

## DOCKETED

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<b>Organization:</b>	Porter Ranch Neighborhood Council
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November 10, 2016

The Honorable Edmund G. Brown, Jr.  
State Capitol Building, 1<sup>st</sup> Floor  
Sacramento, California 95814

Re: Porter Ranch Neighborhood Council position regarding the Aliso Canyon Gas Storage Facility.

Dear Governor Brown:

This letter represents the position of the Porter Ranch Neighborhood Council, and does not necessarily reflect the opinion of the City of Los Angeles.

On October 23, 2015, the Southern California Gas Company (SoCalGas) reported that one of the 115 wells it operates at its Aliso Canyon gas storage facility had failed and was uncontrollably discharging methane gas, and everything else it carried with it, into the air and the surrounding community. Before the well was finally plugged on February 11, 2016, it had released 100,000 metric tons of methane and other chemicals over Porter Ranch and the entire San Fernando Valley. The lives of more than 50,000 residents of the City of Los Angeles have not been the same since then. The short-term and long-term health impacts this blowout has had on us and our children will never be known.

We are now watching SoCalGas push every local and State agency to give it the approval it needs to begin re-injecting gas into the facility. All the while, SoCalGas continues to dismiss citizen's reports of persistent health ailments, it defied the County Department of Health's order to clean the community homes from the chemicals it exposed us to over a period of four months, it continues to stall on the AQMD order to initiate a health study, and spreads fear of gas shortages and power outages unless it is allowed to re-inject gas into the field. SoCalGas insists that the field is "safe" to operate. However, they continue to report leaks on a recurring basis including a recent leak where an estimated 2,000 cubic feet of gas was released from a corroded aboveground pipe.

It has been a year since the gas blowout, and our community continues to deal with its aftermath. Over the last year, we have learned more than we ever wanted to about gas storage facilities, South Coast AQMD, DOGGR, CPUC, CAISO, and the CEC. We have

participated in countless public hearings and workshops, and we listened and analyzed countless presentations from the gas company as well as local and state agencies.

In the meantime, SoCalGas continues to assert the following:

1. The Aliso Canyon facility is safe to operate.
2. The gas blowout caused no adverse health impacts.
3. Aliso Canyon is a critical component of the Southern California energy delivery system.

The people of Porter Ranch dispute each one of these statements, and present you with the following rebuttals.

***Statement 1 – “Aliso Canyon is Safe to Operate”.*** We disagree with this statement. Safety of a facility is measured by the tolerance for its failure. For example, we clearly cannot tolerate a single failure event at a nuclear power plant throughout its entire service life. Therefore, a nuclear power plant is not considered safe if it can fail even once in its lifetime. On the other hand, if the failure of a certain facility has minimal impact on people and the environment, we do consider it to be generally safe even if it could experience a low number of failures throughout its lifetime.

The Aliso Canyon facility stores upwards of 85 billion cubic feet (Bcf) of methane gas in an underground “cavern” under our homes. To put this number in perspective, this is equivalent to covering the entire City of San Francisco with gas that is about seven stories high. The idea that this amount of gas, along with all the irritant chemical additives that are mixed with it, are in a pressurized reservoir under our homes, schools, and streets is highly unnerving. The failure of such a facility, which we have now experienced once, is of tremendous consequences to both public health and the environment. Therefore, the tolerance for its failure should be nonexistent. The fact that the facility already failed once and caused what may be the greatest environmental damage in the history of the State of California, and the fact that there is no change in the configuration of the wells and their connectivity into the gas cavern indicates to us that it is only a matter of time until another well fails and results in the same catastrophic damage. This should not be acceptable to anyone. Adding to our concern about the safety of the facility is the fact that SoCalGas, with all its technical resources and the support of two of the largest engineering firms in the country, could not figure out how to control the gas once it began to escape. It was only after drilling a completely separate relief well that they were able to plug the bottom of the failed well. Unfortunately, it took four months for them to do that, and the release of an unimaginable amount of gas and chemicals into the air we breathe. Finally, we are keenly aware of the fact that the facility sits on top of the Santa Susana fault zone and is surrounded by other seismic fault lines including the Northridge Hills fault, the Mission Hills fault, and the Chatsworth fault.<sup>1</sup> Any significant seismic activity at these fault lines can

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<sup>1</sup> <http://scedc.caltech.edu/significant/index.html>

cause another Well failure, if not multiple Well failures, and the stored gas will be uncontrollably released into the community yet again. The community cannot afford another blowout like this, and that is why we firmly believe that this facility is NOT safe to operate.

***Statement 2 – “The gas blowout caused no adverse health impacts”.*** We disagree with this statement. In fact, SoCalGas has not been forthcoming about the list of chemicals that are added to the gas or those used at the facility. There are also unknown chemicals left in the underground formation from the time it was filled with oil. How can we know the health impacts of the chemical exposure, when we do not know to what chemicals we were exposed? What we do know is that thousands of residents experienced health problems that caused them to flee their homes for four months. The symptoms included severe headaches, migraines, nosebleeds, fatigue, rashes, blurry vision, hair loss, upper respiratory problems (e.g., sore throat, coughing, and enflamed sinuses), and a number of gastrointestinal problems including nausea, vomiting, diarrhea, and intestinal pain. The general answer we always received from the County Department of Public Health and SoCalGas is that methane is not toxic, and that the odorants added to gas, i.e. mercaptans, are only short-term irritants that have “no long term health effects”. Nonetheless, there was clear evidence of the presence of benzene in the gas, and benzene is a known carcinogen. What is the public health effect of continuous exposure to mercaptans and benzene for four months, especially on sensitive subpopulations, such as infants and the elderly? No one knows the answer to this question, and SoCalGas is refusing to fund the health study that they agreed to under the AQMD abatement order. In our opinion, the lack of evidence of an effect, is not an evidence of no effect. Without a clear evidence that there was no health effect caused by this exposure, no one can claim that it had no effect. The only correct answer we have right now is that “we don’t know what the effect was and will be.”

It is also important to note that, while the gas release from the damaged well has been stopped, some residents continue to experience sporadic adverse health symptoms. This is a puzzling fact to us and to others. *How can people be experiencing symptoms when there is no measurable gas release? And how is it that only a small number of people are experiencing these symptoms, and not others?*

On the question of why people continue to experience symptoms after the well has been plugged, we should not forget that our homes, schools, parks, and roads were blanketed with a cloud of chemicals for four months. What chemical residue was left behind is anyone’s guess. The County Health Department ordered SoCalGas to clean ALL homes in the affected area to remove trace levels of metals that were detected in impacted homes. SoCalGas implemented the cleaning program in homes of residents who were relocated at the time of the order, but then refused to clean any other homes. This left the vast majority of homes in Porter Ranch and the surrounding community, with whatever residue was deposited in them. SoCalGas also refused to clean any business in the community. The

effect that this residue has –and will continue to have– on residents, especially children, will never be known. Could this residue be the cause of the symptoms? We will never know.

On the question of why only a subset of the population have reported symptoms, we should recognize that the physiological sensitivity and response of individuals to chemical exposure varies greatly in a manner that the medical field cannot yet explain. A perfect example is peanut allergy: Why are some children highly allergic to peanuts, while the majority is not? We don't know the answer to this question, and the same applies to sensitivities to chemical exposure. In every population, there is a sensitive subpopulation that reacts more adversely to chemical exposure than the majority of the population. However, just because this is a small portion of the population, it does not mean that their health concerns should be dismissed. To put it bluntly: *The comfort of the majority does not justify accepting the suffering of the minority.* The community did ask the County Health Department to commission a clinical study of those individuals who continue to report symptoms in order to understand –and hopefully alleviate– what they are going through. Unfortunately, the Health Department rejected our request.

In the final analysis, what we know with absolute certainty is that our homes and our children were blanketed with a cloud of chemicals for four months, and the long-term effect of that exposure will never be known. This is a fact we have to live with. However, we are not willing to continue exposing our children to the risks posed by this facility, and yet we continue to have to do so since there has been two significant reportable releases from the facility since the well was certified to be capped.

***Statement 3 – “The Aliso Canyon facility is a critical component of the energy delivery system in Southern California”.*** Based on the thorough joint analysis of the California Independent System Operator (CAISO), the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), and the Los Angeles Department of Water & Power (LADWP), we disagree with this statement. We have thoroughly reviewed the report titled: “*Aliso Canyon Winter Risk Assessment Technical Report*”, dated August 23, 2016, which was prepared by the CPUC, CEC, CAISO, LADWP, and SoCalGas, and the report titled: “*Aliso Canyon Gas and Electric Reliability Winter Action Plan*”, dated August 22, 2016, which was prepared by CPUC, CEC, CAISO, and LADWP, and analyzed their contents.

Without getting into too much detail, it is clear that, while Aliso Canyon provided added flexibility to the overall system operation, the mitigation measures put in place during the summer months and those planned for the coming winter months allow for an uninterrupted supply of gas and power to all users without the need for Aliso Canyon. What it will take is for everyone, including SoCalGas, to pay closer attention to balancing supply and demand, which was done very successfully during this past summer. Even under the conditions encountered on the coldest day experienced over the last 10 years, the projected imbalance between supply and demand is calculated to be only 5%, which is well within the calculation error. This value is approximately 260 million cubic feet (MMcf). Even if this

condition were to be encountered this winter, SoCalGas still has the option to withdraw that amount from the 15,000 MMcf it left in Aliso Canyon as a last resort.

Finally, it is also noted that, with the initiatives undertaken by the State of California and the City of Los Angeles to reduce our reliance on fossil fuel and increase renewable energy supplies, the need for the Aliso Canyon facility is gradually diminishing.

In summary, we have reached the conclusion that the Aliso Canyon facility is not a safe facility to operate when considering the dire consequences of its failure, that the potential adverse health effects of the exposure to the gas and its contents are too great to be ignored especially when it comes to the health of our children, and that while the facility has been an integral part of the gas delivery system, it is not a critical component of the system in that the gas demand can be met without it.

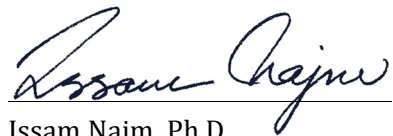
***Therefore, we, the people of Porter Ranch, in order to preserve our quality of life, and protect our health and the health of our children, ask for your assistance, and the assistance of all state and local government agencies, to secure the permanent shutdown of the Aliso Canyon gas storage and processing facility.***

We recognize that this process will take some time as the gas delivery system transitions to a new mode of operation, but we are confident that if there is a *will* to achieve this goal, there will be a clear way to get there. The question is whether that *will* exists... We hope it does.

We hope we can rely on your support, and we look forward to working with your staff on this matter.

Respectfully Yours,

Porter Ranch Neighborhood Council



Issam Najm, Ph.D.  
President

cc: Dianne Feinstein, United States Senator  
Barbara Boxer, United States Senator  
Steve Knight, United States Representative, CA-25  
Brad Sherman, United States Representative, CA-30  
Fran Pavley, California State Senator, Senate District 27  
Scott Wilk, California Assembly Member; 38<sup>th</sup> District  
Mike Gatto, California Assembly Member, 43<sup>rd</sup> District  
Michael Antonovich, Supervisor, Los Angeles County Board of Supervisors, 5<sup>th</sup> District

## Porter Ranch Neighborhood Council

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Mitchell Englander, Councilmember, Los Angeles City Council, District 12  
Eric Garcetti, Mayor, City of Los Angeles  
Jessica Brown, Los Angeles City Attorney's Office  
David Bunn, Director, California Department of Conservation  
Timothy Sullivan, Executive Director, California Public Utilities Commission  
Robert Weisenmiller, Chair, California Energy Commission  
Stephen Berberich, President and CEO, California Independent System Operator  
Hearing Board Members, South Coast Air Quality Management District  
Granada Hills North Neighborhood Council  
Granada Hills South Neighborhood Council  
Northridge East Neighborhood Council  
Northridge West Neighborhood Council  
Northridge South Neighborhood Council  
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