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Mr. Richard Bruckner, Director
Los Angeles County Department of Regional Planning
320 W. Temple Street,
Los Angeles, CA 90012

Via email: tstapleton@planning.lacounty.gov

Re: Baldwin Hills Community Standards District Periodic Review

Dear Director Bruckner:

I am writing to contribute to the overall strengthening of the Baldwin Hills Community Standard District (CSD) and to improve the methods by which the County can collaborate with the oil field operator, community members and the regulatory agencies involved in protecting the well being of those who live, work and recreate in the region. Over the past five years, the CSD's implementation has generated some important improvements, from the utilization of California Air Resources Board certified diesel catalysts to reduce emissions from drilling rigs by up to 90%, to a mandatory habitat restoration plan that replaces native coastal sage scrub and other sensitive habitat areas lost to new construction. These are indeed milestones worth noting. Unfortunately many provisions, such as the Odor Minimization Plan, have fallen short of their intent, resulting in consistent odors associated with land treatment units in close proximity to recreation facilities. While the language in the ordinance puts forth a series of thoughtful objectives, the successful implementation of those objectives is where the substance of the policy takes place. During the review process, it is imperative the Department of Regional Planning give serious consideration to sound input from area stakeholders with an interest in the future of the region. Many of us have participated in the Community Advisory Panel (CAP) and are intimately familiar with the ordinance's limitations and potential. The purpose of the comments below is to add to the collective goal of moving closer to an effective ordinance that continues to improve day-to-day conditions for those impacted by the oil field operations.

<u>Implementation of Data Collection and Analysis</u>

> The CSD has mandated several studies at a cost to the County and the operator. A continual theme resonating as a result of the studies is the lack of credibility and or diligence the public detects in their delivery and development. This has had a crippling impact on the knowledge base needed to better inform the public and the operator on issues concerning,

ground movement, health, air quality, and ultimately planning. For studies that are of a critical public nature, resources should be committed towards contracting with independent experts from educational institutions dedicated to health or science. Methodologies for research and modeling should be developed in a collaborative manner to determine the best course of action without the perceived influence of bias or special interest.

E.4 Geotechnical, (e) Ground Movement: The Ground Movement Survey frequency should be increased to a semi-annual basis and analysis should be coordinated with federal and state geological survey agencies. Currently, the survey period for the CSD is one year with data collection taking place during the calendar year beginning in January and concluding in January the following year. Analysis of the data collected during the calendar year has been delivered in a report typically submitted in August, approximately eight months later. By increasing the frequency of the analysis to twice a year, there would be more opportunities to re-evaluate the granularity of data needed to assess trends and or provide earlier intervention against elevation changes that might be detrimental to surface infrastructure. There is precedent for semi-annual analysis as established by the City of Long Beach with their Subsidence Control Division for the Wilmington Oil Field.

E.7 Biological Resources, (d) Pre-Construction Surveys: All surveys listed under section (d) are currently conducted exclusively in sensitive habitat areas targeted for construction. The sensitive plant and wildlife species identified in the CSD Special Status Species and Habitat Protection Plan should all be surveyed in the coming year for a baseline of data regardless of construction. Advance survey work in all the habitat areas would allow for a more comprehensive restoration and re-vegetation plan that can address future projects that benefit both the operator and the environment i.e. slope stabilization, erosion control, storm-water management and green house gas reduction. The baseline survey data would have no impact on future construction or development in habitat areas due to the fact construction is allowed in sensitive habitat areas under the terms of the CSD.

E.18 Water Management Plan: The implementation and use of new technology can help reduce consumption and achieve better water use efficiency. Smart irrigation systems, solar powered timers, recycled water (purple pipe), are all opportunities to conserve water throughout Southwest L.A. County. As drought conditions continue in California, investment in innovative systems will lead to cost savings as well as a more reliable water supply. The infrastructure for delivering recycled water to the Baldwin Hills area is approximately one mile away. Federal, State and County resources should be leveraged to develop a plan in

conjunction with area stakeholders and the operator to deliver reclaimed water to the region.

E.19 Groundwater Monitoring: The recommendation for a network of up gradient wells to be installed in or around the oil field's perimeter to compliment the existing groundwater monitoring wells should be a part of the CSD implementation. This request should be put forth to make the ground monitoring program acceptable by the director, in addition to being consistent with the Regional Water Quality Control Board recommendation. The more data is made available at various locations of the water table, the better the understanding of the characteristics of ground water in the area.

Management of Odors, Waste and Dust

E.2 Air Quality and Public Health, (g) Odor Suppressant for Bioremediation Farms: The implementation of the odor suppressant program did not achieve the stated objective of ensuing no odors from operations could be detected at the outer CSD boundary. A revised strategy that either improved the odor suppressant process from start to finish, or re-located the bioremediation farms to more remote areas, would achieve the ordinance's objective. In 2012, prior to the SCAQMD Notice of Violation, hydrocarbon impacted soil delivered to the bioremediation farms at LAI (N) and LAI (S) had generated strong odors during handling. Specifically, odors had been reported by park users and staff during soil removal from truck beds and spreading activities at a land treatment unit adjacent to the parklands. These odors impact recreation facilities outside the outer CSD boundaries including Kenneth Hahn State Recreation Area's Eastern Ridgeline and the Yvonne B. Burke Sports Complex.

E.11 Oil Field Waste Removal, (c) Waste Discharge: The implementation of the best practices developed to manage waste from drilling and reworking in metal or plastic bins should be acknowledged by reference as a guideline requirement. Based on the operator's current practice of containment of all waste from drilling, re-drilling and reworking activities in bins, there is no need for leaving the option for use of ground sumps or pits.

E.11 Oil Field Waste Removal, (p) Fugitive Dust Control Plan: The Fugitive Dust Plan approved by the director in 2009 should include additional measures to address mud after a rain event. A revised program that reduces the amount of moist soil leaving the oil field would lower the impacts on busy routes of travel i.e. Fairfax Avenue and Stocker Street. More frequent street cleaning along those routes during the dry days following a rain event would also reduce the amount of dust generated when the remnant soil dries.

Communication and Coordination

G.8 Multiple Agency Coordination Committee: Direct public communication with the entire MACC should take place at least one time a year. Over the course of the CSD, individual agencies participating in the MACC have presented at CAP meetings. These presentations have been informative and should continue, however the opportunity to have a discussion with the multiple agencies that have cross jurisdictional authorities would provide the best possible forum to learn how the regulators and first responders work together.

J.1 Community Advisory Panel (CAP), (a) CAP Members: The CAP should be re-constituted to include more representative appointees and expedited replacements on an as needed basis. The CAP's effectiveness has suffered due to the lack of attendance by its members and few appointments being made by the director in an expedited manner. Representatives for landowners, neighborhood associations and at large community members with an interest in serving should have a clear path to nomination with a timely vetting and response from the director. Communication at meetings is important to improve awareness of the operations involved in oil drilling. Ongoing education on land rights, drilling procedures, safety protocols, infrastructure upgrades and environmental quality monitoring activities help foster critical relationships and manifest collaborative outcomes. It is important to note that outreach is a shared responsibility and is not the sole purpose of the CAP. The CAP relies on the Department of Regional Planning for a web presence, distribution of materials, mailings and notifications. More resources should be deployed by the department because the reach of the County is far more extensive than any individual community organization and its members.

Thank you for the opportunity to comment on the CSD. The ordinance clearly seeks to create some compatibility between a 90 year old oil field and a growing population of environmentally conscious people. The success of its implementation rests in the hands of the Department of Regional Planning.

Sincerely,

David McNeill
Community Advisory Panel Co-Facilitator
Baldwin Hills Community Standards District