

CITY OF LOS ANGELES
CALIFORNIA



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July 12, 2022

Estineh Mailian
Office of The Chief Zoning Administrator
Department of City Planning

VIA EMAIL

Re: Broadway Drill Site, ZA-1964-16926-0

Chief Zoning Administrator Mailian:

At our regularly held public meeting on July 12, 2022, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to provide the following comments below:

As Los Angeles shifts towards a greener and more sustainable future, in alignment with Mayor Eric Garcetti's Green New Deal Plan, questions regarding the status of the historic nature of oil extraction in the city needs to be questioned. Here in Downtown Los Angeles, The Broadway Drill Site, operated by Nasco Petroleum LLC at 155 West 14th Place and 1325 South Broadway, is a site that warrants further examination as to its compatibility in an urban and densely populated community. To that end, the precinct in which the site is located is among the most polluted in the state, and its residents are among the most burdened by air pollution, receiving a score of 97 on the CalEnviroScreen 4.0 tool and a clean environment score on the California Healthy Place Index lower than 98.6% compared to other precincts.

Since 1964, Downtown has vastly expanded to now include a growing and flourishing residential community. As such, Downtown also boasts neighborhoods that are environmentally burdened by pollution with low-income and minority communities vulnerable to the effects of oil extraction. The intersection between equity and public health and safety is undeniable as it relates to oil extraction becoming non-conforming in areas with residential uses with high population density.

More importantly, the serious issue of safety and the pattern of industrial accidents at the Broadway Drill site raises concerns as to whether such use should still be permitted given the site's track record. In February of 2006, the Broadway Site experienced a significant blowout which caused oil to seep into the surrounding

Downtown community, causing a 35-unit apartment building, two blocks away, to be displaced and resulting in extensive cleanup by city and environmental crews in the immediate area¹. In addition, the continued reports by constituents of odors of methane and other gases to the South Coast Air Quality Management District (AQMD), and issues raised by both the California Geologic Energy Management Division (CalGEM) and the City Petroleum Administrator on safety obstructions, further suggest action is needed on the City level to address the potential threat to public health and safety.

DLANC supports Councilmember Kevin De León's letter on March 22, 2022 to your office, calling out the same concern shared by our Neighborhood Council and the urgent need to remedy safety issues posed at this site. In addition, DLANC recommends that this site be declared as a 'Non-Conforming Use' in accordance with provisions established by LAMC 12.23 and LAMC 13.01.

*** SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON JULY 12, 2022 ***

Sincerely,

Claudia Oliveira
President,
DLANC

Debby Zhou
Chair,
DLANC Livability Committee

Cc: Council District 14 (via email)
Office of the Mayor (via email)
Office of Petroleum and Natural Gas Administration and Safety (via email)
South Coast Air Quality Management District (via email)
South Park Business Improvement District (via email)
Neighborhood Council Sustainability Alliance (via email)

¹ "Oil Buckles Street and Damages Building." *Los Angeles Times*, Los Angeles Times, 21 Feb. 2006, <https://www.latimes.com/archives/la-xpm-2006-feb-21-me-ooze21-story.html>.