

**Appendix Q**  
**Agencies Comments**



**CALIFORNIA COASTAL COMMISSION**

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**RECEIVED**

APR 14 2014



COMMUNITY DEV. DEPT.

April 11, 2014

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

**Re: California Coastal Commission Staff Comments on 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") draft 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 6<sup>th</sup> 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 City's coastal zone. Although the City has a Land Use Plan ("LUP") certified by the Coastal Commission, it does not have a certified 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 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 Commission staff will refer to the contents of this EIR in its evaluation of the proposed Oil Project, the Development Agreement, the relocation of the City Maintenance Yard, proposed LUP amendments, and required amendments to existing CDPs (collectively referred to hereafter as "the Project"). To assist us in our review of proposed project elements, we respectfully submit the following comments and request that these issues be addressed by the City in the final

EIR (it may also be appropriate for the City and/or E&B to address some of these comments in the CDP application):

General/Project Description

1. Please provide a map of Hermosa Beach with all the project components, including both temporary and permanent facilities mapped.	CCC-1
2. Please provide detailed mapping of utilities located on the subject project properties and utilities that traverse the pipeline routes.	CCC-2
3. The EIR should address plans for eventual decommissioning and abandonment of the site.	CCC-3

Remedial Action Plan - The draft EIR states that the Remedial Action Plan (RAP) to cleanup lead and total petroleum hydrocarbon (“TPH”) contaminated soil and groundwater would be implemented during “Phase 3” of the proposed project, following the exploratory “test” well phase and before installation of oil, gas and water separation equipment. The RAP states that lead contaminated soil will be removed to a depth of 15 feet below ground surface (bgs) and then capped with a minimum of 5 feet of clean soil. Total Petroleum Hydrocarbons (TPH) will be removed using vapor extraction.

4. The RAP states that the proposed remedial goal for lead is 800 mg/kg based on the USEPA Industrial RSL and 100 mg/kg for light and medium range TPH and 1000 mg/kg for heavy range TPH based on the California Regional Water Quality Control Board-LAR soil-to-groundwater screening values. Please include the rationale for selecting these remedial goals and the document source of the USEPA and RWQCB standards. Are there more protective standards that could apply? The RWQCB Environmental Screening Level Look-up table lists a screening level of 320 mg/kg of lead for industrial land uses in shallow soils where groundwater is not a drinking source.	CCC-4
5. Figures 3-2 and 3-3 of the RAP show that lead contamination reaches to a depth of 26 ft bgs. What is the rationale for leaving lead-contaminated soil in place?	CCC-5
6. Why was an excavation depth of 15 ft bgs for lead-contaminated soil selected (as opposed to 10 ft or 20 ft bgs)?	CCC-6
7. The descriptions of Alternatives 2 and 3 in the RAP state that spot removal of lead impacted soils above the proposed remedial goals will occur if confirmation sampling indicates that the remedial goals have not been met and/or the removal is feasible due to physical site constraints. If removal is not feasible, high levels may be left in place. Please provide more information about how feasibility will be defined in this case, and who will be making that determination.	CCC-7
8. Is it possible that the lead contamination left in place has or could migrate into the groundwater? If so, what is the fate of that groundwater? The RAP states that the site is located seaward of a saltwater intrusion barrier and that the water beneath the site is not considered of beneficial use. Even if it is unlikely that groundwater beneath the site would be used for drinking water, is there the potential for other types of adverse impacts?	CCC-8
9. Table 4.14-7 (Proposed Oil Project Trip Generation Estimates) does not appear to include truck trips associated with soil remediation. Please incorporate traffic and air emission impacts associated with trucking lead-contaminated soil to an off-site facility into the EIR.	CCC-9

10. The RAP provides very little information about the proposed Soil Vapor Extraction (SVE) system for removal of TPH. Please provide additional detail related to air emissions and other potential environmental impacts associated with the SVE system. These impacts should be analyzed in the EIR.	CCC-10
11. Please ensure that all potential environmental impacts associated with the RAP are included in the EIR.	CCC-11
12. One of the remedial goals (RGs) is to reduce the concentrations of contaminants to clean-up levels that are protective of the future use of the Site as a crude oil production facility. However, it is impossible to know how the site will be used in the future. How do the clean-up levels proposed differ from clean-up levels for other types of uses (i.e., residential)? What would be the additional work and cost associated with clean-up to a more strict standard?	CCC-12
13. The RAP is proposed to be implemented during Phase 3 after the testing phase. However, earthwork and grading are planned for Phase 1 of the project. Given the shallow depth of the lead-contaminated soil, is it possible that grading activities planned for Phase 1 could disturb some of the contaminated soil?	CCC-13
14. The EIR should address potential outcomes related to cleanup of the site contamination should the applicant not proceed to Phase 3.	CCC-14
15. How long is the proposed remediation expected to take?	CCC-15

#### Aesthetics and Visual Resources:

16. As discussed in the Draft EIR, the proposed project will have adverse impacts to visual resources. To mitigate these impacts, the project description includes screening of the facility using mature trees but only during Phase 4. Is additional screening using mature trees possible in advance of Phase 4?	CCC-16
17. Lighting of the drill rig at night could also result in impacts to visual resources. Please include a photo simulation(s) of the drill rig at night. In addition, please include a more thorough explanation of why the drill rig needs to be lit at night. The EIR states that it will be lit for worker safety purposes. It would be useful to include an explanation of what types of activities will be occurring during nighttime operations that require continuous lighting. Is it possible to shield the lighting on the rig to minimize impacts to the surrounding land uses?	CCC-17

#### Biological Resources:

18. The description of the environmental setting for the project area and the subsequent descriptions of resources should take into account the subsurface well trajectory that extends from the surface facility on Valley to the offshore reservoir. This would include habitats that overlay this trajectory.	CCC-18
19. In Section 4.3.1.2 (Offshore Resources), please include a discussion of eelgrass bed habitat in Santa Monica Bay.	CCC-19
20. In section 4.3.1.4 (Sensitive Habitats), please include the approximate distance of sensitive habitat areas to the project area.	CCC-20
21. Please include the location and distance from the project area to the nearest Marine Protected Area.	CCC-21
22. Please expand the discussion of Dolphins and Porpoises to include information on patterns of usage and periods of peak abundances.	CCC-22

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

CCC-23

24. Please evaluate any potential impacts to sensitive habitats and species from noise generated by the proposed project.

CCC-24

#### Safety, Risk of Upset and Hazards – H<sub>2</sub>S

25. AQ-5d includes an Air Monitoring plan requiring audible or visible alarms triggered at 5 ppm H<sub>2</sub>S and drilling and plant operation shut down and agency notification triggered at 10 ppm. Previous iterations of this project have included conditions requiring alarms to be audible and visible and for a telephone warning system (including notification to the Hermosa Beach police and fire departments) to be triggered at 5 ppm. We think these more conservative mitigation measures would be more protective of public health and safety and should be incorporated into the EIR's mitigation measures.

CCC-25

26. On p. 4.8-60, there is a discussion of H<sub>2</sub>S concentrations in wells in the same region as the proposed project. The well data included in the EIR includes concentrations ranging from 160-5500 ppm H<sub>2</sub>S, including 1200 ppm at the closest well to the proposed project for which data is available. The applicant indicates H<sub>2</sub>S levels are anticipated to range up to 6 ppm and the facility will be designed to process gas with H<sub>2</sub>S levels up to 100 ppm. The EIR should include additional information on the basis for the assertion that H<sub>2</sub>S levels are expected to range up to 6 ppm including a discussion of why this estimate varies so significantly from data taken from nearby wells (or if this discussion exists elsewhere in the document, this section should refer the reader to that discussion).

CCC-26

27. The worst case release scenario of H<sub>2</sub>S assumes a maximum H<sub>2</sub>S level of 100 ppm (p. 4.8-71). Given the much higher concentrations of H<sub>2</sub>S found at other nearby wells, it seems that a worst-case release could involve much higher concentrations of H<sub>2</sub>S. Although the project description states that wells with concentrations of H<sub>2</sub>S greater than 100 ppm will be shut in, wouldn't it be possible to have an accidental release before the well is permanently shut in? Is it possible that drilling or production operations could encounter gas with much higher concentrations that could overwhelm the proposed safety measures and result in releases of H<sub>2</sub>S at much greater concentrations than contemplated in the EIR? Please include an evaluation of the likelihood of this scenario and an evaluation of the applicant's proposed H<sub>2</sub>S reduction equipment (i.e., scrubbers) when exposed to high concentrations of H<sub>2</sub>S.

CCC-27

#### Oil Spill Prevention and Response

28. In Section 4.3 – Biological Resources (pg. 4.3-17) there is a description of State agencies/regulations applicable to the project (Section 4.3.3.2 - State Regulatory Settings). In this chapter, the Lempert-Keene Seastrand Act section should be expanded to include a more detailed description of OSPR responsibilities surrounding oil spill prevention, preparedness, and response, and particularly with respect to review and approval of oil spill contingency plans. In addition, OSPR should be included in the associated Table 4.8-9, and identified as having regulatory authority over things like oil spills, drills, and facility contingency plans.

CCC-28

29. In Section 4.3 – Biological Resources, BIO.2 requires the applicant to submit an Emergency Response Plan (ERP) to address the protection of biological resources in the event of an oil spill. However, the recommended mitigation measure states: "*The ERP*

CCC-29

<p><i>shall include provisions for containment and cleanup within 1,000 feet downstream of the Pipeline.”</i> (pg. ES-24). This mitigation measure should be clarified to include all containment and cleanup measures/responsibilities irrespective of distance downstream from the pipeline.</p>	
<p>30. The draft EIR describes the construction of an onsite storm drain system and containment wall that is to be designed to handle “110% of the largest onsite vessel, plus 100-year rainfall event”. The largest onsite storage tank appears to hold 2,900 bbls of oil (plans show 2 tanks of this size). What is the maximum capacity of the onsite containment system? Can it handle 110% of the largest oil holding tank, plus peak rainfall volumes?</p>	CCC-30
<p>31. According to the draft EIR, “Installation of a check valve at the intersection of Valley Drive and Herondo Drive can reduce the volume of a potential spill by 50% (pg. 4.10-22).” Could additional check valves be installed to further reduce potential oil spill volumes? If so, where could additional check valves be installed, and what would be the reduction in spill volumes?</p>	CCC-31
<p>32. The draft EIR describes the installation of an oil/water separator or other collection system at the Herondo St. beach outfall to capture and treat oily runoff. Additional detail is needed about the oil/water separator unit. What is the size/footprint of the proposed system, and how much volume of oil and water is the system designed to handle? In addition, the draft EIR shows a second outfall located on the beach at the foot of 6<sup>th</sup> street (Figure 4.8-3). Could a second oil/water separator or other type collection system be installed at this outfall to further reduce/mitigate for potential oil spill impacts? What are the other impacts (e.g., biological, visual, recreation, etc.) associated with installation of an oil/water separator or other collection system at these locations?</p>	CCC-32
<p>33. One potential oil spill prevention measure is the use of double walled pipelines. Please include an analysis of the feasibility of incorporating this type of pipeline into the project in the EIR.</p>	CCC-33
<p>34. The draft EIR describes the potential for a significant oil spill (6,700 gallons) due to an oil truck accident during Phase 2 of the project. To eliminate the potential for an oil truck spill, the crude oil pipeline could be installed prior to Phase 2. Please evaluate this alternative in the EIR.</p>	CCC-34
<p>35. The draft EIR describes a potential spill scenario which would be a “subsurface release from the borehole” (pg.4-8.81). As described, incidents of this type have been recorded in the offshore environment. Most incidents occur during drilling and all involved releases within a few hundred feet from the drilling location. In this case, a release from the wellbore to the ocean could occur through fissures and cracks in the geology of the area (and would require substantial well pressures). According to the draft EIR: “Discussions with the SLC indicate that this scenario would be a very low probability case.” (pg. 4.8-81). The draft EIR does not identify a size of such a potential spill, nor does it assign any risk values to the scenario. Please include a detailed risk analysis, including a trajectory analysis of this type of marine spill in the EIR.</p>	CCC-35
<p>36. Please include a more specific and detailed discussion of sensitive sites and species that could be impacted by a subsurface or surface release to the marine environment. As part of this discussion, please identify the nearest Marine Protected Areas and identify potential impacts from a release of hazardous material to this area. One source of site specific information could be the Los Angeles/Long Beach Area Contingency Plan.</p>	CCC-36

37. The draft EIR describes a requirement to prepare a response manual and Oil Spill Contingency Plan (OSCP) to be implemented in the event of an oil spill (HWQ-2e). The draft EIR also describes the need to prepare an Oil Spill Prevention Control and Countermeasure (SPCC) plan to “ <i>significantly reduce the amount of oil from a spill from reaching sensitive recreational and environmental resources</i> ” (pg. 4.10-22). Please clarify the similarities/differences between the previously highlighted ERP (mitigation measure BIO-2), the OSCP, and the SPCC.	CCC-37
38. The oil spill contingency plan (ERP, OSCP, or SPCC) should describe how response operations can be supported for a worst-case ongoing spill (i.e., during drilling, at the facility, from a pipeline break, or truck accident) and should identify all available resources, including but not limited to, contracted Oil Spill Response Organizations (OSRO’s), company spill management teams, and other available spill responders.	CCC-38
39. The draft EIR generally describes an “ <i>oil spill cleanup trailer</i> ” to be located onsite. The EIR should clearly describe the type, amount, and location of onsite equipment/materials to control, contain, and remove oil discharges (big and small). Effectiveness ratings should be included with the equipment.	CCC-39
40. The EIR should include a mitigation measure requiring the applicant to adequately demonstrate that all personnel are trained and ready to effectively respond, contain, and cleanup an oil spill. HAZMAT training required of all crude oil truck haulers (SR-1c), should be expanded to include additional facility personnel.	CCC-40
41. The EIR should include a mitigation measure requiring the applicant to demonstrate financial capability to pay for all costs and damages that could be caused by a worst-case spill, in compliance with OSPR regulation CCR§§791-797.	CCC-41

Parking:

42. As described in the draft EIR, the applicant will supply parking for project employees and contractors and well as replace parking spaces lost due to the proposed project. To ensure that public parking remains available to residents and visitors to Hermosa Beach, the EIR should include a mitigation measure requiring the applicant to ensure that project employees or contractors do not park on-street or in public lots during any phase of project.	CCC-42
43. As described in the draft EIR, the proposed project would eliminate two on-street parking spaces on 6th Street due to Project Improvements. This action is inconsistent with LCP and zoning code, which prohibit removal of on-street parking spaces in Coastal Zone. If a loss of on-street parking spaces is necessary, the LUP requires that this parking be fully replaced to ensure no net loss of public parking spaces. Under the proposed project, the Applicant will need to provide two public 24-hour parking spaces in Coastal Zone, as close to existing spaces as possible. If, as stated in the draft EIR, these spaces are replaced at the offsite parking lot at 636 Cypress Ave., these spaces must be available to the public 24 hours a day and should not be available to employees or contractors related to the project.	CCC-43
44. Please clarify the loss of parking associated with the temporary maintenance yard. The last paragraph on p. 2-76 states that the temporary facility at 1315 Valley Drive would displace 30 city employee parking spaces but then adds up spaces from three locations that total 40 spaces.	CCC-44

45. The draft EIR states on p. 4.13-40 that the Applicant proposes to provide an additional 20 parking spaces during Phase 3 for additional construction personnel. The site for additional parking should be identified now so that any impacts associated with using or creating the additional 20 spaces can be evaluated in the EIR.

CCC-45

46. As part of the City Maintenance Yard relocation, the draft EIR describes an added parking option and a no added parking option. However, the draft EIR does not include an analysis or discussion of impacts (i.e., aesthetics, noise, traffic, etc.) from these two options. Please include this analysis in the EIR or discuss when a subsequent analysis will be performed.

CCC-46

We appreciate the opportunity to comment on the draft EIR. We look forward to continuing to work with the City as this project develops. If you have any questions or would like to discuss these comments further, please contact either Kate Huckelbridge at 415-396-9708 or me at 415-904-5205.

Sincerely,

A handwritten signature in black ink that reads "Kate H. for". The signature is written in a cursive, flowing style.

ALISON DETTMER  
Deputy Director



# COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

RECEIVED

MAR 10 2014

COMMUNITY DEV. DEPT.

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

March 6, 2014

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

Dear Mr. Robertson:

**COMPLETION/DRAFT ENVIRONMENTAL IMPACT REPORT, SCH # 2013071038, "E&B OIL DRILLING AND PRODUCTION PROJECT," TO DEVELOP THE 1.3-ACRE PROJECT SITE AS AN ONSHORE DRILLING AND PRODUCTION FACILITY, 555 6TH STREET, HERMOSA BEACH (FFER #201400031)**

The Completion/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 project site is located 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 any impact on the emergency responsibilities of this Department.

CLAFD-1

**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.
- 2. Should any questions arise regarding the Land Development Unit's comment, please contact FPEA, Wally Collins, at (323) 890-4243.

CLAFD-2

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CERRITOS	EL MONTE	INDUSTRY	LAKELAND	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	COMMERCE	GLENDORA	IRWINDALE	LAWDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
BRADBURY							WHITTIER

Ken Robertson, Director  
March 6, 2014  
Page 2

**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. CLAFD-3
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division, have been addressed.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. The Health Hazardous Materials Division has no additional comments than those already provided. CLAFD-4

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

Very truly yours,



FRANK VIDALES, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:jl



# City of Manhattan Beach

## Community Development Department

1400 Highland Avenue, Manhattan Beach, CA 90266

Phone: (310) 802-5500 FAX: (310) 802-5501 TDD: (310) 546-3501

April 14, 2014

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

**RE: Response to the Notice of Completion of Draft EIR for the E & B Oil Drilling and Production Project at 555 6<sup>th</sup> Street in the City of Hermosa Beach**

Dear Mr. Robertson:

The City of Manhattan Beach appreciates the opportunity to provide comments on the Draft Environmental Impact Report for the proposed Hermosa Beach Oil Drilling and Production Facility. We have reviewed the document and have the following comments related to the potential impacts to visitors and residents of the City of Manhattan Beach. To ensure the final Environmental Impact Report (EIR) is comprehensive and complete and will assist in the decision making process, the following environmental issues should be addressed in the document:

1. **Statement of Impacts.** The EIR should provide a statement of impacts to surrounding cities including Manhattan Beach. COMB-1
2. **Air Quality.** The EIR should address the air quality impacts associated with traffic and operations that this project will have on resident and visitors to Manhattan Beach. Please identify those impacts and explain how they will be mitigated. COMB-2
3. **Transportation, Safety, Risk of Upset and Hazards.** The potential impacts related to the transportation of hazardous substances including oil (prior to pipeline construction), drilling spoils, demolition debris and contaminated soil during the various project phases have not been adequately addressed. The outbound truck route for the project site includes Artesia Boulevard, which is located adjacent to commercial and residential uses as well as Mira Costa High School in the City of Manhattan Beach. The EIR should address the environmental impacts to our visitors, residents and students that would be caused by spills, fugitive dust, airborne contaminants and other health and safety risks along the truck routes adjacent to these sensitive land use receptors. If the truck route is changed to Aviation Avenue, the same impacts should be addressed adjacent to residential and commercial uses along our eastern city limits. COMB-3
4. **Biology/Hydrology.** The EIR stated that there is a significant and unavoidable impact caused by an oil spill into the ocean. If an oil spill were to occur what are the impacts to the beaches adjacent to the City of Manhattan Beach and how will they be mitigated. COMB-4

(Continued on next page)

Visit the City of Manhattan Beach web site at [www.citymb.info](http://www.citymb.info)



# City of Manhattan Beach

## Community Development Department

1400 Highland Avenue, Manhattan Beach, CA 90266  
Phone: (310) 802-5500 FAX: (310) 802-5501 TDD: (310) 546-3501

5. **Subsidence.** What would the impacts be to our residents and how would they be mitigated if subsidence were to occur that are caused by the project. Please identify any potential impacts and how they will be mitigated. COMB-5
  
6. **Emergency Response.** What is the impact to the City of Manhattan Beach when responding to an emergency including but not limited to an oil spill, blowout, or pipe break? How would emergency services from surrounding cities (including Manhattan Beach) be impacted by these types of incidences? Please include what qualifications and training that are required to respond to each type of emergency and how would it impact the City of Manhattan Beach Fire, Police and Public Works Departments. Mitigation measures to address these impacts should include training and adequate resources necessary to respond to an emergency to the satisfaction of the City of Manhattan Beach. COMB-6

Thank you for your consideration and we look forward to receiving the Final EIR which addresses the concerns as detailed in this letter. Should you have any questions, please contact me directly at (310) 802-5502 or e-mail [rthompson@citymb.info](mailto:rthompson@citymb.info).

Sincerely,

Richard Thompson  
Director of Community Development  
1400 Highland Ave.  
City of Manhattan Beach, CA 90266

C: John Jalili, Interim City Manager

Visit the City of Manhattan Beach web site at [www.citymb.info](http://www.citymb.info)



Community Development Planning Division	415 Diamond Street, P.O. Box 270 Redondo Beach, California 90277-0270 www.redondo.org	tel 310 318-0637 fax 310 372-8021
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April 11, 2014

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

RE: E & B DEIR Comments

Dear Mr. Robertson:

The City of Redondo Beach is pleased to submit the following comments on the Draft Environmental Impact Report for the E & B Oil Drilling and Production Project. We look forward to your consideration of these comments and receipt of appropriate responses.

**Comment No. 1**

Section 4.6 of the DEIR discusses the need for adequate fire protection resources and equipment. Mitigation measures FP-1 (a-b) listed below propose requirements for adequate water supply, pressure and duration and requirements for a community alert notification system to notify area residents and businesses in the event of an emergency at the oil field. The City of Redondo Beach submits that the same mitigation measures should apply not only to the oil field, but they should be extended to include protections for residents and businesses in proximity to the proposed pipeline and valve boxes.

Section 4.6 Fire Protection and Emergency Response			
FP-1	Oil development activities at the site could be deficient in water supplies, detection systems, access or emergency response.	II	<p>FP-1a The Applicant shall ensure adequate (3,000-5,000 gpm) water supplies are available from the reclaimed water pipeline, the existing hydrant system, or some other source for water supplies that provides sufficient water supply rates, pressure and duration to comply with codes and the LACFD. Installation of a fire pump, or installation of a piping connection to area water mains that can supply the flows, may be required to ensure the appropriate water flow and pressure requirements. The Applicant shall ensure that all area hydrants and water supplies are tested annually as required by NFPA standards for water flows and pressures, and shall ensure that the results are reported to the City of Hermosa Beach and the Hermosa Beach Fire Department.</p> <p>FP-1b The Applicant shall implement a community alert notification system to automatically notify area residences and businesses in the event of an emergency at the oil field that would require residents to take shelter or take other protective actions.</p> <p>FP-1c The Applicant shall fund an additional FTE position at the HBFD, or equivalent, for personnel with specific capabilities in inspection and code compliance associated with oil and gas production facilities. This arrangement shall be to the satisfaction of the HBFD.</p>

CORB-1

Proposed mitigation measure FP-1 (c) below requires the applicant to fund a FTE position with the HBFD with specific skills and training in inspection and code compliance with oil and gas production facilities. While RBFD is not requesting additional personnel to provide protection, RBFD does request that funding be provided for training, licensing and certification of personnel within the RBFD. This special training, licensing and certification requirement is separate and apart from general response training and equipment that is considered in mitigation measure FP-1 (f) below.

**Comment No. 2**

As stated in response to the initial request for comments on the scope of the DEIR, the City of Redondo Beach will likely be called upon to respond to any significant incident at the production site or along the length of the pipeline system. Also, as stated in our initial comments, the RBFD lacks the tools, training and equipment to respond to such incidents. Therefore, the City of Redondo Beach requests that the provision of all necessary one-time and ongoing training and equipment be provided to our agency to adequately respond to any potential incidents as a condition of this project. The City requests that mitigation measure FP-1 (f) below be clarified to include one-time and ongoing needs.

Impact No.	Impact	Impact Class	Recommended Mitigation Measures
			<p>FP-1d The Applicant shall develop emergency response plans addressing the facility's fire-fighting capabilities pursuant to the most recent NFPA requirements, Los Angeles County Fire Code, LACFD, California Code of Regulation, and API requirements, in coordination with and to the satisfaction of the LACFD and the City of Hermosa Beach Fire Department. These plans shall include, but not be limited to, fire monitor placement, water capabilities, fire detection capabilities, fire foam requirements, facility condition relating to fire-fighting ease and prevention, and measures to reduce impacts to sensitive resources. The plan should also address coordination with local emergency responders and area schools and daycare facilities.</p> <p>FP-1e The Applicant shall ensure that the emergency response planning includes development and testing of evacuation plans of neighbors for an emergency scenario at the facility, and the Applicant shall implement programs to ensure that all immediate neighbors are included in the notification system.</p> <p>FP-1f The Applicant shall ensure and make funding available to 1) upgrade the dispatch system and procedures within Hermosa/Torrance/Redondo to implement a CAD-to-CAD system to improve dispatch times; and 2) extend the mutual aid agreements between the Hermosa Beach Fire Department and the Torrance Fire Department to include the Torrance HAZMAT unit, or provide for funding to provide additional equipment and to train a sufficient number of Hermosa Beach, Redondo Beach and/or Manhattan Beach Emergency Response personnel to provide first response HAZMAT capabilities.</p>
FP-2	Oil development activities at the site could be deficient in equipment spacing pursuant to applicable codes and standards.	II	<p>FP-2a The Applicant shall ensure that design and construction comply with applicable codes and standards for equipment spacing, particularly those related to flare location and distances to public areas and distances from well drilling equipment to buildings. If this cannot be achieved, additional requirements shall include the construction of thermal radiation barriers or insulation on the crude oil tanks, installation of thermal barriers/walls around the flare stack, increasing the height of the flare stack during drilling, relocation of the flare stack, providing thermal radiation modeling to estimate the impacts of equipment on the crude tanks and process piping and public areas. Fire rated barriers shall be established, as per LACFD requirements, to ensure that all buildings within 100 feet of well drilling would be protected from thermal radiation. The design and construction compliance status shall be verified by third-party audits under the direction of the City.</p> <p>FP-2b Fire protection measures specific to the crude oil containment system shall be provided, including the installation of automatic fire foam systems along the perimeter of the crude oil containment system and wellhead area and immediately adjacent to combustion or spark producing equipment within or immediately adjacent to the crude oil containment area that would be automatically and remotely activated in the event of a crude oil spill. The highest level electrical classification achievable shall be designated for all equipment located within the crude oil containment area.</p>
FP-3	The temporary City	II	FP-3 The City Public Works Department shall coordinate with the Fire Department to ensure that

CORB-2

**Comment No. 3**

Mitigation Measures GEO-4 (a-b) requiring monitoring, reporting and mitigation of subsidence specify the various reporting agencies and the City of Hermosa Beach. Given past documented Harbor subsidence due to oil and gas extraction activities, the City of Redondo Beach requests to receive all information and reports and to be promptly notified of any observed or reported subsidence. The City also requests that the mitigation measures adequately ensure documentation of baseline conditions throughout the Harbor area prior to commencement of operations.

GEO.4	The Proposed Oil Project would potentially result in ground subsidence from oil and gas withdrawal	II	<p>GEO-4a Prior to approval of the first drilling permit, the Applicant shall have submitted and the City of Hermosa Beach, the California Coastal Commission, and the California Division of Oil, Gas and Geothermal Resources shall have approved a Subsidence Monitoring and Avoidance Program. The Subsidence Monitoring Program shall include:</p> <ul style="list-style-type: none"> <li>• Ground elevation survey methodologies with high vertical resolution;</li> <li>• A network of survey or subsidence monitoring locations, including continuous GPS stations and GPS benchmarks, positioned within and outside the City that are sufficiently spaced to draw conclusions about subsidence within the City;</li> <li>• Use of InSAR imagery technology to evaluate regional subsidence patterns both within and beyond the proposed oil field;</li> <li>• Sufficient monitoring frequency to establish trends in subsidence in order to distinguish background ground movement from any subsidence caused by proposed oil field operations;</li> <li>• Reservoir monitoring, including documentation of produced fluid volume (oil, gas and water) and</li> </ul>
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CORB-3

Draft Environmental Impact Report

ES-29

E&B Oil Drilling & Production Project

Impact No.	Impact	Impact Class	Recommended Mitigation Measures
			<p>reservoir pressures at similar frequency to ground elevation measurements;</p> <ul style="list-style-type: none"> <li>• Reporting requirements; and</li> <li>• Action levels.</li> </ul> <p>Subsidence monitoring reports shall be completed annually. Surveying for both vertical and horizontal ground movement shall be completed along the perimeter and throughout the interior of the oil field, utilizing Global Positioning System technology in combination with a network of ground stations. The continuous monitoring GPS stations shall include:</p> <ul style="list-style-type: none"> <li>• Hermosa Beach Pier. The pier will serve as the furthest offshore point in the monitoring program, and the closest to where the center of the subsidence bowl would be expected to occur.</li> <li>• Longfellow Outfall. This Outfall is larger and more structurally stable than some of the other outfalls along the City's coast.</li> <li>• King Harbor Jetty. This location was selected to achieve a distribution of continuous monitoring points along the coast of Hermosa Beach. This will help provide a limited regional picture of the subsidence between survey events.</li> </ul> <p>The results shall be forwarded to the Division of Oil, Gas and Geothermal Resources, the California Coastal Commission, and the City of Hermosa Beach for review.</p> <p>GEO-4b In the event that the Global Position System monitoring indicates that subsidence is occurring in and/or around the Proposed Project area, wastewater or water reinjection operations shall be increased to alleviate such subsidence. The Applicant shall coordinate with the California Division of Oil, Gas and Geothermal Resources in determining appropriate increased levels of wastewater reinjection operations. The Applicant will also coordinate with the City of Hermosa Beach, Public Works Department, to verify that subsidence has been mitigated sufficiently.</p>

GEO.7	Corrosion could potentially damage	II	GEO-7a Proposed Oil Project design must conform to the recommendations of HDR Schiff (2012), included within Appendix C in NMG Geotechnical (2012), or as per the City Engineer, and
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E&B Oil Drilling & Production Project

ES-30

Draft Environmental Impact Report

**Comment No. 4**

The City of Redondo Beach comments that all mitigation measures relative to testing, inspection and operation of pipelines include a provision that the results be reported to the City of Redondo Beach in addition to the other agencies receiving such information.

Impact No.	Impact	Impact Class	Recommended Mitigation Measures
	the structural components and pipelines which would result in a pipe burst and subsequent oil spill.		<p>should occur prior to completion of the final Project design.</p> <p>GEO-7b All buried metal pipelines shall be coated and placed under impressed cathodic protection. To monitor for internal corrosion, corrosion coupons or equivalent measures can be utilized.</p> <p>GEO-7c External pipe inspections shall be conducted for the exposed pipeline sections to ensure atmospheric coatings are in good conditions. All external inspections shall be documented and reviewed by the operations management and repairs documented, when necessary.</p> <p>GEO-7d In accordance with California Division of Oil, Gas, and Geothermal Resources pipeline regulations (Public Resources Code Sections 3013 and 3782), a pipeline management plan shall be implemented. Mechanical testing, including ultrasonic and hydrostatic testing, shall be completed in coordination with the California Department of Conservation Division of Oil, Gas, and Geothermal Resources staff.</p> <p>GEO-7e All concrete in contact with the high sulfate or corrosive soils shall be Type V concrete in accordance with the 2010 California Building Code.</p>

CORB-4

Section 4.8 4.8 Safety, Risk of Upset, and Hazards			
SR-1	Operational and drilling activities would generate offsite risks that exceed the thresholds	I	<p>SR-1a The Applicant shall cause to be prepared an independent third-party audit, under the direction and supervision of the City, of the gas and crude oil plants and pipelines, once constructed, including the well pads, to ensure compliance with Fire Code, applicable API and NFPA codes, EPA RMP, OSHA PSM, and SPCC and emergency response plans requirements. The review shall include a seismic assessment of equipment to withstand earthquakes prepared by a seismic engineer in compliance with Local Emergency Planning Committee Region 1 CalARP guidance. All audit items shall be implemented in a timely fashion, and the audit shall be updated annually, as directed by the City and the Los Angeles County Fire Departments.</p> <p>SR-1b The Applicant shall ensure that no spark producing equipment is located within the crude oil spill containment areas, or that spark producing equipment is sufficiently isolated from the crude oil containment area, in order to reduce the potential for crude oil fires.</p> <p>SR-1c The Applicant shall ensure that all crude-oil truck haulers are trained in HAZMAT (to the HAZWOPER technician level at least) spill response and that each truck carries a spill response kit.</p> <p>SR-1d The Applicant shall install automatic valves on the gas pipeline that will automatically shut down under a low pressure scenario at the Processing Facility Area for all pipelines leaving the processing plant, and shall install a backflow prevention device at the main gas pipeline tie-in location, to prevent the release of gas from the main transmission pipeline in the event of a rupture in the gas pipeline. The second, return pipeline shall remain isolated from the main gas pipeline during normal operations.</p> <p>SR-1e The Applicant shall ensure that warning tape is installed above the pipelines within the pipeline trench to warn third parties that pipelines are located below the warning tape and that the pipelines are capable of utilizing a smartpig.</p>

Impact No.	Impact	Impact Class	Recommended Mitigation Measures
			<p>SR-1f The odorant system shall have its own, smaller containment area around it limiting the spilled pool size to the minimum size attainable, in order to prevent any offsite impacts. Transfer of odorant shall utilize carbon canisters and a canister change-out/maintenance program to ensure that filling of odorant tanks do not cause offsite impacts.</p> <p>SR-1g Produced gas shall be continuously monitored for hydrogen sulfide and, if H<sub>2</sub>S levels exceed 100 ppm, the well shall be shut in and abandoned as per DOGGR requirements.</p>

<p>HWQ-2</p>	<p>A rupture or leak during oil drilling operations, from pipelines, or from other infrastructure could substantially degrade surface water and groundwater quality.</p>	<p>I</p>	<p><b>HWQ-2a</b> The Applicant shall properly maintain the associated crude oil pipelines, storage tanks, and processing facilities within and outside the Project Site, including smart-pigging according to State of California Office of the State Fire Marshal requirements and the standards outlined by the Department of Oil, Gas and Geothermal Resources, and the Los Angeles Regional Water Quality Control Board. The Applicant shall inspect storage tank and processing equipment at least daily and pipeline inspections on a weekly basis.</p> <p><b>HWQ-2b</b> The Applicant shall install a leak detection system for crude pipelines to the Torrance Refinery. The system shall include pressure and flow meters, flow balancing, supervisor control and data acquisition system, and a computer alarm system in the event of a suspected leak. Temperature, pressure, and flow shall be monitored at each pipeline entry and exit. If any variable deviates by more than 10 percent of the normal operating range, the system shall trigger both audible and visual alarms. Flow balancing shall be conducted every 5 minutes, 1 hour, 24 hours, and 48 hours with the accuracy defined once the system is established and tested.</p> <p><b>HWQ-2c</b> Personnel at the site shall be trained in equipment use and containment and cleanup of an oil spill. Dry cleanup methods, such as absorbents, shall be used on paved and impermeable surfaces and shall be included in a spill trailer maintained onsite. Spills in dirt areas shall be immediately contained with an earthen dike and the contaminated soil shall be dug up and discarded in accordance with local and state regulations.</p> <p><b>HWQ-2d</b> Oil spills shall be contained and cleaned according to measures outlined in the then-current California Stormwater Quality Association Best Management Practice Handbook.</p> <p><b>HWQ-2e</b> A response manual and Oil Spill Contingency Plan, approved by the City of Hermosa</p>
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**Comment No. 5**

The leak detection system, monitoring system and alarm systems required in the above mitigation measures should ensure notification of all responsible agencies. The response manual and Oil Spill Contingency Plan required in mitigation measures should also be reviewed and approved by the RBFDP.

Impact No.	Impact	Impact Class	Recommended Mitigation Measures
			<p>Beach Fire Department, shall be implemented to outline response actions in the event of a spill, including a spill response trailer, equipment, and personnel training. The Plan shall be completed prior to Phase 2. Spill cleanup shall be completed under the oversight of the lead regulatory agency, with respect to oil spills, as identified in the Oil Spill Contingency Plan.</p> <p><b>HWQ-2f</b> The well cellars shall be lined with an impermeable membrane to prevent oil-based substances from seeping into groundwater supplies. All drilling muds storage shall be contained within Baker-type enclosed tanks, which shall be sized to accommodate high intensity rainfall events without overtopping.</p> <p><b>HWQ-2g</b> The Applicant shall install a check valve in the crude oil pipeline at the Herondo and Valley drive intersection, where the crude oil pipeline turns eastward and starts uphill.</p> <p><b>HWQ-2h</b> The Applicant shall fund and install, under the direction of the Hermosa Beach Public Works Department, an oil/grit separators or oil/water separator located along Herondo Street, downstream of Valley Drive, in order to capture small to medium sized spills before they reach the ocean. Installation and maintenance costs shall be provided by the Applicant and the devices shall be inspected by the Applicant to ensure that the "trap" is operational before any storm events.</p>

CORB-5

**Comment No. 6**

Mitigation measures requiring improvements within the public right of way should be revised to include coordination with adjacent jurisdictions in the design phase and throughout construction.

TR.2	Construction of the pipelines along area streets could cause significant traffic circulation/hazard impacts.	ii	<p>TR-2a Pipeline construction activities within the Pipeline right-of-way shall be limited to weekday between the hours of 9:00 a.m. and 3:00 p.m., unless the applicable municipality approves a specific exception to the time limit for periods of limited duration, subject to measures required by the municipality to protect the public health and safety.</p> <p>TR-2b The applicant shall implement a Construction Traffic Management Plan (CTMP) during Pipeline construction that includes the following pursuant to the procedures and subject to approval of the applicable municipality: 1) Require the Pipeline contractor(s) to obtain and follow street construction permits in the affected areas (Cities of Hermosa Beach, Redondo Beach, and Torrance, and Caltrans facilities - PCH and Hawthorne Boulevard); 2) Develop detour and traffic management plans consistent with the affected City's standard roadway plans (e.g., Torrance Street Standard T603), the California Manual of Uniform Traffic Control Devices (MUTCD), or the Work Area Traffic Control Handbook (WATCH); 3) Revise Pipeline construction schedules to minimize access impacts to adjacent residents and businesses; and 4) Ensure that all affected residences and business have adequate emergency access during all times and phases of construction.</p>
TR.3	Routing of Proposed Oil Project truck traffic could violate local prohibitions.	ii	<p>TR-3a The applicant shall be prohibited from routing Proposed Oil Project-related heavy truck exceeding 20,000 pounds on 190th Street between Anza Avenue and PCH, except during Pipeline construction. The Applicant shall comply with all requirements of the applicable city.</p> <p>TR-3b The applicant shall route inbound and outbound heavy (&gt;20,000 pounds) truck traffic along PCH and Artesia Boulevard, which are designated truck routes.</p>

CORB-6

Thank you again for the opportunity to comment on the DEIR. We look forward to your responses.

Sincerely,



Aaron S. Jones  
 Community Development Director  
 City of Redondo Beach



# 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

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.

CSDLA-1

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](http://www.lacsd.org/wastewater/industrial_waste/permit.asp).

CSDLA-2

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 2<sup>nd</sup> 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 19<sup>th</sup> 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.

CSDLA-3

Mr. Ken Robertson

-2-

July 31, 2013

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.

CSDLA-4

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

CSDLA-5

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](http://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.

CSDLA-6

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.

CSDLA-7

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

Very truly yours,

Grace Robinson Chan



Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

cc: L. Shadler  
J. Ganz

DOC: #2683172\_DSBC



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
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www.lacsd.org

GRACE ROBINSON HYDE  
Chief Engineer and General Manager

April 14, 2014

Ref File No.: 2887718

**RECEIVED**  
APR 16 2014

COMMUNITY DEV. DEPT.

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

Dear Mr. Robertson:

## E & B Oil Drilling and Production Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on February 14, 2014. The proposed development is located within the jurisdictional boundaries of the South Bay Cities Sanitation District. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated July 31, 2013 (copy enclosed) still apply to the subject project with the following updated information.
2. The Joint Water Pollution Control Plant currently processes an average flow of 263.7 million gallons per day.
3. All other information concerning Districts' facilities and sewerage service contained in the document is current.

CSDLA-8

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

Very truly yours,

Grace Robinson Hyde

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

Enclosure

cc: L. Shadler  
J. Ganz



# DEPARTMENT OF CONSERVATION

*Managing California's Working Lands*

## Division of Oil, Gas, & Geothermal Resources

5816 CORPORATE AVENUE • SUITE 200 • CYPRESS, CALIFORNIA 90630-4731  
PHONE 714 / 816-6847 • FAX 714 / 816-6853 • WEB SITE [conservation.ca.gov](http://conservation.ca.gov)

April 14, 2014

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

Dear Mr. Robertson:

COMMENTS TO E & B OIL DRILLING & PRODUCTION PROJECT, DRAFT ENVIRONMENTAL IMPACT REPORT, PUBLIC DRAFT EIR, FEBRUARY 2014.

The Department of Conservation's Division of Oil, Gas, and Geothermal Resources (Division). Cypress office, has reviewed the subject Draft Environmental Impact Report

Please feel free to contact me if you have any questions.

Sincerely,

Kenneth M. Carlson  
Environmental Unit Supervisor

Attachment: Appendix A

**APPENDIX A**

**COMMENTS TO E & B OIL DRILLING & PRODUCTION PROJECT, DRAFT ENVIRONMENTAL  
IMPACT REPORT**

The following comments are formatted as Page, Section or location, and Comment.

DOGGR-1	ES-29	GEO.2	Waste water is injected into Class II <i>Disposal Wells</i> and is not used for secondary recovery (waterflooding) operations. <i>Produced water</i> is injected into Class II <i>Waterflood Wells</i> , which are strictly associated with secondary recovery operations. Please use the terms <i>wastewater</i> and <i>produced water</i> appropriately.
DOGGR-2	ES-29	GEO.4a	Remove "California Division of Oil, Gas, and Geothermal Resources" from first paragraph. Note: The Division may only exercise its power to arrest or ameliorate subsidence when and where it is occurring. While the Division supports a proposed "Subsidence Monitoring and Avoidance Program", the Division does not have the authority to require or approve such a plan where no subsidence currently exists.
DOGGR-3	ES-29	GEO.4b	Replace second sentence, " <i>The Applicant shall coordinate...</i> " with " <i>The Applicant shall first receive approval from the Division of Oil, Gas, and Geothermal Resources prior to any change (increase) to the injection operations.</i> "
DOGGR-4	ES-31	GEO.7d	Division's Pipeline Management Plan (PMP) only applies to pipelines on the drilling and production site. Additional oversight by other agencies may occur.
DOGGR-5	ES-32	SR-1g	The Division does not have specific authority to require a well be shut in or abandoned based on H2S production concentrations.
DOGGR-6	1-6	Last paragraph	Remove " <i>DOGGR is expected to use the EIR in its permitting review of the Oil Development Project.</i> "
DOGGR-7	2-11	Table 2.2 Maximum no. wells.	Water injection and disposal wells perform different functions and are permitted separately. If the intent is for secondary recovery (waterflooding), then the appropriate terminology is <i>water injection well</i> .
DOGGR-8	2-14	Highlighted Box	Please refer to water pumped back into the oil reservoir as <i>produced water</i> .
DOGGR-9	2-20	2.4.2	DOGGR must review and approve an engineering study conforming to CCR Section 1724.6 and 1724.7 for waterflood operations. No Class II injection wells will be permitted prior to review and approval of the study. A Notice Of Intent (NOI) will need to be submitted for each proposed well. The NOI will be reviewed for accuracy and completeness, and if appropriate, a drilling permit issued
DOGGR-10	2-21	First paragraph	The Catalina schist conglomerate is not part of the Puente Formation.

DOGGR-11	2-30	First paragraph	Blow out prevention equipment shall conform to DOGGR's publication M07, "Blowout Prevention in California, Equipment Selection and Testing," 2006 Edition.
DOGGR-12	2-59	First paragraph	Injection of produced water back into the oil reservoir. Produced water <i>must be injected at below formation fracture pressure.</i>
DOGGR-13	2-82	Section 2.6.2	The Division <i>may review</i> the EIR as part of our review of the proposed injection project.
DOGGR-14	2-85	Federal Agencies	The Division has Primacy in all Class II injection activities, not Federal EPA.
DOGGR-15	4.1-26	1993 CUP	Reoccurring wireline operations will be performed on the injection wells for mechanical integrity testing as required by the Division. The wireline rigs may have equipment that exceeds 16 feet in height.
DOGGR-16	4.1-27	Bullet 9	The Division does not regulate mobilization or demobilization of drilling equipment or workover equipment. The Division does not have the authority to order retention of equipment at the drill site.
DOGGR-17	4.1-27	Bullet 10	Disposal wells or injection wells for EOR?
DOGGR-18	4.2-11	NORM	Please use correct citation: in text, "The Division, et.al" and in references, "A Study of NORM Associated with Oil and Gas Production Operations in California", by Department of Health Services, Radiologic Health Branch and Department of Conservation, Division of Oil, Gas, and Geothermal Resources, 1996.
DOGGR-19	4.6-4	Agency Inspections	The Division conducts inspections of facilities, pipelines, and Class II injection wells, in addition to other items.
DOGGR-20	4.7-11	4.7.1.8	the Division does not <i>directly regulate production</i> of oil, gas or geothermal resources. The Division recognizes the Conservation Committee of California Oil Producers in recommending to the Division, maximum efficient rates of production.
DOGGR-21		Second Bullet	The Division oversees Class II injection well operations. There is no regulation directly requiring abandonment of an idle well, except as an Order of the State Oil and Gas Supervisor.
DOGGR-22		Second Paragraph	Section 1760 (e) defines "Environmentally Sensitive". This applies to pipelines and all wells meeting the definition. Bullet points need revision to include wells.
DOGGR-23	4.7-16	Second Paragraph	The well is "Stinnett" #1. This well was abandoned to Division standards at that time.
DOGGR-24	4.7-24	Second Paragraph	If the injected produced water is used for secondary recovery operations, it is not considered wastewater.

DOGGR-25	4.7-26	GEO-4b	In the event that subsidence is occurring, the Division will analyze the existing waterflood operations, and if deemed appropriate, <i>will approve</i> any increase in water injection.
DOGGR-26	4.7-29	GEO.7d	The Division's Pipeline Management Plan (PMP) only applies to pipelines on the drilling and production site.
DOGGR-27	4.7-34	GEO.4a	The Division is not a Responsible Party, but may be a Reviewer.
DOGGR-28	4.7-33	GEO-2a	The Division's Underground Injection Control (UIC) Program monitors all injection wells for compliance with CCRs independent of the City. The Division is a responsible party for this item.
DOGGR-29	4.7-36	GEO-4b	Injection pressures shall not be increased without the approval of the Division.
DOGGR-30	4.7-37	GEO-7d	Include the Division as a responsible party for on-site pipelines. The Division will conduct inspections independent of the City.
DOGGR-31	4.8-24	H2S	Hydrogen sulfide gas <i>may</i> be present in the fluid from a producing well.
DOGGR-32	4.8-45	CCR Section 1774	Section is specific to practices related to <i>pipeline construction and maintenance</i> .
DOGGR-33	4.8-45	Last paragraph	The Division does not "...regulate(s) and maintain(s) historically abandoned wells..." nor does the Division access sites to reabandon problem wells. If a well is found to be a problem, the well is re-abandoned by the operator. The Division contracts a few wells a year to be re-abandoned when no former operator of the well can be identified.
DOGGR-34	4.8-46	First paragraph	The Division does not require, but may recommend leak checks of former oil and gas wells under or in close proximity to proposed structures.
DOGGR-35	4.8-54	Table 4.8.9	The chart should indicate an "X" for the Division's involvement in the following Oversight Areas: (1) <i>Compliance with permit conditions and local codes</i> , (2) <i>Responding to emergency scenarios, conducting drills, etc.</i> , (3) <i>Spills of hazardous materials</i> .
DOGGR-36	4.8-56	4.8.4.2	Fourth bullet: The Division does not regulate the size or volume of storage tanks.
DOGGR-37	4.8-57	Bullet 9	The SPCC plan has to meet Federal requirements. The Division requires that a Spill Contingency Plan be prepared.
DOGGR-38	4.8-57	Bullet 12	The Division does not require preparation of an emergency response plan. Blow out prevention equipment is used during drilling and workover operations only.

DOGGR-39	4.8-58	Bullet 2	The Division does not specify setback distances of wells from public or private structures, improvements, or streets.
DOGGR-40	4.8-65	BOPD	In the industry, this is generally referred to as Blow Out Prevention Equipment (BOPE).
DOGGR-41	4.8-66	BOEMRE	As stated, this data is for offshore drilling. The offshore drilling environment is very different from the onshore drilling environment and has separate specific regulations. BOEMRE data (and portion of Table 4.8-11) may not be relevant to the project.
DOGGR-42	4.8-66	Last sentence	The purpose of waterflooding is to (1) drive fluids toward the producing wells and (2) maintain reservoir pressure. A properly designed and implemented waterflood will minimize reservoir pressure loss during production.
DOGGR-43	4.8-61	Last paragraph	This section should indicate the caveats of comparing drill stem flow rates and pressures in Redondo Beach with the location and depths of the proposed E&B wells.
DOGGR-44	4.8-67	Table 4.8-11	Please provide a reference for the Division's blowout statistics.
DOGGR-45	4.8-79	SR-1g	The Division does not have specific authority to require a well be shut in or abandoned based on H2S production concentrations.
DOGGR-46	4.8-89	SR-1a	The Division also has applicable requirements and compliance verification.
DOGGR-46	4.8-90	SR-1g	The Division does not have specific authority to require a well be shut in or abandoned based on H2S production concentrations.
DOGGR-47	4.9-8	Third paragraph	Oil field wastes, known as Exploration and Production (E&P) wastes are managed as non-hazardous solid wastes under Federal law, pursuant to the E&P exemption in Title 40, CFR Section 261.4(b)(5). Reference: Oil Exploration and Production Initiative, by Department of Toxic Substances Control, Hazardous Waste Management Program, Statewide Compliance Division, May 2002.
DOGGR-48	4.9-17	Second paragraph	Text should be included to state that in addition to well design features to prevent migration of fluids and gases, the Division requires periodic testing to determine if fluids are confined, and mandates corrective measures, followed by re-testing if this fluid is not confined.
DOGGR-49	4.10-10	Item 3	The Division is mandated to protect Underground Sources of Drinking Water (USDW), which include potential sources of drinking water. USDW is the preferred term over aquifer with respect to the Division.
DOGGR-50	4.14-7	Oil Reservoir	<i>Produced Water</i> is the preferred term.

## Wastewater

DOGGR-51	4.14-11	First sentence	Please clarify <i>disposal</i> of produced water or <i>injection</i> of produced water for EOR operations. The terms disposal and injection are used interchangeably throughout the DEIR and refer to different operations.
DOGGR-52	4.14-11	Third paragraph	In California, the Division has primacy in regulating the Underground Injection Control (UIC) Program, which regulates all Class II injection wells. <u>Federal EPA does not directly regulate Class II wells in California.</u> This distinction is not clear in the discussion.
DOGGR-53	4.14-12	Fourth paragraph	Fourth sentence regarding the Division's review of pressures, quantities, and schedules, in order to prevent subsidence beneath the drilling site is incorrect. Pressure and volume data alone are insufficient to determine if subsidence is occurring. A specific onsite study needs to be performed by a licensed surveyor to determine if subsidence is occurring.
DOGGR-54	4.14-12	Fifth paragraph	In order to operate a Class II injection well, approval must be obtained from the Division. Therefore, operators <i>wishing to operate</i> Class II injection well(s) must file for a permit with the Division.
DOGGR-55	4.14-13	Second paragraph	Last sentence: <i>base of fresh water</i> should be <i>USDW</i> .
DOGGR-56	8-25	GEO-2a	The Division's Underground Injection Control (UIC) Program monitors all injection wells for compliance with CCRs independent of the City. The Division is a responsible party for this item.
DOGGR-57	8-25	GEO.4b	In the event that damage from subsidence is occurring, the Division will analyze the existing waterflood operations, and if deemed appropriate, <i>will approve</i> any increase in water injection.
DOGGR-58	8-27	GEO-7d	Include the Division as a responsible party for on-site pipelines. The Division will conduct inspections independent of the City.
DOGGR-59	8-30	SR-1g	The Division does not have specific authority to require a well be shut in or abandoned based on H <sub>2</sub> S production concentrations.

**DEPARTMENT OF TRANSPORTATION**  
 DISTRICT 7, OFFICE OF TRANSPORTATION PLANNING  
 IGR/CEQA BRANCH  
 100 MAIN STREET, MS # 16  
 LOS ANGELES, CA 90012-3606  
 PHONE: (213) 897-9140  
 FAX: (213) 897-1337



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COMMUNITY DEV. DEPT.

April 7, 2014

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

RE: E and B Oil Drilling and Production Project  
 Draft Environmental Impact Report (DEIR)  
 SCH No. 2014011013; IGR/CEQA #140218  
 Vic. LA/1/35.27, LA I-405, SR-107

Dear Mr. Robertson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project proposes to develop the site currently used as the City Maintenance Yard with an onshore oil drilling and production facility. The project would involve directional drilling of 34 wells to access the oil and gas reserves in the tidelands and in an onshore area known as the uplands. In addition, the proposed project would involve the installation of offsite pipelines for the transportation of the processed crude oil and gas from the project site to purchasers in the Cities of Redondo Beach and Torrance. The new facility would be designed for a maximum capacity of 8,000 barrels per day of crude oil and 2.5 million standard cubic feet per day of produced gas. The facility would be built in four phases.

Based on the information provided in the DEIR, Caltrans offers the following comments:

As you are aware, Caltrans is the State agency with jurisdiction over Pacific Coast Highway, State Route 1 (SR-1), Hawthorne Boulevard, State Route 107 (SR-107) and Interstate 405 (I-405), which are the main highways and freeways that provide regional access to the City of Hermosa Beach (City). The project site is located at 555 6<sup>th</sup> Street, approximately 4 blocks west of Pacific Coast Highway and 7 blocks from the Pacific Ocean. Table 4.14-7 shows the project's estimated vehicle trip generation. Construction truck trips have been converted to Passenger-Car Equivalents (PCE). We note the worst case scenario for traffic impacts would occur during phase 3, the final design and construction phase. According to the Traffic Impact Analysis, truck deliveries would be limited between 9am and 3pm and to 18 round trips trucks per day. Please condition heavy duty construction truck trips to off-peak commuting periods as well.

DOT-1

Figure 4.13-5 shows that Artesia Boulevard is the preferred inbound and outbound truck route to and from the project site towards I-405. Please pay attention to the intersection of Artesia Boulevard and Pacific Coast Highway and I-405 off-ramps to Crenshaw Boulevard. Apparently, the project would not generate enough traffic to significantly impact these intersections according to City and County criteria; however, please note that they would operate at Level of Service (LOS) "F" during the baseline scenario and are expected to worsen in the future with-project scenarios. Caltrans recommends the City establish a funding mechanism to mitigate cumulative transportation impacts from future development on the regional highway network, if it does not have already have one. Funding of this kind might include

DOT-2

Mr. Ken Robertson

April 7, 2014

Page 2 of 2

citywide traffic impact assessments of individual projects. Such funding would help maintain economic vitality and regional livability when combined with funding from nearby cities as well as State and Federal funds.

The intersection of Pacific Coast Highway and Aviation Boulevard also operates at LOS "F" in the 2015 baseline scenario and is expected to worsen in the future with-project scenarios. Caltrans is aware that improvements are planned at this intersection and requests that the TIA include an update of this improvement. We would also like to know if the proposed project will contribute to implementation of planned transportation improvements.

DOT-3

If you have any questions, please feel free to contact me or Elmer Alvarez, Project Coordinator, at (213) 897-6696 and refer to IGR/CEQA No. 140218EA.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



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APR 16 2014

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EDMUND G. BROWN JR.  
GOVERNORMATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Los Angeles Regional Water Quality Control Board

April 14, 2014

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

### COMMENTS TO DRAFT ENVIRONMENTAL IMPACT REPORT FOR CITY OF HERMOSA BEACH OIL DEVELOPMENT PROJECT (E&B'S OIL DEVELOPMENT PROJECT), HERMOSA BEACH, CALIFORNIA (SCH NO. 2013071038)

Dear Mr. Robertson:

On February 14, 2014, the City of Hermosa Beach released the Draft Environmental Impact Report (Draft EIR) for the E & B Oil Drilling & Production Project (proposed Project) located at 555 6<sup>th</sup> Street, Hermosa Beach, California. The Draft EIR describes a proposed development of a 1.3-acre site (site), currently used as the City Of Hermosa Beach Maintenance Yard for onshore drilling and production. After reviewing the Draft EIR, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board), has the following comments<sup>1</sup>.

1. The Draft EIR states that Oil field operations will include re-injection of produced water.
  - a. The United States Environmental Protection Agency (USEPA) and the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) have jurisdiction over Class II underground injection in California. In March 1983, DOGGR received primacy from USEPA to administer the federal Underground Injection Control Program for Class II wells in California.
  - b. On May 19, 1988, the State Water Resources Control Board (State Board) and DOGGR entered a memorandum of agreement (MOA). The MOA outlined the procedures for reporting oil, gas, and geothermal field discharges and the procedures for prescribing permit requirements to ensure coordination and cooperation between the State and Regional Boards and DOGGR. For Underground Injection, DOGGR will incorporate Regional Board's monitoring requirements in DOGGR's permit. For surface water discharges, the Regional Board will issue waste discharge requirements (WDRs) for the disposal of production water.

RWQCB-1

<sup>1</sup> Note that the Regional Board is not a land use planning agency and does not have an opinion on whether the Project should be constructed. These comments focus on the potential impacts to water quality of the Project.

2. Implementation of Remedial Action Plan (RAP): Section 2.4.3.1 (page 2-41) of the Draft EIR states, "[T]he DTSC and the RWQCB have indicated that the contamination is below the levels of concern for the area and that groundwater remediation would not be necessary for the site." Please provide written documentation from both the Department of Toxic Substances Control (DTSC) and the Regional Board regarding the Draft EIR statement. The soil and groundwater plume shall be fully delineated, in order to evaluate whether groundwater remediation is required or not.

RWQCB-2

3. Remedial Action Plan (RAP): section 4.9.4.2 (page 4-9.11) of the Draft EIR states, "[P]hase 3 would include implementation of a Remedial Action Plan to address the known contaminated soil and groundwater beneath the former landfill." The Applicant should contact the Regional Board or DTSC for cleanup oversight of the subject site before the implementation of the RAP. The Applicant may need to implement the RAP now, not in Phase 3, if imminent human health threat and groundwater resource impact is present.

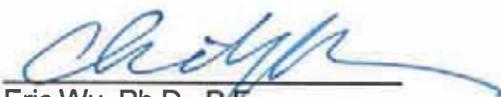
RWQCB-3

4. Stormwater: Section 4.9.2.2 (page 4.9-6) indicates that the applicant will comply with stormwater regulations by obtaining a construction stormwater general permit. Please be advised that, as both the construction and industrial general permits provide site owners and operators with a great degree of flexibility, we expect that the applicant will assess all potential sources of pollutants (such as erosion on cut slopes during grading and construction, the use of auto shredder fluff for alternative daily cover, etc.), and customize best management practices that are documented in a stormwater pollution prevention plan (SWPPP), and monitored for effectiveness. Should the site not be adequately managed for protection of stormwater, the Regional Board may direct more stringent permit requirements.

RWQCB-4

We appreciate the opportunity to comment on the Draft EIR. If you have any questions, please feel free to contact me at (213) 576-6683, or via email ([ewu@waterboards.ca.gov](mailto:ewu@waterboards.ca.gov)) or Project Manager, Ms. Mercedes Merino at (213) 620-6156 ([mmerino@waterboards.ca.gov](mailto:mmerino@waterboards.ca.gov)).

Sincerely,



Eric Wu, Ph.D., P.E.  
Chief of Groundwater Permitting Unit

cc (via email): Mr. John Geroch, Chief Deputy, DOGGR  
Mr. David Albright, Ground Water/Underground Injection Control, USEPA  
Ms. Liz Crosson, Executive Director, LA Waterkeeper  
Ms. Kirsten James, Director, Heal the Bay  
Mr. Peter Shellenbarger, Analyst, Heal the Bay



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

Emailed: April 17, 2014  
[oilproject@hermosabch.org](mailto:oilproject@hermosabch.org)

April 17, 2014

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

## **Review of the Draft Environmental Impact Report (Draft EIR) for the E&B Oil Drilling and Production Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the Draft EIR for this project as a commenting and responsible agency. We also appreciate your willingness to accept these late comments. The comments below are intended as guidance and should be incorporated into the Final EIR as appropriate.

The project includes the relocation of an existing city maintenance yard, and the subsequent placement of an oil drilling and production facility. The nearest residents are approximately 160 feet away and the nearest businesses are 100 feet away. This facility would include 30 production wells and 4 water injection wells, with a maximum capacity of 8,000 barrels per day of crude oil and 2.5 million standard cubic feet per day of natural gas. Among various facility appurtenances, the project would also include an oil treatment system, a gas treatment system, a vapor recovery system, a flare, five natural gas micro-turbines with a total capacity of 1,000 kW, two oil storage tanks, and offsite pipeline construction. The project will not perform hydraulic fracturing.

SCAQMD staff has three primary concerns with the potential air quality impacts and analysis of the proposed project. These include: 1) potential for significant impacts to neighbors during drilling and operation of the facility, 2) apparent inaccuracies in the dispersion modeling analysis that may underestimate impacts, and 3) inadequate mitigation to reduce significant impacts. Details regarding these comments are attached. In order to most effectively address these concerns, the project applicant should contact SCAQMD staff to ensure that the air quality analysis accurately discloses potential impacts to the community and is adequate for any permits needed from our agency.

Mr. Ken Robertson  
Community Development Director

April 17, 2014

Pursuant to Public Resources Code 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to these comments prior to adoption of the Final EIR. Staff is available to work with the lead agency to address these and any other air quality concerns that may arise. Should you have any questions regarding these comments, please contact me at (909) 396-3244.

Sincerely,



Ian MacMillan  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

LAC140213-01  
Control Number

### **1. Potential for Significant Impacts to Community**

The Draft EIR acknowledges that the proposed project may have significant odor impacts due to its close proximity to existing homes in the neighborhood. SCAQMD staff has found that other petroleum operations in our jurisdiction have also caused air quality problems, in part due to their close proximity to residents. Although many of the mitigation measures put forward in the Draft EIR should have some effectiveness at reducing odor impacts, the ultimate conclusion that odor impacts will remain significant due to the proximity to residents is concerning. The Draft EIR indicates that the lead agency appears willing to lock in a long-term problem for local residents that may also affect our agency's resources if we are required to address persistent air quality complaints. We therefore recommend that the proposed Odor Minimization Plan contain contingency measures that are enforceable by the lead agency to ensure that any nuisance odors from the facility are eliminated.

SCAQMD-1

### **2. Dispersion Modeling for Localized Impacts and HRA**

SCAQMD appreciates that the lead agency conducted a detailed quantitative analysis of potential air quality impacts. The Draft EIR indicates that dispersion modeling shows that all operational criteria pollutant and health risk impacts would be less than significant after incorporating mitigation. SCAQMD staff notes that we were not able to completely review this analysis because some of the input files were not provided for review. However, based on the files provided it appears that localized particulate matter and health risk impacts may be significant if the modeling analysis is corrected to be consistent with procedures required for permitting. In particular, the following corrections should be made in the Final EIR:

- The most recent version of AERMOD should be used. Version 09292 was used, however at the time of the model was run the current version of the software was Version 13350. This update may yield substantial differences to predicted concentrations. The most recent version of AERMOD would also be required for air quality permitting purposes.
- Annual particulate matter impacts should be based on calendar year impacts, consistent with SCAQMD recommended methodology.
- All sources modeled in AERMOD for HARP need to use unitized emission rates (e.g., 1 g/s). It appears that some of the area sources did not correctly do this. Non-unitized emission rates may present inaccuracies in reported risks.

SCAQMD-2

Without making these adjustments, it appears that there may be undisclosed and unmitigated significant impacts for carcinogenic health risks, and exceedances of the 24-hour and annual PM10 standards. In addition, all electronic modeling files should be provided to SCAQMD staff, with sufficient time for our review prior to adoption of the Final EIR. Missing files from the Draft EIR analysis include the BPIP input files, a complete set of HARP input and output files, and complete input and output files of mitigated scenarios.

**3. Mitigation**

Mitigation measure AQ-4 requires the applicant to “limit the microturbine PM emissions to 0.0035 lbs/mmBtu, or an equivalent reduction in the number and/or size of the micro-turbines, in order to reduce emissions to below the localized thresholds.” Although the goal of this measure appears to be targeted at keeping project impacts below SCAQMD CEQA significance thresholds, it is unclear how it can be enforced. For example, this limit would presumably be imposed during the air quality permitting process. However air quality permits are applied to each permit unit, not to the facility as a whole. Because the mitigation measure and the CEQA thresholds apply to the entire facility, there is no method defined to ensure that this measure would be enforced at the time of permitting. The project applicant has not yet applied for permits with our agency and it is not clear when this may occur. The mitigation measure should therefore include a provision that the lead agency will be responsible for ensuring that the applicant will take permit conditions that apply to the entire facility, not just individual permit units.

SCAQMD-3

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STATE OF CALIFORNIA COMMUNITY DEV. DEPT.  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

April 2, 2014

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

Subject: E & B Oil Drilling and Production Project  
SCH#: 2013071038

Dear Ken Robertson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on April 1, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

SCH-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2013071038  
**Project Title** E & B Oil Drilling and Production Project  
**Lead Agency** Hermosa Beach, City of

**Type** EIR Draft EIR

**Description** The Applicant proposes to develop the 1.3-acre Project site at 555 6th St., Hermosa Beach, currently used as the City Maintenance Yard, as an onshore drilling and production site using directional drilling to access oil and gas reserves in the tidelands and uplands within the Torrance Oil Field, with 30 production wells, 4 water injection well, liquid and gas separating equipment, and gas processing unit. Oil and gas pipelines will be developed extending into Redondo Beach and Torrance. The EIR also evaluates relocation of the existing City Maintenance Yard to City property adjacent to and south of Hermosa Beach Hall, 1315 Valley Drive/552 11th Place, HB. Coastal parking will be relocated. Local approvals include General Plan, Coastal Land Use Plan, Zoning and Municipal Code amendments, and a Development Agreement.

**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**  
**Lat / Long** 33° 51' 32.10" N / 118° 23' 41.09" W  
**Cross Streets** Valley Drive and 6th Street, and Valley and 11th Place (Public Works Facility, (PWF))  
**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** Various

**Project Issues** 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; Aesthetic/Visual; Drainage/Absorption; Growth Inducing; Sewer Capacity

**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

**Date Received** 02/13/2014 **Start of Review** 02/13/2014 **End of Review** 04/01/2014

**E&B Oil Drilling & Production Project  
Final Environmental Impact Report  
Public Draft Comments  
Government Agencies**

**California Coastal Commission**

Comment #	Response
CCC-1	The Project Description, Figures 2.1, 2.5, 2.6, 2.9, 2.12 and 2.14, shows the various Project components, including the site locations, the site plot plans, well bore locations (for the test wells), traffic routes, and other Project features (temporary and permanent)..
CCC-2	Detailed mapping of utilities would be performed as part of the detailed permit stage that would occur during project implementation.
CCC-3	Section 2.4.7 discusses decommissioning and abandoning. Project life end decommissioning and abandonment would occur under a separate permit and CEQA process.
CCC-4	<p>The RAP was developed by the Applicant and is not necessarily a regulatory document but a plan by the Applicant to clean up the site as part of implementing the Project. Specific levels of lead contamination that would be acceptable might change based on more detailed review and approval by various agencies, such as the RWQCB, but that the levels defined by regulatory authorities would be required under law to be applied. The RWQCB Environmental Screening Level Look-up table value is a guidance document developed by the RWQCB for the protection of groundwater quality. The proposed site specific soil remediation target for lead established by the applicant's consultant is based on human health protection; and the soil remediation target for total petroleum hydrocarbons (TPH) has been established by the RWQCB for the protection of groundwater quality based on the depth to groundwater at TPH-contaminated sites. The RAP was developed with the goal of physically removing both lead- and TPH-containing soil where feasible. Due to the physical limitations of the depth of soil that can be safely excavated at the site due to slope stability (some contamination is 40 feet deep on a small site, which would require extensive shoring), only the upper approximately 15 feet of impacted soil will be excavated and transported off-site for disposal. The Applicant will be required to document the source of the applicable U.S. EPA and RWQCB standards as part of the cleanup efforts.</p> <p>For the air quality and traffic analysis, the DEIR assumes that all material is removed during the RAP process, thereby ensuring that the maximum number of truck trips and excavation activities would occur in order to assess potential impacts to air quality and traffic.</p>
CCC-5	The RAP concludes that lead left in place under a "cap" would not impact public health. This is a common approach to addressing soil contamination in areas where further excavation is not anticipated. Due to the physical limitations of the depth of soil that can be safely excavated at the site due to slope stability (some contamination is 40 feet deep on a small site, which would require extensive shoring/etc), only the upper approximately 15 feet of impacted soil will be excavated and transported off-site for disposal. The removal of lead-containing soil and backfilling the excavation area with imported clean fill material will eliminate potential exposure from lead-containing soil
CCC-6	Due to the physical limitations of the depth of soil that can be safely excavated at the site, only the upper approximately 15 feet of impacted soil will be excavated

	and transported off-site for disposal. Deeper soil excavation activities would require provisions for shoring and/or sheet piles, which would be difficult on the small site. . The 15 foot depth level is the depth at which excavation would be required to install the permanent facilities and place a cap. Impacts to public health of the lead contaminated soils below the facility pads were determined in the EIR to not impact public health.
CCC-7	The feasibility issues on the site are primarily related to the confined area of the site and the close proximity of neighboring buildings and businesses. Excavation to a substantial depth would increase the possibility of impacting these neighboring buildings. Feasibility pertaining to this is associated with the physical limitations of the depth of soil that can be safely excavated at the site (refer to Comment No. 5 and Comment No. 6). Deeper soil excavation activities would require provisions for shoring and/or sheet piles. Therefore, if substantial contamination is found but excavation of these areas would endanger neighbors, methods to limit impacts might be preferred, such as capping, which would be determined in coordination with the applicable agencies under whose regulatory requirements implement the RAP. The RAP will be defined and modified in more detail when the detailed permit period commences (when building permits and permits from the RWQCB are pursued). The City, the County, DTSC and the RWQCB would be involved in these reviews and revisions.
CCC-8	The lead containing soil that will be left in-place exists at depths that are approximately 25 feet from first groundwater, as per previous environmental assessments. Generally, lead is not mobile in soil, and therefore it is unlikely that the lead-containing soil will “migrate” to first groundwater. Due to the physical limitations of the depth of soil that can be safely excavated at the site, only the upper approximately 15 feet of impacted soil will be excavated and transported off-site for disposal. Leaving the lead-containing soil in-place as proposed at depths would not result in impacts. Details of impacts to groundwater would be developed as part of the finalization of the RAP measures with the RWQCB.
CCC-9	Soil remediation truck trips are included in the estimates of truck trips. The Applicant, through the CUP, has a maximum truck trip limit of 18 trucks per day. During soil remediation, this limit would most likely be reached, thereby requiring that the remediation phase extend for a period long enough to allow for all of the excavated soils to be removed while not exceeding the daily truck trip limit. In order to assess the worst case air and soil impacts, the DEIR analysis is based on the conservative assumption that all contaminated soils would be removed, regardless of the feasibility issues discussed above, to ensure that the maximum impacts associated with truck movements and air quality are addressed. Appendix A details the truck traffic calculations.
CCC-10	Information about the soil extraction activities is provided in section 7 of the RAP (located in Appendix A of the EIR). Soil vapor extraction consisting of borings and piping would be permanently installed beneath the site and vapors would be treated, which might involve routing of the vapors through carbon filtration systems or into the processing system or flare at the site. The SVE system will be designed based on the results of a pilot test that will be completed at the site. Additionally, it is possible that the SVE system will include a bio-venting component given the characteristics of the TPH-containing soil that will be targeted (heavy chain hydrocarbons). Air emissions associated with the SVE system will be permitted through the South Coast Air Quality Management District (SCAQMD). For carbon or other systems, it was assumed that the emissions would be nominal as high levels of VOC are not present in the soils.
CCC-11	The primary environmental impacts associated with the RAP activities are the transportation of soils offsite and the potential air emissions associated with the excavation of contaminated soils. Both of these issues are addressed in the Air Quality section of the EIR, under impact AQ.1 and AQ.2.

CCC-12	The Applicant has proposed clean-up levels suitable for a future land use consistent with the zoning and current use of the site. The proposed Project is a crude oil production facility, and does not include any commercial and/or residential land uses.
CCC-13	It is possible that any earth moving or grading activities conducted at the site could disturb shallow soil contamination at the site. Some assessments have been conducted (Brycon and Padre) and mitigation measures require that areas planned to be disturbed be assessed and mitigated prior to Phase I grading activities based on potential exposure to lead-containing fugitive dust (mitigation measure SR-2), and that a Contaminated Soil Management Plan be developed for the site to assist in the proper handling and disposal of contaminated soil. Disturbance of shallow contaminated soils may introduce airborne dust contaminated with lead. Modeling and assessments were provided in the EIR to estimate the levels of lead in soil dust that could exceed allowable exposure levels. Mitigation is included in the EIR that requires testing and removal of lead if soil concentrations exceed those that could cause offsite impacts.
CCC-14	The EIR does examine the impacts of implementing the RAP, including excavation of soils, truck hauling and potential vapors. These are addressed under Phase 3 but would be applicable to any activities undertaken after Phase 2 if those are determined to be required. Remediation of the site if the Project does not move forward into Phase 3 would not occur under the Proposed Project and the site would remain as it is today. The Site does not currently present any public health and safety risk due to the contamination.
CCC-15	As indicated in Table 2.10 of the EIR, the remediation is anticipated to take from week 6 to week 13 of Phase 3 (8 weeks).
CCC-16	As it would not be determined if the Project would move forward until after Phase 2, and Phase 3 involves construction and extensive site re-arrangement, installation of permanent landscaping is not anticipated until Phase 3-4. Landscaping would not have an opportunity to provide much growth or mitigation over the 12 months of Phase 2 drilling and testing, and would therefore provide minimal mitigation.
CCC-17	Drilling would be conducted 24 hours per day. Workers will need to be able to see all areas of the drilling rig both during the day and night to ensure proper operation and for safety reasons. Nighttime operations would be limited through the quiet mode drilling requirements, but lighting would still be needed. All lights would be shielded to limit glare, but some spillover and "glow" would remain. A simulated image of the drilling rig at night has been added to the FEIR (see figure 4.1-45).
CCC-18	This comment requests description of habitats that overlay the well trajectory from the surface facility to the offshore reservoir. Additional language has been added to the baseline, Section 4.3.1.1 to state: "The Project's subsurface trajectory would extend from the Urban/Landscaped communities at the drilling location and then under Sandy Beach and Open Water habitats located in the Pacific Ocean." These habitats are described in the text section 4.3. Subsurface well trajectories are not areas where biological impacts would occur due to depth (2,000 feet), lack of biological resources and the limited nature of the area affected by drilling.
CCC-19	A discussion on eel grass bed habitat has been added to Section 4.3.1.2, page 4.3-6.
CCC-20	Section 4.3.1.4 now contains Figure 4.3-1 that shows the distance between sensitive biological resources and the Project Site.
CCC-21	Section 4.3.1.4 now contains Figure 4.3-1 that shows the distance between sensitive biological resources, including Marine Protected Areas, and the Project Site.
CCC-22	Additional information (underlined) has been added to the discussion of dolphins

	and porpoises to include patterns of usage: <u>“Common, Pacific white-sided, and bottlenose dolphin are common, year round residents. The northern right-whale dolphin is common in the winter and spring, and Risso’s dolphin is common year round with peak population in summer and autumn. Dall’s and harbor porpoises (<i>Phocoena phocoena</i>) are boreal species, which are species found in cooler waters of the North Pacific, and only occasionally travel as far south as the SCB.”</u>
CCC-23	The following (underlined) text has been added to the impact analysis on page 4.3- 21: <u>“Due to the industrial and residential setting in which the Project is located, there is not significant avifauna habitat in the Project vicinity, the site (with its proposed rig lit at night, crane and workover rig) is not located in a significant migratory flight path, and is too minimal to result in a significant obstruction to movement, nesting or foraging behavior. Those species inhabiting the marginal habitat surrounding the Project area would already be accustomed to noise and lighting which is currently produced by houses, major road ways, and industrial activities in the area.”</u>
CCC-24	The following (underlined) text has been added to the impact analysis on page 4.3- 21: <u>Sensitive Habitats including Federal Wetlands:</u> There are no sensitive wetland habitat, coastal scrub habitat, federally protected wetlands, or any other sensitive habitat in the general Project area, nor immediately downstream of the Project Site and therefore, the construction and operation phases of the Project, <u>which includes potential impacts resulting from increased noise and lighting,</u> are not expected to have adverse effects on any sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS.
CCC-25	Alarms would be audible and visual. This change has been added to the FEIR in mitigation measure AQ-5d. Notifications to the Hermosa Beach Fire Department have been modified to require notifications at 5 ppm.
CCC-26	The Applicant has submitted information on nearby wells that indicate levels of up to 6 ppm H2S. However, as can be seen on page 4.8-60, there is a potential range of H2S levels in wells throughout the area. The Applicant has indicated, and mitigation measure SR-1g requires, that produced gas shall not exceed 100ppm, with continuous monitoring of the gas streams and periodic monitoring of individual well streams. Therefore, the analysis was conducted assuming that H2S would not exceed 100ppm.
CCC-27	See response to comment CCC-26. Wells would not be allowed to operate and produce oil/gas if they have H2S levels above 100 ppm. In order for a release to occur that caused impacts associated with H2S exposure, two things would have to occur: 1) there would have to be a failure of the system in some manner to allow a release of produced gas at the same time that 2) high H2S levels were encountered and before the well is shut-down and abandoned as per the H2S limits. This scenario was determined to be a low probability that would not affect the Fn curves as both failures would have to occur simultaneously, and was therefore not examined in more detail.
CCC-28	As requested, additional language has been added to the discussion of the Lempert-Keene Seastrand Act discussion on Page 4.3-17 and OSPR was added to the list of reviewing agencies for the Emergency Response Plan.
CCC-29	Mitigation measure BIO-2 has been changed to include all containment and cleanup <u>measures and responsibilities</u> (irrespective of distance from pipeline).
CCC-30	Although the exact capacity of the berm system has not been determined at this point due to potential changes in equipment arrangement, based on the plot plans provided, the estimated capacity of the bermed area would be about 12,000 bbls. This volume exceeds by a large margin the tank capacities. Assuming a 1.3 acre site, this could also accommodate about 12 inches of rain. This does not include

	<p>the pumping rate associated with water disposal. Using the County rainfall isohyets maps, this would be more than the anticipated 100 year rainfall. So preliminary calculations indicate that the proposed design criteria are feasible and would be detailed in the final permit stages.</p>
CCC-31	<p>Check valves are only effective in areas where the crude oil could drain back to the spill point. Between the Project Site and Herondo St., the pipeline route travels downhill and check valves would be ineffective. Downstream of Herondo St., along 190<sup>th</sup> St., check valves would be effective, but once the pipeline passes the peak elevation on Prospect Ave., the pipeline heads downhill again, farther from the sensitive marine environment, and check valves would be less effective. The distance from the Project Site to Herondo St. or from Herondo St. to Prospect Ave. is less than 0.5 miles and the installation of multiple check valves starts to have diminishing returns. The installation of check valves introduces flanges and valves and maintenance requirements, which actually increase spill frequency over a straight line pipe. The decision to install valves should be done strategically to protect sensitive resources, such as rivers or ocean outfalls, etc, but should also be limited to ensure that the spill frequency is not compromised. Installation of a valve at the Herondo St./Valley Drive intersection would be sufficient to help protect sensitive resources and additional valves are determined to not be warranted.</p>
CCC-32	<p>The outfall at 6th Street would not be impacted from the Project or pipeline. Spills would follow the terrain and would impact the Herondo Street storm drain system only. The exact dimensions and configuration of the collection system have not been determined at this time. The City Public Works Department has indicated that they believe it is feasible and could be installed, possibly upstream of the ocean outfall within the street area to minimize outflow volumes. CalTrans provides information (Caltrans Treatment BMP Technology Report April 2008) of various technologies for oil/water and debris separators that could be effective, with maintenance, for small to medium sized spills.</p>
CCC-33	<p>The Applicant has submitted information on the use of double walled pipelines and this information, along with additional analysis, has been added to the FEIR. Double walled pipes produce a number of advantages, but would be challenging to install with the various grades/terrain and pipeline alignment changes and, as per the CSFM, produces long-term problems. More discussion has been added to the Risk and Hydrology Sections. See response to comment EB-217.</p>
CCC-34	<p>Many aspects of the Project are not developed by Phase 2 as the Applicant has indicated that this would be the testing phase for the Project. This includes gas processing, pipeline transportation, and other activities. Construction of a pipeline before completing the exploratory phase of the Project would have environmental impacts and may be unnecessary if the Project proves uneconomical after the exploratory phase. The Applicant may decide to undertake this substantial construction and cost burden earlier but it is not required to substantially lessen or avoid any significant environmental effects of the proposed Project.</p>
CCC-35	<p>A trajectory analysis of a marine spill has been added to the FEIR based on trajectory analysis done for nearby Projects (i.e. Chevron El Segundo Marine Terminal). However, the risk of a potential sub-surface failure is considered to be very rare and unlikely (as per communication with Mark LeClair , CSLC ), and has therefore not been addressed further.</p>
CCC-36	<p>Section 4.3.1.4 now contains Figure 4.3-1 showing the sensitive biological resources, including Marine Protected Areas, and the Project Site and a description of these sensitive areas. In addition, the following text has been added to BIO-2: <u>Areas of Special Biological Significance: Those areas identified above as Sensitive Areas and Marine Protected Areas are recognized as biologically important and given a level of protection indicating that damage causing or contributing to a measurable change in function in these areas</u></p>

	<u>represents a significant impact. The level of impact to each of these areas would be determined by the amount of material spilled and the distance away from the source area and is described below under the Probability of Spill discussion.</u>
CCC-37	The discussion of mitigation measure BIO-2 has been clarified so that the Emergency Response Plan would be prepared <u>in compliance</u> with the OSPR Contingency Plan. In addition, this plan would be reviewed and approved by OSPR. The EIR text now reads: The Applicant shall submit for City approval and shall implement an Emergency Response Plan that would, <u>in compliance with the California State Oil Spill Contingency Plan (CDFW, OSPR 2010)</u> , address protection of biological resources and possible restoration of any areas disturbed during an oil spill or cleanup activities.
CCC-38	A discussion of the Oil Spill Response Organizations, such as the Marine Spill Response Corporation (MSRC), has been added to the FEIR.
CCC-39	More details on the oil spill response trailer have been added to the FEIR in the Hydrology section under mitigation measure HWQ-2e.
CCC-40	Requirements related to HAZMAT training requirements for onsite personnel also have been added to the mitigation measure SR-1c. Requirements for drills are included in the EIR to allow for demonstrated effectiveness.
CCC-41	OSPR requires that the Applicant shall have the capabilities to pay and it is therefore a regulatory requirement and not specifically addressed under CEQA. The City may include specific measures in their development agreement with draw-down accounts and various <u>bonding requirements to help ensure coverage.</u>
CCC-42	Mitigation measure TR-3c, Applicant shall supply private parking sufficient to meet all parking demands and shall direct all employees and contractors to park within Applicant's private parking areas, or to utilize an alternative parking program approved by the City.
CCC-43	As proposed in Section 2.4.6 of the DEIR, the two on street parking spaces eliminated on 6 <sup>th</sup> Street due to the proposed Project would be replaced at the offsite parking lot at 636 Cypress Avenue or the Applicant would provide other suitable public parking spaces consistent with requirements of the City's Preferential Parking Program and its Coastal Land Use Plan, or Local Coastal Program when certified. Proposed Project employees or contractors would not be allowed to park on the street or in public spaces at any time; see mitigation measure TR-3c.
CCC-44	The discussion has been amended to reflect the accurate number of parking spaces.
CCC-45	The location for the Phase 3 vanpool location for additional construction personnel parking has not yet been identified, but would be at a remote location most likely inland where a long term parking arrangement could be secured. The Applicant is proposing an additional parking area on Cypress and to utilize on-site parking on the Project Site and to utilize vanpools and these are included in the application Parking Plan. The location would be consistent with the requirements of the City's Preferential Parking Program, the City's General Plan, the Coastal Land Use Plan or Local Coastal Program when certified, and the California Coastal Act. Therefore, significant impacts from the offsite Project parking for Phase 3 are not expected.
CCC-46	Both the <i>Parking option</i> and/or the <i>No Parking option</i> of the City Maintenance Yard relocation component of the Proposed Project are addressed in the corresponding issue areas as applicable. Impacts are analyzed and mitigation measures were developed for this component of the Project.

**County of Los Angeles Fire Department**

<b>Comment #</b>	<b>Response</b>
CLAFD-1	Comment and information provided on the emergency response area of the Los Angeles County Fire Department noted.
CLAFD-2	Comment and information provided on the jurisdiction of the Land Development Unit of the Los Angeles County Fire Department noted.
CLAFD-3	Comment noted; the DEIR contains sufficient information to address the statutory responsibilities of the Los Angeles County Fire Department, Forestry Division.
CLAFD-4	Comment noted; the Los Angeles County Fire Department, Hazardous Materials Division has no additional comments on the DEIR.

**City of Manhattan Beach, Community Development Department**

Comment #	Response
COMB-1	<p>Impacts to surrounding cities are described throughout the document as appropriate. Impacts are not generally delineated by municipal boundaries but that the EIR does identify the geographic extent of all impacts. Air quality impacts, for example, are either very localized (as described below in response to COMB-2) or regional, the latter affecting the air basin in which adjacent cities such as Manhattan Beach are located. Impacts to coastal and offshore resources also have the potential to be localized or regional in nature, as described in the Biological Resources section. Traffic impacts and noise impacts examine the jurisdictions through which the traffic or construction occurs and examine the municipal codes and requirements of the respective jurisdictions.</p>
COMB-2	<p>The Project would produce air emissions that would impact areas near the site and along traffic corridors. Mitigation measures reduce the criteria and toxic pollutant impacts to less than significant as per the SCAQMD thresholds. As the localized thresholds are based on the peak ground level concentrations very near to the Project Site, there would not be impacts in Manhattan Beach. Truck traffic could produce impacts due to diesel exhaust, but the level of truck trips would be substantially below the level that could cause localized toxic impacts, and therefore, impacts to Manhattan Beach would be less than significant. Impacts of truck traffic are discussed in the EIR under impact AQ.2.</p>
COMB-3	<p>Transportation of hazardous materials would be limited to the transportation of crude oils. The drill cuttings and muds would not be classified as hazardous. Impacts related to diesel particulate emissions are discussed in the air quality section. Further discussion on the potential impacts of spills along the truck routes has been added to the Safety, Risk of Upset &amp; Hazards section (Section 4.8). However, as the EIR indicates, "As the crude oil would be heavy and not volatile, it would be difficult to ignite and would not present a significant risk to the public." This would apply along all the truck routes, including those that pass through Manhattan Beach.</p>
COMB-4	<p>The comment requests information on the level of impact to the City of Manhattan Beach and how those impacts would be mitigated. The probability of any release into the Pacific Ocean is low. The probability of effect decreases with the distance away from any potential pipe failure, especially with the dilution factor of the Pacific Ocean. Any release into the Pacific Ocean could result in potentially significant adverse effects on native species, sensitive species, sensitive marine mammal, and important coastal habitats. Impacts on resident marine biota could be short- to long-term, depending on the amount of oil released, environmental conditions at the time, containment and cleanup measures taken, and length of time for containment. This potential impact to biological resources has been identified as being a Class I, Significant and Unavoidable impact and would be partially mitigated with the implementation of MM BIO-2 which requires an Emergency Response Plan.</p> <p>As indicated in the fourth paragraph of the discussion for Impact HWQ.2, spills and associated contaminated stormwater runoff reaching the ocean could have significant and widespread impacts to water quality. Mitigation measures HWQ-2d and HWQ-2e would be implemented to clean up any spills, including those that potentially reach Manhattan Beach.</p>
COMB-5	<p>Impacts to neighboring cities are identified in the various issue areas as appropriate. As indicated in the first paragraph of the discussion for Impact GEO.4, differential settlement damage due to subsidence is typically only evident in long linear features, such as pipelines, roadways, or aqueducts. Generally, damage to structures and underground utilities occurs only where a</p>

	substantial amount of subsidence occurs. With implementation of Measure GEO-4a, subsidence would be monitored such that substantial amounts of subsidence would be prevented, thus avoiding damage to structures and infrastructure. In the event that minor amounts of subsidence occurs, Measure GEO-4b would be implemented, which consists of increasing water injections to buoy the land surface.
COMB-6	Mitigation measures are included in the Fire and Emergency Response Section which detail requirements in training and personnel for emergency response. In particular, see Mitigation Measure FP-1f on page 4.6-19. These were developed in cooperation with the City of Hermosa Beach Fire Department. These include funding a fire inspector, upgrading the dispatch system, and developing a HAZMAT capabilities. In general, the local fire departments would rely on the area HAZMAT unit capabilities.

**City of Redondo Beach, Community Development Department**

<b>Comment #</b>	<b>Response</b>
CORB-1	Fire fighting resources are primarily related to the release of natural gas and subsequent flame jets or crude oil fires at the facility. Spills along the pipeline route, due to the heavy nature of the crude oil, would present an environmental concern, but little or no health and safety concerns where community notification, evacuation and appropriate fire water capabilities would be needed. The development of response capabilities for spills, such as a HAZMAT unit in closer proximity than the current County unit, is also included and that would provide for response capabilities both at the Project Site and along the pipeline route in Redondo Beach. The development of a HAZMAT unit could entail the training and equipment for the Redondo Beach Fire Department
CORB-2	Response to an incident at the Project Site or along the pipeline route would require HAZMAT unit capabilities. Mitigation measure FP-1f requires the development of a HAZMAT unit including the training of Hermosa, Redondo and Manhattan Beach Fire Department personnel.
CORB-3	Text has been added to Measure GEO-4c mandating that the cities of Redondo Beach and Hermosa Beach receive a copy of subsidence monitoring reports. Baseline measurements will be completed within an area sufficient to measure potential areas of Project-related subsidence, as determined by the subsidence monitoring contractor.
CORB-4	The Cities of Redondo Beach and Torrance have been added as responsible parties for compliance verification in the various mitigation measures.
CORB-5	The Cities of Redondo Beach and Torrance have been added as responsible parties for compliance verification in the various mitigation measures.
CORB-6	The Cities of Redondo Beach and Torrance have been added as responsible parties for compliance verification in the various mitigation measures.

**County Sanitary Districts of Los Angeles County**

<b>Comment #</b>	<b>Response</b>
CSDLA-1	Comment noted; the Applicant will provide a detailed map of the proposed Project alignment to the Sewer Design Section of the County Sanitation Districts of Los Angeles County for review if the Project is approved.
CSDLA-2	Comment noted; the Applicant will contact the Industrial Waste Section of the County Sanitation Districts of Los Angeles County for a determination on permit requirements for an Industrial Wastewater Discharge Permit if the Project is approved.

CSDLA-3	Comment and provided information on trunk sewer line capacities noted.
CSDLA-4	Comment and provided information on the City of Carson Joint Water Pollution Control Plant noted.
CSDLA-5	Comment and information provided on the County Sanitation Districts of Los Angeles County Wastewater & Sewer Systems Will Serve Program noted.
CSDLA-6	Comment and information provided on the County Sanitation Districts of Los Angeles County Connection Fee application procedure noted.
CSDLA-7	Comment and information provided on the County Sanitation Districts of Los Angeles County requirements of the Federal Clean Air Act and Southern California Association of Government policies regarding available capacity of the District's treatment facilities noted.

**Department of Conservation, Division of Oil, Gas, and Geothermal Resources**

<b>Comment #</b>	<b>Response</b>
DOGGR-1	Geological Resources text has been edited in response to the comment.
DOGGR-2	Geological Resources text has been edited in response to the comment.
DOGGR-3	Geological Resources text has been edited in response to the comment.
DOGGR-4	Geological Resources text has been edited in response to the comment.
DOGGR-5	Safety and Risk text has been edited in response to the comment.
DOGGR-6	Water Resources text has been edited in response to the comment.
DOGGR-7	The Project description has been modified in the FEIR to address water "disposal" and injection wells instead of water flood wells. The purpose of the water disposal/injection is to dispose of the water and to maintain a neutral extraction. Water flooding would be conducted to enhance recovery of crude oil and is managed differently under DOGGR requirements.
DOGGR-8	Text has been modified to use "produced" water instead of just water
DOGGR-9	Text has been added to section 2.4.2 describing DOGGRs process in issuing a drilling permit.
DOGGR-10	Text has been modified to remove the schist formation from the Puente formation discussion.
DOGGR-11	Text has been modified to refer to the DOGGR requirements for blowout prevention.
DOGGR-12	Text has been added to indicate that the produced water would be injected at below the formation fracture pressure.
DOGGR-13	Text has been modified to indicate that DOGGR "may" review the EIR.
DOGGR-14	Text has been modified to remove the Federal EPA from approval of the water injection plan.
DOGGR-15	Text has been modified to include workover rigs in equipment allowed to be higher than 16 feet.
DOGGR-16	The language referring to DOGGR is a part of the 1993 CUP and is therefore left in the description of that document.
DOGGR-17	All wells would be used for water disposal. This change has been made throughout the document. However, notes have been added to the EIR indicating DOGGR description of DOGGRs role.
DOGGR-18	The corrected reference citation has been added to the text in section 4.2 as well as section 10 under references.
DOGGR-19	Reference to DOGGR in the agency inspections section has been added.
DOGGR-20	The text has been edited in response to the comment.
DOGGR-21	The text has been edited in response to the comment.
DOGGR-22	The text has been edited in response to the comment.
DOGGR-23	The text has been edited in response to the comment.

DOGGR-24	Secondary recovery operations are not proposed as part of the Project.
DOGGR-25	The text has been edited in response to the comment.
DOGGR-26	The text has been edited in response to the comment.
DOGGR-27	The text has been edited in response to the comment.
DOGGR-28	The Mitigation Monitoring Plan has been edited in response to the comment.
DOGGR-29	The text and Mitigation Monitoring Plan have been edited in response to the comment.
DOGGR-30	The Mitigation Monitoring Plan has been edited in response to the comment.
DOGGR-31	Text has been modified to indicate that H2S "may" be present in the produced gas
DOGGR-32	Text has been modified to indicate that CCR section 1774 is related to pipeline construction and maintenance activities.
DOGGR-33	Text has been modified to indicate that the operator is required to re-abandon problem wells and that DOGGR will contract to have wells be re-abandoned in a former operator cannot be identified.
DOGGR-34	Text has been modified to indicate that DOGGR "may" require leak testing and re-abandonment of wells near structures.
DOGGR-35	Table 4.8.9 has been updated to add DOGGR to compliance, responding and spills.
DOGGR-36	The language referring to DOGGR is a part of the 1993 CUP and is therefore left in the description of that document. However, a note was added indicating the role of DOGGR.
DOGGR-37	The language referring to DOGGR is a part of the 1993 CUP and is therefore left in the description of that document. However, a note was added indicating the role of DOGGR.
DOGGR-38	The language referring to DOGGR is a part of the 1993 CUP and is therefore left in the description of that document. However, a note was added indicating the role of DOGGR.
DOGGR-39	The language referring to DOGGR is a part of the 1993 CUP and is therefore left in the description of that document. However, a note was added indicating the role of DOGGR.
DOGGR-40	Use of the terminology BOPE was substituted throughout the EIR.
DOGGR-41	The BOEM data base is used in the document to indicate the range of potential blowout rates and to examine the blowout rates associated with drilling into pressurized reservoirs. Many onshore databases include wells drilled into established, low pressure fields where blowouts could not occur. These onshore databases do not present accurate information for a well drilled into a pressurized area. The resulting blowout rate was reduced based on the anticipated fraction of wells that might be pressurized, thereby lowering the actual blowout rate.
DOGGR-42	Page 4.8-66 does not address waterflooding.
DOGGR-43	Language has been added to the discussion of the Redondo Beach wells indicating that the proposed Project wells would be drilled into a different area of the reservoir and that the use of the Redondo Beach wells is used to estimate the fraction of Hermosa wells that would have pressure.
DOGGR-44	The reference for the DOGGR blowout rate is the DOGGR report from 1993, publication TR43, using blowouts during all activities.
DOGGR-45	The mention of DOGGR in mitigation measure SR-1g is in relation to the abandonment procedures, not with regard to the H2S content. This has been clarified in the text of SR-1g.
DOGGR-46	DOGGR has been added to mitigation measure SR-1a as an agency that would have applicable requirements and verification.  The mention of DOGGR in mitigation measure SR-1g is in relation to the abandonment procedures, not with regard to the H2S content. This has been

	clarified in the text of SR-1g.
DOGGR-47	The text has been edited in response to the comment.
DOGGR-48	The text has been edited in response to the comment.
DOGGR-49	The text has been edited in response to the comment.
DOGGR-50	The text has been edited in response to the comment.
DOGGR-51	The text has been edited in response to the comment.
DOGGR-52	The text has been edited in response to the comment.
DOGGR-53	The sentence in question has been removed because the discussion is not related to subsidence.
DOGGR-54	The text has been edited in response to the comment.
DOGGR-55	The text has been edited in response to the comment.
DOGGR-56	The MMP has been edited in response to the comment.
DOGGR-57	The MMP has been edited in response to the comment.
DOGGR-58	The MMP has been edited in response to the comment.
DOGGR-59	The mention of DOGGR in mitigation measure SR-1g is in relation to the abandonment procedures, not with regard to the H2S content. This has been clarified in the text SR-1g.

#### Department of Transportation

Comment #	Response
DOT-1	The Applicant has indicated in their Application materials, and as reiterated within the traffic section, 4.13.6.1, that construction truck traffic would be limited to non-peak hours and that crude oil trucks would operate between 9-3 (which would be non-peak hours). Equipment deliveries, however, could be made between the hours of 8-3 and these are not shown to produce significant traffic impacts.
DOT-2	The EIR indicates that the Artesia/Hwy 1 intersection operates at an LOS of F during the am peak hour, and that the intersection of Artesia and Hwy 405 operates at an LOS of E for the baseline conditions. Truck traffic from the Project would peak at 18 trucks per day, during non-peak hours, which would be less than significant. As the impacts are less than significant, the EIR does not have a nexus for application of mitigation.
DOT-3	The Project would also produce a less than significant impact at Aviation and PCH, even without the improvements. The EIR preparers are not aware of any mechanism locally for collecting cumulative traffic fees. The city has not adopted any impact fee program or formed any assessment district to fund local or regional traffic improvements. The city has adopted an optional in-lieu fee for street pavement improvements required as a consequence of new development per have Municipal Code Section 12.08.060. The city receives funding for specified local improvements through various transportation improvement funding programs based on set allocation schedules.

#### Los Angeles Regional Water Quality Control Board

Comment #	Response
RWQCB-1	Comment noted. The discussion in the FEIR reflects the responsibilities of the various agencies. Text has been added to the regulatory setting section (Section 4.14.2.2) in response to the comment.
RWQCB-2	Comment noted. The Applicant's consultant will be requested to provide the requested written documentation from both DTSC and the RWQCB.

RWQCB-3	The Applicant would be required to obtain the various permits required as part of the Project and the RWQCB would be contacted before initiation of the Phase 1 activities. There is no requirement to implement the RAP now since there is no potential threat to health and the environment and the contamination levels are low by the various agencies' standards.
RWQCB-4	The Applicant will be required to comply with the RWQCB permitting requirements as stated in the comment. Text has been added to the impact discussion for Impact HWQ.1 in response to the comment.

### South Coast Air Quality Management District

Comment #	Response
SCAQMD-1	Contingency measures that are enforceable by the lead agency for odor issues have been added to the odor minimization plan mitigation measure. These include providing the City with the authority to require changes to operations related to air quality, training of City staff in identifying odors, and review and approval of the Air Monitoring Plan by the City as well as the SCAQMD.
SCAQMD-2	<p>An examination of the model change bulletins since the 2009 AERMOD version indicate that only nominal model bug fixes and changes have been made. The newest model was downloaded and run with the same input files. The newer model actually produced lower results by about 1%. However, none of the newer model changes altered the results of the analysis.</p> <p>Annual particulate matter modeling uses the annual timeframe period in the AERMOD modeling run.</p> <p>Only point and volume sources are required to be set up as unit emission rates in HARP onramp using AERMOD. Area sources are handled differently and an area source has to be set up to be a unit emission rate over the entire area. This means dividing a unit emission rate of 1.0 g/s by the area of the area source. The HARP documentation (under the Onramp help screen "important note about emissions") specifically states the following "<i>Please note that area source emissions in model runs are normally entered as g/s-m2. You are required to adjust your g/s-m2 to an overall equivalent of 1 g/s for the area source (e.g., q = 0.01 g/s-m2 for an area source 10m x 10m).</i>" The area sources in the Project modeling runs use a 1 g/s total source rate divided by the area of the area source. Note that this is not the case under a normal, ISC HARP run, where emissions are entered into the dispersion portion of HARP model as a unit rate, but are then generated by the HARP model when as an ISC input file as a unit rate divided by the source area (for area sources only).</p> <p>The electronic modeling files were included on the CD which came with the DEIR binder submitted to the SCAQMD.</p>
SCAQMD-3	Text requiring the City to ensure that the emissions levels for the entire facility are below thresholds defined in the EIR has been added to mitigation measure AQ-4.

### State Clearinghouse

Comment #	Response
SCH-1	The comment from the State Clearinghouse stating that no comments were received on the Draft EIR is acknowledged.

