

City of Culver City
Major Areas of Concern Remaining with the Baldwin Hills
Community Standards District

- **The process has been faulty due to lack of adequate review time and therefore the DEIR should be re-circulated.**
 - The Community Standards District document which is the basis for the EIR preparation has changed substantially since the DEIR was circulated. The DEIR needs to be redone to be in conformance with the document that it evaluates.
 - Throughout the process there has been insufficient time to obtain meaningful public input on the ever changing CSD document.

However, should the County decide to move forward with the CSD the City of Culver City would like to see the following major issues addressed

- **The CSD needs to require the consolidation of well drilling to the maximum extent possible. There needs to be a process in place to review well drilling permits in order to determine that this requirement is being adhered to.**
 - Slant/directional drilling should be used where possible to both eliminate the need, wherever possible, of new well drilling pads and to minimize the drilling of wells close to sensitive receptors in the communities surrounding the oil fields.
- **The number of oil wells that can be drilled annually without additional environmental review should be capped at 15 per year.**
 - All new wells must be subject to a discretionary review that requires well thought out findings and includes a public process.
 - A Conditional Use Permit should be required when the number of new or redrilled oil wells in any given year exceeds 15.
- **Numerous plans or implementation guidelines (over 20) providing guidance for various aspects of oil drilling operations have yet to be developed and require a process that includes public input and oversight. Also, there are many other areas where County approvals will be required ranging from the color of new oil wells to the amount of insurance PXP is required to carry.**
 - These plans and approvals need to be developed and/or reviewed by independent experts in the area of oil field regulation.

- These plans include procedures governing noise reduction, dust mitigation, landscaping to address visual impacts, and vapor monitoring.
- A task force made up of officials and citizen appointees from the County and surrounding communities such as Culver City should be formed for the purpose of reviewing and providing oversight for the development of these plans
- **Potential health impacts from oil drilling operations continues to be a major concern of the communities surrounding the oil field. As such, there needs to be provisions for periodic health assessments in the communities surrounding the oil fields.**
 - Surveys that collect data regarding occurrences of cancer or respiratory diseases would help ensure that no unusual clusters develop in the area surrounding the oil fields that may be attributable to exposure to toxins from the oil operations.
- **On-going incremental clean-up of the oil fields needs to be required.**
 - There are a multitude of abandoned wells within the oil fields. Many of these wells were abandoned years ago when standards were much less stringent than they are today. There needs to be an on-going, systematic investigation and clean-up of these previously abandoned wells that is required. We suggest that for every new well drilled an abandoned well should be investigated and cleaned up if necessary.
 - This clean up work needs to include old tank farms, sumps, and other areas where contamination may have occurred in the past.
- **Plan for eventual conversion of the oil fields to a natural state consistent with the County's General Plan.**
 - An incremental plan that shows gradual pull back of oil drilling activities from the surrounding sensitive receptors and remediation of the land should be developed.
 - Targeted closure dates for sections of the oil field should be developed so as to provide for a gradual pull back from the surrounding communities.