



*United Neighborhoods of the Historic Arlington Heights,
West Adams and Jefferson Park Communities Neighborhood Council*

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September 9, 2014

The Honorable Herb Wesson
Council President
Los Angeles City Council
200 North Spring Street, Room 430
Los Angeles, CA 90012

Dear Council President Wesson:

At the September 4, 2014 regular UNNC Governing Board meeting, UNNC took an action regarding Case ZA-1959-15227-O-PA5, which is a new project request to install a CEB 800 clean enclosed waste gas burner and sound walls in the lower landscaped section of the Murphy Oil parcel in Jefferson Park. The applicant is Freeport McMoRan.

At this meeting, the UNNC Governing Board voted unanimously to approve the following motion.

MOTION: Laura Meyers moved that UNNC recommend the following additional conditions and mitigations (without prejudice to existing conditions and mitigations) for the Murphy Oil site waste gas burner project, case ZA-1959-15227-O-PA5.

Norman Gilmore seconded.

- 1) **No expansion into the parkland on South Side (27th St).**
- 2) **Restore parkland on South side to ZA required condition as of early 2013, before construction started.**
- 3) **Enforce all already existing conditions & mitigation measures for the drill site. Establish Mitigation Monitoring Measures to track compliance with all established conditions.**
- 4) **Landscape with trees on the North, East, and West sides to hide view of drilling rigs and temporary sound walls.** Rigs are brought to the site repeatedly to work over and re-drill old wells as well as new wells. The HPOZ or UNNC, and/or other appropriate body shall conduct a public design review of the proposed landscaping.
- 5) **Regularly scheduled mandatory Reviews of Conditions by ZA with a public hearing.** Mandatory reviews should happen every 5 years. Given the

recent history, this schedule should be supplemented with a review 1 year after the current PA5 case and 3 years after the current PA5 case, and subsequently at no less than 5 year intervals. Environmental conditions and environmental science change over time, even if there are not new major projects at the site. For that reason all drill sites should have periodic mandatory reviews.

- 6) **A CEQA Environmental Impact Report must be produced on the cumulative impact of the Murphy Drill Site, with special attention to the current major expansion of the facilities that was given partial approval by the ZA in 2007 and was commenced without receiving full and final approval in 2013.** There has never been an Environmental Impact Report for any project at Murphy, nor any study or even the filing of a basic Environmental Assessment Form, despite the fact that such reviews have been required by law since the passage of the California Environmental Quality Act (CEQA) in 1970. A baseline study must be conducted now, and future projects must undergo proper CEQA reviews.
- 7) **The operator must replace all five (5) waste gas burning microturbines with new CEBs because the CEBs are a proven technological improvement that emit less noxious gases and carbon than the microturbines.** This condition should be required as per Zoning Code Section 13.01.F.18, which is included as a condition for operations at the Murphy Drill Site in all ZA determinations. Section 10.01.F.18 says “all production equipment shall be so constructed and operated so that no noise, vibration, dust, odor, or other harmful or annoying substances or effect which can be eliminated or diminished by the use of greater care shall ever be permitted.” It additionally requires that “[p]roven technological improvements in methods of production shall be adopted as they from time to time become available if capable of reducing factors of nuisance or annoyance.”
- 8) **Website with updated information on the Murphy site (or all FMOG sites in the City, or all well sites in the City):** to keep the community informed about all projects, supply contact information, and prevent the kind of failure of communication that occurred in 2013.
- 9) **City Petroleum Administration is required by the City Administrative Code and must be reactivated.**
- 10) **City fees should be set to pay for needed City supervision/regulation of oil and gas production. Such supervision/regulation is already required by the City Administrative Code and sections of the Los Angeles Municipal Code, especially the Zoning Code, the Fire Code, and Public Works Code.**
- 11) **Constant monitoring and logging of airborne emissions including CO₂, Hydrogen Sulfide, and Methane. Logs to be publicly reported to City and to the public website on a monthly basis.**
- 12) **Mitigation for CO₂ that is leaked, released, vented or exhausted at the drill site.**
- 13) **Ground water and soil monitoring at the drill site, results to be publicly reported to City and to the public website annually.**
- 14) **Payment for repair and maintenance of streets and sidewalks trafficked by construction & drilling equipment.**

- 15) **Public Notice for all Hearings must go to all owners and tenants (residential & commercial) within the Oil Drilling Districts tapped by wells at the Murphy site.**
- 16) **Continue to require that no vehicles are allowed on 27th Street (with the exception of gardener's small pick-up trucks used for routine landscape maintenance i.e.: like any neighborhood gardener.)**
- 17) **The applicant shall maintain response plans for various plausible emergency conditions and file and update them with LAFD and LAPD. The ZA should verify that the plans have been filed before approval of the case. FMOG should annually orient and review the emergency plans with the three nearest LAFD stations on-site.**
- 18) **An emergency alert system will be established for the community within 1 mile radius of the well.**
- 19) **Emergency plans should specifically address plans for nearby concentrated populations such as schools, senior housing, disabled housing, and churches.**
- 20) **Posting of complaints from the public on the oil company website within 5 business days of receiving said complaints from the public.**
- 21) **Post website address and hotline number on north and south walls of facility.**
- 22) **Develop a phase out plan for when the site is depleted and conduct a public hearing once the property ceases production.**

Vote: 14 in favor, none opposed, no abstentions, approved unanimously.

UNNC greatly appreciates your time and support.

Respectfully submitted,

Norman Gilmore
UNNC Secretary
secretary@unnc.org

cc via email:

Mayor Eric Garcetti
City Attorney Michael Feuer
Linn Wyatt, Chief Zoning Administrator
Staff member assigned to process the case c/o:
Faisal Roble, City of Los Angeles Planning Department
Lynda Smith, City of Los Angeles Planning Department
Ken Bernstein, Director Office of Historic Resources
Michelle Levy, HPOZ Unit
Kimberly Henry, HPOZ Unit
John Arnold, Chair, Jefferson Park HPOZ Board

Additionally hand-delivered:
City of Los Angeles Planning Department, City Hall