

Review Scope: Scientific and technical review of the information and conclusions presented in the “South Ellwood Natural Oil and Gas Seeps Technical Memorandum”

California Ocean Science Trust scientific and technical review on behalf of the California State Lands Commission

Project Background and Management Context

The California State Lands Commission (CSLC) manages the state’s 4 million acres of tidelands and submerged lands and the beds of navigable rivers, streams, lakes, bays, estuaries, inlets, and straits. The CSLC works to protect and enhance these lands and natural resources by issuing leases for use or development, among other activities.

CSLC is in the process of preparing an environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA) to inform decision-making about whether to approve an amendment to State Oil and Gas Lease PRC 3242. If approved, the lease amendment would allow client Venoco to implement the South Ellwood Field Project¹.

The CSLC determined that an EIR was necessary prior to consideration of the lease amendment based on the potential for significant impacts resulting from the proposed project. A primary goal of an EIR is to examine the potential for impacts from project activities according to CEQA issue areas. In addition, an EIR must describe a range of reasonable alternatives to the project that would avoid or substantially lessen any of the significant effects of the project, among other considerations.

A technical memorandum - the subject of this review - is being prepared by AMEC on behalf of the CSLC. This report is intended to be included as an appendix to the draft EIR. It summarizes existing literature and scientific information linking oil production with natural seep activity. Following the scientific review, the information contained within the technical memorandum will be integrated into the draft EIR.

Review Request and Scope

In order to ensure decisions are grounded in sound scientific conclusions, the CSLC has requested Ocean Science Trust, an independent non-profit organization dedicated to advancing a constructive role for science in decision-making, to coordinate an independent scientific and technical review of the “South Ellwood Natural Oil and Gas Seeps Technical Memorandum.” This is not a comprehensive review of the full EIR, or whether the report contains sufficient scientific information to make management decisions. Rather, reviewers will conduct an assessment of whether:

¹ For the full South Ellwood Field Project description, see section 2.0 of *Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meeting*: http://www.slc.ca.gov/Info/Reports/South_Ellwood/NOP.pdf

- 1) the scientific information presented within the report is sound and reasonable,
- 2) the relevant science included in the report is comprehensive and representative of existing knowledge in this field of research; and,
- 3) the conclusions and interpretations drawn in the report are appropriate given the available scientific information.

As is feasible, reviewers will also help identify any data gaps that could impede CSLC from making informed decisions, as well as comment on the types of research that would most effectively advance the state of the science in order to fill such gaps.

To conduct the review process, Ocean Science Trust will work with CSLC to develop a set of questions for reviewers to consider in evaluating the elements outlined above. Reviewers will independently respond to these questions and provide a written assessment to Ocean Science Trust. Ocean Science Trust will produce a public summary and technical review report that appropriately represent the individual reviewer assessments. The review will be conducted as a single blind process with anonymity among reviewers and beyond Ocean Science Trust staff.

Review Outputs

Ocean Science Trust will produce two review outputs:

1. A brief public summary of the review process and resulting reviewer assessments, intended for inclusion in the EIR documentation. This summary will also be made available on the Ocean Science Trust [website](#) upon completion of the review.
2. A technical review report for use by CSLC in the EIR consideration and permit decision-making processes. This report will include technical details from the reviewers, including in-text comments on the draft, as well as responses to guiding questions from the review instructions. We acknowledge that reviewers may provide recommendations beyond the given charge; such recommendations will be honored and represented in the final report.

Roles and Responsibilities

California Ocean Science Trust

CSLC has asked Ocean Science Trust to coordinate all aspects of this external scientific and technical review. Ocean Science Trust will assemble a set of expert reviewers, and design and implement a scientific review process that promotes our core review principles: objectivity, transparency, reviewer candor, efficiency, and scientific rigor.

Ocean Science Trust will participate in the review process as follows:

1. *Design and implement a review process that addresses management needs.* Ocean Science Trust will work with CLSC to formalize a review process that meets our collective intention of promoting full candor among reviewers, scientific rigor, efficiency, and fulfills Ocean Science Trust's and CSLC's shared commitment to public accountability and transparency. The document describing the review process will be publicly available on the Ocean Science Trust [website](#).

2. *Solicit expert reviewers using a rigorous selection process.* Ocean Science Trust will implement a process to identify approximately three reviewers that are expert in relevant and diverse scientific fields as applicable to the scope of this review. Ocean Science Trust will solicit reviewer recommendations from Ocean Science Trust's own professional network, starting with the Ocean Protection Council Science Advisory Team (OPC-SAT). In the service of providing feedback intended to encourage the best possible product, and in accordance with best practices for scientific and technical review, all reviewers will be required to declare whether they perceive a conflict of interest. Ocean Science Trust will evaluate reviewers on a case-by-case basis based on the declared conflicts. Final selection of reviewers will be made by the Ocean Protection Council Science Advisor (Ocean Science Trust Executive Director).
3. *Conduct a review process that is on task and on time.* Ocean Science Trust will work with CSLC to inform the reviewers of the scope and purpose of their task, including how the information they produce will be used. Ocean Science Trust will gather and compile background information relevant to the review scope, and provide administrative and staff support to build greater efficiency into the review process. Ocean Science Trust will propose a timeline that balances management deadlines for delivery of the final product, and availability of appropriate experts.
4. *Produce and deliver final outputs.* Ocean Science Trust will work with reviewers to prepare two deliverables, including a brief public summary of the review process and resulting reviewer assessments, as well as a review report that provides in-depth technical feedback focused on the scope outlined above.
5. *Encourage candor among reviewers.* To encourage unbiased and candid input, the review process will be single blind (i.e., reviewer identities will be kept anonymous beyond Ocean Science Trust staff engaged in this review). Ocean Science Trust will honor and appropriately represent each reviewer's assessment, including any dissenting views, in the review summary and final report.
6. *Serve as honest broker.* Ocean Science Trust will act as an honest broker between participating managers and scientists to help strengthen collaboration and mutual understanding, and promote clear communication.

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CSLC will participate in the review process as follows:

1. *Provide all relevant project documents and supporting materials.* CSLC will identify and provide all project documents and other information necessary for reviewers to conduct a constructive assessment. CSLC will work to ensure all related materials are clear and accessible to reviewers in a realistic timeframe.
2. *Constructively engage with Ocean Science Trust staff.* CSLC staff most familiar with the project documents under review will engage in the process and be available to answer

questions or provide additional materials requested by the reviewers as deemed necessary, with Ocean Science Trust serving as the mediator between reviewers and CLSC. The CSLC project lead, Eric Gillies, Asst. Chief, Division of Environmental Planning and Management, has agreed to serve as the primary contacts during the review process. In order to adhere to review timelines, CSLC will respond to and provide feedback on requested materials from Ocean Science Trust in a reasonable, mutually agreed-upon timeframe.

3. Consider reviewer comments and recommendations. CSLC intends to consider and incorporate reviewer feedback and recommendations into the draft EIR and other supporting materials as appropriate.