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Apri 6, 2014

Los Angeles County
Department of Regional Planning
Attn: Timothy Stapleton, Zoning Enforcement West
320 W. Temple Street
Los Angeles, CA 90012

Re: Baldwin Hills CSD Periodic Review

Dear Tim:

This letter will set forth some comments to the February 2014 Public Draft relating to the Periodic Review of the Baldwin Hills Community Standards District.

On February 23 I sent an email to John Peirson which included a few comments about the Public Draft. The reason I sent this out so quickly (only a few days after the release of the Public Draft) was that I hoped the lack of analysis in certain sections of the document would be remedied during the comment period so that members of the community could learn the rationale behind the County's decision to leave certain sections of the CSD unchanged . This would provide community members with the necessary background to make intelligent decisions as to whether the County's positions made sense or whether changes to the ordinance were necessary. As I said in my previous email, it is not helpful for the Public Draft to simply assert that current amounts "are adequate," without providing any explanation as to the basis for this conclusion. It is unfortunate that my comments have apparently been sitting in the County Counsel's office for the past month and a half, and that any changes the County might choose to make to those sections will now come to late to inform members of the public (including the undersigned) wishing to weigh in on these issues.

I have quoted the substantive body of my earlier email in a postscript to this letter, and hereby incorporate those comments herein.

The remainder of this letter will address a few different points.

The final recommendation in the Public Draft (relating to CSD Section J.2.a) is a good one, although I would ask that the last few words be changed to "are addressed at the Community Meeting." A principal purpose of the Community Meeting is to facilitate

communication and discussion between the operator and its neighbors. Responding to a question by saying the operator will send out an answer next week may ultimately provide an appropriate response, but it makes it very difficult for the community to participate in the discussion.

Continuing with the same line of thought, the stated purpose of the CAP is to "foster communication" about the oil field. Here again, there can be no meaningful communication and discussion if every time a technical issue comes up, the only representative of the operator responds that she does not know anything about it. Even in those cases where an answer is ultimately provided (usually a month or two later), the operator's unwillingness to provide someone who can answer a significant portion of the questions at the CAP meeting makes it virtually impossible to have meaningful communication. I would therefore request that a similar recommendation be made for the monthly CAP meetings, so that the operator is directed to take steps to ensure that questions from the public (or at least a significant percentage of them) are answered at the CAP meeting in which they are asked.

Section J.1.c of the CSD specifically requires the operator to provide copies of numerous reports, documents and other items to members of the CAP who request them. (I believe there are other sections requiring that these also be available to the public at large.) For most of these items, the operator does not deliver physical copies to CAP members, but relies on the fact that the items have been posted on the operator's web site. However, all of the posted documents make it impossible to write electronic notes on the document, and they all have watermarks embedded which frequently make the documents difficult to read, either in their electronic version or after they have been printed. It seems clear that this approach is not consistent with the operator's obligations under the CSD. However, I would request that the County specifically require the operator to make clean copies of the required items available on their web site..

Sincerely yours,

John M. Kuechle

cc: Ms. Meghan Sahli-Wells
Carol Schwab, Esq.
Mr. David McNeil
Ms. Lark Galloway-Gilliam
Kenneth Kutcher, Esq,
Robert Garcia, Esq
Damon Nagami, Esq.

P.S. There follows some of the substantive language from my February 23 email:

"I was greatly troubled by your analysis of Sections G4 and G5 of the CSD (insurance and security). As you know, I have long thought that the County is being far too generous to Freeport in this area, but I was prepared to re-examine my thoughts in light of any analysis contained in the Review. Unfortunately, there is no real analysis in the Review. So far as I can see, the Review does not even mention the amount of insurance coverage or security that is currently required, much less discuss why these are appropriate figures. It simply states the conclusions that "no additional coverage amounts are necessary," and that the bond amounts "are appropriate."

"With regard to Section G4, I accept your point that the level of risk at the oil field is not necessarily comparable with that of operating an off-shore drilling rig in the Gulf of Mexico - however, no attempt was made in the Review to calculate the true level of risk at this oil field, or to compare that with the level of insurance currently being provided.

"I find the lack of analysis for Section G5 even more troubling. Here, the bond is to be tied to the operator's obligations relating to "well abandonment, site restoration and environmental cleanup." However, the Review does not make any reference to the anticipated cost of fulfilling such obligations, much less compare those costs with the amount of the bond. Simply saying that the current bond amount is "appropriate" is obviously not an analysis.

"I would request that these two sections be significantly revised to specifically compare the current bonding and insurance figures with the best available prediction of the clean-up cost and the risk of accidental contamination."