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

VIA ELECTRONIC MAIL and FEDERAL EXPRESS

**RE: March 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 continue to have concerns that the proposed General Plan Update is not completely consistent with the Baldwin Hills Community Standards District (CSD) and accordingly may work an impairment of our vested rights to continue operations and responsibly develop the mineral rights underlying the surface of the IOF. We respectfully request that the General Plan be clarified as indicated in this letter to ensure full consistency and avoid future confusion.

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, however, those rights are 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. We are concerned that the proposed P land use designation does not acknowledge these private rights and accordingly could 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 into this area – which in turn 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 a statement within the purpose of the P land use designation disclosing that uses compatible with the surrounding development (including but not limited to mineral and oil and gas production) are permitted.

FM O&G also remains concerned with the County's requirement to "permanently" preserve mitigation sites. The use of the term "permanent preservation" could result in the interpretation that any restoration area "cannot be touched ever again." Such a scenario 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 put in place to implement 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 IOF. Alternatively, if the County implemented the following change to the RDGP, this issue would not exist:

2. Add the text "to the extent feasible" to policy C/NR 3.10 (Page 131 of the redlined RDGP).

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

Sincerely,



Laura Vlk  
Senior EH&S Specialist

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