June 18, 2008

Rose Hamilton  
Los Angeles County Regional Planning Department  
320 West Temple Street  
Los Angeles, CA

Dear Ms. Hamilton:

This letter is submitted on behalf the Greater Baldwin Hills Alliance (GBHA). The GBHA, representing over 50,000 households and key community organizations, was formed to address PXP's proposal to drill more than 1000 new wells and ongoing community concerns with the environmental and health impact of the Inglewood/Baldwin Hills Oil Field. We submit for your consideration the enclosed initial “working draft” for the Community Standards District ("CSD"). The draft CSD outlines many of the provisions we hope will be contained in the final ordinance to govern oil exploration and production in our neighborhood. It is our hope and expectation that the draft document will provide a baseline and help inform deliberation of this critically needed public policy.

Responding to over twenty years of drilling without environmental review, coupled with minimal County and State oversight, the County determined that a Community Standards District should be established to regulate future oil drilling and operations in the Oil Field. Beginning June 27, 2006, the County imposed a moratorium on PXP's new drilling in the Baldwin Hills Oil Field in order to prepare the Environmental Impact Report for the proposed Community Standards District. We were recently advised that, because PXP is the nominal "applicant" for the CSD, the County is using the CSD that was drafted by PXP late last year (or early this year) as the basis of the EIR study. Furthermore, it is our understanding that the County will not be releasing a revised draft CSD for adoption until after the second public hearing by the Planning and shortly before the Board of Supervisors meeting later this fall.

We believe the timing and limited amount of time for public comment, coupled with the focus of study on the regulations that were themselves drafted by the party that will be regulated, puts the community at a severe disadvantage. Moreover, by PXP’s own admission, their initial draft of the CSD is incomplete and does not yet contain many of the areas of regulation that will be needed to
protect the community and the natural environment from impacts of drilling and producing oil in an otherwise largely undeveloped open space reserve in the midst of a dense urban environment.

We are therefore compelled under these circumstances to articulate and define our expectations through the drafting of a community-driven CSD. We have incorporated and built upon the scientific evidence and experience of other jurisdictions in preparing this initial draft. Obviously, this draft is still a work in progress and will be further informed through the release of the draft EIR.

We would like the community-drafted CSD to be vetted with the same level of consideration as PXP's preliminary draft. Accordingly, we invite the County's comments and analysis of the enclosed “working draft” of the Greater Baldwin Hills Alliance recommendations for the Inglewood/Baldwin Hills Oil Field Community Standard District (CSD).

It is our sincere hope that this document will stimulate thoughtful discussion between the community, PXP and the County. While still incomplete, we believe this draft CSD makes great strides towards ensuring a balance between private economic interests and community needs and expectations for a sustainable, healthy community and environment.

We look forward to the opportunity to work with you, your staff, the EIR consultant and the Planning Commission moving forward. Should you have any questions or need any additional information, please feel free to contact me directly at 323 295-9372.

Sincerely,

Lark Galloway-Gilliam, Executive Director CHC
On behalf of the GBHA

Enclosure

cc: Yvonne B. Burke (w/ encl.)
Gloria Molina (w/ encl.)
Zev Yaroslavsky (w/ encl.)
Don Knabe (w/ encl.)
Michael D. Antonovich (w/ encl.)
Mike Bohkle (w/ encl.)
Steve Rusch (w/ encl.)
Charles Moore (w/ encl.)
City of Culver City (w/ encl.)
Los Angeles County Planning Commission (w/ encl.)
Elaine Lemke (w/ encl.)
Hal Bopp, State Oil and Gas Supervisor (w/ encl.)