## **Communication from Public**

Name: Robert Keehn

**Date Submitted:** 03/09/2023 09:32 AM

Council File No: 21-1025

Comments for Public Posting: Please see attached letter submitted on behalf of Cheviot Hills

Home Owners' Association

## **Cheviot Hills Home Owners' Association**

## P.O. Box 64458, Los Angeles, CA 90064 www.cheviothills.org

March 8, 2023

## **Via Council File System**

Los Angeles City Council 200 N. Spring Street Los Angeles, CA 90012

Re: CF 21-1025

West Pico Drill Site, 9101 & 9151 W. Pico Boulevard, Los Angeles, CA 90035 Appeal by Neighbors for a Safe Environment (NASE)

To the Los Angeles City Council:

The Cheviot Hills Home Owners' Association represents some 1400 households situated less than one mile from the West Pico Drill Site. Our community is also immediately adjacent to the Rancho Park and Hillcrest Drill Sites, so our community has more Controlled Drill Sites concentrated in our vicinity than any other part of Los Angeles.

Our Association submitted a letter to City Council on October 25, 2021, calling upon the City Council to grant the appeal by Neighbors for a Safe Environment (NASE) and thereby overturn the unconscionable and erroneous Categorical Exemption from environmental review in the West Pico Drill Site case. Dangerous things have transpired since then, proving that oil operations in the City are out of control due to the City's failure to police those operations and enforce City Code. The failure to act at West Pico serves only to foster this dangerous chaos. Regulations and prohibitions without enforcement are tantamount to having no regulations and prohibitions at all.

On December 11, 2021 an underground pipeline leak of unknown prior duration emanated on the surface as a spill. CalGEM's Notice of Violation and accompanying investigation showed that the leak was caused by illegal pipeline work conducted in 2001 that violated City regulations. The Water Board-supervised cleanup is likely to continue for several years. Full documentation is in the Council File for the appeal case.

In the Fall of 2022, eight new projects on oil wells were initiated at the West Pico, Hillcrest, and Rancho Park Drill Sites – all contrary to City Code because there were no applications to the ZA, no ZA approvals, and no CEQA clearances of any kind for these projects. Full documentation has been sent to CD5 and from there to the ZA. NASE will upload it to the Council File for the appeal case.

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From 2013 through 2021, ten "maintenance acidization" projects were executed on wells at West Pico – all contrary to City Code because there were no applications to the ZA, no ZA approvals, and no CEQA clearances of any kind for these projects. Two of these projects were executed in October 2021, while NASE's appeal was pending at City Council. One was executed on July 28, 2020, in between the two ZA public hearings for the PA2 review underlying the Categorical Exemption being appealed. Full documentation has been sent to CD5 and from there to the ZA. NASE will upload it to the Council File for the appeal case.

The West Pico Drill Site is one mile from the border of our HOA. The Hillcrest and Rancho Park Drills Sites are immediately adjacent to us. In October 2021, we wrote:

If allowed to stand, the Categorical Exemption and the associated ZA ruling and Area Planning Commission ruling will signal to all oil companies operating in the City that they need not obey City laws and that the City will assist them in evading the State's CEQA law.

Little did we know in October 2021 that oil companies were *already* acting on that signal; they continue to do so even more brazenly. City Council cannot allow that to stand. Granting NASE's appeal in the West Pico case is the first step in turning this around.

Sincerely,

Bob Keehn, President On Behalf of the Board of Directors, Cheviot Hills Home Owners' Association

cc: Ms. Katy Yaroslavsky, Council Member for CD5 Mr. Gary Gero, CD5 Chief of Staff