

# John M. Kuechle

10733 Ranch Road  
Culver City, California 90230  
(310) 838-8940  
jmk@post.harvard.edu

June 8, 2009

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

Re: Baldwin Hills Oil Field, Landscape Plan

Dear Leon,

This letter will set forth the comments that I am making, both on behalf of myself and the Culver Crest Neighborhood Association, to the Landscape Plan.

My initial reaction to the Plan was one of shock.

While the Plan appears to call for the expenditure of a significant amount of money and effort to provide landscaping to screen the oil field from Ladera Crest, Windsor Hills, the Baldwin Hills Scenic Overlook, Kenneth Hahn State Park and both sides of La Cienega Boulevard and Stocker Street, it does not propose to plant even a single blade of grass on the side of the oil field that faces Culver Crest, the Raintree complex, West Los Angeles College, or other parts of Culver City. This west facing exposure of the oil field constitutes more than 25% of the perimeter of the section of the oil field lying to the west of La Cienega Boulevard, and yet it is completely ignored by the proposed Landscape Plan.

It is true that the oil field areas immediately adjoining Culver City and West Los Angeles College are not as intensely developed as some other portions of the oil field. However, this does not mean that the oil field is anything less than a significant visual blight when viewed from these areas. A great deal of the development that has occurred on the west side of the oil field is located on the ridge line, and therefore is visible for many miles, silhouetted against the sky. In fact, the tanks, pumps, storage shacks, vehicles and other oil field equipment, as well as the scars that have been left by indiscriminate grading, can be clearly seen as far away as Marina Del Rey (and presumably well out to sea).

I am not a particularly capable photographer, but I am attaching three photos that I took from the Ballona Creek bike path and which give some idea of the visual pollution that PXP does not think is worthy of any landscaping whatsoever.

The Plan proposed by PXP should be rejected and PXP should be required to treat the visual concerns of Culver City residents as being just as important as those of people living in other neighborhoods.

I will now address a few technical issues.

Section L.8 of the CSD calls for PXP to submit a landscaping plan “consistent with the conceptual landscaping plan prepared for the oil field by Mia Lehrer & Associates, dated October 2008.”

The fact that Mia Lehrer’s “Landscape Improvement Concepts,” dated 4 November 2008, does not show any landscaping on the west side of the oil field does not mean that no landscaping is, or can be, required there.

1. The draft CSD that was distributed to the public and as to which comments were taken by the Planning Commission and the Board of Supervisors called for PXP to screen all of their wells and other equipment. At the end of the Board of Supervisors meeting on October 21, Yvonne Burke’s motion (which was read after all public comment had been taken, and as to which she allowed no additional public comment) called on the Planning Division to amend the CSD to require landscaping in conformity with a conceptual plan to be prepared by Mia Lehrer. Supervisor Burke had mentioned the Mia Lehrer idea on several prior occasions, but always as something that would supplement the then existing landscaping requirements in the CSD, not as something that would replace them. There was no opportunity for public comment on the proposal that the Mia Lehrer landscaping provision would be the only landscaping requirement in the CSD.
2. Staff revised the final version of the CSD to require that landscaping be “consistent with the conceptual landscaping plan prepared for the oil field by Mia Lehrer & Associates, dated October 2008.” However, no such conceptual plan exists. Mia Lehrer’s “Landscape Improvement Concepts” is dated 4 November 2008. Obviously this document did not exist when the final CSD was adopted by the Board of Supervisors. It is true that some individual pages of the plan have October dates, but the entire plan was not finished until November. Not only was no public comment taken on the document before the adoption of the CSD, but no public comment could have been made to a document that did not then exist.

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Furthermore, it is not possible to know if the November 4 document is consistent with what a majority of the Supervisors thought they were voting on in October.

3. Even if the above issues are ignored, there is nothing in the language of the CSD that limits the Director's review right to the single question of whether the proposed Plan calls for all of the landscaping shown on the Mia Lehrer drawings. It would not be not be "inconsistent" with the Mia Lehrer concept for a Plan to call for adequate landscaping on the west side of the oil field, and consequently it is within the Director's discretion to require such additional landscaping .

For all of the reasons set forth above, the Director should do exactly this, and require PXP to expand its Landscape Plan to provide screening of the equipment that is visual from the west of the oil field, and to screen or restore areas that have been scarred by grading.

Sincerely yours,

John M. Kuechle

cc: Culver Crest Neighborhood Association  
Ken Kutcher, Esq.  
Mr. John Peirson  
Andrew Weissman, Esq.  
Gary Silbiger, Esq.  
Scott Zeidman, Esq.  
George Mallory, Esq.  
Mr. David McNeill  
Ms. Gwendolyn Flynn  
Ms. Irma Munoz  
Mr. Ian Cousineau  
Mr. Paul Ferrazzi  
Ms. Karly Kartona  
Ms. Sherry Jordan  
Ms. Lark Galloway-Gilliam  
Ms. Susana Franco-Rogan  
Carol Schwab, Esq.  
Mr. Sol Blumenfeld  
Mr. Charles Herbertson





