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September 12, 2016

Jau Ren Chen
Los Angeles Regional Water Quality Control Board
320 W. 4th St., Suite 200
Los Angeles, CA 90013
JauRen.Chen@waterboards.ca.gov

VIA EMAIL

Re: Tentative Time Schedule Order Amendment for No. R4-2013-0022-A01 – Freeport-McMoRan Oil & Gas (Inglewood Oil Field)

Dear Mr. Chen

On behalf of Heal the Bay, we submit the following comments on the *Tentative Time Schedule Order Amendment for No. R4-2013-0022-A01 – Freeport-McMoran Oil & Gas (Inglewood Oil Field)*. Heal the Bay is an environmental organization with over 15,000 members dedicated to making the coastal waters and watersheds of greater Los Angeles safe, healthy, and clean. We appreciate the opportunity to provide comments on the Tentative Time Schedule Order Amendment (tentative TSO).

We commend the Regional Board's denial of Freeport-McMoRan Oil & Gas's (Discharger) request for a five-year extension on their existing TSO—set to expire September 15, 2016. In addition, we agree with the rationale used to extend the TSO for an additional year and half (1 ½)—compliance schedule set to terminate on February 7, 2018. However, we still have a few concerns over the tentative TSO.

We are perhaps more anxious than the Discharger to discover whether the precautions that they have put into place, a new storm water treatment system, does in fact put them in compliance. We also find it unfortunate that Freeport-McMoRan has found it necessary to wait until it rains to figure out possible faults in their system. We encourage them to take a more proactive role by field testing the integrity of their systems. Blaming it on “no rain” would not pass muster with government flood control and should not be allowed as an excuse for the Discharger. The community and environment around Ballona Creek and Estuary would almost definitely suffer on the gamble of unproven infrastructure. The burden of proof should be completely on the Discharger to demonstrate the effectiveness of their permanent storm water treatments systems. This could be done by investing money into theoretical storm modeling and field testing. Otherwise an intense rainfall event, like that which occurred in February 2014, could put the aquatic environment surrounding the Inglewood Oil Fields at risk of copper, lead, selenium, and zinc contamination once again.



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The story of Inglewood Oil Field has been one commented on by Heal the Bay a multitude of times for over twenty years. We realize that ownership of the fields has traded hands, but this doesn't change the fact that the brunt of the environmental costs over the decades long drilling have been paid by the public. Despite this, the environmental degradation and unattractiveness of the site has continued. In our August 18, 2008 comments regarding the oil field's Draft Environmental Impact Report, Heal the Bay suggested the site owner show some token of good neighborly faith to the surrounding community by implementing aesthetic restoration actions and site beautification protocols. Perhaps as Freeport-McMoRan Oil & Gas pursue their Time Schedule Order, they could also show they have the environment and fellow neighbors in mind by putting some of these beautification processes into practice. In addition to providing some aesthetically pleasing land for the community, extra planted vegetation would also function to help pull suspended solids out of any possible runoff. Total suspended solids are already a tremendous concern for Ballona Creek.

Thank you for your consideration of these comments. If you have any questions please feel free to contact us at (310) 451-1500.

Sincerely,

Steven Johnson
Water Resources Policy Analyst
Heal the Bay