

June 4, 2020

Contra Costa County
Department of Conservation and Development
Attn: Syd Sotoodeh, Planner II
30 Muir Road
Martinez, CA 94553

RE: Proposed Negative Declaration for Land Use Permit LP19-2019

Dear Ms. Sotoodeh:

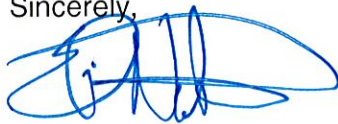
Thank you for the opportunity to review the proposed Negative Declaration for the Powerdrive Oil & Gas Company Wells land use permit. The City's comments are as follows:

- General
 - References to "Hidden" Ranch Road should be changed to "Heidorn" Ranch Road throughout the document.
 - The project description should include a discussion of whether flaring will be used during drilling operations. If flaring will be used, an analysis of the potential impacts should be included in the appropriate section(s).
 - The analysis acknowledges the distance from the project site to the nearest sensitive receptors, which are single-family homes in Brentwood. It does not, however; provide substantial evidence to serve as sufficient justification that many of the impact categories reach the "less than significant" conclusions listed. A more detailed analysis in these categories, as well as corresponding mitigation measures, should be included (see below).
- Aesthetics
 - Page 5 – response (d) should include additional details regarding the temporary lighting that will be used during the drilling phase of the project. This should include, but not be limited to, a description of the types of lighting, the height of associated poles, the locations of poles, and what hours the lighting will be in use. If a generator is to be used to power the lighting, a corresponding analysis in the noise section of the document should be included.
- Air Quality
 - Page 9 – responses (c) and (d) should include additional details regarding potential impacts during both construction and operation. One example is the implementation of dust control measures during construction. While the distance to the nearest sensitive receptor is listed at 1,100 feet, the actual distance appears to be approximately 800 feet, and additional substantial evidence should be provided to substantiate the "unlikely" event of emissions.

- Geology and Soils
 - Page 16 – this should include a description of any grading that is proposed as part of the project and any associated impacts.
- Hazards and Hazardous Materials
 - Page 20 – response (b) should include additional details regarding the potential release of hazardous materials. The analysis relies heavily on compliance with the regulations enforced by the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) to conclude that impacts will be less than significant. At a minimum, the analysis should document what specific regulations will be enforced to ensure the safety of nearby residents and properties.
- Hydrology and Water Quality
 - Pages 22 and 23 – the analysis in response (a) does not substantiate the less than significant conclusion related to groundwater quality impacts.
- Noise
 - Page 27 – the analysis correctly states Brentwood’s General Plan noise level of 75 dB for single-family residential uses as being “conditionally acceptable” and references noise impact studies that were previously prepared for a similar drilling operation nearby. The analysis does not, however, indicate what the actual noise impacts will be as a result of this project. A project-specific noise study should be prepared and then incorporated into the analysis to ensure that any impacts on nearby single-family residential uses are indeed less than significant.
- Transportation
 - Page 32 – the analysis should include a description of what impacts (if any) the project will have on the future construction of Sand Creek Road. It should also address the staging of vehicles and/or equipment that will be used on-site during the construction phase of the project.

Thank you again for the opportunity to review the proposed Negative Declaration and provide comments. Please contact me if you have any questions about the City’s comments or if you would like to discuss.

Sincerely,



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