



# CITY OF CULVER CITY

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November 21, 2019

**Via Email:** [tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov)

Los Angeles County  
Department of Regional Planning  
Attn: Timothy Stapleton, Land Use Regulation Division  
320 W. Temple Street,  
Los Angeles, CA 90012

**Subject: Comments on the Initial Draft Report for the Baldwin Hills Community Standards District Periodic Review II (for Years 2014 – 2018), dated September 2019**

Dear Mr. Stapleton:

Thank you for this opportunity to submit comments on the Initial Draft Report for the Baldwin Hills Community Standards District ("CSD") Periodic Review II, for the period between 2014 and 2018 ("Periodic Review II").

On September 24, 2019, the County of Los Angeles ("County") circulated copies of the Initial Draft Periodic Review II to members of the Baldwin Hills CSD Citizens Advisory Panel ("CAP"), and on October 24, 2019, at the meeting of the CAP, the County presented an overview of the required 5-Year Periodic Review Process and findings of its Periodic Review II. On May 31, 2019, the City of Culver City ("City") submitted comments regarding issues it believed needed to be addressed as part of the Periodic Review II under the County's preliminary scoping process.

Consistent with CSD regulation Section 22.310.070.G, Los Angeles County is required to conduct a comprehensive review of the CSD at least every five years to determine if the provisions of the CSD are adequately protecting the health, safety, and general welfare of the public. The review is required to consider whether additional provisions should be added, appended, or removed and to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of the CSD.

As you are aware, the Inglewood Oil Field ("Oil Field") is located within and adjacent to the City. The Oil Field is unique in that it is an "urban" oil field adjacent to parks, schools, residences, and businesses, including thousands of Culver City residents and businesses that are impacted by and are interested in the on-going operations of the Oil Field. The City has been interested in matters pertaining to the CSD since its inception. Because the City deals with the effects of the ongoing operations at the Oil Field on a daily basis, it

has relevant knowledge as to effectiveness of the CSD regulations and the adequacy of the CSD and its processes for protection of the health, safety and general welfare of the public. In addition, the City has been an active participant of the CAP.

It is due to these unique circumstances that Culver City makes those comments, requests and recommendations, provided below, in order to more effectively achieve the CSD's objectives. The City's comments are not limited to the content of the CSD regulations themselves, but also touch on the County's administrative process for how it conducts auditing, monitoring, reporting and outreach, as well as management and application of the CAP. The City's comments are organized as follows:

- Reiteration of previous comments and request for expanded evaluation and adjustments to CSD provisions to satisfactorily address those issues as previously identified.
- Concurrence with and refinement of the current recommendations to ensure CSD objectives are met.
- More robust evaluation and incorporation of new technologies with a particular focus on data transparency, green technologies and sustainability
- Proactive planning on procedure for CSD expiration and identifying objectives for the Oil Field end-of-life.

### **Reiteration of Previous Comments**

The City reiterates those comments previously submitted in writing and requests that the County continue to review, evaluate and adjust the CSD provisions in order to satisfactorily address those issues in manner that is responsive to the level of concern outlined in the City's detailed comments. Many of the City's comments are repetitive of past requests because those issues remain unaddressed to the City's satisfaction since adoption of the CSD.

Specifically, the City requests that the County reconsider conclusions of the Periodic Review II Report and expand its recommendations to satisfactorily address all issues previously identified by the City through correspondence dated April 24, 2014 and May 31, 2019 (attached for reference). Comments previously raised by the City and requiring further recommendations and refinement of CSD provisions include the following topics:

- Well Stimulation
- Landscaping and Aesthetics
- Funding of CSD Review and Related Studies
- Notifications and Public Notices
- Ground Movement Survey
- Improved Multiple-Agency Coordination Joint Meeting
- Emergency Response Review
- Greenhouse Gas Emissions, Air Quality & Public Health
- Evaluation and Determination of New Technology
- Insurance and Bonding

- CAP Function and Membership
- Accommodation for Changing Conditions Related to Climate Change and DOGGR Regulation

The City has considered the discussion and analysis provided in the Initial Draft Report on the above topics but does not find the level of resolution to be satisfactory to ensure the protection of the public health, safety and welfare. The City respectfully requests that the County reconsider previous comments presented and identify expanded opportunity for improved compliance and resolution of those issues tied to the above CSD topics.

### **Concurrence and Refinement of Current Recommendations**

Based on all the public comments provided, the Initial Draft Periodic Review II Report offers only five recommendations. In general, the City concurs with the five recommendations identified in the Initial Draft Periodic Review II Report, but requests refinement of the current recommendations to ensure objectives are clear and to clarify how those objectives will be met.

The recommendations offered in the Initial Draft Periodic Review II Report are limited in descriptiveness but do appear to attempt to address some aspects of the City's comments related to ground movement/property damage review, emergency response, and public notifications. However, the recommendations are incomplete on the full scope of aspects previously outline by the City on these issues and the recommendations lack specific detail to explain how each will be accomplished and fail to offer tangible objectives for reference against which to measure successful implementation.

Although four of the recommendations touch on comments previously raised by the City, it is unclear how these will be implemented and/or administered. The City believes that the recommendations should be refined to include provisions that fully address the complete range of the City's concerns. More detail should be provided and/or the recommendation should be modified to require that the CAP be consulted to provide detailed input on these recommendations and the protocol for their implementation.

For example, Recommendation #2 provides that the Oil Field Operator meet with staff involved with the complaint process and the 1-800 telephone line vendor to review the required information necessary for filing a complete complaint. How complaints are handled, documented and resolved has been an ongoing concern discussed during CAP meetings. As presented, this recommendation only addresses one aspect of how complaints are handled. As previously noted through CAP discussion, significant improvement to the entire complaint process, including provisions for follow-up and resolution of complaints, is needed. This item should be brought to the CAP so that CAP can assist the County with establishing a complete protocol that comprehensively addresses the complaint process and its implementation in the future.

As another example, Recommendation #3 provides that the Oil Field Operator post updates of oil field incidents on the oil field website. Concern about notification and update

of field incidents has been discussed during CAP meetings. This recommendation should be refined to clarify specifically how incidents and updates are communicated. Further, this item should be brought to the CAP so that CAP can assist the County with establishing a complete protocol for notifications for implementation in the future. The protocol should not be limited to what is convenient for the operator but should address the expectations and informational concerns expressed by the CAP and members of the surrounding communities. The City's previous comments on this topic offer several suggestions and outline target objectives for notifications and updates.

### **Evaluation and Incorporation of New Technologies**

The recommendations of the Periodic Review II should be expanded to include more robust evaluation and incorporation of new technologies with an added focus on data transparency, green technologies and sustainability. Evaluation of the CSD and suggested recommendations should be revised to clarify specific and tangible standards for identification and review of new technology. With this new recommendation, the CSD provisions should take a broader view for new technologies and provide specific guidelines for how potential new technologies are reviewed and evaluated. These standards should encompass accommodation for changing conditions related to climate change and long-term sustainability objectives and practices. Further, consideration of new technologies should be applied to concepts for community communication, data transparency and information management.

The County oversees several independent programs that target community health and sustainability. For example, the County has established a Chief Sustainability Office to provide comprehensive and coordinated policy support and guidance to facilitate making the region and its communities healthier, more livable, economically stronger, more equitable, more resilient, and more sustainable. The Sustainability Plan, adopted August 6, 2019, includes Goal #7 for a fossil fuel-free County. The Periodic Review II should be expanded to address how new technologies and/or best management practices that support the County's sustainability goals can be applied to ongoing daily operation of the Oil Field and for future management for the life-of-the-field (or end-of-field-life) considerations. Similarly, review of new technologies should target protocols for technologies that relate to adaptations for climate change and to both short-term and long-term sustainability objectives.

The Initial Draft should be revised to incorporate recommendations that require application of the CSD provision for new technology to clarify the standard for identification and review of new technology and provide specific guidelines for how potential new technologies are reviewed and evaluated.

Under the CSD and the Settlement Agreement, the Oil Field Operator is required to consider feasible and available technology that would reduce environmental impacts. Such review of available technologies is to be included in connection with the submission of each Annual Drilling Plan. The CSD should be reviewed to impose more specific and comprehensive requirements on both the Oil Field Operator and the County to

meaningfully evaluate all available and feasible technologies that are capable of reducing environmental impacts, supporting sustainability and adapting for climate change. The annual review of new technologies should be broadened to include all aspects of administration and processes of the CSD and not limited to certain types of equipment. Further, an objective of this recommendation should be to establish a process for review of all conclusions concerning available technologies that provides opportunity for substantive input from the CAP, and not be limited to the current procedure, which appears to rely solely on information presented from the perspective of the Operator.

From the City's perspective, the County has failed to press the Oil Field Operator to provide meaningful evaluation of new technologies or to identify potential new technologies in the broader context of sustainability, climate change adaptation, data transparency and various green technologies and best management practices.

The City recommends that the Periodic Review II Report include a recommendation for the thorough review and inventory of CSD standards to identify components that may require change and/or update to ensure that CSD requirements remain consistent with the most current County and State sustainability objectives.

#### **Procedure for CSD Expiration and Objectives for End of Field Life**

The Periodic Review II Report should include a recommendation that addresses the CSD process and Oil Field management procedures that are needed in anticipation of pending expiration of the CSD in ten years and to plan for a specified end-of-field-life target date. The CSD needs to include a pro-active approach for identification of "next steps" as the expiration deadline for the CSD nears. Even if the County ultimately takes action to extend the CSD timeline, a protocol for future consideration of the extension process for the CSD regulations and tenure of the Oil Field needs to be identified and vetted in a public forum. It is appropriate to initiate planning for such steps now so that adequate opportunity is available to gather information and evaluate potential options. A more complete understanding of this process will assist with and inform the review of other aspects of the CSD provisions.

Limited by an incomplete understanding of what may happen with the CSD provisions following year 2028, and left with unknown expectations as to how oil production may be phased out and the Oil Field ultimately closed, it is believed that having these gaps in information and process affect how new technologies and well status review are monitored in the interim. For example, review of the feasibility and practicality of new technologies and applicable sustainability objectives might look different in the context of a "10 years remaining timeframe" compared to the context of having a longer or extended operational timeline. In addition, the Director's required review of well status and annual review of the well abandonment plan and well abandonment progress is presumed to take into account alternate or varied priorities when evaluated in the context of a short-term versus long-term field life assumptions. Early and pro-active planning for the upcoming expiration date would help to address community-wide uncertainty and allow for more meaningful community input and stakeholder review leading up to the expiration date.

Accompanying the City's concern about the approaching expiration date of the CSD is the fact that several of the studies and plans that were prepared at initiation of the CSD are now obsolete and should be updated. For example, the Well Amortization Report and Abandonment Plan are out of date. Incorporating a recommendation in the Periodic Review II Report for pro-actively planning of the CSD expiration date might also include required steps for updating key reports and plans that will be meaningful and important to inform the public and decision-makers as the future of the Oil Field is considered. Consistent with forward planning, the Oil Field Operator should be required to prepare a preliminary Abandonment Plan that would, at a minimum, outline a staging process for cessation of operations within some or all portions of the Oil Field.

In summary, while the City believes that the recommendations made in the Initial Draft Periodic Review II Report have merit and that those recommendations facilitate improved enhancement and implementation of the provisions of the CSD, the City also believes that the recommendations fall short of providing for a comprehensive, programmatic approach to management and oversight of the Oil Field operations and that significant additional measures are needed to address those gaps. Further, the City believes that pre-planning for the steps leading to expiration of the CSD are needed and should be initiated in the very near future, as such pre-planning will be important to inform future reviews. To assure compliance with the intent of the CSD, and to further protection of the public health, welfare and safety, the above recommendations should be implemented.

If you have any questions or need any additional information, please contact either Heather Baker, Assistant City Attorney, at (310) 253-5660, or Melanie Traxler, Project Manager, at (818) 248-7158.

Sincerely,



Meghan Sahli-Wells  
Mayor

cc: Honorable Chair Hahn and Members of the Los Angeles County Board of Supervisors  
The Honorable Members of the City Council  
John M. Nachbar, City Manager  
Gary Gero, Chief Sustainability Officer, County of Los Angeles

Attachments:

1. April 28, 2014, letter to Timothy Stapleton, DRP, commenting on Draft Periodic Review Report (2009 – 2013)
2. May 31, 2019, letter to Timothy Stapleton, DRP, commenting on scope of review for Periodic Review II (2014 - 2018)



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April 28, 2014

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

**Subject: Comments on the Initial Draft Periodic Review for the Baldwin Hills Community Standards District, dated February 2014**

Dear Mr. Stapleton:

As you are aware, the Inglewood Oil Field ("Oil Field") is located within and adjacent to the City of Culver City ("City") and the County of Los Angeles ("County"). As such, thousands of City residents and businesses have been impacted by and are interested in the on-going operations of the Oil Field. As you are also aware, the City has been interested in matters pertaining to the Community Standards District ("CSD") since its inception.

On May 23, 2013, at the meeting of the Citizens Advisory Panel ("CAP"), the County of Los Angeles presented an overview of the required 5-Year Periodic Review Process of the Baldwin Hills Community Standards District. At that meeting, the City submitted comments regarding issues it believed needed to be addressed as part of the 5-Year Review. In February 2014, the County issued its Public Draft of the Baldwin Hills Community Standards District Periodic Review Report ("Report").

The City fully supports and concurs with the comment letter, dated April 28, 2014, submitted by Community Health Councils, Natural Resources Defense Council, the City Project, and Mujeres de la Tierra; and comments submitted by John Kuechle, via email and letter on April 6, 2014; and the comment letter submitted by Kenneth Kutcher on April 25, 2014. The City hereby incorporates these comments by reference, in this letter. In addition, the City provides the following supplemental comments on the Report:

1) Well Stimulation:

The CSD does not contain regulations specific to well stimulation methods, including hydraulic fracturing, acidization and gravel packing. However, the City believes that it is important for the County to address impacts from the use of well stimulation in the Oil Field. Although the Report states that "hydraulic fracturing is not in use at the Oil Field save for the wells 'fracked' for the

Hydraulic Fracturing Study,” the City has significant concerns that the Oil Field Operator may determine it wants to use hydraulic fracturing and other well stimulation techniques in the future. Therefore, the City requests that, at a minimum, the County should prohibit the process of well stimulation, until DOGGR or the State Legislature adopts comprehensive regulations that will adequately protect the public health and safety and the environment. Included in those protections should be a well stimulation monitoring program and an adequate community public notification process.

2) Landscaping:

In 2009 and 2010, the City submitted comments on the CSD Landscaping Plans. (Attachments 1 and 2) The City believes that those Plans did not adequately address the aesthetic impacts of the Oil Field operations for the portion of the Oil Field that is adjacent to Culver City. The Report mentions the City’s comments about the lack of adequate screening from the City’s view shed (Page 54). However, the Report states that the landscaping provisions in the CSD and Settlement Agreement are considered to be fully effective at this time, and no further analysis is recommended. While the approved plans are being implemented, the City continues to assert that the Mia Lehrer Plans do not meet the intent of CSD Environmental Impact Report Mitigation Measures, as discussed in the attached letters. Specifically, measures need 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,” as stated in Mitigation Measure V.1-1. Very few, if any, plans address the view shed from the City of the impacts of the Oil Field operations.

The City repeats its request made in the December 15, 2010, letter (Attachment No. 2) to meet with the Oil Field Operator and the County to tour the boundaries of the Oil Field to identify the City’s areas of concern, understand the Operator’s constraints, and discuss possible solutions for mitigating the view impacts of the Oil Field operation on the City and adjacent communities.

3) Funding:

The City’s concern is that many of the studies conducted under the CSD, including the Public Health, Ground Movement, and Air Quality Studies lacked sufficient funding to produce an accurate and meaningful analysis of these important issues. This fact has been publicly commented upon numerous times. Provisions of the Draw-Down Account (G.2) in the CSD, allow the County to use the account “for the purpose of defraying the expenses involved in the County’s review and verification of the information contained in any required reports and any other activities of the County, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants.”



The Report should require enforcement provisions that state the County may take whatever measures are necessary to ensure that adequate funding exists to cover the cost of preparation of accurate and reliable studies (required under the CSD). This includes requiring the analysis of the studies' findings by appropriate experts in the specific area of study. This has not been sufficiently utilized. The existing studies are inadequate and have lacked satisfactory funding; therefore, they should be enhanced with further detail and methodology to improve their accuracy and confidence in their findings. Measures should include the requirement that the Oil Field Operator replenish or increase the County's Draw Down-Account, as necessary, in order to fund studies, as well as implementation and enforcement of the County CSD provisions and requirements.

4) Public Notice:

The County should not rely on the CAP to notify the public of important information regarding the Oil Field operations, including the events and timelines involved in this 5-Year Review of the CSD. It is the County's obligation, not the CAP's, to ensure the public is fully informed about these matters, and it is insufficient to solely place the information on the County's website. For example, there should be a concentrated effort to establish meaningful methods for maintaining an email list of interested persons and stakeholders for notifications, along with publishing notices in local publications.

5) Ground Movement Survey:

The 2013 Annual Ground Movement Survey has been prepared and concluded that subsidence exists in the Oil Field. However, the County's staff has not been able to determine whether the subsidence is caused by the Oil Field operations. If necessary to properly analyze the survey, the County should retain a consultant with the expertise to evaluate it (which cost can be passed along to the Oil Field operator through the Draw-Down Account).

The Report states DOGGR staff concluded that due to the complex geology and subsidence history of the area, additional ground movement survey data is required to make a determination on the possible impact from Oil Field operations on ground movement. They also list a combination of factors that are more likely to have contributed to ground movement and potential property damage than the operations of the Oil Field. At the March 27, 2014 CAP meeting, representatives from DOGGR acknowledged that additional ground movement survey data and studies are needed to more definitely determine the factors causing the observed ground movement. Such data should be provided by the Operator and any further studies should be paid for through the Draw-Down Account.

6) Annual Joint Meeting:

The City recommends that the CAP and Multiple-Agency Coordination Committee (MACC) meet on an annual basis to better communicate with and inform each other and the public about issues relating to the Oil Field operations.

7) Emergency Response Review:

In consideration of the sensitive nature of the area, including status as a hazardous fire zone, further review should be given to ensure that the best emergency response plans, including notification and evacuation routes, are in place and that individual neighborhoods are better informed about such plans. Identification of evacuation locations and routes should be coordinated with Culver City and Los Angeles County Fire Departments.

It is also important to ensure that unannounced drills are conducted periodically at the Oil Field.

8) Greenhouse Gas Emissions:

In 2008, the EIR for the CSD identified almost 160,000 tons of new annual greenhouse gas emissions ("GHGs") that will be created by the Oil Field project (almost 3.2 million tons over the life of the project). At that time, the County failed to adopt a significance threshold and failed to require any mitigation measures. Since that time, significant new information has come to light about the threat from fugitive methane emissions from oil production and processing facilities, as highlighted by the White House's recently released "Climate Action Plan: Strategy to Reduce Methane Emissions." (Methane is at least 21 times more potent than carbon dioxide in causing global warming.) In addition, lead agencies have made significant progress in establishing appropriate significance thresholds for GHGs (e.g. SCAQMD's 12,000 ton CO<sub>2</sub>e threshold for industrial projects). Clearly, GHG emissions from the Oil Field are more than significant and cannot be ignored. The County should consider establishing an accurate inventory of annual GHG emissions from the Oil Field and consider meaningful and effective ways to mitigate those emissions both from stationary sources and fugitive sources.

9) New Technology:

Under the CSD and the Settlement Agreement, the Oil Field Operator is required to consider feasible and available technology that would reduce environmental impacts in connection with the submission of each Annual Drilling Plan. Historically, the Drilling Plan has evaluated the use of natural gas and electric powered drill rigs, but has not addressed in any detail other technology that could reduce environmental impacts. For example, in the 2014 Annual Drilling Plan, the Oil Field Operator states it will use drill rigs with Tier II or better

engines. To the extent drill rigs with Tier III engines are available, which we believe they are, the Oil Field Operator should be required to use those rigs or state why it cannot. As far as we are aware, the County has failed to press the Oil Field Operator to meaningfully evaluate new technologies and require their implementation if feasible and available. The CSD should be reviewed to impose more specific and comprehensive requirements on both the Oil Field Operator and the County to meaningfully evaluate all available and feasible technologies that are capable of reducing environmental impacts. It may be necessary to provide for review by a third party with expertise in the development and feasibility of new technology that can be used in the Oil Field. In addition, during this Periodic Review, the Settlement Agreement requires that the County itself evaluate the use of electric-powered and natural gas powered rigs and if feasible and reasonably available, requires their use for any new rigs acquired or leased by the Oil Field Operator.

**10)Insurance and Bonding:**

Section G.4 of the Report fails to state the amount of insurance coverage or security that is currently required and it does not discuss the biases upon which the amounts were determined. Instead, it states that "no additional coverage amounts are necessary," and that the bond amounts "are appropriate." There should be an explanation of the factors which were considered in setting these amounts, including the potential accident scenarios and potential damages, and the support for the conclusion that the CSD required amounts are adequate for the significant Oil Field operations. The fact that the Oil Field is not necessarily comparable to a drilling operation in the Gulf of Mexico does not provide the necessary assurance that the public and surrounding jurisdictions are adequately protected in the event of an accident. There have already been spills and releases in the Oil Field in the past ten years. A serious accident could have catastrophic impacts, in particular, due to the proximity of the Oil Field to schools, homes, businesses, parks and waterways, which empty into the Santa Monica Bay.

In addition, there is no real analysis in Section G.5, regarding how it was determined that the amount of the bond is appropriate for the levels of operations at the Oil Field. The City requests that the information referenced in Sections G.4 and G.5 be made public. In addition, the City requests that an explanation is given to substantiate the conclusion that the bonding and insurance amounts are adequate to provide the best coverage for potential clean-up costs and the impacts of accidental contamination.

**11)CAP Membership:**

There is very little direction in the CSD regarding the management of the CAP. The City proposes that the County contact any entity whose representative (or alternate) misses more than three meetings within a six month period to inquire if

they would like to appoint a different representative(s). This would encourage more active participation and representation, and help the County better achieve the goal of the CAP, which is to “foster communication about ongoing operations at the oil field and to allow the community representatives to provide input to the county and the operator.”

As you are aware, the Oil Field is unique in that it is an “urban” oil field adjacent to parks, schools, residences, and businesses. Additionally, there are numerous fault lines running through and adjacent to the Oil Field, including the significant Inglewood-Newport Fault. It is due to these unique circumstances that Culver City makes the above comments, requests and recommendations in order to more effectively achieve the CSD’s objectives. The City believes that the recommendations made in the Report to enhance the implementation of the provisions of the CSD have merit, but also, significant additional measures are needed.

To assure compliance with the intent of the CSD, the above recommendations, along with the recommendations contained in the comment letters from Community Health Councils, John Kuechle and Kenneth Kutcher, should be implemented.

If you have any questions or need any additional information, please contact Sherry Jordan, Project Manager, at (310) 253-5746.

Sincerely,



Jeffrey Cooper  
Mayor

cc: The Honorable Mark Ridley-Thomas, Los Angeles County Supervisor  
The Honorable Members of the Los Angeles County Board of Supervisors  
The Honorable Holly J. Mitchell, Member of the State Senate  
The Honorable Sebastian Ridley-Thomas, Member of the State Assembly  
The Honorable Members of the City Council  
John M. Nachbar, City Manager

Attachments: 1. June 26, 2009, letter to Leon Freeman, DRP, commenting on landscaping plan  
2. December 15, 2010, letter to Leon Freeman DRP, commenting on revised landscaping plan



# CITY OF CULVER CITY

9770 Culver Boulevard, Culver City, California 90232

Sol Blumenfeld  
Community Development Director

310 253-5940  
310 253-5824 Fax

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

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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 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 and advance assurance that landscaping is feasible in the Baldwin Hills.

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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](mailto:sherry.jordan@culvercity.org).

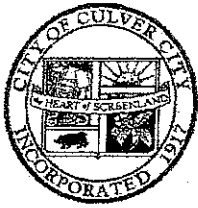
Sincerely,



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



THOMAS GORHAM  
Deputy Community  
Development Director/  
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# Culver CITY

## PLANNING DIVISION

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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.

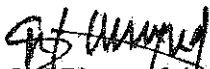
4. The use of mature landscaping should be required as it could be many years before visual impacts are abated if small immature landscaping is used.

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](mailto:sherry.jordan@culvercity.org).

Sincerely,



Sol Blumenfeld

Community Development Director

SB:sj

Copy: City Council

John Nachbar, City Manager

Carol Schwab, City Attorney

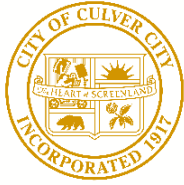
Heather Baker, Assistant City Attorney

Charles Herbertson, Public Works Director

Thomas Gorham, Deputy Community Development Director/Planning Manager

Sherry Jordan, Senior Planner





# CITY OF CULVER CITY

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May 31, 2019

***Via Email: [tstapleton@planning.lacounty.gov](mailto:tstapleton@planning.lacounty.gov)***

Los Angeles County  
Department of Regional Planning  
Attn: Timothy Stapleton, Land Use Regulation Division  
320 W. Temple Street,  
Los Angeles, CA 90012

**Subject: Comments on the Scope for Periodic Review for the Baldwin Hills Community Standards District for Years 2014 – 2018.**

Dear Mr. Stapleton:

Thank you for this opportunity to submit comments and suggestions concerning the scope of review for the Baldwin Hills Community Standards District ("CSD") Periodic Review for the period between 2014 and 2018 ("Periodic Review").

Consistent with CSD regulation Section 22.310.070.G, Los Angeles County is required to conduct a comprehensive review of the CSD at least every five years to determine if the provisions of the CSD are adequately protecting the health, safety, and general welfare of the public. The review is required to consider whether additional provisions should be added, appended, or removed and to evaluate if proven technological advances that would further reduce impacts of oil operations on neighboring land uses should be incorporated into the provisions of the CSD.

The County of Los Angeles ("County") recently announced its intent and schedule for the required 5-Year Periodic Review Process of the Baldwin Hills CSD and is now soliciting input and comments for issues to be considered during its internal review and preparation of the Public Draft of the CSD Periodic Review Report ("Report").

As you are aware, the Inglewood Oil Field ("Oil Field") is located within and adjacent to the City of Culver City ("City"), as well as the County. As such, thousands of City residents and businesses are impacted by and are interested in the on-going operations of the Oil Field. The Oil Field is unique in that it is an "urban" oil field adjacent to parks, schools, residences, and businesses. Additionally, there are numerous fault lines running through and adjacent to the Oil Field, including the significant Inglewood-Newport Fault. As you are also aware, the City has been interested in matters pertaining to the CSD since its inception.

Because the City deals with the effects of the ongoing operations at the Oil Field on a daily basis, it has relevant knowledge as to effectiveness of the CSD regulations and the adequacy of the CSD and its processes for protection of the health, safety and general welfare of the public. In addition, the City has been an active participant of the Citizens Advisory Panel ("CAP"). It is due to these unique circumstances that Culver City makes those comments, requests and

recommendations, provided below, in order to more effectively achieve the CSD's objectives. The City's comments are not limited to the content of the CSD regulations themselves, but also touch on the County's administrative process for how it conducts auditing, monitoring and reporting, as well as management and application of the CAP. Many of the City's comments are repetitive of past requests that remain unaddressed. New and current items have been added.

Accordingly, the City provides the following comments for review and input toward the Draft Report:

1. **Well Stimulation** - The Report should recommend that the CSD be revised to prohibit the process of well stimulation. Currently, the CSD does not contain regulations specific to well stimulation methods, including hydraulic fracturing, acidization and gravel packing. Consistent with its previous comments, the City maintains that the County should acknowledge impacts (both known impacts and the potential for impacts) from the use of well stimulation in the Oil Field, including hydraulic fracturing and other well stimulation techniques in the future, and adopt adequate regulations to prohibit or adequately regulate such activity to ensure the health, safety and general welfare of the public.
2. **Landscaping and Aesthetics** – The Report should require that the CSD acknowledge the view shed from the City of the Oil Field operations and require that additional plans be prepared and implemented to adequately address the visual impacts for along the entire perimeter of the Oil Field. The City continues to have concern that the CSD landscape and screening requirements, and the approved CSD Landscaping Plans, fail to adequately and fully address the aesthetic impacts of the Oil Field operations for the entirety of the Oil Field, including for that portion of the Oil Field that is adjacent to Culver City. The City continues to assert that the implemented plans do not meet the intent of CSD Environmental Impact Report Mitigation Measures. Specifically, the City requests that the CSD be revised to include more robust measures to ensure that the landscaping and screening are adequate to meet the intent “to beautify and screen the operations from adjoining residential, recreational, institutional areas or adjacent public streets or highways,” as stated in Mitigation Measure V.1-1.
3. **Funding of CSD Review and Related Studies** - The City's concern is that many of the studies conducted under the CSD, including the Public Health, Ground Movement, and Air Quality Studies lacked sufficient funding to produce an accurate and meaningful analysis of these important issues. This fact has been publicly commented upon numerous times. Provisions of the Draw-Down Account (G.2) in the CSD, allow the County to use the account “for the purpose of defraying the expenses involved in the County's review and verification of the information contained in any required reports and any other activities of the County, including but not limited to, enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants.”

The Report should require enforcement provisions that state the County may take whatever measures are necessary to ensure that adequate funding exists to cover the cost of preparation of accurate and reliable studies (required under the CSD). This includes requiring the analysis of the studies' findings by appropriate experts in the specific

area of study. This has not been sufficiently utilized and was raised as a concern as recently as the May 23, 2019 CAP meeting. The existing studies are inadequate and have lacked satisfactory funding; therefore, they should be enhanced with further detail and methodology to improve their accuracy and confidence in their findings. Measures should include the requirement that the Oil Field Operator replenish or increase the County's Draw Down-Account, as necessary, in order to fund studies, as well as implementation and enforcement of the County CSD provisions and requirements.

4. **Notifications and Public Notices** – The Report should include recommendations for improved communication and notifications between all interested parties. The County should not rely on the CAP to notify the public of important information regarding the Oil Field operations, especially events that may be time-sensitive and that may have interests beyond the outreach of the CAP members, including for example, notifications addressing this 5-Year Review process of the CSD. It is the County's obligation, not the CAP's, to ensure the public is fully informed about these matters, and it is insufficient to solely place the information on the County's website. For example, there should be a concentrated effort to establish meaningful methods for maintaining an email list of interested persons and stakeholders for notifications, along with publishing notices in local publications. In a similar vein, the CSD administrative process should devise and implement improved methods for timely notification to both members of the CAP and members of the public of incidents or unusual events that occur between scheduled CAP meetings. One suggestion is to make available a publicly accessible bulletin board or calendar where current activities and incidents are posted and regularly updated (i.e., daily). A second suggestion is to establish a clear guideline and protocol for how notifications are managed, so that an adopted procedure is already in place for reference.
5. **Ground Movement Survey** - The periodic Annual Ground Movement Surveys have concluded that subsidence exists in the Oil Field. However, the County's staff has not been able to determine whether the subsidence is caused by the Oil Field operations and it appears the County has accepted, without clear evidence, the conclusion of the Oil Field Operator. More specifically, the Ground Movement reports state that DOGGR staff concluded that due to the complex geology and subsidence history of the area, additional ground movement survey data is required to make a determination on the possible impact from Oil Field operations on ground movement. This lack of a clear conclusion seems to allow the Oil Field Operator to deny any potential liability for property damage that may originate from operations related to the Oil Field, including conditions of subsidence. Although this issue has been raised repeatedly through CAP, it does not appear that the County has taken steps to make any progress toward a satisfactory resolution of this issue. Because representatives from DOGGR have previously acknowledged that additional ground movement survey data and studies are needed to more definitely determine the factors causing the observed ground movement, the City requests that the Report require that such studies be completed and that any revisions to the CSD regulations to either require such supplemental ground movement studies (and periodic updates) or implement recommendations set forth in such studies. Such data should be provided by the Operator and any further studies should be paid for through the Draw-Down Account. If necessary to properly analyze the survey, the County should retain a consultant with the expertise to evaluate it (the cost of which can be passed along to the Oil Field operator through the Draw-Down Account).

6. **Improved Multiple-Agency Coordination Joint Meeting** - The City requests that the Report include a recommendation that the CAP and Multiple-Agency Coordination Committee (MACC) meet, at minimum, on an annual basis to better communicate with and inform each other and the public about issues relating to the Oil Field operations. The need for such improved coordination has been highlighted at CAP meetings over the past few years, especially concerning how “complaints” are reported, tracked and reviewed. Ideally, these meetings should be scheduled at the request of the CAP and with a meeting format separate from that utilized for the regular CAP meetings.
7. **Emergency Response Review** – The Report should include a comprehensive review of the emergency response programs and make recommendations for updating the CSD regulations accordingly. In consideration of the sensitive nature of the area, including status as a hazardous fire zone, further review should be given to ensure that the best emergency response plans, including notification and evacuation routes, are in place and that individual neighborhoods are better informed about such plans. Identification of evacuation locations and routes should be coordinated with Culver City and Los Angeles County Fire Departments. It is also important to ensure that unannounced drills are conducted periodically at the Oil Field. The City encourages that the County reach out to coordinating emergency response agencies for specific input on how the program and communications can be improved.
8. **Greenhouse Gas Emissions, Air Quality & Public Health** – The Report should require that updated studies be completed to inform County as whether enhanced CSD regulations addressing air emissions, including the emission of toxic air contaminants and greenhouse gases should be incorporated to ensure the public health, safety and general welfare. For example, in 2008, the EIR for the CSD identified almost 160,000 tons of new annual greenhouse gas emissions (“GHGs”) that will be created by the Oil Field project (almost 3.2 million tons over the life of the project). At that time, the County failed to adopt a significance threshold and failed to require any mitigation measures. Since that time, significant new information has come to light about the threat from fugitive methane emissions from oil production and processing facilities. In the intervening time, lead agencies have made significant progress in establishing appropriate significance thresholds for GHGs (e.g. SCAQMD’s 12,000-ton CO<sub>2</sub>e threshold for industrial projects). In addition, new information and protocols for modeling and monitoring air quality and greenhouse gas emissions periodically become available

The County should consider establishing an accurate inventory of annual GHG emissions from the Oil Field and consider meaningful and effective ways to mitigate those emissions both from stationary sources and fugitive sources. The County should consider establishing an accurate inventory of toxic air contaminants from the Oil Field and work cooperatively with public health agencies to implement effective means to mitigate those emissions and establish appropriate contingency measures. Finally, the County should not limit evaluation of air quality and public health issues, including greenhouse gas emissions, to only every five years. It is recommended that periodic review be conducted on an “as needed” basis, perhaps at minimum two-year intervals, to ensure that best management practices keep pace with evolving air quality and public health insights.

9. **Evaluation and Determination of New Technology** - The CSD should be revised to clarify the standard for identification and review of new technology and provide specific guidelines for how potential new technologies are reviewed and evaluated. Under the CSD and the Settlement Agreement, the Oil Field Operator is required to consider feasible and available technology that would reduce environmental impacts in connection with the submission of each Annual Drilling Plan. The CSD should be reviewed to impose more specific and comprehensive requirements on both the Oil Field Operator and the County to meaningfully evaluate all available and feasible technologies that are capable of reducing environmental impacts.

Historically, the Drilling Plan has evaluated the use of natural gas and electric powered drill rigs but has not addressed in any detail other technology that could reduce environmental impacts. Further, the potential new technologies are routinely dismissed as “infeasible” without much explanation or supporting details with regard to feasibility. Under the CSD, the review and evaluation process for new technology is problematic because it currently appears to rely solely on information presented from the perspective of the Operator. From the City’s perspective, the County has failed to press the Oil Field Operator to meaningfully evaluate new technologies and require their implementation if feasible and available. Revised CSD regulations and guidelines should require an independent, third-party evaluation of potential new technologies, including the utilization of electric-powered and natural gas-powered rigs.

10. **Insurance and Bonding** – The Report should require a review of the insurance coverage and bonded security requirements and make valid recommendations for identifying adequate coverage requirements under the CSD. The Report should provide an explanation of and references for the factors which were considered in setting these amounts, including the potential accident scenarios and potential damages.
11. **CAP Function and Membership** – The City requests that the Report recommend that guidelines be established to clarify the function of and participation with the CAP. There is very little direction in the CSD regarding the management of the CAP. As a result, there has been on-going frustration among CAP members and the public. One key area that requires more consistent guidance is resolving representation on the CAP, including a reasonable allowance for alternates, absenteeism or limited participation of assigned representatives, and identifying membership of the CAP. In addition, there does not seem to be a clear process for addressing disputes that periodically arise through CAP discussion, such as disputes about submitted information or reporting formats. Finally, it would be helpful for such guidelines to reaffirm and clarify the role of the CAP and outline what authority the CAP may have in affecting and improving the periodic monitoring and reporting of Oil Field operations.
12. **Accommodation for Changing Conditions Related to Climate Change and DOGGR Regulation** – The Report should evaluate how changes within the regulatory background, since adoption of the CSD, may affect the relevancy of standards under the CSD, including the schedules for monitoring and reporting. For example, the California Division of Oil, Gas and Geothermal Resources (“DOGGR”) is in the process of systematic review and update of its regulations. For example, DOGGR revisions affect how idle wells are managed and how old wells are plugged and abandoned. These State regulatory changes

may in turn affect CSD regulations pertaining to these activities and/or the underlying assumptions of the 2008 environmental review. Similarly, considerable information has been generated about the effects of climate change and how the Los Angeles Basin is anticipated to be affected, as well as the establishment of regional-wide policies on climate change. Such new information may require that CSD standards be updated or new standards incorporated to ensure appropriate accommodations and compliance in response to climate change. The City recommends that the Report include a thorough review of the CSD standards to identify components that may require change and/or update to ensure that CSD requirements remain consistent with evolving regulatory changes through the State, regional and local agencies. The City also recommends that along with the review CSD standards that the County review the 2008 Environmental Impact Report ("EIR") and confirm whether underlying assumptions related either directly or indirectly to DOGGR regulations, Climate Change or other pertinent regulatory background conditions that may have changed since adoption of the CSD are still relevant.

To assure compliance with the intent of the CSD, the City respectfully requests that the above recommendations be incorporated and addressed under this Period Review.

If you have any questions or need any additional information, please contact either Heather Baker, Assistant City Attorney, at (310) 253-5660, or Melanie Traxler, Project Manager, at (818) 248-7158.

Sincerely,



Meghan Sahli-Wells  
Mayor

cc: The Honorable Members of the City Council  
John M. Nachbar, City Manager