

LETTER NO. 7

Dated: 1/28/01

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1400 Tenth Street
Sacramento, CA 95812-3044

COMMENT 7.1

The enclosed comment(s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on February 26, 2001. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project please refer to the ten-digit State Clearinghouse number (2000091046) when contacting this office.

RESPONSE 7.1

The comment is noted for the record and will be forwarded to the City decision makers for their review and consideration.

COMMENT 7.2

The Department of Conservation's Division of Oil, Gas and Geothermal Resources (Division) has reviewed the DEIR for the referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas and geothermal wells in California. We offer the following comments for your consideration.

Portions of the proposed project are located within the administrative boundaries of the Los Angeles Downtown oil field. There is one plugged and abandoned exploratory well within the project's Olympic East site. This well is identified on Division maps and records as Chevron U.S.A. Inc. "Salvation Army Corehole" 1 (API No. 037-06334). The well location is given as, "from centerline of 9th Street and Francisco Street, approximately 92 feet Easterly along 9th Street, thence 110 feet

Southerly at right angles.” The Division recommends that this well, and other wells within or in close proximity to project boundaries, be accurately plotted on future project maps.

RESPONSE 7.2

The Los Angeles Downtown Oilfield is addressed in the Draft EIR, Section IV.K. Geologic and Seismic Hazards on page 427. The location of the Chevron U.S.A. Inc. “Salvation Army Core Hole 1” well, based on site-specific data from Division of Oil and Gas files referenced in Appendix F of the Draft EIR, Salvation Army Core Hole 1, located at the corner of Francisco Street and 9th Street, is well outside of the Project site boundaries and is not located within the boundaries of the Olympic East property.

The Draft EIR, Section IV.G., Hazardous Materials, concludes that there are no plugged or abandoned wells located on the Project site that would be impacted by project development. This conclusion is supported by the Hazardous Materials Assessments included as Appendix F of the Draft EIR. Furthermore, as noted above, the “Salvation Army Core Hole 1” well is located sufficiently distant from the Project site so that no Project-related construction activities would occur in proximity of the well. Thus, the Project is not expected to disturb or result in impacts to plugged or abandoned wells during excavation or grading, nor are buildings expected to be constructed over or in proximity to a plugged or abandoned well. Detailed hazardous materials assessments that included investigations for unrecorded wells have been performed for the entire Project site. These assessments, which included subsurface investigations and remediation are discussed in Appendix F of the Draft EIR.

COMMENT 7.3

We recommend that building over or in the proximity of a plugged and abandoned well be avoided if at all possible. If avoidance is not possible, please note that the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells to Division standards when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable, an adequate gas venting system should be placed over the well.

RESPONSE 7.3

Refer to Response to Comment 7.2.

COMMENT 7.4

If plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the

Division's district office must be contacted to obtain information on the requirements for, and approval to perform remedial operations.

RESPONSE 7.4

Refer to Response to Comment 7.2.

COMMENT 7.5

The City's planning department should verify that final building plans have undergone Division review prior to the start of project construction. To assist in the review of building projects for consistency with Division standards, we have published an informational packet, Construction Project Site Review and Well Abandonment Procedure, that outlines the information a project developer must submit to the Division for review. Please contact the Division's Cypress district office for a copy of the site-review packet.

RESPONSE 7.5

Refer to Response to Comment 7.2.

COMMENT 7.6

Thank you for the opportunity to comment on the DEIR. If you have questions on our comments, or require technical assistance or information on well safety and management, please contact David Sanchez at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, California 90630-4731; or, telephone (714) 816-6847. You may also call me at (916) 445-8733.

RESPONSE 7.6

The comment is noted for the record and will be forwarded to the City decision makers for their review and consideration.