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October 10, 2023

Jonathan Hershey
Associate Zoning Administrator,
Office of Zoning Administration,
Department of City Planning

VIA EMAIL

Re: Broadway Drill Site - DIR-2023-3953-RV, ENV-2023-3954-CE, ZA-16926(PAD), ZA-1964-16926-0

Associate Zoning Administrator Hershey:

At our regularly held public meeting on **October 10, 2023**, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to provide the following comments:

At the September 28, 2023 public hearing regarding the nuisance issues at the Broadway Drill Site, the Department of City Planning, community stakeholders, and your Office heard testimony about the longstanding concerns from the community with the continued operation of this site by Nasco Petroleum.

In the staff report presented at the public hearing, evidence showed that the operator had approximately 21 violations since 2019 from City, State, and regional regulators. Approximately six of these violations were within the period in which the Department of City Planning began to investigate complaints from the community and Council Office of nuisances such as odors and emissions coming from site and other CUP violations.

While DLANC understands that Nasco Petroleum is currently attempting to comply and correct violations from regulators, we remain concerned that the pattern and frequency of these violations will continue to persist. Unfortunately, due to the nature of this type of operation, its documented threat to public safety and welfare, and the localized history of industrial accidents at this site, we believe that immediate action should be taken as recommended by the Department in their staff report.

Aside from concerns regarding public safety, Nasco Petroleum has failed to maintain any soundproofing mitigation measures and has also failed to maintain landscaping around the setback spaces between the building at the street frontage and the building frontage as required by conditions set forth in 1964.

Furthermore, the operator has made few attempts to cooperate with the Department in their initial investigations and has not made any good faith measures to contact the Neighborhood Council, Council Office, or other stakeholders to remedy the community's concern in regards to the alleged nuisances addressed by the public.

Therefore, Downtown Los Angeles Neighborhood Council asks that pursuant to LAMC 12.27.1, the OZA **issue a revocation and/or discontinuance** of use for the Broadway Drill site.

Should the OZA choose to impose corrective conditions en-lieu of discontinuance of use, DLANC would reluctantly request that the following conditions be added in addition to the existing conditions imposed by previous dictionary approval provisions:

1. The operator creates and maintains an active complaint log in addition to a 24-hour "hotline" phone number that shall be posted at a conspicuous location at the main entry of the site, and an online submission portal. A list of complaints shall be made available at any time upon request to the Department of City Planning, local Council Office, Neighborhood Council, and any other agency of the City of Los Angeles. The operator shall respond to the complainant within 72 hours of the receipt of the complaint. The operator shall appoint a designated representative to act as a community liaison officer who shall oversee and respond to complaints.
2. The operator shall place emergency contact information signage, including any applicable code or regulatory signage including but not limited to Prop 65 warnings, at all four frontages of the building at conspicuous locations.
3. The operator shall conduct regular air monitoring, noise, and ground/water pollution testing in accordance with provisions from other regulatory bodies and make the data available on an online portal for public viewing quarterly.
4. In addition to the appropriate regulatory and public safety agency, as required by law, the operator shall also notify the local Council Office, Neighborhood Council, Office of Petroleum and Natural Gas Administration and Safety, and Business Improvement District no later than 24 hours after an accident, blow-out, or leak has occurred with the potential for impact to the surrounding community.
5. All graffiti on the site, including at the alleyway, shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
6. Exterior lighting shall be installed on all four frontages of the site, facing the street and adjacent alleyway, such that the light is directed onto the sidewalk and alleyway, and shielded to prevent the light source from being viewed from adjacent properties. Lighting shall be adequate to identify anyone in the front or rear of the building at night.

We thank you for your consideration of our request and ask that you issue a revocation and/or discontinuance for this facility.

SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON OCTOBER 10 ,2023

Sincerely,

Claudia Oliveira

Debby Zhou

President,
DLANC

Chair,
DLANC Livability Committee

Cc: Office of the Chief Zoning Administrator, Department of City Planning (via email)
Office of External Affairs, Department of City Planning (via email)
Council District 14 (via email)
Office of the Mayor (via email)
Office of the City Attorney (via email)
Office of Petroleum and Natural Gas Administration and Safety (via email)
Los Angeles Fire Department, CUPA Unit (via email)
Los Angeles Fire Department, Oil Wells Unit (via email)
Department of Building & Safety (via email)
South Park Business Improvement District (via email)
Neighborhood Council Sustainability Alliance (via email)