



December 12, 2016

**Members of the Orange County Board of Supervisors**  
c/o The Clerk of the Orange County Board of Supervisors  
333 W. Santa Ana Boulevard  
Santa Ana, CA 92702-4048  
Sent Via Email: [response@ocgov.com](mailto:response@ocgov.com)  
Subject: **Proposed Esperanza Hills Development**

**Re: Recent Surface Spill and Unauthorized Release of Crude Oil  
Proposed Esperanza Hills Development  
Yorba Linda, Orange County, California  
IES PROJECT NO. 15-02-002**

Dear Orange County Board of Supervisors:

Innovative Environmental Solutions (IES) had previously reviewed the Final Environmental Impact Report for the proposed Esperanza Hills housing development (the Project), located within the Sphere of Influence for the City of Yorba Linda, with respect to site-specific geologic conditions including historical and current oil production activities and the associated public health hazards. IES identified a number of concerns related to public health impacts and recommended that further studies be conducted as part of the environmental review for the project.

I am a Certified California Professional Geologist (No. 7400) and principal of IES, and have previously commented upon the public health risks associated with the Project, including the likely presence of hazardous materials from decades of oil well operations. (See attachment "A" hereto).

With the oil production history on the around the site, and the common natural co-occurrence of subsurface methane and hydrogen sulfide gases, I have previously urged the County, before approving any footprint for development on the site, to require comprehensive surface and subsurface assessments of the presence of hazardous materials and gases. What is found may very well impact decisions as where to actually build homes. In some cases, homes should not be built on top of methane and or hydrogen sulfide deposits.

I have just learned today that last week a resident came across surficial evidence of an oil spill on the Esperanza Hills property at an active well near the Stonehaven side of the project site (See attachment "B" hereto). I understand that it was also reported by the resident that at least one regulatory agency had stated that the spill had not been properly reported.

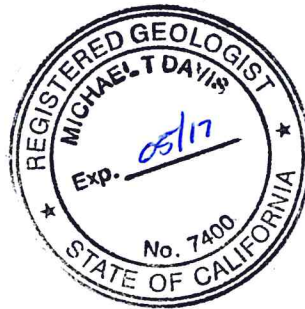
This recent spill is an example of what commonly occurs on and near oil well operations. I once again encourage the County, through the environmental review process to fully assess the entire project site and to identify and implement appropriate mitigation measures before the project is approved. Deferral of assessment of these types of conditions is ill advised and not consistent with the language or spirit of CEQA.

If you have any questions, or if you need any additional information or clarification, please contact myself at (760) 632-2330 (office) or (760) 846-2330 (mobile). Thank you for your attention to these matters.

Sincerely,



Michael T. Davis, P.G.  
Principal Geologist



Attachment A – IES Review of the Environmental Documents for the Proposed Esperanza Hills Development dated March 6, 2016

Attachment B – Photos of Oil on Surface