



Freeport-McMoRan Oil & Gas
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February 26, 2014

Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012-3225

VIA HAND DELIVERY

RE: January 2014 Revised Draft General Plan

Dear Members of the Los Angeles County Regional Planning Commission:

As Operator of the Inglewood Oil Field (IOF), Freeport-McMoRan Oil & Gas has reviewed the subject Revised Draft General Plan (RDGP) and appreciates the County's consideration and implementation of many of our comments on the prior versions of the Draft General Plan. Nonetheless, as reflected in this letter, we remain concerned that the proposed General Plan Update must be consistent with the Baldwin Hills Community Standards District (CSD) and our vested rights to continue operations and responsibly develop the mineral rights underlying the surface of the IOF.

The Revised Draft designates surface parcels within the IOF owned by the City of Los Angeles Department of Water and Power (DWP) as Public and Semi Public (P). DWP has the right to use this surface property for operation and maintenance of high-voltage power lines as part of the electric system of the City of Los Angeles subject to the terms of the underlying oil and gas lease further described in that Deed recorded on May 29, 1959 as Document No. 1503 and that Deed recorded 11/7/1946 as Document No. 2403 in the Official Records of Los Angeles County. The proposed P land use designation would interfere with FM O&G's vested and mineral rights by disallowing any new, oilfield activities or uses within this surface area and allowing incompatible uses to in this area – which conflicts with other policies of the RDGP and comprises the security and safety of the IOF. A solution to this issue that would provide consistency throughout the RDGP itself, the CSD, and FM O&G's vested and mineral rights would be to:

1. Include oil and gas production and processing facilities within the purpose of the P land use designation (page 91 of the redlined RDGP);
2. Reinforce that public access to major public facilities, as referenced in the P land use designation description, not be accessible to the public rather than “generally not publicly accessible” as currently drafted in the RDGP (page 91 of the redlined RDGP);
3. Include oil and gas production and processing facilities within Policy PS/F 6.8 (Page 259 of the redlined RDGP as shown in the enclosure to this letter; and,
4. Include oil and gas production and processing facilities to the description/list of “Major Facilities” (page 83 of the redlined RDGP).

For your reference, the enclosure to this letter shows redlined versions of the aforementioned resolutions within the text of the RDGP (numbers within this letter and the enclosure are consistent).

FM O&G also remains concerned with the County's use of the term "conserve and protect" and the requirement to "permanently" preserve mitigation sites. Both of the words, "conserve" and "protect," may be interpreted as "do not touch." The term "permanent" of "permanent preservation" would result in the same interpretation for the area that makes up any mitigation sites. Both scenarios would not allow for flexibility in development in consideration of unique characteristics of any given site in the County, including the IOF. The "permanent preservation" of mitigation sites would also conflict with CSD Section E.7, which was implemented due to implementation of mitigation measures resulting from the thorough analysis of the CSD EIR. This could result in unintended consequences that could unnecessarily impede positive developments and improvements within the County.

Alternatively, if the County implemented the following changes to the RDGP, these issues would not exist:

5. Change the term "conservation and preservation" to "conservation and protection" within the introduction to Chapter 9 (Page 136 of the redlined RDGP) and any other areas where the term may occur in the RDGP; and,
6. Add the text "to the extent feasible" to policy C/NR 3.10 (Page 150 of the redlined RDGP).

Again, the enclosure to this letter shows redlined versions of the aforementioned resolutions within the text of the RDGP (numbers within this letter and the enclosure are consistent).

Thank you in advance for your consideration of the comments and concerns within this letter and the enclosure thereto. Please feel free to contact me should you have any questions.

Sincerely,



Laura Vlk
Senior EH&S Specialist

Cc Steve Rusch, Vice President EH&S and Government Affairs
Stephen Burke, Manager Land
John Martini, Manager EH&S and Government Affairs
Candace Salway, Manager EH&S
Jon Sanabria, County of Los Angeles, Deputy Director
Jill M. Jones, County of Los Angeles, Deputy County Counsel
Connie Chung, County of Los Angeles, Supervising Regional Planner
Leon Freeman, County of Los Angeles, Planner

**Freeport-McMoRan Oil & Gas
Requested Changes to the
January, 2014 Los Angeles County Revised Draft General Plan (RDGP)
February 25, 2014**

1 and 2: Public and Semi Public (P) Purpose: Page 91 of the redlined RDGP:

...Other major ~~public~~ facilities, including planned facilities that may be public serving but ~~generally~~ not publicly accessible, such as landfills, solid and liquid waste disposal sites, oil and gas production and processing and facilities, multiple use stormwater treatment facilities, and major utilities....

3. Policy PS/F 6.8: Page 259 of the redlined RDGP:

Support the prohibition of public access within, and the limitation of access in areas adjacent to natural gas storage facilities and oil and gas production and processing facilities to minimize trespass and ensure security.

4. Major Facilities Description/List: Page 83 of the redlined RDGP:

Major facilities, such as landfills, solid waste disposal sites, energy facilities, natural gas storage facilities, oil and gas production and processing facilities, military installations, and airports should be protected from the encroachment of incompatible uses.

5. Introduction to Chapter 9: Page 136 of the redlined RDGP:

The County's role in the protection, and conservation ~~and preservation~~ of natural resources and open spaces areas is vital as most of the natural resources and open space areas in Los Angeles County are located within the unincorporated area.

6. Policy C/NR 3.10: Page 150 of the redlined RDGP:

Require that development mitigate 'in-kind' for unavoidable impacts biologically sensitive – onsite or nearby as feasible, but allow flexible off-site application to the benefit of other County SEAs of connectivity among them if onsite is not feasible, and permanently preserve mitigation sites to the extent feasible.