Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

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Director of Regional Planning

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Chief Deputy Director,
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December 9, 2021

Mr. Daniel Taimuty
Sentinel Peak Resources
5640 S. Fairfax Avenue
Los Angeles, California 90056

Dear Mr. Taimuty:

BALDWIN HILLS PERIODIC REVIEW

As you are aware, the Baldwin Hills Community Standards District (CSD) was adopted into Title 22 of the Los Angeles County Code on October 28, 2008, to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and production of oil and gas within the unincorporated portion of the Inglewood Oil Field located in the Baldwin Hills area. The purpose of the CSD is to help ensure that oil field operations are conducted in harmony with adjacent land uses, minimize the potential adverse impacts on neighbors, and to enhance the appearance of the site with landscaping and other property maintenance requirements. Since then, the County, the oil field operator, and community representatives have been working together to ensure that the standards of the CSD are implemented to protect the comfort, health, safety, and general welfare of people living, working, and recreating in the surrounding areas.

Pursuant to Section 22.310.070.G of the CSD, the County conducted a comprehensive review of the requirements of the CSD to determine if the provisions achieve this objective. The Periodic Review Final Report (Report) concluded that the provisions of the CSD have been effective. However, the Report does identify nine recommendations to strengthen the implementation of the CSD. I reviewed the Report and agree with its conclusions.

Accordingly, the Department of Regional Planning (DRP) requests that Sentinel Peak Resources immediately begin implementing the recommendations related to CSD Sections 22.310.050.D, 22.310.050.O, 22.310.050.Z.3, 22.310.060.C, 22.310.060.G, and 22.310.100.B as summarized on page 12 of the Report (attached). I am instructing DRP staff to begin work on the Report's recommendations related to CSD Sections 22.310.060.D.

Please contact Edgar De La Torre at (213) 974-6483, or at edelatorre@planning.lacounty.gov with any questions. We look forward to continuing our work together.

Sincerely,

AMY J. BODEK, AICP
Director of Regional Planning

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Attachment

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to the language of the CSD ordinance; rather, the recommendations are improvements in the method of implementation or compliance effort of the subject provision as summarized in the table below.

CSD Provision	Summary of Recommendation
22.310.050.D	Based on public input, it is recommended the operator use an alternate geotechnical engineering firm, to the satisfaction of Public Works, for the property damage complaint follow-up investigations. The use of an alternate firm would bring an additional team of subject matter experts to the issue.
22.310.050.O	Recommendation that the Operator continue the use of metal and or plastic bins and tanks consistent with current practice as the elimination of the use of below ground sumps is a significant environmental benefit.
22.310.050.Z.3	Based on the results of the 2020 Health Risk Assessment (HRA), all future Annual Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan reviews shall include consideration of the HRA results with respect to the number and location of new wells proposed to be drilled in the plan prior to approval by DRP (CSD 22.310.050.Z.3). If more than 25 wells are proposed, the plan review analysis should consider additional potential mitigation which could include further setbacks, emissions reductions or others as determined in the Annual Drilling Plan review.
23.310.060.C	To improve the documentation of the oil field wildfire prevention program, it is recommended that the existing electrical maintenance activities be added to the facility Safety, Inspection, Maintenance and Quality Assurance Program (SIMQAP) document.
22.310.060.D	Due to the fact that unannounced drills have not taken place in the past, it is recommended that efforts be made to ensure that unannounced drills take place at the oil field as allowed for by the provision of the CSD. The Department of Regional Planning may coordinate with the Fire Department to ensure that unannounced drills occur in the future. The Hearing Officer recommended a revision to this CSD provision to require an unannounced drill at least once per year. Please see the discussion for Provision 22.320.060.D in Section 5.0.
22.310.060.G	Based on evidence of some incomplete complaint data, it is recommended that the operator meet with staff involved with the complaint process and the 1-800 telephone line vendor to review the required information necessary for filing a complete complaint. Better complaint documentation will improve the quality of the data collected for a complaint, assist in investigation of the complaint, and therefore upgrade the complaint process and data base.
22.310.100.B	To improve the communication of oil field activities to the public it is recommended that the operator post updates of oil field incidents on the oil field website.
22.310.100.B	To improve the communication of oil field activities to the public outlined in CSD Provisions 22.310.100, Public Outreach, it is recommended that the operator provide a Frequently Asked Questions (FAQ) section to the oil field website.
22.310.100.B	To improve the communication of oil field activities to the public outlined in CSD Provisions 22.310.100, Public Outreach, it is recommended that the operator provide an oil and gas primer to the oil field website.