

Dear members of WRAC PLUM:

Thank you very much for agreeing to consider this matter on such short notice. I am a 23-year resident of Mar Vista, Secretary and Outreach Chair of MVCC.

There is a very large gas flare under consideration by Associate Zoning Administrator Theodore Irving as part of a Review of Compliance regarding the oil drilling site situated on the grounds of Rancho Park Golf Course between Motor and Patricia; Pico and Lorenzo in Rancho Park-Cheviot Hills.

The compliance review follows from a multiagency City Report pursuant to [CF 2017-1049](#) moved by CD5 member Paul Koretz regarding long-term operations at the Rancho Park Drillsite. You can view the April, 2017 report [here](#) documenting a 20+-year history of violations of City Code and Conditions-of-Use Violations. The matter is summarized in this LA Times article [here](#).

The CEB 1200 gas burning flare was confirmed to be operating without required Zoning or DBS or Fire permits during the multi-agency site inspection of 2017. Subsequently the equipment was shutdown. Now reactivation is sought by the oil company in this Review of Compliance. The company is requesting to use the CEB 1200 gas burning flare to burn up to 12 million cubic feet of gas per month, as demonstrated in its application and permit from SCAQMD. The company did not explain this at the ZA's public hearing on April 28, 2018.

The arguments Hillcrest Beverly Oil Company presents for operating this equipment are essentially identical to those denied by now-Chief Zoning Administrator Charlie Rausch in 2016 for a drill site in West Adams, as reported [here](#) by the LA Times' Emily Alpert Reyes. The application to operate a smaller CEB 800 gas burning flare at the Murphy Drill Site in West Adams was rejected because "...it constitutes an industrial use not needed for oil production and thus, belongs in an M3 industrial zone".

And it is hard to see how, shy of a material shift in the nature of operations, this site would suddenly be in need of such equipment. The Rancho Park Drill Site has been in existence since 1958, and for sixty years it has operated without a gas burning flare. No Controlled Drill Site in the central parts of the City of Los Angeles has ever had a gas burning flare. There is no necessity for such a device at Rancho Park.

The history of negligence and violations documented at Rancho Park is punctuated by industrial accidents in 1977 (tank explosion and fire), [1993](#) (oil spill that contaminated acres of the golf course and some surrounding residences) and the mercaptan odorant release of last November 29, 2017 that adversely affected many square miles across LA's west side.

In sparking widespread reports of [physical symptoms, public concern and confusion](#), the November mishap highlighted potential jeopardy to the health and public safety of many thousands of Angelenos across dozens of neighborhoods.

I am hoping it will be possible for WRAC to write our Council Members in CD5 and CD11, as well as the Associate ZA in the Rancho Park case to request that Chief ZA Rausch's finding in the 2016 Murphy Drill Site Case be applied to the Rancho Park Drill Site case: industrial equipment like a CEB 800 flare, let alone a larger CEB 1200 flare, belongs only in an industrial M3 Zone. This plan to burn off up to 12 million cubic feet of unwanted gas per month is simply incompatible with residential neighborhoods and public parks. The application to install and operate a CEB 1200 gas burning flare at the Rancho Park Drill Site should be denied by the ZA.

In addition, in light of the history of violations and accidents at the Rancho Park Drill Site, and in keeping with best practices recommended by a recent LA County Department of Health report, WRAC should ask our council members and the ZA to assign several new Conditions of Use to enhance public safety: 24/7 laser-based fenceline emissions monitoring with recorded data and alert systems for the operator; annual compliance inspections to be conducted by the City Petroleum Administrator and the ZA; periodic Reviews of Conditions by the ZA on a 5 year cycle to allow for updating of ZA-assigned Conditions of Use; and an accident/emergency notification requirement by which the operating oil company must immediately notify LAFD, LAPD, the Petroleum Administrator, and CD5 of accidents and emergencies.

This ZA case is on the agenda of the MVCC Board Meeting scheduled for Tuesday, May 8, at 7PM in the Mar Vista Recreation Center on the corner of McLaughlin and Palms (11430 Woodbine Street, Mar Vista, CA 90066).

And it is on the agenda of the WNC Board Meeting scheduled for Thursday, May 10, at 7PM in the Westside Pavilion, Meeting Room A (3rd Floor behind food court, 10800 W. Pico, LA, CA 90064).

WNC is the NC whose territory directly abuts the Rancho Park Drill Site, and its constituents are the primary stakeholders here. However, the mercaptan odorant leak of November 2017 showed how operations at this Drill Site contact a much wider geographical region. This proposed gas flare is a matter that touches all of us here on the westside.

Policy Motion: “Enhance Safety At Oil Drill Sites Including The Residential Neighborhood Surrounding Rancho Park Public Golf Course”

WHEREAS industrial oil drilling operations at Rancho Park Public Golf Course are ongoing and in close proximity to thousands of residents, and

WHEREAS there is an extensive history at this Drillsite of City Code violations, Conditions-of-Use violations, and repeated industrial accidents, and

WHEREAS considerable and widespread concern regarding potential jeopardy to human health and safety from extractive oil and gas operations in close proximity to dense residential areas is demonstrable from the widely reported physical symptoms and complaints about communications following the odorant spill of November 29, 2017, reminiscent of the 2015 natural gas leak further north at Aliso Canyon.

THEREFORE be it resolved to exhort that the Zoning Administrator (ZA) follow precedent and deny Drillsite approval of CEB industrial equipment within the residentially zoned Rancho Park Public Golf Course, and

FURTHER mandate all the following safety conditions:

- (i) 24/7 emissions monitoring using up-to-date laser-based equipment,*
- (ii) Annual compliance inspections by the ZA’s office and Petroleum Administrator,*
- (iii) Mandatory periodic Reviews of Conditions by the ZA on a 5 year cycle to allow for updating of ZA assigned conditions of use,*
- (iv) A clear emergency and accident reporting plan by which the oil company must notify LAFD, LAPD, the Petroleum Administrator, and Council District 5.*

WRAC’s collective and constituent member’s support of this position will significantly enhance Public Safety across the westside of LA.

The broad public concern following last November’s odorant leak should be evidenced by stakeholders at that Neighborhood Council with oversight of this Drillsite: Westside NC. It will be very useful if individual NCs would consider notifying their constituents to support this matter before the Westside NC next Thursday, 5/10/18 at 7pm in the Westside Pavilion, 10800 W. Pico, Meeting Room A (3rd Floor behind food court). Additional support can be furthered by submitting written comments and concerns through June 10, 2018 to:

- **Connie Chauv, City Planning Associate, 200 N. Spring St., Room 720/721, Los Angeles, CA 90012. connie.chauv@lacity.org (210) 978-0016. CC’d to:**
- **Theodore L. Irving, Associate Zoning Administrator, 200 N. Spring St., 7th Floor, Los Angeles, 90012. theodore.irving@lacity.org (213) 978-1366, and**
- **Andy Shrader, Director of Environmental Affairs, Councilmember Paul Koretz, CD 5, 200 N. Spring St., Room 440, Los Angeles, CA 90012 andy.shrader@lacity.org (213) 473-7005.**
- **Make sure to include your address, and**
- **reference Case No. ZA 14560-PAD.**

Thank you very much for your time..

Sara Roos

MVCC Director At-Large, Secretary and Outreach Committee Chair