

## BALDWIN HILLS CONSERVANCY

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July 31, 2007

Maria B. Masis  
Los Angeles County  
Department of Regional Planning  
320 West Temple Street, Room 1354  
Los Angeles, CA 90012

Dear Ms. Masis:

This letter is in response to the Notice of Preparation of the Environmental Impact Report (EIR) for the Baldwin Hills Community Standards District (SCH# 2007061133). The Baldwin Hills Conservancy is a state agency created through legislation with a mission to acquire and develop parkland in approximately two-square miles of land located within the Baldwin Hills territory. Our agency is committed to work collaboratively with the appropriate stakeholders to develop the proper mitigations for present and future land use compatibility in the Baldwin Hills. Our comments are focused on opportunities to improve quality of life in the area and accomplish our state mandate of implementing the community-driven Baldwin Hills Park Master Plan.

In the interest of the thousands of visitors who recreate at Kenneth Hahn State Recreation Area, we respectfully request the addition of a separate public health section in the EIR, analyzing potential health impacts of the proposed project. The purpose of the section would be to fully address community concerns and allow for proper planning and compatibility of land use in the proposed district. The Notice of Preparation (NOP) mentions public health issues in the Land Use Policy/Consistency Analysis. Because of the importance of public health and its correlation to opportunities for recreation and outdoor activities in the region, the EIR could include a Health Impact Assessment that would research possible health outcomes such as asthma, cancer, diabetes, obesity, and heart disease within the context of the current deficit of quality parkland and open space in what is currently one of the most densely populated areas of Los Angeles County. Consideration of this recommendation would create a more deliberate EIR process for the benefit of the general public.

To follow please find the remainder of our comments referenced by section corresponding with the NOP presented by your office.

### 2.0 Proposed Project Description

The project description should explain how the estimated wells drilled per year are to be geographically distributed. In other words, the reason why so few wells will be drilled west of La Cienga as compared to other areas should be discussed. The regulatory setting of each of the issue areas should be discussed in addition to the environmental setting.

## 2.2 Existing Conditions

The description of the adjacent land uses should include public and private facilities located near the Baldwin Hills Oil Field. Additionally, any future drilling and operational activities at the oil field would need to take into consideration the surrounding neighborhoods and other land uses within the context of planned maintenance and well workover programs proposed over the next 20 years, since these land uses exist today and will be further impacted by the increased operational activities. The locations of historic mineral deposit sites accessed by the existing wells should be catalogued as a part of the existing conditions to provide proper context.

### 2.5.1 Drilling

The estimated number of wells drilled over the next 20 years should include the type of drilling activity; for example, directional, straight, or extended reach. The number of proposed wells should also include an indication of how many different surface locations are anticipated, both in terms of new locations and current locations. This section should include any proposed concepts for consolidation of drilling sites. The project description also mentions that the drilling would occur 24 hours a day, which could be in excess of applicable noise ordinances in the area. The potential impact of the noise and vibration caused by truck traffic related to constant drilling and operational activities should be further analyzed in Section 3.1.8 Noise and Vibration.

### 2.5.2 Oil and Gas Processing

Precautionary measures for liquid gas storage and its subsequent off site distribution by trucks should be detailed in this section to insure public safety.

### 2.5.3 Well Workovers and Abandonments

The well workover process should be described in greater detail for example, height, hours of operation, noise level, support equipment, light and glare, etc, since it is different than a drilling rig. The estimated well maintenance and workover quantities are stipulated without a schedule. Additionally, the 640 proposed well abandonments are set forth without a schedule. As the aforementioned projects are operational activities, a proposed maintenance and abandonment schedule should be developed and incorporated into the overall proposed drilling schedule.

### 2.5.4 Steam Drive Development Project

No details on the footprint and or construction elements of the proposed steam plant are mentioned. Specific information should be available regarding this project, including its location, hours of operation, and any potential environmental impacts from its activities should be included in all issue areas. Furthermore, a steam drive could result in additional subsidence, which should be discussed in Section 3.1.5 Geological Resources. This impact is potentially significant.

### 3.1.1 Safety, Risk of Upset, and Hazardous Materials

Hazardous materials and volatile organic compounds, carbon-based and otherwise, such as Benzene could potentially be dispersed into the environment, including in groundwater and through vapor intrusion. A comprehensive list of hazardous materials, contaminants and or pollutants present, transported, and disposed at the project site during regular drilling and operational activities should be included in this section. A list of the potential health impacts from upset of these materials should be developed and referenced in this section. Additionally, a

discussion of precautionary measures that will be undertaken to protect the public from the risk of upset should be included.

### 3.1.2 Air Quality

The construction activities analyzed in the Air Quality section should be considered long-term impacts rather than the short-term impacts, since these activities will continuously occur. Sensitive receptors such as children, other people who use the nearby parks as well as those people that live in the vicinity such as the elderly should also be considered.

The establishment of a baseline for air pollutant concentrations and trends should not only rely on regional air quality monitoring devices and records of the regulatory agencies. Further evaluation would help to create an accurate baseline. For example, the number of complaints registered with the South Coast Air Quality Monitoring District will not fully reflect the frequency of public encounters with odors or pollutants from the field due to the lack of an accessible “odor hotline” or availability of public agency phone number postings at the time of the encounter. Readings and/or surveys should be conducted in the area to provide primary data regarding the composition and quantity of releases that occur on a regular basis.

Moreover, as a part of the mitigation measures, air monitoring devices with alarms should be installed in and around the field to detect pollutants and warn people of the potential long and short-term human health impacts. Data collected from the monitoring should be available to the general public.

### 3.1.3 Biological Resources

The Biological Resources section should also analyze the potential impacts of the proposed project on wildlife corridors and the area’s fragmented ecosystems. An extensive habitat inventory is available from the *Biota of the Baldwin Hills: An Ecological Assessment*, which includes data collected outside of the Community Standard District. The existing assessment was conducted by biologists from the Natural History Museum. Professional biologists familiar with habitat in the California Coastal Zone should conduct similar field surveys within the oil field.

### 3.1.4 Water Resources

Urban runoff as a result of drilling and operational activities could impact storm water drains and the nearby Ballona and Centinela Creeks. A list of Best Management Practices should be included in this section.

### 3.1.5 Geological Resources

A list of specific mitigation measures should be developed for the EIR to reduce the potential for further subsidence, disturbance of known faults or ground fissures, interruption of hydro-carbon traps, landslides and erosion. Additionally, any available mapping and or description of historical and future oil reservoirs in the field should be included as a part of the analysis in this section. Anticipated subsidence due to continued operations and steam injection should also be included in this section.

### 3.1.7 Land Use Policy/Consistency Analysis

Compatibility with the Baldwin Hills Park Master Plan, the Kenneth Hahn State Recreation General Plan Amendment, the West Los Angeles College Facilities Master Plan, and the Los Angeles County General Plan Update should be included as a part of the discussion in this

section. According to the *California Environmental Quality Act (CEQA) Guidelines*, the Land Use/Policy Consistency Analysis should include a discussion of the proposed project potentially conflicting with these applicable land use plans and its consistency with them. Specifically, the compatibility of these land use plans and associated recreational and open space uses should be considered in terms of future oil field drilling and operational activities. Impacts to these public recreational, institutional and open space land uses should be fully mitigated.

### 3.1.9 Recreation

Impacts to recreational resources should include mitigation measures such as fencing and signage around individual well sites on developed public lands or near public facilities. Moreover, a discussion regarding the significance of recreational opportunities in terms of the lack of parks and open space in the region should be included. Compatibility of these recreational opportunities with the future drilling and operational activities are very important in this park-poor area.

### 3.1.10 Fire Protection/Emergency Services

Fire and explosion risk as well as evacuation procedures should be thoroughly discussed in this section. Furthermore, a comprehensive fire safety plan including plant debris removal, weed abatement and buffer zones should be included in this section. Additionally, an emergency public warning and evacuation plan for fire and/or toxic air incidents, such as a hydrogen sulfide release.

### 3.1.11 Cultural Resources/Archeology

This section should include a discussion on the Native American populations that are indigenous to this area. The NOP states that the Chumash occupied this area; the Tongva might be the correct Native American population.

Historical resources such as the 6,000 square foot craftsman-style house that is located at the Cone Family Trust property in the western ridge of the hills should be identified as a historical resource with the appropriate regulatory protection in the Cultural Resources/Archaeology section.

### 3.1.12 Aesthetics/Visual Resources

The landscaping plan developed in collaboration between the oil field operator, Baldwin Hills Conservancy and County of Los Angeles should be incorporated into the mitigation measures. Power lines and installation of steam plant, gas distribution pipelines, or other facilities should be discussed. Any impacts resulting from this infrastructure should be mitigated to a less-than-significant level.

### 3.1.13 Energy Resources

Renewable and alternative energy sources such as bio-fuels that could be grown at the project site should be discussed in the Energy Resources section.

## 4.0 Alternatives to the Proposed Project

An alternative to the proposed project should be a Park Alternative. Under this alternative, wells would be operated in an environmentally-sensitive manner, and publicly owned surface acreage

could be accessed for open space and recreation use in cohabitation with minor oil field operations. As wells become inactive, the land could be transformed into park space in a manner consistent with the Baldwin Hills Park Master Plan.

The above-mentioned issues are recommended to be included in the EIR for a more comprehensive analysis of the environmental impacts of the proposed project. Feel free to contact me at 310.558.5596 if you have any further questions.

Sincerely,



David McNeill  
Executive Officer

cc: Scott Morgan, Governor's Office of Planning and Research  
Supervisor Yvonne Burke  
Councilman Herb Wesson  
Councilman Bernard Parks  
Majority Leader Karen Bass  
Senator Mark-Ridley Thomas  
Rosana Miramontes, Deputy Attorney General  
Paul Mount, State Lands Commission  
Jonathan Fielding, Los Angeles County Department of Public Health