

COMMUNITY ADVISORY PANEL
Baldwin Hills Community Standards District
c/o Los Angeles County Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

May 31, 2020

VIA Email: clozo@arb.ca.gov

Carolyn Lozo, Manager, Program Assessment Section
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Subject: Input Concerning the Study of Neighborhood Air near Petroleum Sources (SNAPS) Program for the Baldwin Hills Communities

Dear Ms. Lozo,

The Community Advisory Panel (CAP) is very pleased that the Baldwin Hills Communities, which surround the Inglewood Oil Field (IOF), has been selected by the California Air Resources Board (CARB) as one of four initial locations to be monitored and studied under the first round of the Study of Neighborhood Air near Petroleum Sources (SNAPS) Program.

The purpose of this letter is three-fold. First, the CAP would like to extend an offer to assist with the Baldwin Hills component of the SNAPS program in any manner possible. Second, CAP requests opportunity for frequent coordination with CARB throughout the process to collaborate on input and design of the Baldwin Hills communities program, especially for components that could interface with other periodic studies of the IOF. Finally, based on information presented at CARB's informational workshops held during July 2019 and February 2020, the collective membership of the CAP offers initial guidance toward CARB's approach for monitoring and study of the Baldwin Hills communities. These items are discussed in more detail below.

CAP Offers Assistance to the Baldwin Hills SNAPS Program

As you may know, the CAP was established in 2008 by Section 22.310.100 (previous Section 22.44.142.J.1) of the Los Angeles County Code. It was created as part of the Baldwin Hills Community Standards District, which provides the County's regulatory framework for the IOF (located in the Baldwin Hills area of Los Angeles County). The CAP's purpose is to foster communication about ongoing operations at the IOF, and to allow community representatives to provide input to the County and the operator of the IOF. The CAP membership is comprised of representatives of the city of Los Angeles, city of Culver City, West Los Angeles College, each of the major neighborhoods surrounding the IOF, landowners, and includes also representation by the current IOF operator, Sentinel Peak Resources (SPR). Representatives of both the Los Angeles Unified School District and the Culver City Unified School District also participate on the CAP. A complete list of organizations represented on the current 2020 CAP is provided in **Attachment A** for reference.

The CAP membership is comprised of a broad set of organizations that: 1) have strong familiarity with the IOF, its history and its role within the Baldwin Hills communities; 2) represent distinct and diverse interests and roles within the Baldwin Hills communities; and 3) have in place established communication networks for outreach to residents and businesses within the anticipated study area. As a result, the CAP and its members can function as a valuable resource to CARB for this SNAPS study, such as through facilitation for outreach and coordination. Many individual CAP members/organizations have volunteered to assist in this capacity as feasible. CAP members represent a range of interested groups and agencies tied to the Baldwin Hills community, and such assistance could benefit the SNAPS program by helping to secure monitoring sites, facilitating access to potentially relevant data, networking for community outreach and/or coordination of community-based data gathering, etc.

CAP Requests Ongoing Corridination with CARB Throughout the Baldwin Hills SNAPS Program

To facilitate collaboration with CARB, maintain an active dialogue of key issues and identify areas where CAP membership might assist and support the needs of the SNAPS program, the CAP suggests:

- 1) CARB establish a process to regularly update CAP on decision points and data collection under the SNAPS program. Such reporting might occur on a monthly basis to coincide with monthly CAP meetings.
- 2) CARB enhance the technical value of the SNAPS study by establishing a liaison function with the County's technical team that will be working simultaneously on a localized Health Assessment-Environmental Justice study.

The CAP recognizes that study of the Baldwin Hills and neighboring communities under the SNAPS program could produce significant benefits by providing information that would be useful to Los Angeles County in its ongoing regulation and monitoring of the IOF. As such, the CAP seeks to ensure that the design of the study represents the broad range of issues and interests of both those organizations represented by the CAP membership and the overall community-at-large, many of whom regularly attend CAP meetings and monitor IOF activity.

Further, 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. Similarly, pertinent social-economic data from the HA-EJ Study may benefit and help refine design considerations for the SNAPS Program and its follow-up health assessment.

To assist Los Angeles County with the design and scope for the HA-EJ Study, the CAP delegated the technical task to the CAP's Health Working Group. A small subset of the Health Working Group, the HA-EJ Steering Committee, dedicated several months to working directly with the County Department of Health staff providing input on the design and scope of the HA-EJ Study. It is anticipated that a Consultant will be hired by the County in the near future to initiate work on that study. The overlap and timing between the County's HA-EJ Study and the Baldwin Hills SNAPS study highlights the opportunity for the SNAPS study to benefit from collaboration with not only the CAP as a whole, but also by possibly establishing a liaison role with any or all of the technical-focused groups (i.e., the Health Working Group, the HA-EJ

Steering Committee; or the HA-EJ Study Consultant) associated with the HA-EJ. CAP requests that a possible role of these groups be considered for the evaluation of preliminary data and that their input be considered at key decision points throughout the SNAPS study.

Periodic collaboration between the CAP and CARB, including a regular reporting process and embracing a liaison relationship with representative(s) of the County's technical team, could ensure the following CAP objectives:

- Public transparency of the SNAPS program process and decisions;
- Accessibility to data, interim reviews and management decisions throughout the process and in a format that facilitates broad access and understandability;
- Facilitate CARB with its program design and implementation in order to strive for the best possible criteria and conditions for the Baldwin Hills SNAPS study;
- Ensure that monitoring data is pertinent to specific community concerns, including concerns tied to odors, health, mortality and nuisance; and
- Maintain a consistent presence and ongoing advisory role for key decision points for the Baldwin Hills SNAPS program;

CAP Input and Feedback Specific to the Baldwin Hills SNAPS Program

Many of the CAP members attended the series of SNAPS workshops held in the Baldwin Hills communities, including those workshops held during July 2019 and February 2020. In addition, some individuals have been following the SNAPS program currently underway in Lost Hills, CA. During the course of those workshops and in subsequent discussion during CAP meetings, the CAP has identified various recommendations for consideration through the SNAPS study. As discussed above, the CAP's ultimate goal is to establish an active collaboration and ongoing dialogue with CARB on key decision points of mutual interest for the SNAPS study and the County's HA-EJ study. Through this active collaboration and the role of a liaison, the CAP would utilize that opportunity to expand on the details of these topics directly with SNAPS staff.

- Selection of Monitoring Sites –In early May 2020, CARB posted a document addressing the candidate and selection criteria for potential SNAPS monitoring sites within the Baldwin Hills area. The information in this document expands upon details that were previously provided during the February, 2020 workshop sessions. It appears that CARB has conducted thorough evaluation of up to 20 potential sites based on its minimum criteria (listed on page 2 of that document). However, these criteria might be expanded to incorporate additional criteria for social justice and community-specific and individual neighborhood factors. The CAP can offer insight into other community-based factors or potential site alternatives that should be considered prior to a final decision on site selection.
- Calendar for Monitoring – Ideally, monitoring for the SNAPS program should be conducted for an adequate time period and range of conditions to capture a realistic representation of IOF operations. CAP requests that the overall duration of monitoring be calendared to capture a full range of metrological conditions, including both a summer and winter cycle, as well as samplings during common extreme conditions (such as Santa Ana wind events, extended periods of marine layer inversion, and excessive heat conditions, for example). Therefore, the CAP recommends a minimum monitoring period of one year. Further, if full (or near full) operational conditions are

delayed (see COVID-19 Conditions discussion below), CAP requests that the calendar for monitoring be extended to capture a reasonable period of “typical” (e.g., pre-COVID or pre-downturn of oil economy) operational/production conditions.

- Schedule and Circuits for Mobile Monitoring – The Mobile Monitoring unit offers a unique opportunity to collect monitoring data at a granular level for individual neighborhoods. The CAP encourages that design of the SNAPS study 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. 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. Further, the SNAPS design for Baldwin Hills should establish a plan that strives to cover a significant percentage of the study area for at least a minimum specified time period. The CAP can offer insight into neighborhood-specific factors that influence mobile monitoring routes and target specific elements and timeframes for investigation.
- Utilization of Mobile Monitoring Unit and Other Supplemental Monitoring – 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. The CAP can offer input on typical community issues and provide guidance on how to prioritize the use of mobile monitoring for supplemental or mutually-beneficial support.
- Data Collection and Formats to Compliment HA-EJ Study – A liaison role with the technical team associated with the County’s HA-EJ study can assist with defining appropriate parameters for data to be shared between the studies. 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.
- Peer Review of Data and Conclusions – CARB should identify and share with the CAP and community how the SNAPS collected data will be internally reviewed, peer reviewed and ultimately validated. In addition, CARB should develop a plan for the Baldwin Hills SNAPS study to clarify how preliminary report conclusions and presentation of data, including any interim conclusions that may serve to confirm or re-direct the course of the study, will be peer reviewed. A component of that plan, consistent with CAP’s objectives for maintaining public transparency, should identify how those decisions points, validation of data and preliminary conclusions that are reviewed throughout the course of the SNAPS study will be shared publicly.
- Coordination Between Other Monitoring Programs - CAP is 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 within the vicinity of Baldwin Hills. In addition, the County Department of Health may be conducting special focus health studies targeting the relationship between the COVID-19 and experience within socially/economically disadvantaged communities Such a study

could generate useful information for use for both the HA-EJ and SNAPS studies. Also, Los Angeles County is preparing an updated Health Risk Assessment for the IOF, which is expected to be completed by fall 2020. Coordination with such programs could generate a more complete picture of comprehensive and complimentary data. CAP encourages collaboration with such programs to address how data sharing could be accomplished to benefit the SNAPS program.

- COVID-19 and Oil Economy Downturn Conditions – Conditions during the COVID-19 pandemic offer a unique and rare opportunity for collecting air quality and emissions samples. Most obvious is the reduction in both vehicle and air traffic, resulting in a drastic reduction of ambient background emissions. Similarly, many stationary-source businesses are closed or operating at reduced capacity. Air sampling of the Baldwin Hills/IOF communities during this period of reduced travel and business activity offer an opportunity to obtain comparative data that may be representative of isolated emissions from IOF operations. Also, the COVID-19 conditions and shift in oil market economics have triggered changes in the operational characteristics at the IOF. It is possible that oil production volume, routine maintenance and other major work will be seriously curtailed, not only for the immediate future, but for many months ahead. This condition also offers an opportunity to obtain valuable comparative data, but should not be a substitute for more normal operational conditions. In the event that recovery of IOF operational levels to capacities considered “typical” for pre-March 2020 conditions, the design of the SNAPS study should include a plan for how to translate monitoring data obtained during an oil economic downturn to reflect those that would be expected under a more “typical” condition.

Thank you for consideration of our request. The CAP looks forward to establishing a collaborative exchange with CARB and hearing about next steps with the SNAPS program.

Sincerely,

The Baldwin Hills CSD Community Advisory Panel

Attachment A List of Organizations Represented on the Baldwin Hills Community
Advisory Panel (CAP)

Attachment A

List of Organizations Represented on the Baldwin Hills Community Advisory Panel (CAP)

Governmental Entities

1	Department of Regional Planning	Timothy Stapleton, Edgar de la Torre
2	City of Culver City	Alex Fisch
3	West Los Angeles College	Jim Limbaugh
4	City of Los Angeles	Erica Blyther

Operator

5	Sentinel Peak Resources	Amanda Parsons DeRosier; Dan Taimuty
---	-------------------------	--------------------------------------

Landowners

6	Vickers Family Trust	Roger Shockley*
7	Cone Fee Trust	Liz Gosnell

Neighborhood Organizations (Recognized Homeowners Associations)

8	Ladera Heights Civic Assoc.	Carmen Spiva
9	Windsor Hills HOA	vacant
10	United HOA (View Park)	Charles McCaw
11	Culver Crest Neighborhood Assoc.	John Kuechle
12	Blair Hills HOA	Lloyd Dixon
13	Raintree Community HOA	Deborah Weinrauch
14	Baldwin Hills Estates HOA	Lori Johansson
15	Ladera Crest HOA	Frank Jackson

Neighborhood Organizations (Non-Recognized Homeowners Associations)

16	Baldwin Vista Homeowner	Irma Munoz
----	-------------------------	------------

School Districts

17	Los Angeles Unified School District	Talal Balaa
18	Culver City Unified	Steven Levin

Neighborhood Organizations (All Others)

19	Windsor Hills Block Club	Myles Goodson
20	Community Health Councils	Sonya Vasquez
21	Baldwin Hills Conservancy	David McNeill