

ENVIRONMENTAL ASSESSMENT, SECTION 1

Air Quality

Since the Whittier Conservancy is concerned with quality of life issues, environmental concerns such as air pollution and climate change have been stressed through our recent focus on Sustainability. For this reason, the Draft EIR's conclusion that green house gases will exceed both federal and state standards is of great concern to our membership.

This year, California businesses are *required by law* to reduce greenhouse gas emissions to 2010 levels. By 2020, this requirement goes to the 1990 levels; and by 2050, such emissions are to go to 80% *below* 1990 levels. These laws were put in place as an acknowledgement of the criticality of the carbon footprint that is threatening the viability of the planet. The Conservancy has been steadfast in trying to educate the public about this imminent threat and about what we, as individuals, can do to ease the situation and prepare for a less oil-dependent future as a result.

The Project Impacts and Mitigation Measures section states that the proposed Project would generate air emissions due to the following activities:

- *construction equipment and fugitive dust
- *drilling emissions during test drilling
- *operational combustion equipment
- *operational fugitive emissions
- *drilling emissions during initial drilling (five years)
- *emissions from re-drilling

As a result of these ongoing actions, "Construction activities would generate emissions that EXCEED South Coast Air Quality Management District thresholds." **We find these significant and unavoidable impacts---especially with the potential life of the Project being 45 years---to be unacceptable on a number of levels.**

First, the residents (and workers) in the immediate vicinity would be exposed to years of particulate matter that would not be generated in the absence of this Project. This does not even include the construction activity that would produce NOx emissions well above both regional and local thresholds. **Since there is no way of adequately protecting**

those in the immediate vicinity, we would like to know how this project can go forth despite a demonstrated lack of mitigation to offset the liabilities.

While measures are suggested that would require the operator to submit and implement a Fugitive Dust Control Plan to limit exposure to both humans and animals, what would be the operator's incentive for doing so? There would have to be on-site inspectors for the life of the project to assure such compliance within a controlled environment, the purpose of which is to continue drilling? **We feel that at a minimum, there should be on-site inspectors for the life of the project to insure compliance.**

Impact #AQ.2 notes that, "Operational activities would generate emissions that exceed South Coast Air Quality Management District thresholds," but that these impacts can be reduced to "less than significant with mitigation." We disagree with this assumption based on the duration of the construction phase of the proposed Project. **Suggesting "offsets" for NOx emissions may be beneficial to the company, but how does that help the people in close proximity to those emissions? Since impacts are local, shouldn't the mitigation be local as well?**

Impact #AQ.4 warns that, "Potential operations and drilling at the Whittier Mail Oil Field would increase greenhouse gas emissions." In keeping with our current mission of *Sustainability*, we find this **"significant and unavoidable impact" to be unacceptable given the current recognition of greenhouse gases as being the #1 man-generated environmental problem facing mankind.** In the Cumulative Impacts and Mitigation Measures section, it is stated that the proposed Project *could* produce significant impacts. The report concludes that "emissions of Greenhouse Gases would contribute to global GHG emissions," both individually and cumulatively. **The Whittier Conservancy is asking why we in Whittier should be contributing to further environmental degradation at a time when other communities are acknowledging their role in doing just the opposite?**

As a point of omission, we wonder why the emphasis on toxic emissions is limited to the activities on-site, and not coupled with the additional impacts of incoming truck traffic and with their accompanying emissions? **We would like this addressed in the responses.**

Finally, in the Mitigation Monitoring Plan, the City of Whittier is listed as the responsible party for compliance oversight. We would like to know if this presents some conflict of interest, since it would be the city's job to oversee, and therefore, restrict an enterprise that would become a significant economic factor in the decision-making process. **Would the political and economic implications be in conflict with the health and safety considerations of the general public?**

ENVIRONMENTAL ANALYSIS, SECTION 3:

Safety, Risk of Upset, and Hazardous Materials

This section states that, “The principal immediate hazards to public health at an oil field include:

- releases of flammable gas causing vapor cloud explosions or thermal impacts from fire and flame jets;
- releases of propane or butane causing vapor cloud explosions, thermal impacts from fire and flame jets, or thermal and overpressure impacts from explosions and boiling liquid expanding vapor explosions;
- releases of odorant causing toxic impacts; and
- releases of crude oil with subsequent fire causing impacts from thermal exposure to crude oil fires.”

This analysis reiterates state, national, and local requirements for addressing hazardous materials and for contingency plans during potential emergencies. These are “boiler-plate” paragraphs that satisfy EIR documentation, but do little to address the local concerns that are real and palpable. For example, the City of Whittier’s codified references to oil and gas development are from 1970 and 1975. These are outdated and were put in place long before CEQA requirements were mandated. The 2006 agreement with Matrix Oil, specific to the Honolulu Terrace operation, was a direct response to an explosion and fire that caused a fatality in a residential area. Where is the relevance to the proposed project?

In responding to the potential for the four above-referenced “immediate hazards,” the draft EIR states that “The proposed Project could introduce risk to the public associated with accidental releases from drilling and processing operations.” It further states that these impacts are **significant and unavoidable**, but that they could be “reduced” by “preventing vandalism.” The mitigation measures proposed include:

- *Security policies for employees and contractors, including access control, pre-employment screening, information security, and post-employment issues;
- *Appropriate signage preventing access;
- *Fencing systems;
- *Visitor sign-in and sign-out;

- *Surveillance of hazardous material areas;
- *Employee and contractor identification methods;
- *Night lighting;
- *Partnerships with local response agencies;
- *System to report and collect security incidents;
- *Communications equipment;
- *Employee vehicles and access keys, codes, and card security.

OUR QUESTION IS: HOW DO THESE SECURITY POLICIES HAVE ANYTHING TO DO WITH TOXIC RELEASES OR POTENTIAL BLOW-OUTS RESULTING FROM OPERATIONAL PROCEDURES/POLICIES/PRACTICES? WHERE IS THE CORRELATION BETWEEN INTERNAL ACCIDENTS VS. POTENTIAL INCOMING VANDALISM. Negligence, poor oversight, aging systems, quality and training-level of personnel, and economic incentives are all factors in any enterprise operation. The BP blowout in the Gulf of Mexico is an example. Locally, Matrix has had previous problems to which this EIR does not refer. *These proposed mitigation measures suggest very inadequate solutions to a very real problem.* We would like to have more thorough and relevant responses to this “unavoidable significant impact.”

In discussing potential hazards to the community, we feel it would be appropriate to include a report on Matrix Oil’s history with regard to public safety. How long have they been drilling, where, with what success, and with how many violations/incidents? This should be part of the public record and the environmental assessment of the Project. Also, **if Matrix were to sell or lease its interests to others, by what process would the city assure a future operator’s experience or community commitment?**

In the Mitigation Monitoring Plan), the “Responsible Party” for compliance verification is the City of Whittier. **We would like to see a chart of the City’s history with regard to mitigation monitoring compliance. This applies to CUP compliance as well. Where is the assurance to the public that adequate oversight and compliance with complex environmental issues will be well-served by city staff, given the potential for a conflict of interest in the city’s dual role as both overseer and beneficiary?**

Additionally, there is a very important omission in this section of the Draft EIR. **While there is reference to potential hazards coming *FROM* the drilling site, there is no reference whatsoever to potential hazards traveling *TO* and being used within the site. For example, will there be any toxic materials used at the operation site to**

facilitate the drilling activities and what toxic materials will be transported to the facility through adjoining neighborhoods? Will there be chemicals used in the extraction process? If so, what? Will this be a steam-only drilling process, or will other supplemental chemical compounds be used to loosen the earth in order to accomplish and maximize production? What exactly will be *injected* into the ground and in what volume? We feel that the public has a right to know what, if any, toxic materials are being used, stored, and/or transported to/within the drilling site. These are areas where we feel the Draft EIR has been inadequate.

Finally, the Executive Summary (p. ES-8) states that “automatic shutdown valves on the Colima gas pipeline” will be installed to ensure the safety of the transport of natural gas from the drilling site. **Given the reliability and assurances given by BP in the Gulf of Mexico, what make Matrix less vulnerable to natural disasters like earthquakes and more reliable than a multi-national corporation that was unable to rely on their own shut-off valves?**