



July 31, 2007

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

Re: Public Comments on Notice of Preparation of an Environmental Impact Report for the Baldwin Hills Community Standards District

Dear Ms. Masis:

A. Introduction

These public comments are submitted by Community Health Councils, the 26th Senate Empowerment Congress, and The City Project.

The purpose of this letter is to comment on the scope of the Environmental Impact Report (EIR) described in the June 28, 2007, Notice of Preparation (NOP) of an Environmental Impact Report for the Baldwin Hills Community Standards District (CSD). The recommendations are in part an outgrowth of the "Baldwin Hills Environment Health Summit" held on July 21, 2007 sponsored by the 26th District Empowerment Congress, Peoples Congress, City Project, Community Health Council and attended by area residents and stakeholders. We have come together to ensure that the issues, concerns and recommendations of the community surrounding the Baldwin Hills Oil Field are adequately reflected in the EIR and CSD.

We applaud the County of Los Angeles under the leadership of Supervisor Yvonne Burke for the actions that have led to the present EIR and CSD process. The temporary moratorium on new oil drilling in the Baldwin Hills area enacted on June 27, 2007 is an important step that has enabled this process to go forward. We offer the following comments for your consideration in the preparation of the EIR. It is our hope and intention to assist the department in utilizing the EIR and CSD process to actively engage the community in the analysis and development of recommendations to mitigate any potential environmental and health impact of future drilling and operational activities in the Baldwin Hills Oil Field.

B. Specific Comments

The following comments address salient points in the order presented in the June 28, 2007, Notice of Preparation.

2.0 Proposed Project Description

NOP section 2.0 provides a brief description of the project, including the location, existing conditions, and historical background. NOP 2-6. The NOP does not adequately describe the demographics and background of the Baldwin Hills project area.

We request that the EIR and CSD explicitly address the demographics and background of the Baldwin Hills area. The objectives of the EIR and CSD include addressing the unique compatibility concerns of operating an oil field in the midst of urban development, and minimizing the environmental impacts of the oil field operations in the surrounding community. NOP 6. Other recent environmental impact reports/statements (EIR/S) in the Los Angeles region analyze the demographics and background of the project area, including population, racial and ethnic composition, housing, employment, income, and industry/business composition. *See, e.g.*, Final Program Environmental Impact Report/Statement for the Los Angeles River Revitalization Master Plan §§ 3.14, 4.14, 3.15, and 4.15 (April 2007), adopted by the Los Angeles City Council on May 2, 2007) (LARRMP EIR/S).

The EIR and CSD should explicitly address the demographics and background of the Baldwin Hills area in describing the project location, existing conditions, background, and project objectives. Within a three mile radius of the Baldwin Hills, for example, the population is 40.4% African American, 30% Hispanic, 34% non-Hispanic white, 8.1% Asian Pacific Islander, and 16.9% other.¹ 24.9% are children. The mean household income is \$46,691. 18.5% live in poverty.² Additional information is described below in the park, land use, and cultural/historical sections.

NOP section 2.4 describes the Project Objectives. We recommend that the Project Objectives be amended to include studying and mitigating or eliminating health risks from oil and gas drilling and operations to people and sensitive receptors in surrounding communities.

Section 2.4 Project Objectives

NOP section 2.4 describes the Project Objectives. While it is explicit in other sections of the NOP and EIR process, we recommend amending the Project Objectives to include studying and mitigating or eliminating health risks from oil and gas drilling and operations to people in surrounding communities and sensitive receptors as follows:

- #2: Address **and seek to mitigate** the unique compatibility concerns associated with operating an oil field in the midst of urban development
- #3: Minimize the environmental **and health** impacts of the oil field operation on the surrounding community.

Again, establishing a baseline and monitoring the population health immediately surrounding the oil fields is of equal concern given the nature and environmental risk factors associated with the project.

2.5.1 Drilling

The NOP provides an inventory of the “Estimated Wells Drilled per Year” by Drilling Area. We ask that the EIR provide more detail on: (1) the type of drilling activity (e.g. slant, straight, etc); (2) estimated depth of the drilling by site; and (3) some explanation of the rationale for the distribution of the drilling sites.

¹ Robert García and Aubrey White, *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for the Los Angeles Region* 1302C and Map 401 (2006) (“*Healthy Parks, Schools, and Communities*”), based on 2000 Census data compiled by GreenInfo Network. Totals exceed 100% because Hispanics can be of any race.

² *Id.* County wide, the population is 10.3% African American, 44.6% Hispanic, 63.8% non-Hispanic white, 12.9% Asian Pacific Islander, and 24.8% other. 28.0% are children. The mean household income is \$42,189. 17.9% live in poverty. *Id.*

2.5.2 Oil and Gas Processing

This section of the NOP provides a brief description of the handling of the production at the oil field. Given the on site storage and processing functions, we ask that an inventory of the equipment to be used in the processing, holding and transfer of the oil and gas by products be provided including the age of the equipment and findings from safety records.

2.5.3 Well Workover and Abandonment

The NOP describes the process for plugging abandoned wells. We ask that the EIR examine the soil sample test results of the 643 plugged and abandoned wells currently at the site and that consideration be given to the “clean up” plan as wells are closed.

2.5.4 Steam Drive Development Project

PXP is considering a steam drive development project. More information should be provided on this proposal including, but not limited to: the location, size and scope of the project; hours of operation; a comprehensive list of potential emissions and hazardous materials; any potential environmental impacts; and process for removal.

3.0 Scope of the EIR

The NOP addresses CEQA but does not address other relevant laws. The EIR and CSD should address compliance with laws that cover the environmental burdens and benefits of industrial, municipal, and commercial operations, policies, and practices for diverse communities such as Baldwin Hills, including but not limited to Executive Order 12,898 (Feb. 11, 1994); Title VI of the Civil Rights Act of 1964 and its implementing regulations; Govt. Code § 11135; and Govt. Code § 65040.12 (environmental justice). Other recent environmental impact reports/statements in the Los Angeles region analyze the relevance of such laws. *See, e.g.,* LARRMP EIR/S §§ 3.15, 4.15, 3.14, and 4.14.

The NOP makes reference to public health issues but does not adequately address the community’s concerns in this area. We therefore recommend that the EIR include a Health Impact Assessment to examine and establish a baseline health outcomes including, but not limited to: asthma; heart disease, obesity, and cancer. Los Angeles County Department of Public Health reports that the community immediately surrounding the oil fields ranks the highest in morbidity and mortality due to coronary heart disease (22.9.7 vs 216.4 countywide deaths per 100,000 population), diabetes (39.2 vs 25.3 countywide), lung (46 vs 35.3 countywide), breast(27.8 vs 23.1 countywide) and colorectal(23.2 vs 16.2 countywide) cancer. In addition, the number of children (9.0 vs 8.8) and adult (7.2 vs 6.5 countywide) with asthma ranks among the highest in the county.

3.1 Significant Impacts

3.1.1 Safety, Risk of Upset, Hazardous Materials

We ask that the EIR include a comprehensive list of all hazardous materials, contaminants and pollutants produced, present or transported. Furthermore, we recommend that the EIR and CSD explicitly study and provide for the mitigation or elimination of health risks from oil and gas drilling and operations, air quality, odors, noise, and vibrations for people and sensitive receptors in communities surrounding the project area.

3.1.2 Air Quality

We recommend that the EIR and CSD explicitly study and provide for the mitigation or elimination of air quality impacts from oil and gas drilling and operations, including but not limited to health risks to people and sensitive receptors in communities surrounding the project area.

We recommend that the EIR and CSD address the impact of oil and gas drilling, operations, and park space on global warming and climate change, including but not limited to the impacts of extraction, processing, transportation and usage of hydrocarbon-based products derived from oil-drilling activities in the Baldwin Hills area. Additional park and green space in the Baldwin Hills area can also help reduce the urban carbon footprint. See Robert García and Aubrey White, *Healthy Parks, Schools, and Counties: Mapping Green Access and Equity for California* 9 (May 2007).

We ask that the calculations of the inert pollutants go beyond the baseline and provide a reasonable estimate of the air quality based upon increased production by year as new wells are drilled and put into production and the steam drive development project is operational. We are concerned that the baseline will be under estimated given the lack of information available to the public to file such complaints over the years. It is our sincere hope that the CSD and EIR will provide for a “hot line” and the posting and dissemination of information on how to report suspected emission and other environmental hazards that is readily available to the public.

3.1.3 Biological Resources

We recommend that the EIR and CSD address the wildlife and biological resources in the area. The Baldwin Hills Park Master Plan should be reviewed from baseline documentation, potential impacts, and mitigation measures. See, e.g., Baldwin Hills Park Master Plan at 3, 21, 26-28, 30. 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 oil field. Professional biologists familiar with habitat in the California Coastal Zone should conduct similar field surveys within the oil field.

3.1.4 Water Resources

We are particularly concerned about the fact that the staff of the California Regional Water Quality Control Board concluded that “the determination of No Impact to water quality does not appear to be supported” in the Board’s January 4, 2007, public comments regarding PXP’s December 11, 2006, initial study/negative declaration for new oil drilling operations. We recommend that the EIR and CSD adequately address water usage in drilling operations, water run off, and water quality. Urban runoff as a

result of drilling and operational activities could impact storm water drains and the nearby Ballona and Centinela Creeks. Best Management Practices should be included in this section. We also recommend addressing multiple benefit park projects including the use of Baldwin Hills parklands for water retention, water filtration, and flood control purposes. See Robert García and Aubrey White, *Healthy Parks, Schools, and Counties: Mapping Green Access and Equity for California* 9 (May 2007).

3.1.6 Transportation/Circulation

The NOP discusses the local roadway network that could be affected by traffic related to oil drilling and operations. We recommend that the EIR and CSD address alternatives including public transit to the Baldwin Hills parklands to mitigate the impact of traffic related to oil drilling and operations, as well as traffic related to residential, commercial, and park usage. Additional concerns are addressed in sections 3.2.2 and 3.2.3 below.

3.1.7 Land Use/Policy Consistency

The proposed EIR and CSD will entail significant land use and policy analyses to establish a new zoning overlay. 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 public recreational, institutional, and open space land uses, and to human health should be fully mitigated.

The NOP does not present public health issues adequately. Analyzing public health issues in a separate section, rather than in passing as part of the land use section, is recommended because of the importance of the potential impacts of the project on public health. The public health section should include a Health Impact Assessment that would include possible health outcomes such as asthma, cancer, diabetes and obesity. We recommend that the EIR and CSD address health risks from oil and gas drilling and operations to people and sensitive receptors, and on the public health impacts of drilling and operations “in the midst of an urban development” including housing, parks, schools, and businesses. “[A]pplying public health criteria to land-use and urban design decisions could substantially improve the health and quality of life of the American people.” Richard J. Jackson, MD, MPH & Chris Kochtitzky, MSP, *Creating a Healthy Environment: The Impact of the Built Environment on Public Health*, Sprawl Watch Clearinghouse Monograph Series, Public Health/Land Use Monograph 5, available at <http://www.sprawlwatch.org/Jackson>. The Los Angeles River Revitalization Master Plan explicitly recognizes this point. LARRMP at page 5-26. Additional concerns regarding the Baldwin Hills Park Master Plan are discussed below in 3.1.9 Recreation.

The recent national study *Toxics Waste and Race at Twenty 1987-2007* documents that California has the nation's highest concentration of people of color living near hazardous waste facilities. Statewide, 81% are people of color.³ Greater Los Angeles is the worst in the nation, with 1.2 million people living less than two

3. Robert D. Bullard et al., *Toxics Waste and Race at Twenty 1987-2007: A Report Prepared for the United Church of Christ Justice & Witness Ministries* at xi, 58, 74, 154 (2007), available at www.ucc.org/justice/pdfs/toxic20.pdf.

miles from 17 hazardous waste facilities. 91%, or 1.1 million, are people of color.⁴ The study by the United Church of Christ examined neighborhoods adjacent to 413 facilities nationwide that process or store hazardous chemical waste produced by refineries, metal plating shops, drycleaners, and battery recyclers, among others. Although about one-third of United States residents are nonwhite, more than half of the people living near such facilities were Latino, African American or Asian American.⁵

3.1.8 Noise and Vibration

We recommend that the EIR and CSD explicitly study and provide for the mitigation or elimination of health risks from oil and gas drilling and operations, noise, and vibrations for people and sensitive receptors in communities surrounding the project area, as well as the impact of vibrations on buildings including but not limited to houses and businesses in the area.

3.1.9 Recreation

We recommend that the EIR and CSD explicitly address:

- The need for parks and open space and the park, school field, and health disparities based on race, ethnicity, income, poverty, youth, and access to cars and transportation in the region;
- Places for physical activity and active recreation to help improve physical and psychic health and reduce obesity and inactivity;
- The values at stake in providing open space and recreation in the Baldwin Hills parklands.

The Los Angeles River Revitalization Master Plan addresses the connections between parks and open space, recreation, and human health. LARRMP § 5-26 (April 2007).

The Baldwin Hills Park Master Plan addresses the critical need for parks and open space in the area. The Baldwin Hills area is one of the most park-poor in the state, with barely one acre of park space per thousand people. Master Plan at 32, 35, and Figure 11; Robert Garcia and Aubrey White, *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for the Los Angeles Region* 3-6, 8-10, 19-21 (2006).

As reported in the Los Angeles Times, there are large disparities in the amount of park acreage in Los Angeles.⁶

4. *Id.* at 61, 62, 154.

5. *Id.* at x, 52, 152.

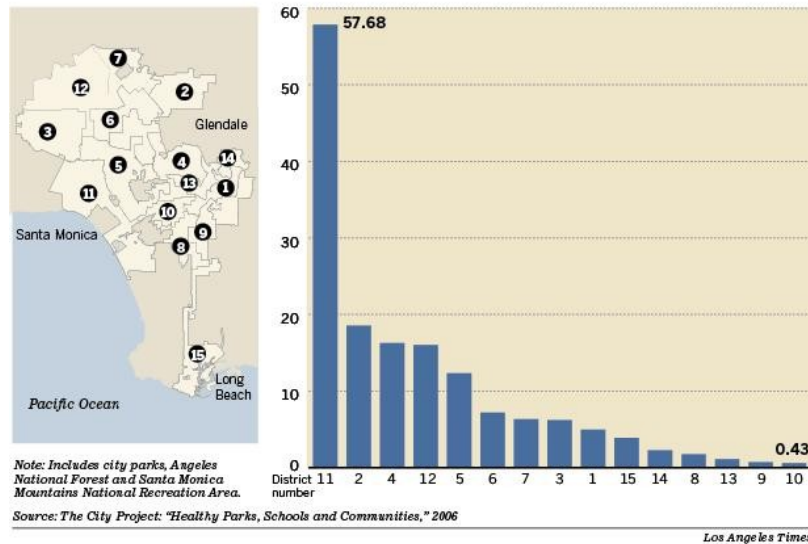
6. Deborah Schoch, *How Can L.A. Create Better Places To Play?*, L.A. Times, June 1, 2007, citing Robert Garcia and Aubrey White, *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for the Los Angeles Region* 9 (The City Project Policy Report 2006).

Los Angeles parkland

The amount of park acreage available to L.A. residents varies widely from one part of the city to another. Nationally, some park planners recommend six to 10 acres of parks per 1,000 residents.

City Council districts

Acres of parkland per 1,000 residents, by council district



There are disparities in access to safe places to play based on race, ethnicity, income, and poverty nationally. While 87% of non-Hispanic respondents reported that “there are safe places for children to play” in their neighborhood, only 68% of Hispanics, 71% of African Americans, and 81% of Asians agreed, according to the Census Bureau survey “A Child’s Day.”⁷ Almost half (48%) of Hispanic children under 18 in central cities were kept inside as much as possible because their neighborhoods were perceived as dangerous. The same was true for more than 39% of black children, 25% of non-Hispanic white children, and 24% of Asian children.⁸ Non-Hispanic White children and youth were most likely to participate in after school sports, with Hispanic children and children in poverty least likely.⁹ Children involved in sports and extracurricular activities tend to score higher on standardized tests and are less likely to engage in antisocial behavior.¹⁰

A survey by the Public Policy Institute of California reported that 64% of Californians say that poorer communities have less than their fair share of well-maintained parks and recreational facilities. Latinos are far more likely than non-Hispanic Whites (72% to 60%) to say that poorer communities do not receive their fair share of parks and recreational facilities. A majority of residents (58%) agree that compared to

7. Jane Lawler Dye and Tailese Johnson, U.S. Census Bureau, A Child’s Day 2003: Selected Indicators of Child Well-Being Table D29 (Jan. 2007) (“A Child’s Day”), available at www.census.gov/population/www/socdemo/wellbeing.html.

8. 33% of Hispanic children in suburban areas were kept inside because of perceived dangers, followed by 25% of Blacks and 15% of non-Hispanic Whites. The number of Asian respondents in metropolitan areas outside central cities was not statistically significant. *Id.* at 19-20.

9. Non-Hispanic White children were most likely to participate in sports – 45% of both 6- to 11- and 12- to 17-year-old children, compared to 26% and 42% of Asians; 24% and 35% of blacks; and 21% and 35% of Hispanics. Only 26% of 6- to 17-year-old children in poverty participated in after school sports, compared to 46% living at twice the federal poverty level or higher. *Id.* at 13-14.

10. *Id.* at 13, citing Joseph Mahoney, *School Extracurricular Activity Participation as a Moderator in the Development of Antisocial Patterns*, 71 Child Development 502-16 (2000), and National Institute of Child Health and Human Development Early Child Care and Youth Development Research Network (NICHD), *Are Child Developmental Outcomes Related to Before- and After-School Care Arrangements? Results from the NICHD Study of Early Child Care*, 75 Child Development 284-95 (2004).

wealthier neighborhoods, lower-income and minority neighborhoods have more than their fair share of toxic waste and polluting facilities.¹¹

We recommend that the EIR and CSD address health risks from oil and gas drilling and operations for people and sensitive receptors using the Baldwin Hills parklands.

3.1.10 Fire Protection/Emergency Services

Issues of fire protection and safety are of great concern. The current as well as projected risk factors with the proposed increased drilling should be thoroughly examined and a comprehensive prevention and emergency response plan outlined including the process for warning and evacuating the public. See comments re 3.2.2 and 3.2.3 below.

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. The Hispanic/Latino/Spanish/Mexican/Californio and rancho heritage should also be addressed.

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.

The EIR and CSD should address the cultural and historical significance of Baldwin Hills in African-American Los Angeles. *See, e.g.,* Josh Sides, *L.A. City Limits* 16-20, 21, 190-91 (2003). Contemporary research addresses the need for cultural sensitivity in such planning efforts, as noted in the recent Los Angeles River Revitalization Master Plan § 5-37 (April 2007 adopted May 2, 2007).

Professor Sides describes the unique role of the Baldwin Hills in the history of African Americans in Los Angeles and across the nation. The Baldwin Hills area including the Crenshaw District and Leimert Park have long been the geographical focus of African American Los Angeles.

By the late 1950s and early 1960s, blacks had pushed west and south of West Adams into Leimert Park and the exclusive area of Baldwin Hills, which quickly became the heart of affluent black Los Angeles, a position it still holds today.

A five-square-mile area of unincorporated hillside west of Leimert Park/Crenshaw and south of West Adams, Baldwin Hills boasted large homes and expansive views. Largely undeveloped until the 1940s, hundreds of houses and apartment complexes were built there in the 1950s. As they had in Compton, blacks moved into new and large homes, with an average of four to six bedrooms per household. African Americans in Baldwin Hills were generally much better educated than their South Central counterparts, a fact that translated into greater job opportunities in the post-boom economy. Accordingly, just over 71 percent of all employed African Americans in Baldwin Hills were white-collar workers. Many Baldwin Hills residents were typical of those who fled South

11. Mark Baldasare, *Public Policy Institute of California Statewide Survey: Special Survey on Californians and the Environment* vi (June 2002).

Central after the Watts riot; according to the 1970 census, 57 percent of blacks in Baldwin Hills had lived in the central city in 1965.

In addition to superior housing, residents of Baldwin Hills and the nearby Leimert Park and Crenshaw areas also enjoyed many more conveniences as consumers. While many Watts and Willowbrook residents were forced to buy groceries at overpriced liquor stores, Baldwin Hills residents had other options. The Crenshaw Shopping Center—opened in 1947, as one of the first planned suburban malls in the United States—was the most popular shopping area for local residents. And, during the 1960s, the Baldwin Hills Center and the Ladera Center also opened, offering residents even greater selection and convenience. Central to this improved consumer selection, and middle-class life in general, was the greater mobility of Baldwin Hills residents relative to blacks in the central city. Whereas 57 percent of Baldwin Hills households had one car, and 37 percent had two or more cars, a survey of Watts residents found that 57 percent did not own a car.

Perhaps the greatest advantage to residing in Baldwin Hills was the superior quality of the area's public schools. In 1971, the Los Angeles Department of City Planning described Baldwin Hills public schools as the "the best schools of any city area inhabited primarily by black people" and "on par with those in West Los Angeles and the San Fernando Valley." In addition to boasting low dropout rates and small class sizes relative to public schools in Watts and South Central, public schools in Baldwin Hills were also more racially integrated.¹²

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.

3.1.14 Public Services and Utilities

The NOP indicates that the EIR will assess the proposed increase in water use, wastewater and solid waste generation against the available capacity. This examination must also take into consideration the growing demand on the public utilities as a result of population growth estimates as well as current, the capacity, age, condition and any proposed and recommended improvements needed to the existing infrastructures.

¹² Josh Sides, *L.A. City Limits: African American Los Angeles from the Great Depression to the Present 190-91* (2003). See also James P. Allen and Eugene Turner, *Changing Faces, Changing Places: Mapping Southern Californians 16-20* (2002).

3.2 Issue Areas with No Impacts or Less than Significant Impacts

3.2.2 Housing

The NOP says that there is no impact or less than significant impact on housing because drilling and operations would not affect existing housing through demolition, conversion, or removal of existing housing stock as there are no occupied residential structures on the site. The issue is not the displacement of housing stock, but rather the impact of the increased drilling and operations on neighboring homes. Area residents have expressed a great deal of concern for the impact of drilling on the safety of existing construction and the erosion of hillside property.

Housing requires further analysis. We recommend that the EIR and CSD address the impacts of oil and gas drilling and operations “in the midst of an urban development” including housing, schools, parks, and businesses. We recommend that the EIR and CSD address the impact of oil drilling and operations on the demand for existing and future housing. The EIR and CSD should address induced demand for housing and changes in employment arising from community revitalization as drilling and operations stop over time and park acreage increases. Wealth creation through affordable housing, local jobs for local workers, and an even playing field for small business enterprises can help guard against displacement of existing residents, housing, and businesses.

3.2.3 Schools and Police Protection

The NOP says that there is no impact or less than significant impact on schools because drilling and operations would not result in a significant increase in the number of workers in the oil field, nor would it generate a significant increase in the number of local students.

This requires further analysis. We recommend that the EIR and CSD address oil drilling and operations “in the midst of an urban development” including schools, parks, housing, and businesses. See 3.2.2. The EIR and CSD should address induced demand for schools and housing and changes in employment and school attendance arising from community revitalization as drilling and operations stop over time and park acreage increases. This can increase the need for schools. See 3.2.2.

4.0 Alternatives to the Proposed Project

Public Park [NEW]. The project alternatives should consider establishing a public park consistent with the “One Big Park Concept” set forth in the Baldwin Hills Master Plan (see Fig. 18 of the Master Plan). Under the park 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.

Clean Up [New]. The project alternatives should consider establishing a requirement for the clean up and safe removal of any and all containments, environmental hazards and in active equipment.

5.0 Cumulative Effects [NEW].

The NOP fails to indicate whether cumulative impacts of the existing and proposed drilling will be analyzed in the EIR.

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We incorporate by reference the public comments submitted by the Baldwin Hills Conservancy and by the Culver Crest Neighborhood Association.

CONCLUSION

Thank you for giving us the opportunity to review and comment on the County's NOP concerning these important issues to the community.

We would like to once again reiterate our eagerness to work with the County as the lead agency and the Department of Regional Planning on a continuous basis beyond submitting public comments to the NOP, EIR and CSD. We look forward to the community engagement.

Finally, we hereby officially recommend notice of all public hearings, the release of all public documents related to this project (including all CEQA documentation), and all other related County actions concerning the proposed CSD, PXP's current operations, or any future proposals concerning the Baldwin Hills Oil Field.

Sincerely,

Community Health Councils, Inc.

26th Senate Empowerment Congress

Robert Garcia
Executive Director and Counsel
The City Project

Cc: Senator Mark Ridley-Thomas
Assembly Majority Leader Karen Bass
Supervisor Yvonne B. Burke
Los Angeles City Council Member Herb Wesson
Los Angeles City Council Member Bernard Parks
Joseph Fielding, Los Angeles County Director of Public Health
Bruce McClendon, Los Angeles County Planning Director
Charles D. Herbertson, Culver City Public Works Director
Joseph Liaw, SCAQMD
Mark Rocha, President, West Los Angeles College
Chair, Baldwin Hills Conservancy
David F. McNeill, Executive Officer, Baldwin Hills Conservancy
Ruth Coleman, Director, California State Parks
Bobby Shriver, Chair, California State Park and Recreation Commission