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RECEIVED
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BY:

April 25, 2014

VIA E-MAIL

Department of Regional Planning
Attn: Timothy Stapleton, Zoning Enforcement West
320 W. Temple Street,
Los Angeles, CA 90012

Re: Initial Periodic Review (February 2014 Public Draft)
Baldwin Hills Community Standards District
Our File No. 9065.2

Dear Mr. Stapleton:

I am a resident of Culver Crest. This letter is submitted to comment on the February 2014 public draft of the County's Baldwin Hills Community Standards District Periodic Review.

This first Periodic Review misses an opportunity to address important public policies related to the future of the Inglewood Oil Field. The technical analysis provided in the County's draft report does not take into account the long-term unparalleled opportunity to convert this unimproved raw blighted land into a critically needed urban park.

Strategies for reducing the footprint of the oil field, winding down or compacting the exploration, using new and improved technologies, creating greater opportunities for public acquisition and/or access, cleaning up existing contamination, ensuring against risks of future disasters, establishing a sunset horizon for production, imposing a long-overdue production tax that should be used to fund parkland expansion, and empowering surrounding residents should be vigorously explored at each five year milestone.

BACKGROUND

The Inglewood Oil Field is the largest urban oil field in the nation. When the oil operations began in 1924, the area was primarily farm land. The surrounding land that once supported crops and livestock is now home to more than one million residents within a five mile radius. The oil field and its operations and the County land use policies and regulations must reflect that there are numerous established residential neighborhoods surrounding the oil field.

Oil and gas are no longer as readily recovered from the oil field as they once were. So-called "enhanced recovery techniques" are now required. These operations

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involve high pressure injection of water into the earth to extract the oil and gas from reservoirs located generally between 1,000 and 10,000 feet beneath the surface.

Researchers believe that as secondary recovery become more widespread, waterflood operations may be accompanied by an increase in the potential hazard of earthquakes, as has occurred elsewhere.

Over the last 90 years of oil drilling and production, there have also been numerous instances of contamination and other health hazards.

THE NEED FOR MORE PARKLAND

The area surrounding the Baldwin Hills is one of the most park-poor urban areas in California, with less than one acre of park space per 1000 people, far below the nationally-recommended standard of 6 to 10 acres per 1000 people.

The Baldwin Hills represent one of the last largely undeveloped areas of open space in urban Los Angeles County. Over one million people live within five miles of the Baldwin Hills, and, with barely one acre of parkland per one thousand people, this is one of the most park-poor regions in California. The Baldwin Hills present a unique opportunity to enrich the lives of millions by creating one of the most dramatic new parks in an urban setting desperately in need of critical park space.

In 1999, the State Legislature passed Senate Bill No. 1048 (Murray, 1999) declaring the Legislature's intent to provide for the expansion of the Kenneth Hahn State Recreation Area in the Baldwin Hills. This legislation contemplated the development of a master plan to accomplish the following goals: (A) increase active recreation opportunities for underserved communities, (B) create a comprehensive trail system, (C) provide for public access and entry ways, (D) protect and restore natural habitat, (E) protect critical viewsheds, (F) protect and improve urban water quality, (G) emphasize connections between existing parks, trails, and urban streams, (H) restore industrial lands to park and open-space use, and (I) protect watersheds connecting to Santa Monica Bay. This legislation assumes eventual conversion of the Oil Field into the largest urban park created in the last century anywhere in the nation.

After an extensive public process, the Baldwin Hills Park Master Plan was adopted pursuant to Public Resources Code Section 32565.5(f). The stated purpose of the Baldwin Hills Park Master Plan is as follows:

> "The purpose of the Baldwin Hills Park Master Plan is to serve as a guide for future natural open space and parkland acquisition and improvements, facility development and habitat restoration within the Baldwin Hills, and for connections to trails, parks and other public facilities."

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The Park Master Plan envisions preservation and restoration of natural habitat along with the development of active and passive recreational facilities and education and cultural facilities, including the following: approximately 300 acres of protected and restored natural lands; over 60 acres of multiple-use (softball, baseball, soccer) fields; a 120-acre/18-hole golf course; a tennis center, skate parks, over 15 miles of jogging, bicycle, and hiking trails; playgrounds; indoor basketball courts, a recreation center and gymnasium, a par course, and climbing wall; and a competition-sized swimming pool.

The CSD is located within the area encompassed by the Baldwin Hills Park Master Plan.

CSD PERIODIC REVIEW COMMENTS

In light of the foregoing, the CSD Review should look towards how to better implement public policy related to the Inglewood Oil Field. This should include:

- reducing (over time) the footprint of the oil field, through a combination of restrictions and incentives;
- winding down or contracting the drilling/exploration over time;
- due to its unique circumstance as the largest urban oil field in the nation, compelling the use of cutting-edge, newer, quieter, cleaner, smaller, safer and improved technologies in drilling and production activities even if they might not be as cost efficient as are used in other smaller or less urban oil fields;
- creating greater opportunities for public acquisition and/or public access to the existing vast oil field land for greater parks and open space;
- locating, identifying, cleaning up and certifying existing contamination and reducing or eliminating risks of further contamination throughout the oil field, including from prior abandoned well sites;
- ensuring against risks of future disasters through increased and improved monitoring, contingency planning, intra-agency communication, and dramatically increasing the CEO's financial bonding/insurance requirements to levels that truly reflects the levels of risk posed by existing operations and eventual clean up upon ultimate closure of the oil field;
- establishing a realistic sunset horizon for oil and gas production from this urban oil field and developing strategies to implement that transition;
- imposing a long-overdue production tax that should be used to fund parkland expansion; and

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- empowering surrounding residents to remain informed, engaged and responded to.

Sincerely,

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