

PUBLIC COMMENT TEMPLATES FOR PHILLIPS 66 and MARATHON PROPOSALS

Submit Draft EIR comments by 4 PM on Friday, December 17, 2021

FOR PHILLIPS 66

Email (email address Gary.Kupp@dcd.cccounty.us):

Dear Mr. Kupp:

I'm writing to you concerning the draft EIR for the proposed conversion of the Phillips 66 Rodeo oil refinery to biofuel production (File No. LP20-2040).

This project will have a potentially enormous impact on our community for years to come. It is therefore critically important that the CEQA review be thorough and accurate, and that the public be involved to the maximum extent possible.

I have the following specific concerns about the draft EIR for the project that I would like you to address:

1. **BASELINE:** The draft EIR basically assumes that if the permit isn't granted Phillips 66 will continue to refine crude oil at historic levels, so that biofuel refining will reduce pollution. But that is not accurate. Phillips 66 has repeatedly said elsewhere that it is planning to shut down its Santa Maria refinery regardless, and that is clearly the case since both its Santa Maria and Rodeo Refineries uniquely rely on landlocked and fast-dwindling crude supplies. (Santa Maria and Rodeo are the two halves of the San Francisco refinery, joined by a pipeline.) So any project emissions are actually a pollution increase.
2. **LAND USE:** The draft EIR does not consider at all impact of a massive increase in use of food crops like soybean oil as a feedstock, which threatens to wreak havoc with land use. Current indications are that the refinery could potentially use up to 40 percent of the nation's entire supply of soybean oil. More environmentally sustainable feedstocks like waste oil are not available in the quantities contemplated by the project.
3. **PUBLIC SAFETY:** I am worried about our safety from the biofuel refining process, and the draft EIR doesn't consider that at all. You have information about the risk that refining biofuels increases the incidence of flaring, but you did not consider it in the draft EIR. I am very concerned by the potential impact of a spike in flaring on my health and that of my neighbors.

4. **PROJECT ALTERNATIVES:** The draft EIR does not evaluate alternatives to the project in a way that makes sense. Most significantly, the County was wrong to reject a green hydrogen alternative for the project when considering that same alternative for the similar Marathon project.
5. **OPERATING WITHOUT A PERMIT:** The Bay Area Air Quality Management District (BAAQMD) is currently investigating whether Phillips 66 violated the law in starting its conversion project before it received a permit. The County should consider whether the previously converted unit (Unit 250) should have been evaluated as part of this project. And it should not issue any permit at all if it is determined that Phillips 66 is acting in violation of the law.
6. **CUMULATIVE IMPACTS:** All of these potential impacts are from just one project. The draft EIR did not make any meaningful effort at all to evaluate the cumulative impacts of the project considered collectively with the impacts of the very similar Marathon Martinez refinery project, being evaluated nearly simultaneously.

I ask that this project not move forward until and unless these very serious potential impacts are fully analyzed and addressed. Additionally, given the enormous import of this project for the community, we believe a public hearing concerning the project and its environmental review would facilitate the purposes and goals of CEQA. We therefore request that you schedule such a hearing as soon as possible.

[signed]

Postcard: [address: Gary Kupp, Senior Planner, Contra Costa County Department of Conservation and Development, 30 Muir Rd, Martinez, CA 94553]

Dear Mr. Kupp:

I'm writing to you concerning the draft EIR for the proposed conversion of the Phillips 66 Rodeo oil refinery to biofuel production (File No. LP20-2040). I am very concerned that the analysis of the project's impacts in the draft EIR is inadequate. In particular, the draft assumes that the alternative to granting the permit is more crude oil processing, which is not actually true: the refinery's crude oil supply is already winding down. The draft also does not consider the impact on land use of massive importation of food crops as feedstocks, or public safety risks associated with the proposed biofuel refining—which has the potential to cause more flaring. Given our grave concerns with this project, and the controversy about it in the community, we ask that you hold a public hearing to solicit input.

[signed]

FOR MARATHON

Email (email address Joseph.Lawlor@dcd.cccounty.us)

Dear Mr. Lawlor:

I'm writing to you concerning the draft EIR for the proposed conversion of the Marathon Martinez oil refinery to biofuel production (File No. CDLP20-02046).

This project will have a potentially enormous impact on our community for years to come. It is therefore critically important that the CEQA review be thorough and accurate, and that the public be involved to the maximum extent possible.

I have the following specific concerns about the draft EIR for the project that I would like you to address:

1. **BASELINE:** The draft EIR basically assumes if the permit is denied Marathon will continue refining crude oil at past levels, so that biofuel refining will reduce pollution. But that is not accurate. The Marathon refinery is currently shut down, so any project emissions are actually a pollution increase.
2. **LAND USE:** The draft EIR does not consider at all impact of a massive increase in use of food crops like soybean oil as a feedstock, which threatens to wreak havoc with land use. Current indications are that the refinery could potentially use up to 24 percent of the nation's entire supply of soybean oil. More environmentally sustainable feedstocks like waste oil are not available in the quantities contemplated by the project.
3. **PUBLIC SAFETY:** We are worried about our safety from the biofuel refining process, and the draft EIR doesn't consider that at all. You have information about the risk that refining biofuels increases the incidence of flaring, but you did not consider it in the draft EIR. I am very concerned by the potential impact of a spike in flaring on my health and that of my neighbors.
4. **PROJECT ALTERNATIVES:** The draft EIR does not evaluate alternatives to the project in a way that makes sense. There is no reason, for instance, for not considering opting to both reduce the scale of the project and use green hydrogen.
5. **CUMULATIVE IMPACTS:** All of these potential impacts are from just one project. The draft EIR did not make any meaningful effort at all to evaluate the cumulative impacts of the project considered collectively with the impacts of the very similar Phillips 66 Rodeo refinery project, being evaluated nearly simultaneously.

I ask that this project not move forward until and unless these very serious potential impacts are fully analyzed and addressed. Additionally, given the enormous import of

this project for the community, we believe a public hearing concerning the project and its environmental review would facilitate the purposes and goals of CEQA. We therefore request that you schedule such a hearing as soon as possible.

[signed]

Postcard: [Address: Joseph W. Lawlor Jr., AICP , Project Planner, Contra Costa County Department of Conservation and Development, 30 Muir Rd, Martinez, CA 94553]

Dear Mr. Lawlor:

I'm writing to you concerning the draft EIR for the proposed conversion of the Marathon Martinez oil refinery to biofuel production (File No. CDLP20-02046). I am very concerned that the analysis of the project's impacts in the draft EIR is inadequate. In particular, the draft assumes that the alternative to granting the permit is more crude oil processing, which is not actually true: the refinery is shut down, and did not open back up even with recent spikes in demand. The draft also does not consider the impact on land use of massive importation of food crops as feedstocks, or public safety risks associated with the proposed biofuel refining—which has the potential to cause more flaring. Given our grave concerns with this project, and the controversy about it in the community, we ask that you hold a public hearing to solicit input.

[signed]