

Phillips 66 biofuels conversion Environmental Impact Review: Summary of environmental and community organizations' comments*

The organizations' comments outline various ways in which the EIR fails to give adequate consideration of issues:

The “baseline” – ‘no project’ alternative. The EIR assumes that the alternative to biofuel conversion is continuation of petroleum refining at historic levels. This is unlikely. The Phillips 66 Rodeo refinery is part of one complete production process that starts at their refinery in Santa Maria. But that refinery is slated to close next year, mostly because sources of the crude oil they process have declined. In addition, recent levels of production are incompatible with California's declared climate goal of an all-electric transportation system.

Inadequate description of the project. Insufficient information about potential feedstocks or about the process of production, including the fact that refining animal/vegetable feedstock requires higher temperatures, increased pressure, and the use of more hydrogen than refining petroleum.

Failure to consider possible safety problems, which might result from the higher temperatures, increased pressure, and increased production and use of hydrogen.

Failure to fully evaluate possible air quality impacts, including increased risk of flaring and accidental releases, and failure to evaluate the different air quality impacts of different feedstocks and product slates.

Failure to consider marine impacts, such as increased tanker traffic.

Inadequate consideration of the climate impacts of the project. The production process for biofuels, including direct and indirect impacts, produces as much or even more carbon emissions than refining petroleum. The EIR also fails to consider the impact of production of a large amount of combustible fuel on California's plan for conversion of transportation to electricity.

Inadequate consideration of the land-use impacts of biofuels. This project would be the largest biofuel production site in the world. This could result in converting more land to agriculture, leading to deforestation and the destruction of wetlands, prairies, and other natural areas that absorb carbon. [The conversion of current agricultural land to producing biofuel could also raise food prices].

Failure to consider other project alternatives, such as the production of hydrogen by electrolysis (“green” hydrogen) or reducing the scope of the project.

*This is a summary of comments by the Natural Resources Defense Council, Asian Pacific Environmental Network, BiofuelWatch, California Environmental Justice Alliance, Center for Biological Diversity, Communities for a Better Environment, Citizens Air Monitoring Network, Community Energy ReSource, Extinction Rebellion SF, Fossil Free California, Friends of the Earth, Interfaith Climate Action Network of Contra Costa, Rainforest Action Network, Richmond Progressive Alliance, Rodeo Citizens Association, Baykeeper, Stand.earth, Sunflower Alliance, The Climate Center, 350 Contra Costa