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## **San Gabriel Valley Task Force and Save the Puente-Chino Hills Task Force**

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### **RE: Comments on Draft EIR prepared for City of Whittier, Whittier Main Oil Field Development Project Environmental Impact Report Public Draft**

The following comments are submitted on behalf of the San Gabriel Valley and the Save the Puente-Chino Hills Task Forces of the Sierra Club, Angeles Chapter in response to the Draft Environmental Impact Report (DEIR) prepared for Whittier Main Oil Field Development Project.

The San Gabriel Valley Task Force was created to address environmental issues in the San Gabriel Valley. The focus of the San Gabriel Valley Task Force is on potential enhancements of natural areas, open space and recreational opportunities within the San Gabriel Valley, the watersheds of the San Gabriel River and the Rio Hondo, the foothills of the San Gabriel Mountains, and the hills defining the margins of the Valley. The mission of the Save the Puente-Chino Hills Task Force is to work towards the preservation and biological integrity of the Puente-Chino Hills Wildlife Corridor which extends from the Whittier Narrows to the Santa Ana Mountains, as well as providing open-space and recreational activities within the Puente-Chino Hills.

We agree with statements in the DEIR that the project site is an especially sensitive and important portion of both the Puente Hills Landfill Native Habitat Preservation Authority Preserve (Preserve) and the greater Puente-Chino Hills region (DEIR, pg.4.2-42). **As such, we oppose this project and all alternatives with their associated, significant and unavoidable impacts on habitats and wildlife.**

**After review of the DEIR we believe that this document is inadequate to meet CEQA requirements. The DEIR states that the environmentally preferred alternative is not the proposed project which was studied in most detail, but one of the alternatives—the Consolidated Central Site. We concur with that conclusion. However, this document does not study that alternative in detail, nor does it address completely the impacts of alternative access routes to the Consolidated Central Site. If all operations are to be consolidated in one area, the site descriptions, facility plans and all impacts will be different than those described in this document. In addition, if the Central Consolidated Site is considered the “most friendly”, then Catalina Ave. would seem the most environmentally friendly access route. Because these alternatives and their impacts were not fully considered, we believe a new Environmental Impact Report must be prepared and recirculated for 60 days.**

We have reviewed the DEIR for renewed drilling and oil production from lands owned by the City of Whittier and located within the Preserve. We oppose the proposed project and all alternatives described in the DEIR for the following reasons:

- The Sierra Club believes that “no leasing, renewing of unworked leases, development facilities such as pipelines, or disruptive exploratory work such as drilling should be allowed in existing or potential conservation system units where these activities could lead to the destruction of the values the systems were designed to protect” (Sierra Club, National Policy).
- The Task Forces are alarmed at the impacts on special status species by permanent grading for pads, processing equipment, and permanent upgrading of roads with associated fuel modification clearings on each side. The USFWS designates the Project Site as critical habitat for the federally threatened coastal California Gnatcatcher. The project would permanently destroy Coastal Sage Scrub and riparian habitat for this protected species. In addition several other “special status species” are or could be present on the sites (pg. 4.2-37). Although the project and alternatives suggest mitigation by restoration at other sites, impacts cannot be eliminated (DEIR, pg. 4.2-39). Biological baseline studies should be required before any project area disturbance takes place.
- The proposed development, including all alternatives, would affect the flora and fauna of the Core Habitat Management Zone of the Preserve—considered to be an important wildlife nursery site for deer and bobcats as well as habitat for many other species. Core habitat areas are critical for maintaining wildlife populations in fragmented habitat corridors. The Core Habitat includes areas that generally are not open to the unsupervised public and are to provide undisturbed habitat for wildlife. Permissible activities are only to include “authorized biological survey and some restoration and/or invasive species removal, but no unsupervised public access” (Habitat Authority Resource Management Plan-RMP (DEIR pg. 4.2-31). The proposed project and all alternatives are incompatible with this RMP.
- The project and all alternatives, except the No Project Alternative, will interfere with movements of wildlife through and within the Preserve. Continued drilling and well maintenance will extend these impacts for the life of oil operations in the project areas.
- The Task Forces are concerned about on-site impacts of drilling, construction, maintenance, and pipeline installation, including light pollution, noise, air quality impacts, and traffic on the affected part of the Wildlife Corridor. While these impacts would be greatest during early stages of the project, they would continue for the life of the project. Drilling 60 wells, one at a time, each taking about 30 days, will spread just the drilling impacts over approximately 5 years. Vibrations from drilling, construction and transportation may exceed significance levels. (DEIR, pg. 4.5-35). Drilling takes place 24 hours a day with night lighting and vibrations; this will impact activities of nocturnal animals both large (i.e. bobcats, coyotes) and small (i.e. various species of bats). Maintenance of wells would cause impacts throughout the life of the oil operations in the Preserve. The effects of these impacts were not studied in sufficient detail for the environmentally preferred alternative and further study is needed.
- The proposed oil drilling and production contradicts the mission statement of the Puente Hills Landfill Native Habitat Preservation Authority which is “dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity with the primary purpose to protect the biological diversity”.
- Section 4.4 Geological Resources is wholly inadequate. Although long descriptions of conditions that could exist are included, little site or no specific data is given for various geological hazards for the proposal or alternatives. Were site specific studies done? If so, what were the results? In addition, if the Central Consolidated Site Alternative is chosen, documentation of geological hazards and site characteristics must be included.
- Analysis of earthquake hazards is inadequate. In Section 4.4 (Geological Resources) the DEIR does not consider potential effects of an earthquake on the Puente Hills Thrust Fault. Studies indicate that the four past earthquakes discovered along the fault had magnitudes between M 7.2 and 7.5 in the last 11,000 years, a higher  $M_w$  than any nearby fault listed on Table 4.4 of the DEIR. What is the estimated maximum peak ground acceleration in the project area due to the

Puente Hills Thrust? Mitigation measures should reflect the highest ground accelerations that could be expected.

- Accidental spills of toxic drilling muds, fluids, or oil, including contaminated formation water are a possibility. Such accidents could endanger the flora and fauna of this important habitat, impact special status species, and affect surrounding residential areas.
- The Preserve is currently within a proposed Los Angeles County Significant Ecological Area.
- The increased risk of fires cannot be avoided since potential ignition sources are inherent in mechanical and electrical equipment as well as with human activities associated with clearing all vegetation from pad areas and along roads. While it is normal for chaparral areas to burn, the increased frequency of fire escaping even to just a portion of the Preserve could lead to permanent changes in the habitat as well as risk to nearby residential areas.
- Since parcels became part of the Habitat Authority, people have purchased homes in Whittier near the proposed project with the expectation that the City and the Habitat Authority would abide by the conditions attached to the purchase. Current property owners had no expectation of having to experience the increased traffic, noise, light pollution, odors, and other risks associated with this proposal.
- The project, and the products of the project, will contribute to greenhouse gas emissions and to global warming. This will lead to cumulative GHG and global warming impacts which are inadequately addressed by the DEIR.
- Impacts to the Preserve Core Habitat could impact the Puente-Chino Hills Wildlife Corridor due to fragmentation of habitat, and these have not been analyzed in the DEIR.
- The analysis of cumulative impacts is not adequate. CEQA requires study of past, current and planned future projects that may cumulatively affect the region's environment. Major losses of habitat have occurred in this area due to housing development, local landfills, golf courses and cemeteries. The Tehachapi Renewable Transmission project will take place during proposed oil development. Potential development of the Aera property would have major impacts to connectivity along the Puente-Chino Hills Wildlife Corridor. The National Park Service is currently studying the feasibility of creating a national recreation area that potentially could include the Puente-Chino Hills. The Whittier Hills Oil project would degrade the potential of this area to be included in such a federally designated national recreation area.
- Recreational use of the trails and outdoor education will be interrupted during this project--development that would particularly affect Arroyo Pescadero and the Core area. The major activity in the Preserve is hiking. A potential long-term closure of the Arroyo Pescadero trail system will take place due to this proposed project. This area is heavily used by hikers, equestrians, bicyclists and Habitat Authority educational programs. The oil development and production will diminish the quality of outdoor recreation due to noise which will exceed General Plan levels, vibrations, exhaust, and dust generated for the life of the project. The public uses this area to escape from the noise and disturbance of the urban environment—not to encounter noise of drilling, trucks etc.

**Although we do not believe this project should be approved, if it is considered further by the City of Whittier:**

- As mitigation to prevent damage to the Preserve, funding from Matrix must be required for hiring Habitat Authority staff equivalent to two full time equivalent positions which specialize in compliance monitoring to monitor all project activities.  
Funding from Matrix must be included to train oil company and contract workers on this project about the environmental/biological concerns associated with the Preserve.
- Funding from Matrix should be designated for community and educational outreach programs in the Preserve to account for the loss of recreational and educational opportunities due to this project.

- Requirements should be included to minimize auto and truck traffic through carpooling of workers and to limit, as much as possible, truck traffic through neighborhoods and to address parking issues within the Preserve or community. There should be strict limits established on the number of allowed vehicle trips, with meaningful monitoring and fines if limits are exceeded.
- As mitigation for loss of Core Habitat, funds from this project should be stipulated for Preserve management and purchase of lands before the project is started to complete the continuity of the Puente-Chino Hills Wildlife Corridor.
- Up-front funding for emergency response and cleanup of any toxic materials should be included for the life of the project. Funding should also be included for cleanup and restoration of the entire project after completion.
- Conservation easements should be put on all Habitat Authority lands which are owned by the City.

**The following comments are provided on elements of the proposal.**

**The Proposed Project:**

The proposed action with 3 well sites, gas plant, a new access road, an oil truck loading facility is totally unacceptable. Major impacts to recreational areas and trails within Habitat Authority lands will affect recreational use of Arroyo Pescadero Park as well as other trails in the area. Operations will impact the Core area, and cause major habitat disruption due to construction of the new access road from the Central Site to Colima Road. Viewsheds from Colima and Arroyo Pescadero Park will be impacted throughout the life of the project; this will affect popular recreational trails within the general area. These impacts cannot be fully mitigated. Five separate areas of habitat will be destroyed causing disruption of animal movement, foraging, and breeding. This option would increase edge effect area and maximize land cleared permanently for oil operations and fuel modifications.

**Consolidated Upper Colima Road Site Alternative**

The Sierra Club believes the Consolidated Upper Colima Road Site Alternative is not acceptable. As stated in the DEIR, this alternative would block the use by wildlife of the wildlife tunnel passing under Colima Road and would still require a western drill site. Recreation in Arroyo Pescadero Park would be affected and the project would be visible to residents in the area. Directional drilling from this site will necessitate oil wells on the proposed western site with its associated impacts to the Core region of the Habitat Authority lands.

**Consolidated Central Site and Savage Canyon Landfill Road**

Although supposedly the most environmentally preferred alternative, this option is also unacceptable. The Consolidated Central Site would still require construction of a pipeline between the Central Site facilities to Colima Road, destroying native vegetation along this path. Simply “consolidating” the impacts to one area, which has already been the site of restoration efforts, negates all efforts and resources already expended to mitigate the damage caused by past oil drilling. In addition, there has been a great deal of work by volunteer groups or other park and resource agencies to set the area on the road to recovery that will be disrupted or destroyed.

The use of an existing road around Savage Canyon Landfill to the Consolidated Site would eliminate the need for the new access road. However, the landfill road would need to be

widened with fire modification clearance of 10 feet required on either side. This requires the permanent removal of some of the best quality native vegetation in the Core Habitat Area for the lifespan of the project—violating the mandate for protection of such resources in the Preserve. The Landfill Road would cut through habitat of the federally listed California Gnatcatcher. The only reported breeding pair of gnatcatchers in the Core Habitat is adjacent to this road. Improvement of this road and fuel modification requirements would result in the removal of occupied gnatcatcher habitat. For these reasons we believe this road is not an acceptable access. In addition, we are also concerned with the impacts to Penn Park and the community adjacent to the entrance of the Savage Landfill access; these impacts were not addressed in the DEIR.

### **Consolidated Central Site with Catalina Ave. Access**

We believe the shortest route and most environmentally friendly route to the Consolidated Central Site would be along Catalina Ave. This should be analyzed more fully and compared to other access road alternatives.

Because of the above concerns, we believe that renewed drilling in the Whittier Hills is unacceptable. However, if a project other than the proposed project is to be considered by the City of Whittier, a new DEIR that would fully meet CEQA requirements must be circulated that analyzes the environmental impacts of any new proposal and access routes along with opportunities provided for public comment.

We respectfully submit these comments.

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