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May 28, 2019

Damon Nagami, J.D.
Natural Resources Defense Council
1314 Second Street
Santa Monica, CA 90401

Dear Mr. Nagami:

The Los Angeles County Department of Public Health (DPH) is writing to update all of the parties to the July 15, 2011 Baldwin Hills Community Standards District (CSD) Settlement Agreement on the status of the Health Assessment and Environmental Justice Study required pursuant to Section Five of the Agreement (see attached, page 7). The agreement requires DPH to conduct a Health Assessment and Environmental Justice Study every 5-7 years throughout the life of the CSD, and since the previous assessment was completed in June 2012, the next study is due approximately June 2019.

DPH acknowledges that the study completed in 2012 was unable to determine whether exposures to chemicals from oil field activities at the Inglewood Oil Field directly affected health outcomes among individuals living nearby. Public health surveys of community-reported diseases and other health outcomes are generally insufficient to establish such relationships. Thus, rather than repeating the 2012 study, DPH and the Community Advisory Panel (CAP) agreed to develop a new approach. While we understand the importance of the June deadline, there is no useful study that we can give this community by that date. In consultation with the CAP, DPH outlined a three-phase process for the Health Assessment and Environmental Justice Study to meet the expectations of the community, as described below:

Phase 1

The first phase consisted of formative work, which has been completed. Over the past year, DPH worked closely with the CAP to determine the best approach to the next assessment. DPH staff have attended monthly CAP meetings, several health working group meetings, and met bi-monthly with the working group's former chair Jacqueline Illum, from Community Health Councils (CHC). In addition, DPH collaborated with CHC on a brief survey of CAP members to prioritize concerns; reviewed recently published literature and research methodologies; and interfaced with the City of Los Angeles Petroleum Administrator regarding existing data on local oil and gas operations.

Further, DPH advocated for and provided information to California Air Resources Board (CARB) that led to the selection of the Inglewood Oil Field communities for their Study of Neighborhood Air near Petroleum Sources (SNAPS). The goal of CARB SNAPS is to characterize air quality in communities near oil and gas operations using monitors in selected communities for several months to assess air levels of toxic air contaminants, volatile organic compounds, particulate matter, metals, and criteria air pollutants. CARB anticipates beginning SNAPS in the Inglewood communities by Fall 2019. The SNAPS study will provide new and significant air quality data that DPH and the CAP would not otherwise have access to, filling critical gaps in environmental data and enabling an expedient evaluation of community health risks based on contemporaneous data regarding potential exposures related to field operations. DPH and the CAP agree that the best and most effective way for DPH to assess the health of the community is to do so in parallel with CARB SNAPS.

Phases 2 and 3

The second phase is envisioned as a “scoping” process, driven by a steering committee that will include the CAP health working group, a CARB representative, DPH representatives, and two to three expert academic consultants. During this phase the steering committee will meet to review what was learned in Phase 1 and align the Phase 3 assessment and timeline with CARB SNAPS. The chief output will be the design of the DPH study. Phase 3 will comprise the study implementation and analysis, culminating in a published report of the findings.

Although it will not be possible to complete the study by June 2019, we are confident that the needs of the community will be met through this process, and that they support this plan. Using this approach, DPH anticipates that its second Health Assessment and Environmental Justice Study will be completed by July 2021.

Sincerely,



Barbara Ferrer, Ph.D., M.P.H., M.Ed.
Director

BF:cr

Attachment

c: Elaine Lemke, County of Los Angeles, Office of the County Counsel
Robert Ragland, County of Los Angeles, Office of the County Counsel
Timothy Stapleton, County of Los Angeles, Department of Regional Planning