Comments Received on the Notice of Preparation of an Environmental Impact Report for an Oil Production Project proposed by E& B Natural Resources Management Corp.

August 21, 2013

Originals on file at:
City of Hermosa Beach
Community Development Department
1315 Valley Drive, Hermosa Beach, CA 90254
Monday-Thursday, 7:00 a.m. to 6:00 p.m.
(310) 318-0242
Ken Robertson, Director
krobertson@hermosabch.org

Agencies and Utilities

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

Notice of Preparation

RECEIVED
JUL 15 2013
COMMUNITY DEV. DEPT.

July 11, 2013

To: Reviewing Agencies

Re: E & B Oil Development Project
SCH# 2013071038

Attached for your review and comment is the Notice of Preparation (NOP) for the E & B Oil Development Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Ken Robertson
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2013071038
Project Title E & B Oil Development Project
Lead Agency Hermosa Beach, City of

Type NOP Notice of Preparation

Description As proposed, the fully developed Project would consist of 30 production wells, four injection wells, liquid and gas separating equipment, a gas processing unit and other processing equipment, storage tanks, and off-site oil and gas pipelines. The Project would be developed in four phases, Phase 1, Site Preparation; Phase 2, Drilling and Testing; Phase 3, Final Design and Construction; and Phase 4, Development and Operations.

Lead Agency Contact

Name Ken Robertson
Agency City of Hermosa Beach
Phone (310) 318-0242 **Fax**
email
Address 1315 Valley Drive
City Hermosa Beach **State** CA **Zip** 90254

Project Location

County Los Angeles
City Hermosa Beach
Region
Cross Streets Valley Drive and 6th Street, and Valley and 11th Place (Public Works Facility, (PWF))
Lat / Long 33° 51' 32.10" N / 118° 23' 41.09" W
Parcel No. 4187-031-900, 4187-020-907-904
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 1
Airports
Railways
Waterways Pacific Ocean
Schools Hermosa Valley ES
Land Use Light Manufacturing

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Landuse; Cumulative Effects

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Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board, Major Industrial Projects; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Date Received 07/11/2013 **Start of Review** 07/11/2013 **End of Review** 08/09/2013

NOP Distribution List

County: Los Angeles

SCH# 2013071038

Resources Agency

- [x] **Resources Agency**
  Nadell Gayou
- [ ] **Dept. of Boating & Waterways**
  Nicole Wong
- [x] **California Coastal Commission**
  Elizabeth A. Fuchs
- [ ] **Colorado River Board**
  Gerald R. Zimmerman
- [x] **Dept. of Conservation**
  Elizabeth Carpenter
- [ ] **California Energy Commission**
  Eric Knight
- [ ] **Cal Fire**
  Dan Foster
- [ ] **Central Valley Flood Protection Board**
  James Herota
- [x] **Office of Historic Preservation**
  Ron Parsons
- [x] **Dept of Parks & Recreation**
  Environmental Stewardship Section
- [x] **California Department of Resources, Recycling & Recovery**
  Sue O'Leary
- [ ] **S.F. Bay Conservation & Dev't. Comm.**
  Steve McAdam
- [ ] **Dept. of Water Resources** Resources Agency
  Nadell Gayou

Fish and Game

- [ ] **Depart. of Fish & Wildlife**
  Scott Flint
  Environmental Services Division
- [ ] **Fish & Wildlife Region 1**
  Donald Koch
- [ ] **Fish & Wildlife Region 1E**
  Laurie Harnsberger
- [ ] **Fish & Wildlife Region 2**
  Jeff Drongesen
- [ ] **Fish & Wildlife Region 3**
  Charles Armor
- [ ] **Fish & Wildlife Region 4**
  Julie Vance
- [x] **Fish & Wildlife Region 5**
  Leslie Newton-Reed
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6**
  Gabrina Gatchel
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6 I/M**
  Heidi Sickler
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Wildlife M**
  George Isaac
  Marine Region

Other Departments

- [ ] **Food & Agriculture**
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] **Depart. of General Services**
  Public School Construction
- [ ] **Dept. of General Services**
  Anna Garbeff
  Environmental Services Section
- [ ] **Dept. of Public Health**
  Jeffery Worth
  Dept. of Health/Drinking Water
- [ ] **Delta Stewardship Council**
  Kevan Samsam

Independent Commissions,Boards

- [ ] **Delta Protection Commission**
  Michael Machado
- [ ] **Cal EMA (Emergency Management Agency)**
  Dennis Castrillo
- [x] **Native American Heritage Comm.**
  Debbie Treadway
- [ ] **Public Utilities Commission**
  Leo Wong
- [ ] **Santa Monica Bay Restoration**
  Guangyu Wang
- [x] **State Lands Commission**
  Jennifer Deleong
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Business, Trans & Housing

- [ ] **Caltrans - Division of Aeronautics**
  Philip Crimmins
- [ ] **Caltrans - Planning**
  Terri Pencovic
- [x] **California Highway Patrol**
  Suzann Ikeuchi
  Office of Special Projects
- [ ] **Housing & Community Development**
  CEQA Coordinator
  Housing Policy Division

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Rex Jackman
- [ ] **Caltrans, District 2**
  Marcelino Gonzalez
- [ ] **Caltrans, District 3**
  Gary Arnold
- [ ] **Caltrans, District 4**
  Erik Alm
- [ ] **Caltrans, District 5**
  David Murray
- [ ] **Caltrans, District 6**
  Michael Navarro
- [x] **Caltrans, District 7**
  Dianna Watson
- [ ] **Caltrans, District 8**
  Dan Kopulsky
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [ ] **Caltrans, District 11**
  Jacob Armstrong
- [ ] **Caltrans, District 12**
  Marlon Regisford

Cal EPA

Air Resources Board

- [ ] Airport/Energy Projects
  Jim Lerner
- [ ] Transportation Projects
  Douglas Ito
- [x] Industrial Projects
  Mike Tollstrup
- [ ] **State Water Resources Control Board**
  Regional Programs Unit
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Phil Crader
  Division of Water Rights
- [x] **Dept. of Toxic Substances Control**
  CEQA Tracking Center
- [ ] **Department of Pesticide Regulation**
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [x] **RWQCB 4**
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
- [ ] **RWQCB 5F**
  Central Valley Region (5)
  Fresno Branch Office
- [ ] **RWQCB 5R**
  Central Valley Region (5)
  Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
- [ ] **RWQCB 6V**
  Lahontan Region (6)
  Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [ ] **RWQCB 9**
  San Diego Region (9)

- [ ] **Other** _____

_____

_____

- [ ] _____
  Conservancy

Last Updated 07/09/2013

NOTICE OF COMPLETION & ENVIRONMENTAL DOCUMENT TRANSMITTAL

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2013071038

Project Title: E & B Oil Development Project

Lead Agency: City of Hermosa Beach — Contact Person: Ken Robertson
Mailing Address: 1315 Valley Drive — Phone: 310-318-0242
City: Hermosa Beach — Zip: 90254 — County: Los Angeles

Project Location: County: Los Angeles — City Nearest Community: Hermosa Beach
Cross Streets: Valley Drive and 6th Street, and Valley and 11th Place (Public Works Facility, (PWF)) — Zip Code: 90602
Longitude/Latitude (degrees, minutes and seconds): 33 51 32.10 N 118 23 41.09 W — Total Acres: 1.3 and 1.25 acres (PWF)
Assessor's Parcel No.: 4187-031-900, 4187-020-907-904 — Section: — Twp.: — Range: — Base:
Within 2 Miles: State Hwy #: 1 — Waterways: Pacific Ocean
Airports: — Railways: — Schools: Hermosa Valley Elemen.

Document Type:

CEQA: [X] NOP [ ] Early Cons [ ] Neg Dec [ ] Mit Neg Dec [ ] Draft EIR [ ] Supplement/Subsequent EIR (Prior SCH No.) [ ] Other
NEPA: [ ] NOI [ ] EA [ ] Draft EIS
Other: [ ] Joint Document [ ] Final Document [ ] Other

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Local Action Type:

[ ] General Plan Update [X] General Plan Amendment [ ] General Plan Element [ ] Community Plan
[ ] Specific Plan [ ] Master Plan [ ] Planned Unit Development [X] Site Plan
[X] Rezone [ ] Prezone [ ] Use Permit [ ] Land Division (Subdivision, etc.)
[ ] Annexation [ ] Redevelopment [ ] Coastal Permit [X] Other: Coastal Plan Amdt, Dev. Agreement, other municipal code amendments

Development Type:

[ ] Residential Units ____ Acres ____
[ ] Office Sq ft ____ Acres ____ Employees ____
[ ] Commercial Sq ft ____ Acres ____ Employees ____
[X] Industrial Sq ft ____ Acres ____ Employees ____
[ ] Educational
[ ] Recreational
[ ] Water Facilities: Type ____ MGD ____
[ ] Transportation Type
[X] Mining Mineral: Oil and Gas
[ ] Power Type ____ MW ____
[ ] Waste Treatment: Type ____ MGD ____
[ ] Hazardous Waste: Type
[ ] Other

Project Issues Discussed in Document:

[X] Aesthetic/Visual
[ ] Agricultural Land
[X] Air Quality
[X] Archeological/Historical
[X] Biological Resources
[X] Coastal Zone
[ ] Drainage/Absorption
[ ] Economic/Jobs
[ ] Fiscal
[X] Flood Plain/Flooding
[X] Forest Land/Fire Hazard
[X] Geologic/Seismic
[X] Minerals
[X] Noise
[X] Population/Housing Balance
[X] Public Services/Facilities
[X] Recreation/Parks
[ ] Schools/Universities
[ ] Septic Systems
[ ] Sewer Capacity
[X] Soil Erosion/Compaction/Grading
[X] Solid Waste
[X] Toxic/Hazardous
[X] Traffic/Circulation
[X] Vegetation
[X] Water Quality
[X] Water Supply/Groundwater
[ ] Wetland/Riparian
[ ] Growth Inducement
[X] Land Use
[X] Cumulative Effects
[ ] Other

Present Land Use/Zoning/General Plan Designation:
Light Manufacturing

Project Description: *(please use a separate page if necessary)*
See Attached

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2008

STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., *GOVERNOR*

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200
FAX (415) 904-5400

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AUG 14 2013
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August 12, 2013

Ken Robertson
City of Hermosa Beach
Community Development Director
1315 Valley Drive
Hermosa Beach, California 90254

Re: **Comments on Notice of Preparation of a Draft Environmental Impact Report for the E&B Oil Development Project**

Dear Mr. Robertson:

Thank you for the opportunity to provide input on the City of Hermosa Beach's ("City") preparation of an Environmental Impact Report ("EIR") for the E&B Oil Development Project in the City of Hermosa Beach. The project applicant, E&B Natural Resources Management Corporation ("E&B"), proposes to use the City's existing 1.3-acre Maintenance Yard as an onshore drilling and production site to directionally drill into the uplands and tidelands of the Torrance Oil Field ("Oil Project"). A fully developed Oil Project would consist of 30 production wells, four injection wells, liquid and gas separating equipment, a gas processing unit, other processing equipment, and storage tanks all located within a 1.3-acre site at 555 6th Street that is currently used by the City as its Maintenance Yard. The project would also require construction of about four total miles of offsite oil and gas pipelines within Hermosa Beach, Redondo Beach and Torrance and would require the City to relocate its Maintenance Yard. The City proposes to relocate the Maintenance Yard to City-owned property adjacent to and south of City Hall that is currently developed with a self-storage building.

The drilling and production site, a portion of the proposed pipelines, and the proposed site to relocate the City Maintenance Yard are all located within the coastal zone of the City. Although the City has a Coastal Land Use Plan ("LUP") certified by the Coastal Commission, it does not have a certified Coastal Implementation Plan. Accordingly, the City does not have a fully certified Local Coastal Program ("LCP") and therefore all required coastal development permits ("CDP") required by the Oil Project and relocation of the City Maintenance Yard must be obtained from the Coastal Commission. The standard of review that the Commission will use to evaluate these CDPs is the policies in Chapter 3 of the Coastal Act, with the City's LUP used as guidance.

The City's LUP currently designates the proposed Oil Project site as Open Space and does not allow for oil and gas development. The LUP lacks either energy or industrial land use designations that would typically be applied to a site considered for oil and gas production and development, and contains no policies to guide such development. As part of this overall project, the City must amendment its LUP to change the land use designation of the proposed

General:

1. For all issue areas, please include in the EIR all relevant Coastal Act and LUP policies, an analysis of the project's conformity with the identified policies, and any identification of mitigation measures necessary to bring the project into conformity with the Coastal Act and LUP.

2. The list of potential actions required by the Coastal Commission in Tables 5.1 and 5.2 is incomplete. Please make sure the EIR also identifies that amendments to existing CDPs, such as CDP 5-84-236, may be required, and that Commission approval of the Development Agreement is necessary.

3. Table 5.1 should be amended to include the requirement for a Coastal Development Permit from the City of Redondo Beach for installation of pipelines within the Coastal Zone.

Oil and Gas Development:

4. As discussed in the NOP, the EIR will evaluate an amendment to the LUP that includes the addition of specific policies and standards to govern oil and gas recovery. We urge that the EIR, as part of the LUP amendment analysis and recommendation, consider, as a starting point and model, the relevant oil and gas drilling, exploration, development, transportation and abandonment policies and standards contained in Santa Barbara County's certified LCP.

5. Please evaluate the adequacy of the applicant's oil spill prevention and response plan.

6. Please address if "fracking" is anticipated or planned during drilling. If it is, please evaluate the potential environmental impacts of "fracking."

7. E&B proposes to install as part of the production phase equipment to remove hydrogen sulfide from oil and gas stream. The potential for hydrogen sulfide is a significant project hazard. Please address in the EIR what is known currently about the potential for hydrogen sulfide to be produced here, the potential range of hydrogen sulfide concentrations and the processes and equipment the applicant proposes to measure and treat gas containing high concentrations of hydrogen sulfide. When will these processes be implemented? If the applicant is not proposing to implement them until Phase 4 (Development and Operations), how will produced gas with high concentrations of hydrogen sulfide be addressed during Phase 2 (Drilling and Testing)? Does the local air district or other authorities have rules or requirements limiting the amount of hydrogen sulfide that can be produced onsite and transported via pipeline? Please evaluate the adequacy of E&B's proposed method to address hydrogen sulfide and propose mitigation measures to avoid or at least minimize the hazard.

8. As part of the hazards analysis, please provide detailed mapping of utilities located on the subject project properties and utilities that traverse the pipeline routes. We also request

Other Coastal Impacts:

12. Please analyze the extent of noise impacts, if any, on coastal recreation, including the beach and the adjacent Hermosa Valley Greenbelt, sensitive habitats and species. The noise analysis should identify all sensitive receptors and evaluate peak noise and nighttime noise for the different phases of the project.

13. As part of the visual analysis for both the proposed drill and production site and the relocated City Maintenance Yard site, consider installing on site representative "story poles" to help inform the public and decision-makers as to potential changes in the local viewshed.

14. Please evaluate any potential impacts to birds or other sensitive species due to night lighting.

As described above, the overall project is procedurally and technically complex. We greatly appreciate the outreach, regular updates and other communications between the City and Coastal Commission staff as project details develop and the EIR commences. We look forward to working closely with the City as it prepares a Draft EIR. Please do not hesitate to call either Kate Huckelbridge at 415-396-9708 or me at 415-904-5205 if we can be of assistance at any phase of the environmental review process and during the City's preparation of the amendment to its LUP.

Sincerely,

Alison Dettmer

ALISON DETTMER
Deputy Director

State of California

California State Lands Commission

MEMORANDUM

To: Mark LeClair
MRMD

Date: August 9, 2013

From: Cynthia Herzog
Staff Environmental Scientist
DEPM

Ref: SCH# 2013071038

cc: Eric Gillies
Assistant Chief
DEPM

Subject: **City of Hermosa Beach E & B Oil Development Project (Project), Notice of Preparation (NOP)**

DEPM has prepared the following comments on the above-mentioned Project's NOP.

Project Description

1. Although mentioned in the NOP's Introduction, Section 2.1 "Project Overview" should also reiterate that directional drilling would access oil and gas reserves in both the tidelands (offshore) and the uplands (onshore) within the Torrance Oil Field to facilitate a clearer understanding of the Project components and aid in reader comprehension.

Project Permits

2. Table 5.1 of the NOP (Page 57), indicates that a lease agreement would be required from the CSLC. Because the proposed Project would be located on uplands and sovereign submerged lands that have been transferred, in trust, to the city of Hermosa Beach (Statue of 1919, Chapter 479), no CSLC authorization would be required. However, the CSLC would act as a trustee agency because of its trust responsibility for projects that could directly or indirectly affect sovereign lands, their accompanying Public Trust resources or uses, and the public easement in navigable waters.

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DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-0219
FAX: (213) 897-1337

Flex your power!
Be energy efficient!

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AUG 13 2013
COMMUNITY DEV. DEPT.

August 9, 2013

Mr. Ken Robertson
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

IGR/CEQA No. 130712/NOP
E & B Oil Development Project
Vic. SR-1 PM 20.951 to 33.717
SCH#2013071015

Dear Mr. Robertson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed E & B Oil Development Project. The project site is located at 555 6th Street in the southern portion of the City of Hermosa Beach.

The project when fully developed will consist of 30 production wells, four injection wells, liquid and gas separating equipment, a gas processing unit and other processing equipment, storage tanks, and off-site oil and gas pipelines.

To assist in evaluating the impacts on State transportation facilities, a traffic study should be prepared, using the Highway Capacity Manual (HCM) methodology, prior to preparing the Draft Environmental Impact Report (DEIR). Please refer the traffic consultant to the Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

When preparing the traffic study please include the following:

- Exhibits showing proposed project generated traffic routes, trip distribution for this project and other projects. Exhibits to show volumes/road geometric/measure of effectiveness (LOS)
- Proposed specific mitigation measures for analyzed State facilities.
- An analysis of all major intersections/ramps/freeways in the project vicinity.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of

storm water run-off is not permitted onto State highways facilities without any storm water management plan.

An Encroachment Permit from the Department of Transportation (Caltrans) may be needed for this project. Any encroachment into, on or over State right-of-way will need a Caltrans Encroachment Permit.

For information regarding the Encroachment Permit application process, please contact Caltrans Office of Permits at (213) 897-3631 or visit the website at:

http://www.dot.ca.gov/hq/traffops/developserv/permits/

Transportation of heavy construction equipment and/or materials, which require the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods. In addition, a truck/traffic construction management plan is needed for this project.

If you have any questions regarding these comments, please contact Zeron Jefferson, Project Coordinator at (213) 897-0219. Please refer to IGR #130712/ZJ.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

STATE OF CALIFORNIA Edmund G. Brown, Jr., *Govemor*

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

RECEIVED
JUL 23 2013
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July 22, 2013

Mr. Ken Robertson, Director
City of Hermosa Beach
Community Development Department
1315 Valley Drive
Hermosa Beach, CA 90254

RE: SCH# 2013071038; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the "**E&B Oil Development Project;**" located in the City of Hermosa Beach; Los Angeles County, California

Dear Mr. Robertson:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to

the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst
(916) 653-6251

CC: State Clearinghouse

Attachment: Native American Contacts list

Native American Contacts
Los Angeles County
July 22, 2013

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3094 Mace Avenue, Apt. B Gabrielino
Costa Mesa, , CA 92626
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva
,
tattnlaw@gmail.com
310-570-6567

Gabrielino-Tongva Tribe
Bernie Acuna, Co-Chairperson
P.O. Box 180 Gabrielino
Bonsall , CA 92003
(619) 294-6660-work
(310) 428-5690 - cell
(760) 636-0854- FAX
bacuna1@gabrielinotribe.org

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
P.O. Box 180 Gabrielino
Bonsall , CA 92003
palmsprings9@yahoo.com
626-676-1184- cell
(760) 636-0854 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013071038; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the E & B Oil Development Project; located in the City of Hermosa Beach; Los Angeles County, California.

Native American Contacts
Los Angeles County
July 22, 2013

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina , CA 91723
gabrielenoindians@yahoo.
(626) 926-4131

Gabrielino-Tongva Tribe
Conrad Acuna,
P.O. Box 180 Gabrielino
Bonsall , CA 92003

760-636-0854 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed **SCH#2013071038; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the E & B Oil Development Project; located in the City of Hermosa Beach; Los Angeles County, California.**

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

August 1, 2013

Mr. Ken Robertson
City of Hermosa Beach
City Community Development Department
1315 Valley Drive
Hermosa Beach, CA 90254

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Notice of Preparation of a CEQA Document for the
E&B Oil Development Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: http://www.aqmd.gov/ceqa/handbook/signthres.pdf. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore,

when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide.html.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (http://www.aqmd.gov).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at imacmillan@aqmd.gov or call me at (909) 396-3244.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

LAC130717-02
Control Number

OIL, GAS & GEOTHERMAL

DEPARTMENT OF CONSERVATION

DIVISION OF OIL, GAS AND GEOTHERMAL RESOURCES

5816 Corporate Avenue • Suite 200 • CYPRESS, CALIFORNIA, 90630-4731

PHONE 714 / 816-6847 • **FAX** 714 / 816-6853 • **WEBSITE** conservation.ca.gov

August 2, 2013

RECEIVED
AUG 05 2013
COMMUNITY DEV. DEPT.

Mr. Ken Robertson
Community Development Director
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

Dear Mr. Robertson:

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE E & B OIL DEVELOPMENT PROJECT, HERMOSA BEACH, LOS ANGELES COUNTY, CA

The Department of Conservation's Division of Oil, Gas, and Geothermal Resources (Division), Cypress office, has reviewed the above referenced project. Our comments are as follows.

Your proposed project is located within the administrative boundaries of the Torrance Oil Field and Orange County. There is one abandoned well that is adjacent to the proposed project location at 555 6th Street, Hermosa Beach. Well "Stinnett" 1 (037-16902) is mapped 100 feet north and 155 feet east of the northeast corner of Cypress Avenue and 6th Street, which would place it about 100 feet west of the western project boundary. This well is located on Division map 126 and in Division records. There are no wells mapped within a quarter mile of the project location at 552 11th Place, Hermosa Beach.

The Division is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and plugging and abandonment of wells for the purpose of preventing: (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor (Supervisor) the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable methods for the purpose of increasing the ultimate recovery of oil and gas.

The scope and content of information that is germane to the Division's responsibility are contained in Section 3000 et seq. of the Public Resources Code (PRC), and

administrative regulations under Title 14, Division 2, Chapter 4 of the California Code of Regulations.

If any structure is to be located over or in the proximity of a previously plugged and abandoned well, the well may need to be plugged to current Division specifications. Section 3208.1 of the Public Resources Code (PRC) authorizes the State Oil and Gas Supervisor (Supervisor) to order the reabandonment of any previously plugged and abandoned well when construction of any structure over or in the proximity of the well could result in a hazard.

An operator must have a bond on file with the Division before certain well operations are allowed to begin. The purpose of the bond is to secure the state against all losses, charges, and expenses incurred by it to obtain such compliance by the principal named in the bond. The operator must also designate an agent, residing in the state, to receive and accept service of all orders, notices, and processes of the Supervisor or any court of law.

Written approval from the Supervisor is required prior to changing the physical condition of any well. The operator's notice of intent (notice) to perform any well operation is reviewed on engineering and geological basis. For new wells and the altering of existing wells, approval of the proposal depends primarily on the following: protecting all subsurface hydrocarbons and fresh waters; protection of the environment; using adequate blowout prevention equipment; and utilizing approved drilling and cementing techniques.

The Division must be notified to witness or inspect all operations specified in the approval of any notice. This includes tests and inspections of blowout-prevention equipment, reservoir and freshwater protection measures, and well-plugging operations.

The Division recommends that adequate safety measures be taken by the project manager to prevent people from gaining unauthorized access to oilfield equipment. Safety shut-down devices on wells and other oilfield equipment must be considered when appropriate.

If any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's Cypress district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

Sincerely,

Kathleen M. Andrews

Kathleen M. Andrews
Associate Oil & Gas Engineer - Facilities

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

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DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

August 5, 2013

Mr. Ken Robertson, Director
Community Development Department
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

Dear Mr. Robertson:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, PUBLIC REVIEW PERIOD AND PUBLIC SCOPING MEETING, "E & B OIL DEVELOPMENT PROJECT" THE DEVELOPMENT OF AN ONSHORE DRILLING AND PRODUCTION FACILITY, 555 6TH STREET AND 552 11TH PLACE, HERMOSA BEACH (FFER #201300103)

The Notice of Preparation of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. The subject property is entirely within the City of Hermosa Beach, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have an impact on the emergency responsibilities of this Department.

LAND DEVELOPMENT UNIT:

1. The Land Development Unit has no comments for the proposed project. The project is not within the jurisdiction of the County of Los Angeles Fire Department.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Draft Environmental Impact Report.

HEALTH HAZARDOUS MATERIALS DIVISION:

The following should be discussed in detail in the Environmental Impact Report (EIR):

1. The hazardous material types and quantities to be stored or used at the facility.
2. Required permits from the Los Angeles County Certified Unified Program Agency (CUPA) and other appropriate agencies.
3. Hazardous materials inventory submittal to CUPA.
4. Hazardous materials management and emergency response plan.
5. Oversight agency for remediation of onsite soil and groundwater contamination.
6. Furthermore, include CUPA in the table of the local agencies and if storing natural gas over 10,000 pounds, a Risk Management Plan must be prepared and submitted to the CUPA.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

Frank Vidales

FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:ij

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON CHAN
Chief Engineer and General Manager

July 31, 2013

Ref File No.: 2671005

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AUG 05 2013
COMMUNITY DEV. DEPT.

Mr. Ken Robertson
Community Development Director
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

Dear Mr. Robertson:

E & B Oil Development Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on July 15, 2013. The proposed development is located within the jurisdictional boundaries of the South Bay Cities Sanitation District. We offer the following comments regarding sewerage service:

1. The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specification that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Mr. Jon Ganz of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

2. The proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at extension 2900, in order to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to http://www.lacsd.org/wastewater/industrial_waste/permit.asp.

3. The wastewater flow originating from the proposed Oil Development project site will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' South Bay Cities Main Trunk Sewer, located in Valley Drive north of 2nd Street. This 23.5–inch diameter lined trunk sewer has a design capacity of 6.2 million gallons per day (mgd) and conveyed a peak flow of 2.3 mgd when last measured in 2010. The wastewater flow originating from the proposed relocation project site will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' South Bay Cities Main Trunk Sewer, located in Palm Drive south of 19th Street. This 27–inch diameter trunk sewer has a design capacity of 6.6 mgd and conveyed a peak flow of 2.9 mgd when last measured in 2010.

Recycled Paper

4. The wastewater generated by the entire proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 265.3 mgd.

5. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

6. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

7. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Chan

Adriana R

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: L. Shadler
J. Ganz

DOC: #2683172.DSBC

redondo BEACH

Community Development Department

415 Diamond Street, P.O. Box 270
Redondo Beach, California 90277-0270
www.redondo.org

tel 310 318-0637
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AUG 05 2013
COMMUNITY DEV. DEPT.

July 27, 2013

Ken Robertson, Community Development Director
City of Hermosa Beach 1315 Valley Drive
Hermosa Beach, CA 90254

RE: E & B Oil and Gas Development Project- Comments on Scope and Content of Environmental Review

Dear Mr. Robertson:

The City of Redondo Beach as a Responsible Agency is pleased to have the opportunity to comment on the scope and content of the Environmental Impact Report (EIR) being prepared for the E & B Oil and Gas Development Project. We also look forward to working with you and the applicant to ensure that all necessary entitlements and approvals are obtained from the City of Redondo Beach and that all necessary mitigation measures are developed and implemented.

The following are preliminary comments as to the scope and content of the EIR and should not be considered a complete or exhaustive list of the issues that must be addressed in association with this project.

Traffic Transportation and Circulation

During all Phases of the project and particularly Phases 1-3 heavy truck traffic will significantly impact local streets and intersections. Given that 190th Street is not a designated truck route due to the significant grade, heavy trucks will be required to use either Torrance Boulevard or Artesia Boulevard, and will be required to travel on Pacific Coast Highway to access these streets.

The Engineering Services Division provides the following comments and requests for analysis.

A) **Must obtain 24 hour counts for the following roadway segments for inclusion in the EIR:**

Roadway Segments

1. Anita Street, Prospect Avenue to Flagler Lane
2. 190th Street, Flagler Lane to Blossom Lane – N. Beryl Street

3. 190th Street, Blossom Lane – N. Beryl Street to Meyer Lane – Entradero Avenue
4. 190th Street, Meyer Lane – Entradero Avenue to Anza Avenue
5. 190th Street, Anza Avenue to Inglewood Avenue
6. 190th Street, Inglewood Avenue to Firmona Avenue
7. 190th Street, Firmona Avenue to Hawthorne Boulevard (SR 107)
8. 190th Street, Hawthorne Boulevard (SR 107) to Prairie Avenue
9. Aviation Boulevard, Harper Ave to Artesia Boulevard
10. Aviation Boulevard, Artesia Boulevard to Manhattan Beach Blvd
11. Aviation Boulevard, Manhattan Beach Blvd to Marine Avenue
12. Artesia Boulevard, Ford Avenue to Aviation Boulevard
13. Artesia Boulevard, Aviation Boulevard to Inglewood Avenue
14. Artesia Boulevard, Inglewood Avenue to Hawthorne Boulevard
    Aviation Boulevard and Artesia Boulevard included for study as truck hauling route has not been determined.

B) **Must obtain A.M. and P.M. peak hour turning movement counts at the following Intersections to determine Level of Service impacts**:

1. Herondo Street/North Francisca Avenue-Valley Drive
2. Pacific Coast Highway/Herondo-190th Street
3. 190th Street/Prospect Avenue
4. Flagler Lane/Anita Street – 190th Street
5. Blossom Lane – N. Beryl Street/190th Street
6. Meyer Lane – Entradero Avenue/190th Street
7. Anza Avenue/190th Street
8. Inglewood Avenue/190th Street
9. Firmona Avenue/190th Street
10. Hawthorne Boulevard (SR 107)/190th Street
11. Artesia Boulevard/Ford Avenue
12. Artesia Boulevard/Aviation Boulevard
13. Artesia Boulevard/Inglewood Avenue
14. Artesia Boulevard/Kingsdale Avenue
15. Artesia Boulevard/Hawthorne Boulevard
16. Aviation Boulevard/Ford Avenue
17. Aviation Boulevard/Grant Avenue
18. Aviation Boulevard/Robinson Street-2nd Street
19. Aviation Boulevard/Manhattan Beach Blvd
20. Aviation Boulevard/Marine Avenue
21. Inglewood Avenue/Manhattan Beach Blvd.
22. Inglewood Avenue/Marine Avenue

The intersections were chosen based upon impacts during construction of pipeline along 190th Street; or due to possible impacts to intersections along Aviation Boulevard, Artesia Boulevard, Inglewood Avenue being used a truck route for hauling of petroleum products.

Redondo Beach will not accept traffic counts for an EIR study unless the counts are taken during a normal K-12 school day/week.

The traffic study requirements and thresholds of significance for the City of Redondo Beach are as follows:

A project requires mitigation if a significant increase results from the proposed project. Illegal dwellings or other conditions that exist in violation of the City's zoning ordinance or its local coastal program and are subject to the City's power of abatement may not be accounted for in the as-built condition for the purpose of determining a significant increase.

A significant increase results if the project:

1) produces more than 150 additional morning or evening peak hour trips; or,

2) equals or exceeds the following Level of Service Thresholds;

Intersection LOS Under Current Conditions	Change in Volume to Capacity (Future w/Project less Future w/o Project)
A	----
B	----
C	0.040
D	0.020
E	0.010
F	0.010

or,

3) density increase generated by the project produces more than 25 additional residential units or produces more than 40,000 additional square feet of residential, office or other nonresidential floor area; or,

4) proposed change in allowable land use would change nonresidential use to residential or a mixed use resulting in a density of greater than 8.8 dwelling units per acre.

ICU and LOS impact analysis shall be provided for critical intersections within 3,000 feet of any parcel (unless determined otherwise by the City's Engineering Services Division).

Baseline and projected ICU and LOS analysis shall consider weekday morning and afternoon peak hour conditions at such time of the year when local public schools are in session.

The signalized intersections shall use the Intersection Capacity Utilization 2003 methodology and the Highway Capacity Manual methodology for nonsignalized intersections.

The traffic analysis shall adequately disclose the direct, the indirect or secondary, and the cumulative impacts of the project, accounting for all relevant factors, such as heavy vehicle traffic, bus stop, intersection and corridor over saturation (downstream traffic queuing impacts), pedestrian traffic, side street and driveway entrances and exits, ingress stacking and overflowing, and left turn lane queuing and overflow. The traffic analysis also shall identify the mitigations necessary or recommended to reduce the traffic impacts to an ICU below 0.80 or a LOS better than "D" for the corridors and intersections subject to this analysis. The location, nature and adverse construction-phase impacts of the traffic impact mitigations shall be clearly described.

Lane capacities shall not exceed 1600 vehicles per lane per hour.

Ambient growth rate shall be 1.6% per year as obtained from the Southern California Association of Governments (SCAG) Integrated Growth Forecast for the City of Redondo Beach from the 2008 Regional Transportation Plan (RTP) and included in the Redondo Beach Circulation Element, November 2009.

The significance of project-generated traffic impacts at intersections is determined by calculating the projected volume-to-capacity (V/C) change from Future Without Project Conditions to Future With Project Conditions.

The owner/developer is responsible to obtaining all turning movement counts at the intersections. The turning movement counts will be obtained from 7 to 9 AM and 4 to 6 PM on a Monday, Tuesday, Wednesday or Thursday.

Twenty-four hour counts will be obtained on any the four days previously mentioned, preferable on the same day as the turning movement counts. No holiday counts.

The following Tables, or similar, are recommended to be provided in the traffic study report along with narrative and other details supporting the information provided.

TABLE - EXISTING CONDITIONS INTERSECTION LEVELS OF SERVICE

Intersection	Existing Conditions (201-)			
	AM Peak Hour		PM Peak Hour	
	LOS	V/C or Delay	LOS	V/C or Delay

TABLE - PROJECT TRIP GENERATION ESTIMATES

Designation	Size Units	Trip Generation Rates	Trip Generation Estimates		
			Daily	AM Peak Hour	PM Peak Hour

		Daily	AM Peak Hour	PM Peak Hour		In	Out	Total	In	Out	Total

TABLE - EXISTING PLUS PROJECT CONDITIONS INTERSECTION LEVELS OF SERVICE AND IMPACT ANALYSIS

Intersection	Existing Conditions				Existing plus Project Conditions				Existing plus Project Impact			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	Change in VC or Delay	Sig Impact?	Change in VC or Delay	Sig Impact?

TABLE - CUMULATIVE WITHOUT PROJECT INTERSECTION LEVELS OF SERVICE

Intersection	Cumulative Base Conditions (201-)			
	AM Peak Hour		PM Peak Hour	
	LOS	V/C or Delay	LOS	V/C or Delay

TABLE - CUMULATIVE PLUS PROJECT CONDITIONS INTERSECTION LEVELS OF SERVICE AND IMPACT ANALYSIS

Intersection	Cumulative Base Conditions				Cumulative plus Project Conditions				Cumulative plus Project Impact			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	Change in VC or Delay	Sig Impact?	Change in VC or Delay	Sig Impact?

C) Truck Route Notice

190th Street from Pacific Coast Highway to Anza Avenue is a truck route with a weight restriction per RB Municipal Code as follows – see Section (b):

3-7.902 Commercial vehicles: Load limits on streets.

(a) Basic weight limit. Any commercial vehicle having an unladen weight as defined in Section 660 of the California Vehicle Code of 6,000 pounds or more or having a manufacturer's gross vehicle weight rating as defined in Section 390 of the California Vehicle Code of 10,000 pounds or more is hereby prohibited from using any street in the City, except as otherwise provided by this article.

(b) Special weight limit. Any commercial vehicle having a fully laden weight of 20,000 pounds or more is hereby prohibited from using 190th Street/Anita Street between Anza Avenue and Pacific Coast Highway. (§ 1, Ord. 2168 c.s., eff. January 21, 1976, as amended by § 1, Ord. 2249 c.s., eff. August 23, 1978, § 1, Ord. 2534 c.s., eff. March 23, 1989, and § 2, Ord. 2555 c.s., eff. August 31, 1989)

3-7.903 Truck routes: Designated.

Any commercial vehicle having an unladen weight as defined in Section 660 of the California Vehicle Code of 6,000 pounds or more or having a manufacturer's gross vehicle weight rating as defined in Section 390 of the California Vehicle Code of 10,000 pounds or more may use the following streets within the City limits:

(a) Artesia Boulevard within the City limits;

(b) Aviation Boulevard within the City limits;

(c) Marine Avenue within the City limits;

(d) Hawthorne Boulevard within the City limits;

(e) Inglewood Avenue between Compton Boulevard and Artesia Boulevard;

(f) Manhattan Beach Boulevard within the City limits;

(g) Pacific Coast Highway within the City limits;

(h) Redondo Beach Boulevard within the City limits;

(i) Torrance Boulevard from the eastern boundary of the City to Pacific Coast Highway; and

(j) 190th/Anita Streets from Hawthorne Boulevard to Pacific Coast Highway, subject to the provisions of Section 3-7.902(b).

D) Pavement Impacts to 190th Street:

The City of Redondo Beach has a 5 year moratorium regarding the trenching of private or public utilities after the end of a street resurfacing/rehabilitation project. Anita Street/190th Street was recently resurfaced from Pacific Coast Highway to Prospect Avenue with completion during

July 2013. Therefore, no trenching of this portion of 190th Street will be allowed until after July 2018.

E) Engineering Encroachment Permits

Any construction activity within the Public Right of Way will require plan review and approval by the Engineering Services Division of the Public Works Department and/or other Departments within the City as necessary before construction may proceed. Contractor is required to obtain insurance, licenses and pay fees/deposits as required by the City of Redondo Beach.

The EIR should fully study the intersection and roadway segment impacts of this truck traffic and transportation and traffic and pavement impact mitigation measures should be required to fully mitigate these impacts. Mitigation fees and/or construction of mitigations will be required, Fees will be assessed based on determined traffic and environmental impacts.

Noise and Odors

The development and production of oil and gas will by nature involve the extended use of heavy equipment and considerable releases of hydrocarbons and other odiferous gases and substances. Due to prevailing wind conditions with both onshore and long shore (southward trending) winds, Redondo Beach is concerned that residents will be exposed to significant noise and odor impacts. The area west of Prospect Avenue between 190th Street and Beryl Street serves as a natural acoustical and climatologic basin and residents frequently complain of noise and odors that emanate from great distances.

The EIR should evaluate the potential for noise and odor impacts and include baseline acoustical and climatological measurements and modeling of the potential of the use to determine the impact these areas and require appropriate mitigation measures.

Public Safety Services

The Redondo Beach Fire and Police Departments provide public safety services to the City of Hermosa Beach through a Mutual Aid Agreement. The proposed Oil and Gas Development Project will place additional demands on public safety services and will necessitate that First Responders be fully trained in proper incident response due to the unique characteristics of the project. Without proper ongoing training and equipment the public safety impact of constructing and operating this facility will be significant.

Hydrology, Water Quality and Subsidence

Oil and gas extraction and transportation have potential to impact existing aquifers and pose the risk of spills and other releases. The EIR should fully assess the potential hydrologic impacts and risks associated with the construction and operation of the facility and pipelines. Oil extraction activities previously conducted in Redondo Beach have been proven to have resulted in subsidence in the Tidelands. Any extraction activities must ensure that no further subsidence will occur and must provide documentation and indemnification for these potential impacts.

Project Approvals and Entitlements

The project requires the construction and operation of private pipelines that will transport up to 8,000 barrels of crude oil and 2.5 Million cubic feet of natural gas daily. The proposed pipelines will require use of public street right of way. As such, the City of Redondo Beach will require a Franchise or License Agreement for their installation, operation and maintenance.

Aaron S. Jones
Community Development Director
City of Redondo Beach

C: Bill Workman, City Manager
Joseph Leonardi, Police Chief
Chief Robert Metzger, Fire Chief
Michael Witzansky, Public Works Director
Wisam Altowaiji, City Engineer

CALIFORNIA WATER SERVICE COMPANY
1720 NORTH FIRST STREET • SAN JOSE, CA 95112-4598
(408) 367-8200

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COMMUNITY D

August 12, 2013

Attention: Mr. Ken Robertson
City of Hermosa Beach
Community Development Director
1315 Valley Drive
Hermosa Beach, California 90254

Re: Comments to Notice of Preparation and Scoping Document for an Environmental Impact Report for the E&B Oil Development Project.

California Water Service Company (CWS) is pleased to submit these comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the E&B Oil Development Project (the "Project"). The Project will include thirty production wells and four water injection wells. The NOP indicates that "produced" water would be processed and injected back into the reservoir below the oil water contact line.

CWS is the sole water provider for the Cities of Hermosa Beach and Redondo Beach. CWS uses groundwater, imported surface water, and recycled supplies to satisfy customer demand. Groundwater extracted from the West Coast Basin's Silverado aquifer satisfies ten to fifteen percent of CWS's water demand, although groundwater use is expected to increase in the future. CWS holds adjudicated groundwater rights to the basin in the amount of 4,070 acre-feet/year. CWS operates two drinking water wells within two miles of the proposed project. CWS intends to construct new wells and increase groundwater production in the future. In addition, CWS operates a brackish groundwater desalter that began operations in 1993. For more details on CWS' water supply system, please see CWS' 2010 Urban Water Management Plan, Hermosa-Redondo District.

We recommend that the Project applicant work closely with CWS to carefully address and fully mitigate the Project's potential impacts to water quality and water supply, as discussed below.

Water quality:

Produced water may contain a variety of chemicals that are hazardous. Well stimulation techniques often inject hazardous chemicals into wells that return to the surface as produced water. In addition, fluids emitted from wells may carry dissolved hazardous elements from the underground rock formation. The threats posed by produced water are magnified by the risk that disposal wells may pierce aquifers suitable for domestic or agricultural use. If the well casing fails, materials may potentially leak into surrounding groundwater.

The EIR must thoroughly evaluate the Project's potential for impact ground water quality. This includes evaluating the potential the Project has to impact freshwater injection wells to prevent saltwater intrusion. It also requires a careful evaluation of groundwater quality, including

baseline water quality conditions. Such an evaluation must consider the potential to impact CWS' current drinking water wells, but also the groundwater basin in general as demand for drinking water will increase in the future. In addition, the EIR must include robust mitigation to prevent potential impacts from occurring during the life of the project, including ongoing water quality monitoring and contingency planning to protect CWS' wells, water supply, and water rights.

Water supply:

The EIR should evaluate potential impacts to the existing potable and recycled water supply, transmission and distribution systems, including short-term impacts associated with constructing the project and long-term impacts associated with its ongoing operation. The project's average and instantaneous potable/recycled water demands must be analyzed to ensure the adequacy of the water conveyance system and to ensure that water system performance is not negatively impacted. Any potential impacts to the water supply system must be fully mitigated at the project applicant's cost.

Sincerely,

Dale Gonzales

Dale Gonzales, P.E.
Environmental Manager
File

Yu-Ying Ting

From: Chuang, Wan-Che <WCChuang@semprautilities.com>
Sent: Monday, August 12, 2013 11:51 AM
To: Ken Robertson
Subject: NOP/IS Comment for E&B Oil Development Project
Attachments: E_B Oil Developmet Project NOP Hermosa Beach.pdf

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AUG 12 2013
COMMUNITY DEV. DEPT.

Mr. Robertson,

Please find Southern California Gas Company's Comments to the Notice of Preparation of the Draft Environmental Impact Report for the E&B Oil Development Project.

James Chuang
Environmental Specialist/Land Planner
Environmental Programs
Southern California Gas Company - Sempra Energy utility
(213) 244 - 5817 - office
WCChuang@semprautilities.com

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California
Gas Company

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James Chuang
Environmental Specialist

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Fax: 323 518 2324

August 12, 2013

Mr. Ken Robertson
Community Development Director
City of Hermosa Beach, City Community Development Department
1315 Valley Drive
Hermosa Beach, CA 90254

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Re: **E & B Oil Development Project**

Dear Mr. Robertson:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the Project's Initial Study. We respectfully request that the following comments be incorporated in the subsequent Draft Environmental Impact Report (DEIR).

SoCalGas recommends that the DEIR include a discussion of activities associated with the installation of new oil and gas pipelines along Valley Drive, Frasncisca Avenue, Herondo Street. Anita Street, 190th Street that will cause relocation of our existing natural gas pipelines and regulation stations. At present, there is only the mention of new facilities that would have to be installed. This additional discussion should include:

- The presence and condition of existing utility infrastructure on the project site, including right-of-ways and/or easements.
- Identification of any exiting natural gas infrastructure that would need to be relocated and/or abandoned.
- Identification of any actions that would require permitting or acquisition of new right-of-way or easements for natural gas relocations.

A discussion of these issues with appropriate diagrams, including specific environmental impact analyses related to these activities, if necessary, may help to reduce the time and cost associated with the relocation of existing natural gas pipelines.

In addition, if any field monitoring for cultural or biological resources is required during construction of the natural gas facilities, the monitoring should be mentioned in the DEIR as a requirement and responsibility of the ("larger") E & B Oil Development Project. Likewise, any environmental mitigation required for the potential impacts associated with the construction of gas service to the project should also be addressed as part of the responsibility of the "larger" development project.

Once again, we appreciate the opportunity to comment on the Initial Study. If you have any questions, please feel free to contact me at (213) 244-5817 or wcchuang@semprautilities.com.

Sincerely,

James Chuang
Environmental Specialist
Southern California Gas Company

Yu-Ying Ting

From: Gonzales, Dale <dgonzales@calwater.com>
Sent: Monday, August 12, 2013 11:03 AM
To: Ken Robertson
Subject: Comments to NOP of a Draft EIR Public Review
Attachments: Comment to NOP to Draft EIR 12AUG13.pdf

RECEIVED
AUG 12 2013
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Mr. Ken Robertson,
Attached is California Water Service Company's comments to the Notice of Preparation of a Draft Environmental Impact Report. The hard copy is also been mailed.

Dale Gonzales, P.E.
Environmental Manager
California Water Service Company
1720 North First Street
San Jose, CA 95112

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August 12, 2013

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Hermosa Beach, California 90254

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Sincerely,

Dale Gonzales

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