

July 22, 2011

Attn: Mr. Jeffrey Adams, Planning Manager
City of Whittier Planning Division
13230 Penn Street
Whittier, CA 90602
Email: JAdams@CityOf Whittier.org

Dear Mr. Adams,

The Friendly Hills Property Owners Association (FHPOA) wishes to express its thanks to the Whittier Planning Division, as Lead Agency for the Whittier Main Oil Drilling Project, for this opportunity to comment on the Draft EIR for that project, as released on June 6, 2011.

A primary concern of the Property owner's Association is that the age of the City's current General Plan (last updated in 1993) makes it very difficult to make a finding of consistency with that document. It is our understanding that a current General Plan serves as a local government's guiding document in its daily affairs and its development activities, much as does the Constitution for the Nation's Federal Government. It is further our understanding that California Law establishes an expectation that this document should be updated at approximately ten year intervals and that the updating process takes approximately two years to competently complete.

A required part of the Environmental Impact Report is a determination of consistency of the proposed project with the City's General Plan. Since the last update of the City's General Plan dates from 1993, this poses a real challenge for the Whittier Main Oil Project. The current General Plan clearly establishes a preference for the acquisition and preservation of open spaces, outdoor recreational opportunities, energy conservation, and the maintenance of environmental values. (See Land Use Element pp. 2-10 through 2-11 and Environmental Resource Management Element (ERME) pp. 5-2 through 5-5). As stated in both the Land Use Element and ERME of the General Plan, meeting the goals stated therein and pursuing the Whittier Main Oil Field Drilling Project is, at best, problematic. Indeed, the only mention of oil drilling in the general plan relates to its role in the contamination of the City's ground water resources (ERME p. 5-1) and to the establishment of a policy of working with appropriate agencies to rehabilitate or encourage rehabilitation of former drilling sites for the preservation of natural resources (ERME p.5-3,policy1.4).

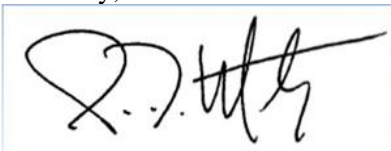
It could be that an update of the General Plan would show that community values and priorities have shifted from the goals stated in the current plan to those of tax avoidance (through City investment in oil production) and a lowering of environmental values to allow for that investment. Such a clear shift in public sentiment might justify the oil drilling project. We could only know that, however, if the citizenry went through the detailed democratic process of updating the City's General Plan as is mandated under State law. Unless clear consistency with a current General Plan can be shown in the Environmental Report, this project will undermine the process of orderly development in the City of Whittier. We would strongly urge that the City go through that process and establish consistency with a current General Plan, prior to the undertaking of the proposed radical shift in policy.

Should the City Council decide to advance this project, despite this concern for consistency with the General Plan, FHPOA also has concerns that relate to the specifics of the project as currently proposed. These concerns include the following points.

1. The current proposal for an access road is off Catalina and down Mar Vista, for the duration of the five year construction phase of the project. The use of heavy equipment and trucks on these roads for this period of time will have a significant impact on both the road infrastructure and the traffic flow and safety of the Friendly Hills neighborhood. We note with further concern that it is currently proposed to remove the traffic calming medians from Mar Vista Street, West of Colima road. That measure, combined with the imposition of this heavy industrial truck traffic, will undoubtedly exponentially increase the traffic safety threat posed by a street where local residents are already driven to posting their own, hand-made signs imploring the traffic to "Slow Down." An alternate drilling site or a route that avoids sending heavy industrial traffic through residential neighborhoods would be the only policy options that could reduce the impact of this truck traffic to a less than significant level.
2. Consultants for the Oil Project have publicly proposed an earthen berm of ten to fifteen feet in height between the drilling site and the residences along Lodosa. The project as proposed, however, makes no mention of this safety/environmental quality feature for the project. We believe that such a feature should be made a condition of the project to the extent that the drilling site is kept as near residential neighborhoods as is currently proposed. An even better approach might be to require a fifteen-foot-tall freeway type sound-wall surrounding the site to help mitigate the noise, pollution, and fire safety threats posed by the drilling. Ivy or creeping fig type plant material should be added to the wall to soften its visual impact on the community.
3. The proposed plan calls for twenty-four-hour per day, seven-days-per week drilling. Such noise should not be allowed in this residential neighborhood. Evening (6 PM to 7 AM) and week-end quiet periods to allow for sleep and relaxation should be a fundamental condition for the project. Also, the proposed diesel engine drilling rigs should be changed to electric engines to help reduce noise and pollution from the project.
4. The currently proposed drilling site is a mere 1500 feet from homes and schools. The size of the overall proposed site makes it eminently possible to move the drilling site deeper into the canyon to further mitigate its environmental impact from both noise and pollution.

We look forward to the resolution of these concerns in whatever proposal for this project advances from the current proposal. Thank you, again for the opportunity to comment on the Draft EIR.

Sincerely,

A handwritten signature in black ink, appearing to read "R.D. Martinez", enclosed in a thin blue rectangular border.

Randall D. Martinez
President
Friendly Hills Property Owners Association