

**Study of Neighborhood Air near Petroleum Sources (SNAPS):
Responses to Comments Submitted on the Baldwin Hills Site Selection Document**

Given current circumstances due to COVID-19, the California Air Resources Board (CARB) is unable to begin monitoring near the Inglewood Oil Field in 2020. The pandemic has highlighted concerns including staff safety and monitoring during reduced operations at Inglewood Oil Field. Due to these concerns, CARB decided to delay monitoring until staff is safely able to prepare monitoring equipment for all sites, secure site agreements, and meet travel needs to deploy equipment in the Baldwin Hills area. The delay in scheduling is not expected to change the one-year commitment made to monitor in the area. If you have questions, please contact us at snaps@arb.ca.gov.

Background

CARB selected Baldwin Hills and communities surrounding the Inglewood Oil Field (IOF) for intensive air quality monitoring under the SNAPS program. The primary purpose of SNAPS monitoring is to assess community air quality to better understand potential community exposure to all nearby pollution sources, including emissions from oil and gas infrastructure, mobile sources, consumer products, residential activities, and waste management, among others.

CARB's SNAPS staff (staff) developed a site selection process to methodically assess each potential site's ability to meet the project's air monitoring goals and logistical requirements. On May 1, 2020, staff released [documentation](#) detailing the site selection process, including a discussion on the site selection approach, a list of proposed monitoring sites, and a proposed short-list of sites. Stakeholders were invited to submit public comments on this released site selection material through May 31, 2020, and staff have since reviewed all comments. We are providing responses to public comments received. In some instances, we are providing quotes from comment letters grouped by similar topic. The numbered comments are followed by staff responses.

Stationary site selection

Throughout the site selection process, staff pursued locations that provide representative air quality data in the communities located near the IOF. Potential sites must also meet minimum logistical and technical criteria for SNAPS air monitoring, including a safe working environment, adequate power, security, space, and regular site access for staff. These criteria are based on CARB's experience in siting and maintaining stationary monitoring sites throughout California.

Staff reviewed many sites, and several sites evaluated by staff fulfill these criteria. In some cases, owners/operators of sites that would provide the most representative data for the community were not able to or declined to coordinate with CARB staff to locate

instrumentation on their property. The short-list sites chosen meet the minimum criteria, and all of the site owners/operators have offered support as staff works through the logistics of temporary leasing agreements, installation, and monitoring (Figure 1).

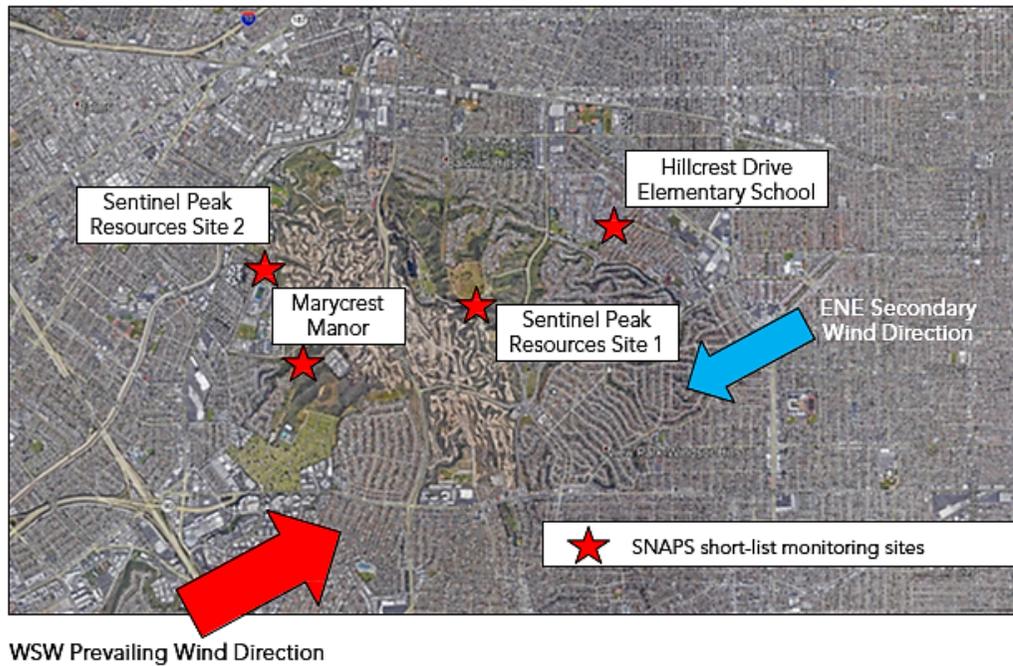


Figure 1. SNAPS short-list of potential monitoring sites near the Inglewood Oil Field

1. **Comment:** “At least one monitoring site should be located within a representative neighborhood westerly of the IOF.”

Response: Staff anticipates locating one of the two stationary monitoring trailers west of the IOF, likely in or near Culver City. Staff are prioritizing Marycrest Manor, a stakeholder-suggested site, as the preferred monitoring site west of the IOF due to its proximity to the IOF gas processing plant and several storage tanks, and its location adjacent to a residential community that has reported odor complaints in recent years.

2. **Comment:** “. . . take into consideration additional criteria that will account for the best possible data collection, including community-specific and individual neighborhood factors around environmental justice.”

Response: Staff reviewed neighborhoods around the IOF using the CalEnviroScreen 3.0 tool in an effort to include socioeconomic and pollution burden factors during the site selection process (Figure 2).

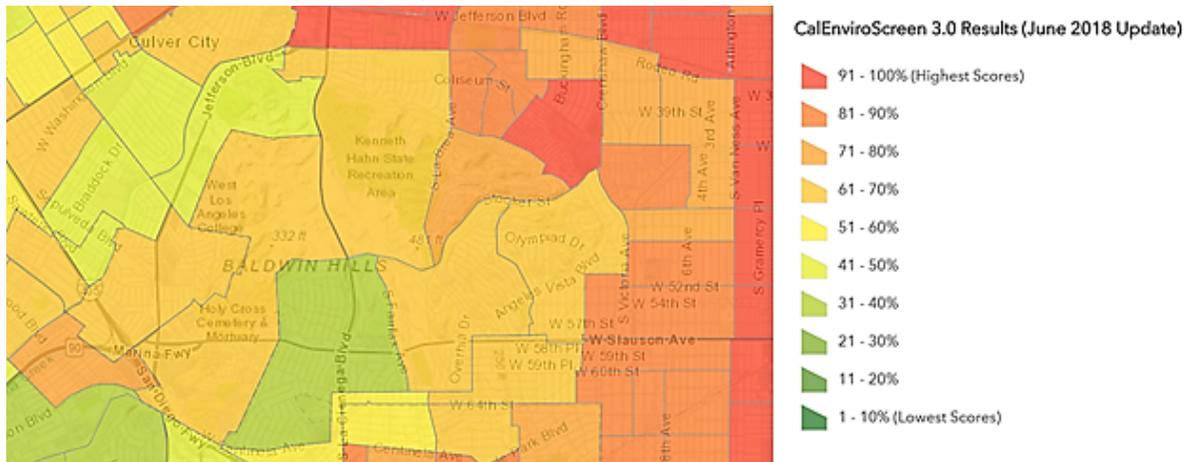


Figure 2. CalEnviroScreen 3.0 results for communities surrounding the Inglewood Oil Field

One reason staff selected Hillcrest Drive Elementary School for the short-list of potential monitoring sites is because the school is located in a densely-populated, disadvantaged community (CalEnviroScreen 3.0 score above the 75th percentile). While there are other disadvantaged communities in the area, they are at a similar or further distance from the IOF, and therefore would be less likely to be impacted by potential oilfield emissions compared to the two IOF sites and Marycrest Manor. Staff will continue to use these population characteristics, pollution data, and community suggestions to inform mobile monitoring routes.

3. **Comment:** “The Hillcrest Drive Elementary School site should be eliminated from consideration because it is too distant from the IOF and not representative of conditions experienced by other impacted neighborhoods that abut the IOF.”

Response: Based on several public comments regarding this site, Hillcrest Drive Elementary School will be considered a lower priority site than the other three short-list locations. While this site is located in a disadvantaged community (see above), the school is also located more than one mile northeast of and several hundred feet in elevation below the oilfield, and is not as close in proximity to IOF odor complaints. Therefore, there is less likelihood of gathering air pollution data near potential oil and gas sources at this potential monitoring site.

4. **Comment:** “Furthermore, we have serious concerns about the extent to which representatives from Sentinel Peak Resources, the current oil operator of the Inglewood Oil Field, have been in collaboration with your office to determine the site selection for this program. Two of the four recommended sites (one to the east and one to the west of the field) are both on Sentinel Peak Resources property. . . It is clearly in the oil operator’s best interest to reduce the extent to which air pollution concerns are documented in this study

as that could require them to take additional action to clean up or potentially even shut down their operations.”

Response: Staff are considering two potential monitoring sites on the IOF and have been in communication with Sentinel Peak Resources to assess the feasibility of these sites. These sites, particularly the site on the eastern edge of the IOF (Sentinel Peak Resources Site 1), are of high priority because they are the closest to active oil wells, the gas processing plant, and storage tanks – all of which have the potential to emit hazardous pollutants into the surrounding communities. Sentinel Peak Resources Site 1 is located directly adjacent to Kenneth Hahn State Recreation Area and could potentially assess community exposure near the park, and Sentinel Peak Resources Site 2 is in close proximity to dense housing and could also potentially assess community exposure in that area of Culver City. CARB staff are currently monitoring IOF activity through California Geologic Energy Management Division (CalGEM)¹ and South Coast Air Quality Management District (SCAQMD) databases², and will continue to do so throughout the monitoring duration to ensure Sentinel Peak Resources is not decreasing activity specifically in response to SNAPS monitoring. Staff will document these activities in the final report and utilize activity data for data analysis as appropriate.

Mobile monitoring

5. **Comment:** “The Mobile Monitoring unit offers a unique opportunity to collect monitoring data at a granular level for individual neighborhoods . . . include identification of multiple mobile monitoring routes that would be scheduled to capture a full-range of representative conditions experienced by residents of those neighborhoods.”

Response: The value of mobile monitoring is in the ability to measure pollutants quickly over a wide spatial area. However, individual mobile monitoring measurements represent a snapshot of pollutant concentrations. Persistent and widespread mobile monitoring measurements of an area – street, block, and/or neighborhood – would be required to fully characterize all representative conditions. The SNAPS program mobile monitoring is limited to one mobile platform and two staff responsible for all monitoring and data analysis. CARB will utilize these resources to the fullest extent considering limited resources; however, a full characterization of every street within the Baldwin Hills area is beyond the current resource capacity of the SNAPS program.

Limited mobile monitoring resources require staff to be strategic about where and when mobile monitoring is conducted. CARB staff will work with community suggestions and stationary monitoring results to develop mobile monitoring routes. All mobile monitoring

¹ California Geologic Energy Management Division, WellSTAR database.

https://www.conservation.ca.gov/calgem/for_operators/Pages/WellSTAR.aspx

² South Coast Air Quality Management District, Rule 1148.2 Oil and Gas Well Activity Search.

<http://xapprod.aqmd.gov/r1148pubaccessportal/>

routes suggestions will be incorporated as resources, time, and safety allow. Please continue to send suggestions via the contact information below to better inform our mobile monitoring plans.

6. **Comment:** “At a minimum, varied mobile monitoring routes should be designed to capture target areas for data that will be useful toward evaluation of odor complaints, social justice factors and both prevailing and irregular field and meteorological conditions.”

Response: Suggestions like these are appreciated and will guide us in determining mobile monitoring routes that are thoughtfully developed and implemented. Mobile monitoring will be informed by local meteorological conditions, times of day when odor complaints are reported (including the overnight hours when many of the community odor complaints near the IOF are reported), and through discussion with stakeholders. As mentioned previously, staff will also incorporate environmental justice metrics, such as CalEnviroScreen 3.0 scores, when selecting neighborhoods to monitor.

7. **Comment:** “The Mobile Monitoring unit could also serve as an asset for investigating complaints or irregular conditions on a real-time basis. The SNAPS mobile unit could be coordinated to function as a primary data collection tool or to provide supplemental monitoring to compliment other localized monitoring, such as AQMD monitoring and odor-complaint response.”

Response: Staff will be unable to respond to complaints in real-time given the logistical considerations of planning a mobile monitoring trip. However, staff will assess past and current odor complaints to determine locations and likely time periods to inform mobile monitoring plans.

Monitoring duration

8. **Comment:** “Ideally, monitoring for the SNAPS program should be conducted for one calendar year in order to assess seasonal influence. I request that the overall duration of one-year monitoring be scheduled to clearly defined and enumerate a full range of metrological conditions, including for night-/day-time, for low-wind (0.1-1.5 ft/sec), and for summer and winter cycles.”

Response: Based on a clear community desire for one year of SNAPS monitoring near the IOF, staff anticipates maintaining two stationary monitoring trailers in the area for one year and will perform mobile monitoring (as feasible) throughout that same year.

9. **Comment:** “The duration of monitoring should be adjusted as necessary, to capture “typical” IOF operational/production conditions for a relevant period of time. Current COVID and oil economic downturn have affected the level of activity within the IOF. IOF

activity levels at this time may not be representative of conditions experienced in recent past years.”

Response: CARB will not begin monitoring near the IOF in 2020 due to current COVID-19 conditions. CARB and OEHHA staff are confident that one year of continuous monitoring will provide for a representative assessment of the air quality and potential associated health impacts in communities near the IOF. Given the SNAPS program was created to better characterize air quality in communities near oil and gas operations statewide, staff plan to relocate the trailers to a different community (McKittrick/Derby Acres or South Los Angeles) after one year of monitoring near Baldwin Hills.

Coordination with community groups, local agencies, and the nearby communities-at-large

10. Comment: “I am aware that the South Coast Air Quality Management District has initiated a program for Community Air Monitoring, which may evaluate localized air pollution concerns associated with oil and gas facilities and/or urban air pollution with socially/economically disadvantaged communities. . . . In addition, the County Department of Health and others in Los Angeles County are preparing an updated Health Risk Assessment for the IOF . . . along with a County-wide update of oil and gas regulations which must reflect the health and safety issues of oil/gas production in urban/residential areas. Coordination with such programs could generate a more complete picture of comprehensive and complimentary data.”

Response: CARB plans to continue working with agencies, stakeholders, and communities near the IOF before, throughout, and after the year-long SNAPS monitoring period to best characterize air quality near the IOF. Staff will continue to build on current collaborative efforts and are open to learning about and understanding additional relevant efforts that affect communities surrounding the IOF. Fostering an open dialogue with the public and local authorities/agencies is a vital part of the SNAPS program – please reach out via the contact information at the end of this document with any comments or suggestions.

11. Comment: “Los Angeles County will soon embark on preparing a Health Assessment and Environmental Justice (HA-EJ) Study, which is a requirement stipulated by the terms of the CSD Settlement Agreement. As such, there is an opportunity for high-level technical support (via CARB and the SNAPS program) to conduct studies and develop focused air quality data for neighborhoods surrounding the IOF that may be relevant and useful to the HA-EJ Study.”

Response: Staff are participating in monthly calls with the LA County Department of Public Health to provide updates on progress of the SNAPS program and the LA County Health Assessment-Environmental Justice study. These calls and communication between the two studies will continue while both efforts are underway.

12. **Comment:** “Such coordination could include how data should be formatted to maximize compatibility for sharing, protocol for collecting and validating data, electronic portals for accessing and viewing data, and other steps to ensure the integrity of the data is preserved.”

Response: CARB will upload near real-time hourly data to the [SNAPS website](#) for a subset of pollutants, including meteorological data. In the previous SNAPS community, Lost Hills, these data included PM_{2.5}, ozone, black carbon, carbon monoxide, methane, and hydrogen sulfide. However, staff plans to tailor the website display to the needs of the community, specifically, which real-time measurements would be most helpful to display. More detailed analysis, including source attribution and a health risk assessment of all pollutants monitored under the SNAPS program, will be released in a final report after the completion of air monitoring. Largely for quality control purposes and to ensure data validity, CARB does not plan to share any additional data until releasing this final report, though staff will be in communication with LA County to create the dataset that will be accessible for the HA-EJ Study. A draft report will be released prior to the final report, with an opportunity for public comment. Release of the draft report will precede community meetings in which staff will solicit feedback on portions of the report. If at any point, the community has comments on the SNAPS program and air monitoring near Baldwin Hills, please contact us.

Next Steps

Considering the comments detailed in this document, the SNAPS team will select the final two stationary monitoring sites and begin securing agreements with the sites over the next few months. Once agreements are in place, staff will announce the final two selected monitoring sites via the SNAPS website. Staff will also continue to communicate with local community groups, agencies, and residents during that time, and will begin air monitoring near the Inglewood Oil Field in 2021.

SNAPS Contact Information

Email: snaps@arb.ca.gov | Call: (916) 327-5599