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December 15, 2010

Via Email, Facsimile & U.S. Mail

Leon Freeman
Department of Regional Planning
Zoning Enforcement, Section I
320 West Temple Street
Los Angeles, CA 90012

CULVER CITY COMMENTS ON THE PXP LANDSCAPING PLAN
INGLEWOOD OIL FIELD, REVISED NOVEMBER 2010

Dear Mr. Freeman:

We have reviewed the Revised November 2010 Landscaping Plan (Revised Plan) submitted by PXP as required by the Community Standards District (CSD) (L.8., Page 89) and provide the following comments:

1. Throughout the review of the four versions of the CSD, Culver City repeatedly commented that specific measures needed to be taken to ensure that the landscaping meets the intent "to beautify and screen the operations from adjoining residential, recreational, institutional areas or adjacent public streets or highways" of Mitigation Measure V.1-1 of the CSD Environmental Impact Report (EIR). As the Plan only proposes to provide landscaping for three of the four sides of the Inglewood Oil Field (Oil Field), we do not see how it meets the requirements of Mitigation Measures V.1-1 through V.1-3 especially as the plan relates to the views of the oil field operations from Culver City to the west. The City remains disappointed in the lack of landscaping proposed to be installed along the westerly side of the oil field. The Culver City ridgeline is visible for many miles and the oil field operations are seen by Culver City and City of Los Angeles residents and businesses. In PXP's proposed 2009 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan, dated January 2009, Attachments Nos. 2 through 30 clearly illustrate the view impacts of oil field operations from the west.

2. Although the Revised Plan indicates that it is infeasible for landscaping enhancement in this location, the analysis provided to substantiate these claims is substantially deficient. It would not appear to be cost prohibitive for PXP to install an above-ground drip irrigation system and plant a faster growing indigenous and native

species of trees, such as the eucalyptus, which are well established throughout the Oil Field presently.

3. The Revised Plan must address the required EIR mitigation measures and be consistent with the 2009 (or current) Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. As such the Revised Plan dated November 2010 is incomplete and insufficient in its attempt to beautify and provide screening of oil well operations for the oil field. The Revised Plan as proposed should be rejected and be required to be modified to address the viewsheds from all sides of the oil field.

4. The use of mature landscaping should be required as it could be many years before visual impacts are abated if small immature landscaping is used.

5. The County should be aware that in an executed agreement, PXP had promised to provide landscaping to shield pumping equipment in Culver City Park over four years ago. PXP has not honored that obligation by claiming that it was not feasible to do so. Thus, the County should have an effective enforcement mechanism to assure that PXP follows through with its landscaping obligations.

To address these comments, the City proposes that PXP meet with City staff to tour the boundaries of the Oil Field to identify the City's areas of concern, understand PXP's constraints and discuss possible solutions for mitigating the view impacts of Oil Field operations on Culver City and adjacent communities.

We look forward to working with the County to achieve the proper landscaping to beautify and screen the oil operations in Baldwin Hills. If you have any questions please contact Sherry Jordan, Senior Planner, at (310) 253-5746 or by email at sherry.jordan@culvercity.org.

Sincerely,

Sol Blumenfeld
Community Development Director

SB:sj

Copy: City Council
John Nachbar, City Manager
Carol Schwab, City Attorney
Heather Baker, Assistant City Attorney
Charles Herbertson, Public Works Director
Thomas Gorham, Deputy Community Development Director/Planning Manager
Sherry Jordan, Senior Planner

CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

Sol Blumenfeld
Community Development Director

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June 26, 2009

Leon Freeman
Department of Regional Planning
Zoning Enforcement, Section I
320 West Temple Street
Los Angeles, CA 90012

CULVER CITY COMMENTS ON THE PXP LANDSCAPING PLAN
INGLEWOOD OIL FIELD, DATED MAY 2009

Dear Mr. Freeman:

While reviewing the landscaping requirement in the Community Standards District (CSD) (L.8., Page 89), we see that the final version only required that the landscaping plan be consistent with a conceptual landscaping plan prepared by Mia Lehrer & Associates, dated October 2008. When inquiring about said plan we were referred to a website where there was a Mai Lehrer & Associate Plan dated November 4, 2008.

Throughout the review of the four versions of the CSD, Culver City repeatedly commented that specific measures needed to be taken to ensure that the landscaping meets the intent "to beautify and screen the operations from adjoining residential, recreational, institutional areas or adjacent public streets or highways." of Mitigation Measure V.1-1 of the CSD Environmental Impact Report (EIR). As the Mia Lehrer/PXP Plan only addresses three of the four sides of the oil field, we do not see how it meets the requirements of Mitigation Measures V.1-1 through V.1-3 especially as the plan relates to the views of the oil field operations from Culver City to the west.

Needless to say in reviewing the PXP Landscaping Plan, staff was shocked with the lack of landscaping proposed to be installed along the westerly side of the oil field. The PXP Plan does not properly analyze the viewshed from the west or provide for any landscaping or screening along the ridgeline overlooking Culver City. This ridgeline is visible for many miles and the oil field operations are seen by Culver City and City of Los Angeles residents and businesses. In PXP's proposed 2009 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan, dated January 2009, Attachments Nos. 2 through 30 clearly illustrate the view impacts of oil field operations from the west.

The Landscaping Plan must address the required EIR mitigation measures and be consistent with the 2009 Drilling, Redrilling, Well Abandonment, and Well Pad Restoration Plan. As such the proposed plan dated May 2009 is incomplete and insufficient in its attempt to beautify and provide screening of oil well operations for the oil field. The plan as proposed should be rejected and be required to be modified to address the viewsheds from all sides of the oil field.

Additional comments Include: (1) The use of mature landscaping should be required as it could be many years before visual impacts are abated if small immature landscaping is used, and (2) The County should be aware than in an executed agreement, PXP had promised to provide landscaping to shield pumping equipment in Culver City Park over four years ago. PXP has not honored that obligation by claiming that it was not feasible to do so. Thus, the County should have an effective enforcement mechanism to assure that PXP follows through with its landscaping obligations and advance assurance that landscaping is feasible in the Baldwin Hills.

We look forward to working with the County to achieve the proper landscaping to beautify and screen the oil operations in Baldwin Hills. If you have any questions please contact Sherry Jordan, Senior Planner, at (310) 253-5746 or by email at sherry.jordan@culvercity.org.

Sincerely,

Sol Blumenfeld
Community Development Director

SB:sj

Copy: Andy Weissman, Mayor
Gary Silbiger, Councilmember
Mark Scott, City Manager
Carol Schwab, City Attorney
Heather Baker, Assistant City Attorney
Charles Herbertson, Public Works Director
Thomas Gorham, Deputy Community Development Director/Planning Manager
Sherry Jordan, Senior Planner