacks	Recommends 2,500-foot setback. Requests enforcement of the CSD existing 400-foot setback.	See group response GRP-1. The 400-foot setback requirement in the CSD is included in Section 22.310.050B.14.a and included below: *14. Drilling and Redrilling Setbacks. The following setbacks shall apply within the IOF for drilling or redrilling:* *a. At least 400 feet from developed areas.* *b. At least 20 feet from any public roadway.* The County enforces this requirement through review of the *Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* required under CSD Provision 310.050.Z.3. Every proposed drilling or redrilling location is checked and mapped by the County during review of these annual plans. No drill or redrill location has been proposed or completed in either the 400 feet from developed areas or 20 feet from any public roadway setback as documented and confirmed by the County in the 2009 through 2020 annual drilling plans.
CFBD-3	IOF Operations Project Life	Request that the County develop a plan to phase out oil operations.	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 IOF since June 2014 and well stimulation as defined under SB4 is not occurring at the IOF.
CFBD-4	Financial Safeguards	Request for financial safeguards.	See Periodic Review discussion on CSD requirement 22.310.070.G. subsections B, C, D, and E. As discussed in those sections, insurance requirements were evaluated in August 2017 and bonding requirements in January 2017.

Comment #	Issue Area	Brief Description	Response
CFBD-5	Public Input/Outreach	Request for independent oversight and public input on same.	Oilfield oversight and compliance with the CSD is conducted by the County DRP with the assistance of an independent consultant with expertise in oil and gas operations and permit compliance. In addition, the IOF is subject to the regulatory requirements and oversight of 9 Federal and 17 State agencies. Regarding public input, 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.
CHC-1	Ground Movement Surveys	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 and note the review incudes the subject recommendation.
CHC-2	Emergency Notification Public Outreach	Improve the CAN system and public outreach.	See group response GRP-3. See Periodic Review discussions and recommendations for CSD provisions 22.310.060.D regarding drills and 22.310.100.B on public outreach improvements.
CHC-3	Complaints	Improve the complaint system.	See discussion and Periodic Review recommendation for CSD 22.310.060.G. Also note that the public is invited to discuss complaints at each month's CAP meeting, with the IOF ombudsperson or the County at any time.
CHC-4	Public Information	Update the Baldwin Hills DRP and IOF web sites.	See discussion in Section 9.0 (CSD 22.310.100) and the associated Periodic Review recommendations for web site posting of incidents, a FAQ section and an oil and gas primer. The County also notes that more information is available to the public through the public outreach provisions of the CSD than any other project under the County's oversight.
CHC-5	Setbacks	Request for setback.	See group response GRP-1.

Comment #	Issue Area	Brief Description	Response
CHC-6	MACC Meetings	Request that 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.
CHC-7	Financial Safeguards	Request to update the CSD financial safeguards.	See Periodic Review discussion on CSD requirement 22.310.070.G. subsections B, C, D, and E. As discussed in those sections, insurance requirements were evaluated in August 2017 and bonding requirements in January 2017.
CHC-8	DPH Health Study	Funding comments and request.	The Public Health Study is administered and funded by the DPH as stipulated by the Settlement Agreement; the CSD does not fund this study.
CPPHTF-1	Public Outreach	Request for information on SCAQMD Rule 1148.2, CAN system, complaint logs, and public information.	SCAQMD Rule 1148.2 data is available to the public via the web site Rule 1148.5 Public Information Portal. See group response GRP-3 for discussion on the CAN system. See Periodic Review discussions and recommendations for CSD provisions 22.310.060.D regarding drills and 22.310.100.B on public outreach improvements.

Comment #	Issue Area	Brief Description	Response
CPPHTF-2	Setbacks	Recommends 2,500-foot setback. Requests enforcement of the CSD existing 400-foot setback.	See group response GRP-1. The 400-foot setback requirement in the CSD is included in Section 22.310.050B.14.a and included below: *14. Drilling and Redrilling Setbacks. The following setbacks shall apply within the IOF for drilling or redrilling:* *a. At least 400 feet from developed areas.* *b. At least 20 feet from any public roadway.* The County enforces this requirement through review of the *Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* required under CSD Provision 310.050.Z.3. Every proposed drilling or redrilling location is checked and mapped by the County during review of these annual plans. No drill or redrill location has been proposed or completed in either the 400 feet from developed areas or 20 feet from any public roadway setback as documented and confirmed by the County in the 2009 through 2020 annual drilling plans.
CPPHTF-3	IOF Operations Project Life	Request that the County develop a plan to phase out oil operations.	See group response GRP-2.
CPPHTF-4	Setbacks	Request for more review on setbacks.	See group response GRP-1.
CPPHTF-5	Wildlife and Parks	Request for more review on wildlife and parks.	Comment acknowledged, however, analysis of a future park at the IOF is outside the scope of the Periodic Review. Wildlife at the IOF is monitored through CSD 22.310.050.G Biological Resources; see Section 47.7.
CPPHTF-6	Evacuation Plans	Request for more review on evacuation plans.	See group response GRP-3 and note the IOF Emergency Response Plan is discussed in Section 4.1 (CSD 22.310.050.A).
CPPHTF-7	Climate Change	Request for more review on climate change.	See group response GRP-4.
CPPHTF-8	IOF Operations Project Life	Request for more review to plan to phase out oil operations.	See group response GRP-2.

Comment #	Issue Area	Brief Description	Response
CPPHTF-9	Setbacks	Discussion on setback input from the public and the complaint system.	See group response GRP-1. Please also note the Periodic Review addresses and discusses complaints based on the complaints received during the review period (2014 to 2018). Complaints are discussed in Section 5.7 (CSD 22.310.060.G) and a table presenting the number and type of complaints is provided in that section. The County has received comments requesting a 2,500 setback from the public, however, a general comment about setback or buffer zones with no nexus to the IOF does not constitute a complaint pursuant to CSD 22.310.060.G. Further, comments on the forthcoming County update to the oil code ordinance are not applicable to the CSD or the Periodic Review process.
CPPHTF-10	Air Quality Odors	Discussion on SCAQMD Rule 1148.2 and odor suppressants.	SCAQMD Rule 1148.2 data is available to the public via the web site Rule 1148.5 Public Information Portal and such data is relevant for discussion at CAP meetings should the public wish to do so. Odor suppressants are currently in use at the IOF for use in soil contamination remediation projects and certain cleaning activities as well as in the past for drilling operations. Odor suppressants are not currently used for Bio Farm operations. Review of the odor control (Odor Control Jasmine) Safety Data Sheet, also known as MSDS, and correspondence with the manufacturer laboratory director confirm the product is safe as used by the operator. Further, Section 15.3, US State Regulations, of the Safety Data Sheet contains the following information: *"California Proposition 65 - This product does not contain any substances known to the state of California to cause cancer, developmental and/or reproductive harm".*

Comment #	Issue Area	Brief Description	Response
TSIL-1	Public Health	Draft Periodic Review does not identify precautions for residents.	The Periodic Review is an analysis of the provisions of the CSD and the IOF. Section 4.2 Air Quality and Public Health, provides discussion on air quality studies specific to the IOF including the STI Air Quality Study required under the Settlement Agreement. The STI study presents data on the potential health effects of the hazardous materials used at the IOF.
TSIL-2	Spills/Earthquakes	Commenter expresses concern on "ongoing spills and leaks" and the potential impacts of an earthquake.	The County is not aware of any ongoing spill or leak issues at the IOF and onsite inspections by the Environmental Compliance Coordinator has not identified any such incidents. The IOF Emergency Response Plan (ERP) contains procedures for responding to natural disasters and the ERP is implemented on an annual basis during emergency response drills attended by County Fire and other applicable resource agencies.
TSIL-3	Monitoring and Oversight	Request for outside experts for monitoring and oversight of the IOF.	Oilfield oversight and compliance with the CSD is conducted by the County DRP with the assistance of an independent consultant with expertise in oil and gas operations and permit compliance. In addition, the IOF is subject to the regulatory requirements and oversight of 9 Federal and 17 State agencies.
TSIL-4	Oilfield Project Life	Request that the County require IOF operations to cease by 2030.	See group response GRP-2.
TSIL-5	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
TSIL-6	Community Safety Plan	Request for a community safety plan and notification.	See group response GRP-3.

Comment #	Issue Area	Brief Description	Response
STND-1	Existing CSD Regulation	Existing CSD regulations are outdated and inadequate.	The County disagrees with the assertation that the CSD provisions are outdated or inadequate. In fact, the County is currently working on revising the County zoning code for oil and gas facilities (Section 22.140.400) and using the provisions in the CSD and the environmental analysis from which the requirements were derived as the model. Other jurisdictions such as the City of Carson and the City of Los Angeles have also looked to the CSD for guidance in drafting their own ordinance updates for oil and gas facilities.
STND-2	Health Studies	The Periodic Review should include discussion of other studies on the potential oil and gas impacts to the public.	As noted in the document, an analysis of health studies and other oil and gas facilities is outside the scope of the Periodic Review. The Periodic Review is an analysis of the provisions of the CSD and the IOF. Section 4.2, Air Quality and Public Health, provides discussion on air quality studies specific to the IOF including the STI Air Quality Study required under the Settlement Agreement. The STI study presents data on the potential health effects of the hazardous materials used at the IOF. The IOF is subject to SCAQMD Rule 1148.2 and is in compliance with those requirements.
STND-3	Public Health	The CSD does not protect public health and requires a policy change.	Please see response to STND-1 above. The CARB SNAPS project and the DPH Health Assessment and Environmental Justice Study are currently under preparation or scheduled to start shortly and these studies are specific to the IOF. The County will review these studies upon completion independent of the Periodic Review effort and can require permit or policy change as applicable as allowed by the CSD.

Comment #	Issue Area	Brief Description	Response
STND-4	Setbacks	Request for a 2,500-foot setback.	See group response GRP-1. Please also note the Periodic Review addresses and discusses complaints based on the complaints received during the review period (2014 to 2018). Complaints are discussed in Section 5.7 (CSD 22.310.060.G) and a table presenting the number and type of complaints is provided in that section. The County has received comments requesting a 2,500 setback from the public, however, a general comment about setback or buffer zones with no nexus to the IOF does not constitute a complaint pursuant to CSD 22.310.060.G.
STND-5	Oil Field Project Life Sustainability Plan	Request to phase out wells consistent with the County Sustainability Plan.	See group response GRP-2. Consistency with the County Sustainability Plan is outside the scope of the Periodic Review.
BCAM-1	IOF Infrastructure Odor Complaints	Request that tanks and piping be mapped before additional new wells are drilled. This can assist in identifying odors.	The infrastructure at the IOF is mapped and monitored as overseen by the County and other regulatory agencies. Tanks are discussed in Section 4.29 (CSD 22.310.050.CC) of the Periodic Review. Two new tanks were built during the review period as discussed in Section 4.29. IOF pipelines are identified and mapped in the facility piping and instrumentation (P&ID) plans and monitored with the Pipeline Integrity program; this documentation is reviewed by the County. The County also notes that no drilling has occurred at the IOF since June 2014.

Comment #	Issue Area	Brief Description	Response
BCAM-2	Setbacks	Recommends 2,500-foot setback. Requests enforcement of the CSD existing 400-foot setback.	See group response GRP-1. The 400-foot setback requirement in the CSD is included in Section 22.310.050B.14.a and included below: *14. Drilling and Redrilling Setbacks. The following setbacks shall apply within the IOF for drilling or redrilling:* *a. At least 400 feet from developed areas.* *b. At least 20 feet from any public roadway.* The County enforces this requirement through review of the *Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan* required under CSD Provision 310.050.Z.3. Every proposed drilling or redrilling location is checked and mapped by the County during review of these annual plans. No drill or redrill location has been proposed or completed in either the 400 feet from developed areas or 20 feet from any public roadway setback as documented and confirmed by the County in the 2009 through 2020 annual drilling plans. Please also note the Periodic Review addresses and discusses complaints based on the complaints received during the review period (2014 to 2018). Complaints are discussed in Section 5.7 (CSD 22.310.060.G) and a table presenting the number and type of complaints is provided in that section. The County has received comments requesting a 2,500 setback from the public, however, a general comment about setback or buffer zones with no nexus to the IOF does not constitute a complaint pursuant to CSD 22.310.060.G.

Comment #	Issue Area	Brief Description	Response
BCAM-3	Insurance/Bonding	Insurance and bonding amount are too low.	Insurance and bonding are discussed in Sections 6.4 (CSD 22.310.070.D) and 6.5 (CSD 22.310.070.E), respectively. As discussed in the Periodic Review, insurance requirements were evaluated in August 2017 and bonding requirements in January 2017.
BCAM-4	Drilling Hydraulic Fracturing	The Periodic Review discussions on new technology should address drilling and hydraulic fracturing.	No drilling has occurred at the IOF since June 2014 nor does the operator plan to conduct any drilling activities. The IOF does not use the hydraulic fracking well completion technology. New technology is reviewed as applicable in the discussion of each CSD provision.
BCAM-5	Well Completions Well Work	Request for a ban on certain well completion techniques including hydraulic fracturing. Request for inventory of chemicals used in well work.	Prohibition of permitted and regulated operations is a legal issue and beyond the scope of the Periodic Review analysis. However, no drilling has occurred at the IOF since June 2014 and the IOF does not use the hydraulic fracking well completion technology. All well work, including maintenance work, is reviewed by the County and CalGEM (DOGGR) with some activities requiring permits. Chemical use for well work is monitored under SCAQMD Rule 1148.2 whereby all hazardous materials used in well work is submitted to the SCAQMD.
BCAM-6	Climate Change	Review should address climate change and include the impacts of new wells and tanks.	See group response GRP-4. With regard to new wells, no drilling has occurred at the IOF since June 2014 nor does the operator plan to conduct any drilling activities. As noted in Section 4.29 (CSD 22.310.050.CC), two new tanks were installed during this review period. Both tanks were built at the water plant.

Comment #	Issue Area	Brief Description	Response
BCAM-7	Community Safety Plan Regulations	Periodic Review should address community safety issues and the regulations should be consistent with County and other agencies.	See group response GRP-3. The CSD regulations are consistent with all County and other agencies' regulations. In fact, the County is currently working on revising the County zoning code for oil and gas facilities (Section 22.140.400) and using the provisions in the CSD and the environmental analysis from which the requirements were derived as the model. Other jurisdictions such as the City of Carson and the City of Los Angeles have also looked to the CSD for guidance in drafting their own ordinance updates for oil and gas facilities.
BCAM-8	Air Quality Monitoring	Incorrect monitoring station was used in IOF analysis and air quality monitoring should be utilized at the IOF.	The commenters reference to the use of a monitoring station in China Town for studies at the IOF is incorrect. Six meteorological stations and four air quality monitoring stations have been used for various studies at the IOF. The meteorological station at LAX was used for the health risk assessment study in the Baldwin Hills CSD EIR. An onsite meteorological station is currently operating at the IOF and is used for odor complaint investigations. Four meteorological and air quality stations were used in the STI Air Quality Study which analyzed toxic emissions at the IOF. The monitoring stations were located in the IOF and the study is available on the DRP Baldwin Hills web site. The County is looking forward to the forthcoming CARB SNAPS monitoring effort scheduled to begin in late 2019 which includes a monitoring station specific to the IOF.

Comment #	Issue Area	Brief Description	Response
BCAM-9	Public Health	Certain health studies were not included in the review.	As noted in the document, an analysis of health studies and other oil and gas facilities is outside the scope of the Periodic Review. The Periodic Review is an analysis of the provisions of the CSD and the IOF. Section 4.2, Air Quality and Public Health, provides discussion on air quality studies specific to the IOF including the STI Air Quality Study required under the Settlement Agreement. The STI study presents data on the potential health effects of the hazardous materials used at the IOF.
JFEN-1	Setbacks	Recommends 2,500-foot setback.	See group response GRP-1.
JFEN-2	Spill Procedures	Request for spill procedures.	Spill procedures are discussed in Section 4.1 (CSD 22.310.050.A).

Comment #	Issue Area	Brief Description	Response
JFEN-3	Monitoring	Install 24-hour 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 IOF and is available to respond as necessary to events or issues at the IOF. 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 IOF.
JFEN-4	Community Alert Notification (CAN) System	Improve the CAN system.	See group response GRP-3.
JFEN-5	Community Safety Plan	Request for community safety plan.	See group response GRP-3.
JFEN-6	Disaster Planning	Establish financial safeguards for disasters.	The CSD financial safeguards for insurance and bonding are discussed in Sections 6.4 (CSD 22.310.070.D) and 6.5 (CSD 22.310.070.E), respectively. As discussed in the Periodic Review, insurance requirements were evaluated in August 2017 and bonding requirements in January 2017.

Comment #	Issue Area	Brief Description	Response
CCSC A-1	Information Request	Request for maps and to define certain terms in the CSD.	The maps and information requested is outside the scope of the Periodic Review. Wordsmithing of the CSD is also not in the scope of the review.
CCSC A-2	Information Request	Request to define throughput terms used in the Periodic Review.	As shown in the Table on page 2, average production is provided in Barrels Oil Per Day (BOPD), gas in Thousand Standard Cubic Feet per Day (MSCFD), and water in Barrels Water Per Day (BWPD).
CCSC A-3	Agency Jurisdiction	Request to clarify State and local agency jurisdiction regarding surface and down hole operations.	Generally, DOGGR (now CalGEM) has jurisdiction of all downhole activities, however, there is some overlap between the agencies.
CCSC A-4	Typographical Error	Incorrect reference.	Reference corrected.
CCSC A-5	New Technology	Request for discussion on new technology.	New technology is reviewed as applicable in the discussion of each CSD provision.
CCSC A-6	Periodic Review Methodology	Request for word definition.	Providing the definition of commonly used words is not part of the scope of the review.
CCSC A-7	Information	Request for references regarding the Settlement Agreement.	A discussion on the Settlement Agreement is provided in Section 2.2 of the review and the Settlement Agreement document is included as Appendix C.
CCSC A-8	New Technology	Request for discussion on new technology.	New technology is reviewed as applicable in the discussion of each CSD provision.
CCSC A-9	Periodic Review Recommendations	Request to define certain terms in the Periodic Review and provide the review recommendations.	Providing the definition of commonly used words is not part of the scope of the review. The recommendations detailed in the review are found in the discussion of the applicable CSD provision and in the summary tables provided in the Executive Summary and Section 1.8.

Comment #	Issue Area	Brief Description	Response
CCSC A-10	Periodic Review Recommendations	Request clarification on the County approach to recommend rather than require the findings of the review. Request to provide compliance documentation.	The recommendation approach to improving the CSD is more efficient and timelier because the recommendations do not require a modification or change to the language of the CSD ordinance. The recommendations are improvements in the method of implementation or compliance effort for the subject CSD provision. This approach has been used with 100% success rate for every Periodic Review finding in the past. A multitude of compliance documentation is provided to the public and posted on both the DRP Baldwin Hills and the IOF web sites.
CCSC A-11	Information Request	Request to provide mitigation measures from the Baldwin Hills CSD EIR.	The mitigation measures the CSD provisions are derived from are discussed in the Baldwin Hills CSD EIR. The document is available on the DRP Baldwin Hills web site.
CCSC A-12	Settlement Agreement	Request for information on the Clean Technology requirement in the Settlement Agreement.	Compliance with the Clean Technology requirement is documented in the annual Drilling Plan submittal which is reviewed by the County and CalGEM (DOGGR).
CCSC A-13	DPH Health Study	Request for CSD section references regarding selection of the DPH Health Study Health Working Group.	Selection of the members of the Health Working Group was completed by members of the CAP.
CCSC A-14	STI Air Quality Study	Request for information on the STI Air Quality Study.	The STI Air Quality Study is available on the DRP Baldwin Hills web site and the requested information is available in the document.
CCSC A-15	STI Air Quality Study	Statement that the STI Air Quality Study analysis should use complex terrain air quality model.	The commenter is mistaken. Air quality modeling with “flat” terrain provides a worst-case impact and result. Use of complex terrain in the modeling analysis would introduce dispersion and mixing and would therefore lower the concentrations of a pollutant as it travels downwind to a receptor point. This approach is consistent with SCAQMD guidelines.

Comment #	Issue Area	Brief Description	Response
CCSC A-16	Operational Limits	Request to define certain terms drilling terms in the Periodic Review document.	Providing the definition of commonly used words is not part of the scope of the review. The County notes no wells have been drilled at the IOF since June 2014 and the operator has no plans to drill any wells in 2020.
CCSC A-17	Operational Limits	Commenter provides text of CSD Provision Section 22.310.040.	No response necessary.
CCSC A-18	Operational Limits	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC A-19	Operational Limits	Questions and comments regarding CSD Provision Section 22.310.040.	The County and the IOF operator have confirmed that no surface or bottom hole well locations have been drilled outside the DOGGR established boundaries of the CSD/Inglewood IOF consistent with the subject CSD provision.
CCSC A-20	Operational Limits	Information request including CalGEM documents regarding CSD Provision Section 22.310.040.	Information requested is outside the scope of the Periodic Review.
CCSC A-21	Operational Limits	Request to define certain terms in the Periodic Review.	Providing the definition of commonly used words is not part of the scope of the review.
CCSC A-22	Secondary Containment	Request that tank secondary containment include a permeability factor.	Requested requirement is not a requirement of the CSD and no issues with the secondary containment for tanks at the IOF have occurred.
CCSC A-23	SPCC Plan	Request for compliance documentation on SPCC plan drills.	Information requested is outside the scope of the Periodic Review. As noted in Section 22.310.050.A, emergency response/spill drills were conducted annually by the operator on October 3, 2014, November 5, 2015, November 3, 2016, June 29, 2017, and March 14, 2018.
CCSC A-24	Secondary Containment	Concern regarding the adequacy of tank secondary containment.	No issues with the secondary containment for tanks at the IOF have occurred. For example, fluid from the tank overflow on Thanksgiving 2018 was completely confined in the secondary containment area.
CCSC A-25	SPCC	Request to provide definitions of certain terms drilling terms in the SPCC document.	Information requested is outside the scope of the Periodic Review. The SPPC was most recently updated in July 2018.

Comment #	Issue Area	Brief Description	Response
CCSC A-26	ERP	Information request regarding the ERP.	Information requested is outside the scope of the Periodic Review. The ERP was most recently updated in June 2019.
CCSC A-27	Air Quality/Odors	Request for to rewrite certain aspects of the Draft Periodic Review.	Wordsmithing of the document is outside the scope for a Periodic Review comment.
CCSC A-28	Air Quality/Odors	Questions and comments regarding reworking and re-drilling.	Reworking projects may not require re-drilling; therefore, the subject references are correct.
CCSC A-29	Air Quality/Odors	Request to define certain terms in the Periodic Review.	Providing the definition of commonly used words is not part of the scope of the review.
CCSC A-30	New Technology	Request for discussion on best practices and/or new technology as it relates to CSD Provision Section 22.310.050.B Air Quality.	The draft review includes a discussion on new technologies for each CSD provision as applicable. The County notes that no drilling is occurring, nor is planned, for the IOF at this time and that all IOF pumps are already powered by electricity. In addition, the maintenance rigs used at the IOF are under the CARB diesel exhaust reduction program which requires engine replacement or the installation of emission control devices at specific time schedule intervals.
CCSC A-31	Greenhouse Gases	Request for discussion on GHGs and CSD requirements and potential revision.	GHGs are discussed in Section 4.2 of the review (Section 22.310.040.B Air Quality) and as noted are under the jurisdiction of the State and the SCAQMD. See also group response GRP-4.
CCSC A-32	Tank Overflow Event Thanksgiving 2018	Request for information regarding the air quality/odor analysis completed for the tank overflow event on Thanksgiving 2018.	Information on the referenced spill modeling completed by MRS Environmental is contained in the letter report dated April 18, 2019; the report is available on the DRP Baldwin Hills web site. Note that air quality modeling with “flat” terrain provides a worst-case impact and result. Use of complex terrain in the modeling analysis would introduce dispersion and mixing and therefore lower the concentrations of a pollutant as it travels downwind to a receptor point.
CCSC A-33	New Technology	Request for discussion on new technology.	New technology is reviewed as applicable in the discussion of each CSD provision.

Comment #	Issue Area	Brief Description	Response
CCSC A-34	Secondary Containment	Information request regarding tank secondary containment.	Information requested is outside the scope of the Periodic Review. The Retention Basin Survey is available on the DRP Baldwin Hills web site.
CCSC A-35	Downhole Operations	Request to revise the document regarding downhole issues and new technologies.	New technology is reviewed as applicable in the discussion of each CSD provision. Downhole issues are the jurisdiction of CalGEM (DOGGR).
CCSC A-36	Secondary Containment	Request for to rewrite certain aspects of the Draft Periodic Review. Request for secondary containment documentation.	Wordsmithing of the document is outside the scope for a Periodic Review comment. The Retention Basin Survey is available on the DRP Baldwin Hills web site.
CCSC A-37	Secondary Containment	Comments on the secondary containment failure during the April 1, 2019 pipe oil leak.	The County has worked with the operator to review and map areas that require berming and confirm such berming is maintained and inspected on a regular basis.
CCSC A-38	Ground Movement	Request for clarification on formatting of the Periodic Review document and information request.	Italicized text in the document are the CSD provisions. Ground movement survey documents are available on the DRP Baldwin Hills web site.
CCSC A-39	Ground Movement	Information request regarding ground movement survey documentation and document reviewers.	Information requested is outside the scope of the Periodic Review. Ground movement survey documents are available on the DRP Baldwin Hills web site.
CCSC A-40	Ground Movement	Information request regarding ground movement data.	Information requested is outside the scope of the Periodic Review. Ground movement survey documents are available on the DRP Baldwin Hills web site.
CCSC A-41	Ground Movement	Information request on earthquake faults.	Information requested is outside the scope of the Periodic Review. No permanent structures have been constructed in an Alquist-Priolo Fault Zone since the adoption of the CSD, therefore, the preparation of a fault study required by subsection D.6 has not been required to date.
CCSC A-42	Ground Movement	Request to rewrite certain aspects of the Draft Periodic Review.	Wordsmithing of the document is outside of the scope for a Periodic Review comment.

Comment #	Issue Area	Brief Description	Response
CCSC A-43	Ground Movement	Request for clarification on formatting and revision of the Periodic Review.	Italicized text in the document are the CSD provisions. Wordsmithing of the document is outside the scope for a Periodic Review comment.
CCSC A-44	Equipment Removal	Outdated operator reference.	The reference has been corrected.
CCSC A-45	Drilling Plan	Information request regarding Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan.	The Drilling Plans are available on the DRP Baldwin Hills web site. In addition, Drilling Plans are discussed at CAP meetings and comments on the Drilling Plans by the CAP is encouraged.
CCSC A-46	New Technology	Request for discussion on new technology with regard to the Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan.	New technology is reviewed as applicable in the discussion of each CSD provision and discussed in each annual Drilling Plan. As of May 2019, 113 well pumps out of the total of 442 producing wells (25.6%) are using submersible pump technology.
CCSC A-47	Settlement Agreement	Clarification on jurisdiction and the Settlement Agreement.	Downhole issues are the jurisdiction of CalGEM (DOGGR).
CCSC A-48	Settlement Agreement	Commenter notes that the Settlement Agreement applies to downhole jurisdiction (well plugs).	No response necessary.
CCSC A-49	Drilling Plan	Request to rewrite certain aspects of the Draft Periodic Review.	Wordsmithing of the document is outside the scope for a Periodic Review comment.
CCSC A-50	Drilling Plan	Information request on term definitions and jurisdiction issues.	Providing the definition of commonly used words is not part of the scope of the review. Downhole issues are the jurisdiction of CalGEM (DOGGR).
CCSC A-51	Drilling Plan	Request for clarification on the Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan discussion.	The Drilling Plan is reviewed each year by the County consistent with CSD and Settlement Agreement requirements. The County notes no wells have been drilled at the IOF since June 2014, and the operator has no plans to drill any wells in 2020.

Comment #	Issue Area	Brief Description	Response
CCSC A-52	Processing	Request for clarification on discussion on oil and gas processing.	As of May 2019, 113 well pumps out of the total of 442 producing wells (25.6%) are using submersible pump technology. As discussed in the subject text, the only processing operations permitted at the well site shall be the dehydration of oil and gas produced from the well; the storage, handling, recycling, and transportation of such materials; and those processing operations required for water injection purposes. No refining occurs at the IOF.
CCSC A-53	Processing	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC A-54	Pipelines	Request for information about pipelines that serve the IOF and franchise agreements.	Pipelines outside the IOF are not part of the CSD or the scope of the Periodic Review. Franchise Agreements are also a separate issue and permitting action.
CCSC A-55	Well Operations	Notes on jurisdiction of SCAQMD, CalGEM, and the County regarding well work; request to provide definitions.	Generally, DOGGR (now CalGEM) has jurisdiction of all downhole activities, however, there is some overlap between the agencies. The IOF complies with the requirements of SCAQMD Rule 1148.2.
CCSC A-56	Well Operations	Information request.	Information requested is outside the scope of the Periodic Review. An analysis of the CalGEM permitting process is outside the scope of the Periodic Review.
CCSC A-57	Typographical Error	Typo identified in the document.	Typo has been corrected.
CCSC A-58	Idle Wells	Information request.	Information requested is outside the scope of the Periodic Review. Ground movement survey documents are available on the DRP Baldwin Hills web site.
CCSC A-59	Idle Wells	Information request on idle wells.	The idle wells at the IOF are in the Idle Well Program administered by CalGEM (DOGGR).
CCSC A-60	Idle Wells	Information request on idle wells.	The idle wells at the IOF are in the Idle Well Program administered by CalGEM (DOGGR).

Comment #	Issue Area	Brief Description	Response
CCSC A-61	Settlement Agreement	Information request on the Settlement Agreement.	A discussion on the Settlement Agreement is provided in Section 2.2 of the review, in the discussion of certain CSD provisions as applicable, and the Settlement Agreement document is included as Appendix C.
CCSC A-62	Abandoned Well Testing	Information request on the soil vapor testing completed under CSD Provision 22.310.050.FF, Abandoned Well Testing.	The Abandoned Well Testing reports are available on the DRP Baldwin Hills web site.
CCSC A-63	Well P&A	Request for justification on the Settlement Agreement requirement for 150-foot cement plug for plugging and abandoning wells.	The requirement was negotiated as Condition 10 of the Settlement Agreement. Citizens Coalition for a Safe Community was a party in the agreement.
CCSC A-64	Well P&A	Request for re-write of CSD Condition 22.310.050.GG.	Wordsmithing of the CSD is outside the scope for a Periodic Review comment.
CCSC A-65	Well P&A	Notes that the County, through the Settlement Agreement, has jurisdictional authority downhole.	Comment noted.
CCSC A-66	Well P&A	Request for information (DOGGR AOR process) and maps.	Information requested is outside the scope of the Periodic Review. The CalGEM (DOGGR) AOR process as it relates to the IOF is discussed in Section 4.33 (22.310.050.GG) Well and Well Pad Abandonment.
CCSC A-67	Settlement Agreement	Notes that the County, through the Settlement Agreement, has jurisdictional authority downhole.	Comment noted.
CCSC A-68	Well P&A	Information request and document revision request.	Information requested is outside the scope of the Periodic Review. Wordsmithing of the CSD is outside the scope for a Periodic Review comment.
CCSC A-69	Drilling Plan	Request for clarification on the review of the Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan and information request.	The Drilling Plan is reviewed each year by the County consistent with CSD and Settlement Agreement requirements. CalGEM (DOGGR) and the public also have the opportunity to review the plan. The County notes no wells have been drilled at the IOF since June 2014, and the operator has no plans to drill any wells in 2020.
CCSC A-70	County Review of Well Status	Reference to CalGEM (DOGGR) AOR and associated field rules.	Referenced regulations are administered by CalGEM (DOGGR).
CCSC A-71	County Review of Well Status	Request for clarification on CSD 22.310.50.HH.	The referenced CSD condition does not require soil vapor testing at the 155-foot depth level.

Comment #	Issue Area	Brief Description	Response
CCSC A-72	County Review of Well Status	Information request.	Information requested is outside the scope of the Periodic Review.
CCSC A-73	County Review of Well Status	Request for clarification on CSD 22.310.50.HH.	The referenced CSD provision includes reference to State Public Resources Code section 3206.5, therefore, any changes to the Code are incorporated into the CSD provision by reference.
CCSC A-74	Reduced Throughput Triggering Review	Request for re-write and bond information.	Wordsmithing of the CSD is outside the scope for a Periodic Review comment. Bond information is in Section 6.5, CSD 22.310.070.E.
CCSC A-75	EQAP	Request for EQAP documentation.	EQAP documentation is available on the Inglewood IOF website.
CCSC A-76	SIMAQ	Request for SIMQAP documentation.	SIMQAP documentation is available on the Inglewood IOF website.
CCSC A-77	ERP	Request for list of unannounced emergency response drills at the IOF.	Unannounced drills have not taken place at the IOF, Section Request for EQAP documentation. See Section 5.4 (22.310.060.D) and the associated Periodic Review recommendation.
CCSC A-78	Vibration Monitoring	Request for information on vibration issues.	Vibration is discussed in Section 4.6 (22.310.050.F) of the Periodic Review. The County has not required vibration monitoring and therefore CSD Provision 212.310.060.F has not been activated to date.
CCSC A-79	Complaints	Request to define certain terms.	Providing the definition of commonly used words is not part of the scope of the review.
CCSC A-80	Complaints	Request for video monitoring for areas with repeated complaints.	Video recording is not required by the CSD; however, the County can require additional monitoring methodologies if deemed warranted.
CCSC A-81	Periodic Review	Request to define certain terms and document edits.	Providing the definition of commonly used words and wordsmithing text are not part of the scope for comments on the Periodic Review.
CCSC A-82	Periodic Review	Document wordsmithing edits.	Wordsmithing text is not part of the scope for comments on the Periodic Review.
CCSC A-83	Scoping Comments	Request for information on produced water injection data.	Information requested is outside the scope of the Periodic Review, referenced data is CalGEM (DOGGR) jurisdiction.

Comment #	Issue Area	Brief Description	Response
CCSC A-84	Scoping Comments	Clarification on scoping comment regarding prohibiting certain 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 IOF since June 2014 and well stimulation as defined under SB4 is not occurring at the IOF.
CCSC A-85	Scoping Comments	Clarification on scoping comment on submersible pumps and downhole safety valves.	As of May 2019, 113 well pumps out of the total of 442 producing wells (25.6%) are using submersible pump technology. Downhole safety valves are under the jurisdiction of CalGEM (DOGGR).
CCSC B-1	Emergency Response	Request for CAN test notification and for global recipient CAN test.	As discussed at recent CAP meetings, the County notified the operator to improve and update the CAN system test list, and that process is underway.
CCSC B-2	Agency Compliance Records	Request that SCAQMD and RWQCB compliance records be included and discussed.	The referenced regulatory agency record research results were omitted from the document due to an editing error and the document has been revised. Please see Section 4.2, Air Quality and Public Health, and Section 4.17, Stormwater Drainage Management.
CCSC B-3	Bio Farms	Bio Farms are not permitted and therefore should be removed from the CSD.	The SCAQMD Rule 1166 permit referenced in the comment does not allow for treatment of contaminated soils with a VOC content greater than 50 ppmv. The Bio Farm operation at the IOF only treats soils with less than 50 ppmv VOC, any soil encountered with a VOC content greater than 50 ppmv VOC is left in place for later remediation consistent with SCAQMD direction. There is no other AQMD or air permit that is used or required by AQMD for the Bio Farm activity. Operation of the Bio Farm is also permitted by the RWQCB and require quarterly reports to that agency. The Bio Farm operations are in compliance with the RWQCB permit.

Comment #	Issue Area	Brief Description	Response
CCSC B-4	Ground Movement	Request that the ground movement surveys should occur quarterly or semi-annually and include areas outside the IOF boundaries.	The ground movement surveys are completed pursuant to CSD requirements. Reports are prepared in collaboration with a California-registered professional petroleum engineer, registered geotechnical engineer, and certified engineering geologist. The results of the annual monitoring survey and analysis are reviewed by CalGEM (DOGGR) and the Director of Public Works. Neither the County nor CalGEM have determined that a change in survey frequency is warranted at this time.
CCSC B-5	Drilling	Request for bottom hole locations that occur outside the surface area of the Culver City portion of the IOF.	Information requested is outside the scope of the Periodic Review. Requested information is available on the CalGEM (DOGGR) web site.
CCSC B-6	Ground Movement	Surveys are not accurate with respect to cause of ground movement.	See response to CCSC B-4 above and note both the County and CalGEM (DOGGR) have not determined a definitive cause of any ground movement in the Baldwin Hills area.
CCSC B-7	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 and the applicable Periodic Review recommendation.
CCSC B-8	Storm Water	The Dabney-Lloyd retention basin is not adequate.	The Dabney-Lloyd basin is adequate as required by the CSD as documented in the Retention Basin Study completed pursuant to CSD 22.310.120.C. Basin capacity is maintained by annual brush and material removal as observed and documented by the County ECC. The IOF does not have uncontrolled releases of stormwater; stormwater is released in a controlled manner and water quality tests have been completed per RWQCB requirements.

Comment #	Issue Area	Brief Description	Response
CCSC B-9	Emergency Response	Request that the unannounced drills provided for in CSD Provision 22.310.060.D be completed.	Annual and unannounced drills by County Fire are provided for in CSD Provision 22.310.060.D. This issue was noted in the first Periodic Review document; see applicable Periodic Review recommendation.
CCSC B-10	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.
CCSC B-11	CAP	CAP, guidelines, management and membership.	Guidelines for the CAP were created and approved by the CAP in June 2009. See Periodic Review discussion for Provision 22.310.100.A.
CCSC B-12	IOF Operations Project Life	Request to halt drilling and phase out oil operations.	See group response GRP-2.
CCSC B-13	Noise	Request for clarification on noise monitoring sites.	Seven noise monitoring sites were utilized in preparation of the Baldwin Hills CSD EIR, and the Settlement Agreement notes that four additional noise monitoring sites were subsequently determined by the County, a noise expert, and the operator.
CCSC B-14	Health Assessment	Request the County fund the current health study and set aside funding for future 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.
CCSC B-15	Typographical Error	Incorrect operator references.	References have been corrected.
RAIN B-1	Landscaping	Comment in support of the operator's landscaping and fire fuel management efforts (dead tree and brush removal) and cooperation on the same with the residents of the Raintree Condos Homeowners Association.	Comment in support of the operator acknowledged.
RAIN B-2	Public Outreach	Comment in support of the operator's efforts at CAP meetings to address the needs of the public.	Comment in support of the operator acknowledged.
RAIN B-3	Air Quality/Odors	Comment in support of the operator's efforts to address odor issues near the Raintree Condos.	Comment in support of the operator acknowledged.
PMOF-1	Setbacks	Recommending a setback/buffer zone of several thousand feet.	See group response GRP-1.
PMOF-2	Oilfield Project Life	Question on if CSD expires in 2030 and the County's plans for the shutdown of the oilfield.	See group response GRP-2.

Comment #	Issue Area	Brief Description	Response
RAIN C-1	Setbacks	Comment is a resolution passed by the Raintree Condos Homeowners Association representing 354 households recommending a 2,500-foot setback/buffer zone.	See group response GRP-1. The County acknowledges the comment represents 354 residents.
RAIN C-2	Setbacks	Comment is a list of cards recommending a 2,500-foot setback/buffer zone signed by 43 residents.	See group response GRP-1. The County acknowledges the comment represents 43 residents.
NAT-1	Maintenance Painting	Request for clarification on the maintenance of painted/coated equipment at the oilfield.	Information has been added to Section 22.310.
NAT-2	SoCal Gas Co. Equipment Maintenance	Request for detail on the maintenance of SoCal Gas Co. equipment maintenance.	Information requested is outside the scope of the Periodic Review.