Table of Contents for General Public Comments and Responses

Code	Organization	Page #	
		Comment Letter	Responses
AND	Andreasen, David	4-1	4-2
APT	Applebaum, Ted	4-3	4-4
BAP	Baczuk, Pamela	4-5	4-7
BAE	Baker, Erik	4-9	4-10
BAJ	Barandiaran, Javiera	4-11	4-12
BAS	Bartz, Susan	4-13	4-14
BET	Becker, Tom	4-15	4-18
BEA	Berenstein, Angela	4-20	4-22
BEB	Berry, Bryanna	4-23	4-24
BIR	Birney, Robin	4-25	4-26
BLV	Blum, Vicky	4-27	4-28
BOM	Bower, Melissa	4-29	4-30
BRK	Brill, Karen	4-31	4-32
BRS	Broberg, Sharon	4-33	4-34
BRB	Brown, Brad	4-37	4-38
CHC	Chanev, Carolyn	4-39	4-40
CHS	Chess, Susanne	4-41	4-43
COK	Cook, Kevin	4-44	4-46
CRL	Crane, Linda	4-47	4-48
DAM	Davis, Margot	4-49	4-50
DEC	DeVries, Chris	4-51	4-52
DOK	Dorfman, Karen	4-53	4-54
DOJ	Douglas, John	4-57	4-59
DRL	Draucker, Louise	4-60	4-62
EAM	Earls, Maureen	4-64	4-66
ENE	Engel, Emily	4-69	4-70
FOM	Foster, Matthew	4-71	4-72
GES	Gerson, Sage	4-73	4-74
GIV	Girard, Valerie	4-78	4-79
GOK	Gorman, Kayla	4-82	4-83
GRC	Green, Cathy	4-84	4-85
HAL	Handelman, Lad	4-88	4-91
HAG	Handler, George	4-92	4-93
HEL	Heller, Lee	4-94	4-95
HIH	Hill, Harold	4-96	4-97
HVE	Hvolboll, Eric	4-98	4-103

Code	Organization	Page #	
		Comment Letter	Responses
JOM	Jones, Melanja	4-106	4-107
KIB	Kieler, Berna	4-110	4-111
KIG	Kilfoyle, Gwendolyn	4-114	4-115
LAA	Lagerquist, Amy	4-118	4-119
LEB	Leonard, Brendan	4-123	4-124
LIK	Libis, Kyle	4-128	4-129
LUJ	Lumley, Julie	4-130	4-131
MAK	Maloney, Kelsey	4-134	4-135
MAP	Marchus, Priscilla	4-136	4-137
MAR	Marge	4-138	4-139
MIL	Mindell, Loren	4-140	4-141
MOR	Moon, Randell	4-142	4-143
MUK	Mullen, Kesh	4-144	4-145
OSC	Osborn, Cecelia	4-148	4-149
PAR	Parkinson, Roberta	4-152	4-153
PAT	Partridge, Tristan	4-154	4-156
PAS	Patchen, Sara	4-161	4-162
PAJ	Patterson, Jeff	4-163	4-164
PHD	Phillips, David	4-165	4-167
PHR	Phillips, Rebecca	4-168	4-169
RER	Reed, Roy	4-170	4-172
ROA	Robertson, Antonia	4-173	4-174
ROC	Roe, Carol	4-175	4-176
ROD	Rowell, David	4-177	4-178
SAE	Sayers, Ethan	4-179	4-180
SCB	Schaal, Bill	4-181	4-182
SHS	Shields, Susan	4-183	4-184
SMK	Smith, Kevin	4-185	4-186
STM	Steinfeld, Michael	4-187	4-188
SUP	Surmeier, Patrice	4-189	4-190
TEC	Terry, Carol	4-191	4-192
THC	Thompson, Carole	4-193	4-194
VDR	Van Der Raay, Brigitta	4-195	4-198
VED	Velazquz, David	4-201	4-202
WAB	Watts, Barbara	4-203	4-204
WED	Webb, Don and Sally	4-205	4-206

Table of Contents for General Public Comments and Responses

Code	Organization	Page #	
		Comment Letter	Responses
WEL	Weinstock, Lesley	4-209	4-210
WIJ	Willson, John	4-213	4-231
WOB	Woodbridge, Bill	4-232	4-233
ZAG	Zant, Grady	4-234	4-235

---------- Forwarded message ----------
From: "**David Andreasen**" <david@cacriminalappeal.com>
Date: Fri, May 24, 2019 at 10:56 AM -0500
Subject: opposition to Exxon proposal to truck oil
To: "Villalobos, David" <dvillalo@co.santa-barbara.ca.us>

I am a lifelong Santa Barbara County resident and am writing to voice my opposition to Exxon's proposal to truck oil from its offshore platform. Allowing Exxon to truck oil makes no sense since a pipeline will be available in the future. There is a finite number of oil to be extracted through that platform, so there is no good reason to extract it now rather than wait and extract it when it can be moved via a pipeline. Exxon will still get its oil, the county will still get its tax revenue, oil workers will still get their jobs. The only difference is that all of this will happen a few years from now and the oil will be moved through a much safer and less impactful method than trucking. AND-1

Thanks you for considering my view.

--
David Andreasen
Attorney at Law
P.O Box 30520
Santa Barbara, CA 93130-0520
Phone: (805) 252-1786
www.CAcriminalappeal.com

Comment Code	Response
AND-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Ted Applebaum <ted.applebaum@gmail.com>
Sent: Friday, May 03, 2019 2:20 PM
To: Villalobos, David <dvillalo@co.santa-barbara.ca.us>
Cc: 350santabarbara@gmail.com; center@biologicaldiversity.org; lkrop@environmentaldefensecenter.org; audubon@rain.org
Subject: RE Planning Meeting May 6 on ExxonMobil Transporting Oil by Truck

ExxonMobil's proposal to truck oil through Santa Barbara County raises serious concerns both for public safety and for the safety of our evironment.
The Central and Southern California coastal region is a particularly sensitive area of biological and scenic diversity, which has already seen multiple large releases of oil into the environment from on- and off-shore drilling, as well as from pipeline failures. Yet those activities are relatively easy to secure and monitor, compared to the prospect of crude oil tankers traveling on our roads and highways. Statistics from the National Highway Traffic Safety Administration show that traffic crashes are a daily occurrence in Santa Barbara County and remain a primary public safety issue. The involvement of oil tankers in traffic accidents is a matter of "when" and not "if". The timing and frequency of such accidents are sensitive to the number trips permitted, and the degree of care devoted to training and monitoring drivers, and to maintaining their equipment. APT-1

The public would best be served by denying permission to transport crude oil on our roads and highways. However, if such permission is granted, it is imperative that the responsible parties, such as the oil company, be legally required to act immediately to remediate the effects of any accident, and to pay substantial penalties at a high enough level to command the attention of the executive decision-makers at these organizations. APT-2

We have seen how, as with Plains Oil Company, the interests of the oil company and the interests of county residents diverge greatly. Let's ensure that any agreement include provisions to focus the company's attention on preventing, forestalling and adequately responding to the inevitability of accidents. APT-3

Comment Code	Response
APT-1	The SEIR evaluates the public safety risks associated with transporting crude oil (See Section 4.3, Hazardous Material and Risk of Upset), and determined that a truck accident from the proposed Project is possible. This comment does not address an issue associated with the adequacy of the SEIR, but rather discusses that truck accidents are likely to happen. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project, and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
APT-2	This comment does not address an issue associated with the adequacy of the SEIR, but rather requests the Project be denied. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
APT-3	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

To the Santa Barbara County Board of Supervisors and Members of the Planning Commission:

Thank you for the extensive work you are undertaking for this important decision.

When I moved to New Cuyama in January of 2014 from Los Angeles, I was warned about dangers of traveling on the 166. The advice from locals was" travel at the speed limits, watch for oncoming cars making dangerous passes."
I wondered how it could be more dangerous than the L.A freeways. I soon realized the two-lane highway presented as many, if not more dangers of serious accidents. There are no passing lanes west of the Route 33 Intersection and only two East to Highway 5. There are no marked turnouts. A limited CHP presence is tasked with patrolling the entire highway in Santa Barbara County. A heavily loaded commercial truck can slow a line of vehicles, inciting some drivers to pass the entire line, even in marked double yellow lines with little visibility, therefore risking major collisions. This scenario has greatly increased since the May 2015 Refugio Oil pipeline break and spill. We now see and hear oil tanker trucks day and night, often trailing a line of cars. The oil tankers have contributed to accidents, some serious, some fatal. BAP-1

In 2016 I began traveling for business to the Central Coast and to Los Angeles. Because of the dangerous conditions, I have limited my business travel. The probability of becoming involved in a serious accident due to the dangers of the current increased oil truck traffic has therefore impacted my business. I can only imagine what dangers 70 more trucks each way would mean for commuters, business and personal travel for residents.

When the 101 and Route 33 were closed during and after the disastrous Thomas Fire and subsequent mudslides, the traffic was greatly increased and Highway 166 was even more heavily impacted.. Accidents were more frequent.

Exxon Mobil does not have an exemplary safety record. There are 8 major international waterway oil spill incidents listed from 1973 through 2013. Countless Google image photos reveal oil tanker truck accidents and spills on the highways throughout the U.S. BAP-2

An overturned tanker has the potential of leaking oil or diesel fuel onto the highway(one such accident occurred on 166 in 2016.) A fire started from such a leak would be an environmental disaster to any surrounding farms, ranches, and natural habitat and of course, the people on the highway and living near the fire. BAP-3
During the school year, school buses travel twice a day in both directions transporting children from the Cuyama elementary and high schools. These children and the drivers will be further put at risk. Seasonal agricultural field workers use the route to travel to and from the major farmlands. This is not a major highway. BAP-4

Schools and organic farmlands border the road. Increase in the greenhouse gas emissions from 70 extra oil trucks making 2 trips a day, and resulting slower traffic movement will certainly impact the air quality in the valley. Children and the elderly are the most vulnerable. The towns of New Cuyama and Cuyama are populated with many children, families, and elderly residents. BAP-5

Heavily loaded tanker trucks should not be traveling on winding mountain two lane highways that are the only thoroughfare for residents in rural areas.

I strongly urge the County to oppose the Exxon Mobil proposal. In addition, I would highly recommend that Santa Barbara County conduct their own unbiased, independent EIR .

Thank you for the opportunity and consideration of my comments.

Pamela Baczuk
Resident of New Cuyama

Comment Code	Response
BAP-1	The Project's potential impacts to State Route 166 are described in Table 4.5-16, which shows that the addition of Project traffic would not result in a significant impact. The analysis reports the percent time spent following on State Route 166, consistent with guidance in the Highway Capacity Manual, 6th Edition for this roadway type. The SEIR's collision analysis included all reported collisions along State Route 166 and concluded that the collision rate along State Route 166 was not statistically significant. As discussed in the Traffic and Circulation Study (See Appendix D.1), the rate of accidents on State Route 166 between the U.S. Highway 101 interchange and the State Route 33 South Junction is slightly higher than the California statewide average for similar facilities (accident rate=0.82; statewide average rate=0.70). The Caltrans significance test shows that the number of accidents required to be statistically significant is 175 accidents within the three year period and the number that occurred was 167 accidents. Therefore, based upon the Caltrans criteria, the slightly higher baseline accident rate is not considered statistically significant. The expected number of additional accidents for 86 round trips per day for the cumulative oil trucks has been estimated at 4.57 accidents over a three year period based upon the project specific accident rates provided in Appendix C.1. This increase in accidents would still be below the statistically significant baseline threshold of 175 accidents over a three year period. Also, the proposed Project would have a limited duration of no more than seven years. Therefore, cumulative oil truck accidents along State Route 166 would be less than significant. Also, as discussed in the SEIR, it is likely that most of the proposed Project oil trucks will go to the SMPS, which would reduce the baseline trucks that are currently traveling from the east to the SMPS via State Route 166. This would serve to reduce overall oil truck traffic along State Route 166. As discussed in the Land Use Section (Section 4.4), trucking impacts along State Route 166 from the proposed Project impacts can be reduced by requiring the use of the Trucking to the SMPS Only Alternative. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BAP-2	As discussed in Section 4.3.1.2, *Risk of Upset for SYU Operations*, between May 2010 and May 2015 there were a total of 10 reportable spills from the offshore portion of the SYU project. These are listed in Table 4.3-1. The total volume of oil spilled from these reportable releases was approximately 0.0015 barrels (0.063 gallons). One of the releases was a chemical spill with an approximate volume of 0.0001 barrels (0.0042 gallons). There were no reportable spills at LFC between May 2010 and May 2015. A risk analysis was conducted to address the probability of truck accidents along the proposed trucking routes. This analysis is detailed in Appendix C.1 of the SEIR.
BAP-3	The impacts associate with fires from a truck oil spill are discussed on Section 4.3.5 of the SEIR (*Hazardous Materials and Risk of Upset*). This comment does not address an issue associated with the adequacy of the SEIR, but rather raises a concern about oil spills and

Comment Code	Response
	resultant fires. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BAP-4	See Response to Comment BAP-1.
BAP-5	Trucking emissions and potential health risk impacts are discussed and analyzed in Section 4.1 of the SEIR. Truck emissions have been reduced substantially with regulations promulgated in California over the last few years. The Applicant is proposing the use of the recent model year trucks (2017), which will maintain air quality impacts to a minimum utilizing the most recent technology. Impacts from truck emissions are estimated to be well below the thresholds for diesel particulate matter and cancer-causing pollutants. Based on the CARB EMFAC2017 model for emissions from on-road vehicles, the Applicant-proposed trucks would be 5 times cleaner than the average truck on the roadway. Impacts are determined to be less than significant for trucking DPM emissions on nearby residences.

From: Erik Baker <ebaker@aegion.com>
Sent: Monday, May 20, 2019 10:59 AM
To: Lehr, Kathryn
Cc: Villalobos, David; jparke@aklaw.net
Subject: Temporary Trucking Permit - Supplemental DEIR Comments

Good Morning -

Thank you to county staff for your work on the draft SEIR. There are many good points in this document that reflect the attention to detail county staff made in drafting this environmental report.

We at Brinderson have worked with ExxonMobil for many years and are very confident that the SYU Facility staff will be as diligent in their commitment to environmental and safety standards as they have always been. I wanted to reiterate the county staff's determination that there is no significant risk to public safety under this project. A reasonable alternative to mitigate risks has been put forward in the rainy-day alternative, and we commend and support the county's dedication to public safety and adhering to California's strict environmental regulations.

The safety and security of ExxonMobil's employees and contractors has always been a top priority at the SYU facility. The draft SEIR includes lists of mitigations and safety measure that the SYU Facility will do to reduce the risk of an incident that will be adhered to with the upmost diligence by all. BAE-1

In 2016, ExxonMobil demonstrated their ability to transport crude oil safely and properly without a single incident or spill. The SYU facility, employees, and contractors are known for their dedication and commitment to safety preparedness. I personally would love to see my family, friends, and colleagues come back home and their families flourish again while working in such a safe and caring facility.

Again, I would like to thank you for all the hard work on this thorough and complete SEIR and for considering to allow us to put people back to work and invest in the local community.

Sincerely,

Erik Baker | General Manager – Southern Operations | Brinderson
6851D McDivitt Dr. | Bakersfield, Ca 93313
Office: 661.243.8830 | **Mobile: 661.802.8286** | **www.Aegion.com**
ebaker@aegion.com

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Comment Code	Response
BAE-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Javiera Barandiaran <javiera.barandiaran@gmail.com>
Sent: Monday, June 3, 2019 3:28 PM
To: Lehr, Kathryn
Subject: Public comment for ExxonMobile Truck Traffic application

Dear Kathryn,

I am submitting this email as part of the public hearing on the ExxonMobil Interim Trucking permit.

I ask that staff recommend denial of the project to the Planning Commission in light of its Class I and Class II impacts. The EIR provides some alarming figures: a total of 245 trucks on a relatively small stretch of our roads if this project is approved along with ERG, Aera, and PetroRock. Add to this the truck traffic Plains hopes to contribute in its efforts to rebuild its broken pipeline. I simply cannot imagine how our roads would absorb this traffic increase and not see a reduction in their quality, from the A and B range the EIR claims they have now to C or D. I do not see the evidence in the EIR that this increase is simply absorbed as if nothing had happened; indeed, the mitigation gestures proposed suggest that all this truck traffic will be extremely significant. No trucks during school bus hours. No trucks during afternoon peak traffic. These are polite measures. It means there will be even more truck traffic during the other hours of the day and that the impacts are indeed significant: if these trucks are a risk to children surely they are a risk to all of us. BAJ-1

The first Class I impact is an accident in which hazardous materials are spilled. Once in 86 years or once in 30 years - as the EIR estimates - might seem fine at first site. But then you realize this is just the increased risk from this one project, not from the total of 245+ oil trucks. And I wonder: did these risk calculations take into account increases in unsafe conditions from road construction? Did the assessment of the ecological effects of more spills take into account the assessments of all the additional spills planed under ERG, Aera, and PetroRock's projects? Under the new pipeline projects? BAJ-2

All this next to Refugio State Beach, which would see eight additional oil trucks per hour pass by its gates. I really wonder, Would it not be more honest to shut this beleaguered beach down? How many spills, how bad must the air and water quality there be, for this to no longer be considered a space for recreation? Is Refugio there for families and beach goers, or for the oil industry to have a dumping ground? BAJ-3

The City of Santa Maria once again is projected to suffer the worst impacts: the most new traffic, the most air pollution. BAJ-4

All this for a pittance of oil: the EIR shows that these platforms are producing dwindling amounts of oil (table 4-1). Why take such risks with our health and environment for so little? Why burn so much diesel moving oil around for the extraction of less than 30k barrels a day? The perverse business model of this moribund industry reveals itself in these numbers. The oil industry is its own own biggest customer, while the rest of us pay the costs with our health, our environment and now planetary livability. BAJ-5

We have every reason to reject this project and make room for projects with a future.

Best,
Javiera Barandiaran

Comment Code	Response
BAJ-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BAJ-2	The cumulative risk analysis presented in Section 4.3.5 addressed the cumulative risk of spills from the various proposed projects listed in the comment. The Aera and PetroRock Projects have been removed from the cumulative analysis since their respective application have been withdrawn. Table 3-2 includes other North County oil projects trucks that were included in the cumulative analysis. The probability of an accident associated with the crude trucks is based upon route specific historical accident data that that would include accidents that occurred during road construction. Section 4.3.5 discusses the cumulative spill impacts from the projects listed in the comment. Regarding the Plains Replacement Pipeline Project, trucking would not be occurring once the pipeline became available; therefore, so spill risks from the pipeline was not included in the cumulative impact analysis. Construction of the Plains Replacement Pipeline Project was included in the cumulative analysis.
BAJ-3	Section 4.5.5, *Transportation and Circulation* discusses the impact of the additional truck traffic on the roads and intersections in the vicinity of Refugio State Beach Park. The project would generate an additional six trucks per hour along the roads in the vicinity of the park. Vehicle, pedestrian, and bicycle counts were conducted during the peak 4th of July weekend to determine what would be considered the peak volume of traffic on these local roadways and intersections. This data was used to assess the impacts of the additional traffic from the proposed Project.
BAJ-4	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BAJ-5	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: jbartz4@everyactioncustom.com on behalf of Susan Bartz <jbartz4@everyactioncustom.com>
Sent: Monday, May 6, 2019 1:39 PM
To: Lehr, Kathryn
Subject: Reject Exxon's Application to Truck Dangerous Oil

Dear Kathryn Lehr,

Please don't let big money and promises of same skew your thinking! It is imperative to deny ExxonMobil's trucking permit application 17RVP-00000-00081. Trucking oil is inherently dangerous and poses unacceptable risks to our highways and coastline. We've already seen how bad this can be.

Allowing oil trucks to serve three decrepit offshore drilling platforms 24 hours a day is a recipe for environmental disaster.

Denying Exxon's permit is consistent with California's emergence as a champion against the Trump administration's plan to expand oil development off the California coast.

BAS-1

May I suggest an alternative? It would be much, much better to encourage Exxon to use their legal clout and money to develop SUSTAINABLE SOLAR AND WIND energy. These power sources are free and CLEAN, and they'll last as long as the earth rotates. Exxon could lead the way for other companies involved with oil and gas to move forward into the future, not get stuck (like gooey crude) in the past.

It would take some courage; do you have any??? The rest of the nation is watching. Let's show them how to harness the sun and wind by focusing on the wellbeing of not only humankind but of the whole planet.

Enough of corporate greed and its throwback policy of old, inadequate technology. I urge you to protect our coastal community, marine ecosystems and climate by rejecting this permit.

Sincerely,
Susan Bartz
Santa Barbara, CA 93109
jbartz4@cox.net

Comment Code	Response
BAS-1	The SEIR looked at renewable energy alternatives and found that they did not meet the objectives of the proposed Project. It is not clear that a solar or wind facility is a feasible alternative since neither could be accomplished in a reasonable period of time (i.e. a solar or wind facility would likely take more than seven years to design, permit, and construct). In addition, it is speculative to assume that the Applicant could reasonably acquire control or otherwise have access to alternative sites in the County that would be suitable and of sufficient size (approximately 6,650 acres as discussed in Section 2.7.2.4 of the SEIR) for wind or solar installations. The remainder of the comment does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

5/27/19

To: SB County Planning and Development

From: Tom Becker

Subject: Public comment, Exxon Interim Trucking Project draft SEIR.

1) County P&D is required by CEQA to act in good faith as the lead agency for the Exxon Interim Trucking Project SEIR ("the SEIR"). BET-1
2) County P&D is required to respond fully, accurately and truthfully to questions and comments submitted by the public that address project alternatives and/or address the adequacy and scope of the SEIR. BET-2
3) County P&D has violated CEQA by deliberately refusing to respond to public comments that were submitted during the scoping period that address project alternatives and/or the adequacy and scope of the SEIR. BET-3
4) County P&D has violated CEQA by intentionally refusing to provide the public with information that the county has in its possession and the public needs to properly prepare comments on the draft SEIR. BET-4
5) County government has intentionally damaged the public's ability to participate in this SEIR process and other environmental documents, in violation of CEQA. BET-5
6) County government has officially established a position that the county government opposes onshore and offshore oil development.
7) County government has officially established a position that the elimination of oil and gas facilities within the county or offshore of the county will be carried out by all departments of the county government, and all actions taken by county government departments concerning oil and gas production will have as their objective the elimination of oil and gas facilities. BET-6
8) The actions of County P&D as lead agency of the SEIR appears to indicate that P&D intends to manipulate the SEIR process to inflict maximum damage to oil and gas processing and production facilities. This is a gross violation of the SEIR process and CEQA.
9) As part of the SEIR scoping process, I submitted an alternative for the project. My alternative called for repairing the existing Line 901/903 Pipeline. It is my belief that repairing the pipeline will be much shorter in duration that replacing the pipeline. This alternative will reduce both the time and impact of the trucking plan. P&D staff deliberately refused to consider my alternative, in violation of CEQA.
10) I have researched the condition of the existing Plains Line 901/903 pipeline. I have been given access to information that was not made available to the general public. The existing pipeline is fully repairable, and Plains was given permission by PHMSA to repair the pipeline in 2016. There are several areas of the pipeline that PHMSA has indicated as possible defects. I have been given the locations of several of those possible defects. PHMSA requires those locations be excavated and examined externally, and repaired as necessary, if Plains wishes to place the existing pipeline back in service. It has been estimated that the examination of and repairs to the existing pipeline would take about 1/3 the time of replacing the pipeline. BET-7

11) During my investigation of the Plains 901/903 pipeline, I was informed that county staff, specifically P&D, refused to accept documents from PHMSA concerning the condition of the existing pipeline before and after the rupture. PHMSA was informed by county government that the county government would not accept documents from PHMSA because the county did not want to be required to make those documents available to the public. This decision by the county appears to be a possible attempt to develop "plausible deniability" on the part of the county to protect the county's interest and positions in environmental documents and court cases. BET-8

12) It is my position that the Plains 901/903 pipeline should be kept at its present 300,000 BPD capacity, or expanded up to 500,000 BPD. This would allow the pipeline to transport future oil production from the OCS, or allow oil produced in Alaska to be transported through the pipeline via marine terminals located in the OCS offshore of Santa Barbara County. BET-9

13) County P&D has confirmed, in an email response, that transporting Alaskan oil via offshore terminals connected to the current Line 901/903 is an environmentally superior alternative to the current practice of Alaskan oil tankers continuing on past Santa Barbara County, near the Channel Islands, and into the Port of Los Angeles/Long Beach, which is in the SCAQMD. BET-10

14) County P&D has confirmed that repairing the existing pipeline would not require any "discretionary approvals", eliminating the requirement for an EIR for the pipeline replacement. That fact alone would reduce the time required to return the pipeline to service by over a year. That in and of itself would eliminate 4,380 truck trips. BET-11

15) At an open house hosted by ExxonMobil and Plains on January 31, both the ExxonMobil representative, Tobe, and the Plains representative Steve Greig stated that the pipeline reduction was requested by ExxonMobil for the purpose of reducing ExxonMobil's transportation cost. Steve Greig went further, and stated that Plains would be more than happy to repair the existing pipeline, keeping the existing 300,000 BPD capacity, if they had another customer to put oil in the pipeline. Mr. Greig stated that repairing the existing pipeline would be far faster and cheaper than installing a new pipeline. BET-12

16) County P&D staff has refused to respond to questions asking if any past or present employee of the county government proposed, discussed or considered reducing the pipeline capacity as a way of preventing the pipeline from being used to transport future new oil production. P&D staff also refused to answer questions concerning county government's discussions with Plains concerning the pipeline reduction, and if county government threatened Plains or put pressure on Plains to reduce the pipeline diameter.

17) County staff has confirmed that they have never contacted BOEM, BLM or any other federal agency or entity to obtain the federal government's position about reducing the pipeline diameter, preventing the pipeline from being available to transport future new oil produced from federal lands. BET-13

18) In a letter sent to BOEM on March 18, 2018, P&D stated that county government would be submitting environmental documents producing during environmental reviews of oil and gas projects as scientific responses to the proposed new BOEM 5-year leasing plan. That would include this SEIR and the EIR for the pipeline replacement project. Because of the county's gross violation of CEQA during this SEIR, which includes deliberate refusal to answer questions,

deliberate refusal to consider alternatives submitted by the public, deliberate refusal to provide requested information and county government's deliberate actions to damage the oil and gas industry during environmental reviews, the county government has demonstrated a shocking lack of good faith, which should be taken into account by BOEM and any court of law. BET-13 (con't)

19) I consider all emails sent and received between me and P&D concerning the ExxonMobil Interim Trucking plan as attached to and submitted as part of this public comment. That would include all questions posed to staff, comment made, positions taken and responses received. BET-14

Thank you,

Tom Becker

Buellton, CA

lesdeplorable7@gmail.com

Comment Code	Response
BET-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BET-2	The County has made a good faith effort to accurately and truthfully respond to comments that relate to the scope and adequacy of the SEIR.
BET-3	The County complied with all the requirements of CEQA Guidelines §15082 covering the Notice of Preparation (NOP) and scoping meetings. The County prepared a final scoping report that detailed the comments received during the scoping process which is included as Appendix A of the SEIR. The comments received during the scoping process were used to guide the overall scope of the SEIR including the discussion of alternatives.
BET-4	All Project application documents are available to the public, and the County has responded to all public records requests in accordance with the California Public Records Act Govt. Code 6250-6276.48.
BET-5	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BET-6	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BET-7	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BET-8	This comment does not address an issue associated with the adequacy of the SEIR. Actions regarding the Plains Pipeline are not part of the proposed Project. The Plains Replacement Pipeline Project is being considered under a separate project.
BET-9	This comment does not address an issue associated with the adequacy of the SEIR. Actions regarding the Plains Pipeline are not part of the proposed Project. The Plains Replacement Pipeline Project is being considered under a separate project.
BET-10	The Plains 901/903 pipeline is not germane to the adequacy of the ExxonMobil Interim Trucking Project SEIR and is a separate issue to be considered under a separate project.

Comment Code	Response
BET-11	The Plains 901/903 pipeline is not germane to the adequacy of the ExxonMobil Interim Trucking Project SEIR and is a separate issue to be considered under a separate project.
BET-12	The Plains 901/903 pipeline is not germane to the adequacy of the ExxonMobil Interim Trucking Project SEIR and is a separate issue to be considered under a separate project.
BET-13	It is not in the purview of the County to influence the design or capacity of the Plains 901/903 pipeline, which is being considered under a separate project. This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BET-14	The commenter's letter dated 5/27/19 did not include additional emails as an attachment to the letter as stated. All communications received by the County outside of the public comment period are not required to be responded to and are therefore not included in the response to comments.

From: Angela Berenstein <angela.berenstein@gmail.com>
Sent: Wednesday, May 15, 2019 11:22 AM
To: Lehr, Kathryn
Subject: Exxon Oil comment--hope to be considered

Good morning, Kathryn,

Please do not allow Exxon to resume production on their platforms.

Please do not allow hazardous oil-filled trucks or trains to pass through Santa Barbara. Train cars have been known to explode with such hazardous materials, and I live close to the Santa Barbara train station. Most companies have not upgraded their train cars to help prevent explosions.

As you are probably aware, Earth Day began here in Santa Barbara after a major Exxon spill. Exxon has historically been negligent when it comes to taking care of our environment. Also, remember how the recent oil spill contaminated Refugio beach? We don't want that to happen again. BEA-1

Finally, our planet cannot handle burning fossil fuels any more. Climate change is a real problem and we are the last generation to be able to do anything about it before our children suffer. People are already suffering from the effects of climate change, which has definitely been caused by fossil fuels.

The state of California has set ambitious goals to eliminate fossil fuels by 2040. Allowing Exxon to resume production is counter to these overarching goals.

We should be focusing our efforts (and ways of acquiring revenue) by using sustainable energy.

BEA-1 (con't)

Thank you for taking time out of your busy schedule to consider my thoughts on this.

With gratitude,
Mama Angela Berenstein & Professor David Berenstein
Santa Barbara, CA

Comment Code	Response
BEA-1	The proposed Project would not use any train cars for transporting crude oil. The crude oil would be transported via tanker truck along existing roadways. None of the proposed routes that the trucks would use would go through or near the City of Santa Barbara. The remainder of the comment does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: bryanna berry <bryanna_berry@hotmail.com>
Sent: Friday, May 31, 2019 2:30 PM
To: Lehr, Kathryn
Subject: Speaking up for local health and safety, climate and environment

I'm writing to express my deep concern for the earth that I live on, the earth that provides life for generations of beings of all kinds that we are all connected to.
If we go forth with Exxon mobiles plan, we will inevitably be going forth with more air pollution than there already is , more oil spills than there already has been, and therefore be continuing our disconnect from the very thing that gives us life. BEB-1
Our mother needs to be healed rather than destroyed.
With faith,
Bryanna

Sent from my iPhone

Comment Code	Response
BEB-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Robin Birney <robinbbirney@gmail.com>
Sent: Thursday, May 2, 2019 7:57 AM
To: Lehr, Kathryn
Subject: No Drilling offshore

I am Robin Birney, 93001. I am concerned that ExxonMobil is again trying to open offshore drilling and then trucking thru our communities. Please require them to disclose all impacts on their proposal. thank you BIR-1

Comment Code	Response
BIR-1	The SEIR provides a discussion of the impacts associated with the proposed Project and provides mitigation measures for significant impacts.

From: blumvicky@gmail.com
Sent: Sunday, May 5, 2019 11:16 AM
To: Lehr, Kathryn
Subject: ExxonMobil Project

We are contacting you regarding ExxonMobil's proposed project to restart offshore oil platforms and trucking.

The project would truck crude oil 24 hours a day, 7 days a week, with 140 one way truck trips per day. That would threaten public safety with a huge risk of tanker truck accidents on our highways.
This project would also resume offshore drilling at Platforms Hondo, Harmony and Heritage, using risky well stimulation practices including fracking and acidizing. Those practices would have a negative impact on our clean air, clean water, and ocean wildlife. And, perhaps the biggest issue is climate change, which is threatening to destroy our planet. BLV-1

We hope that Santa Barbara County will disclose all of the impacts resulting from ExxonMobil's restart of offshore oil platforms and trucking in the Final Environmental Impact Report.

Sincerely,

Vicky Blum and David Lebell

Comment Code	Response
BLV-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Melissa Bower <m-bower@earthlink.net>
Sent: Monday, May 27, 2019 10:37 AM
To: Lehr, Kathryn
Subject: ExxonMobil proposal to develop oil

I am writing to kindly request SB County disclose all impacts associated with ExxonMobil's restart of offshore oil platforms and proposed trucking of all materials associated with oil extraction.

As a citizen of Santa Barbara County, I am deeply concerned about oil production as well as the hazards to human life, and costs to our local bird and wildlife. I am concerned about our future, and the growing and urgent need to phase **out** fossil fuels while developing clean energy. BOM-1

Thank you for your time and consideration.

Melissa Bower
Santa Barbara, CA

Comment Code	Response
BOM-1	The SEIR provides a discussion of the impacts associated with the proposed Project and provides mitigation measures for significant impacts. The remainder of the comment does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Karen Brill <karenlbrill@gmail.com>
Sent: Thursday, May 23, 2019 4:08 PM
To: Lehr, Kathryn
Subject: ExxonMobil restart

I am advocating for the protection of clean air and water in Santa Barbara County. Please deny ExxonMobil's efforts to resume offshore drilling. The gains would be short lived, if at all, and the negative impact would go on for generations. We need to think long term and consider alternative sources of energy that would bring in jobs and economic gain. The old sources of energy are finite and we will lose valuable time exploring renewable sources of energy. BRK-1

Santa Barbara County, please disclose all impacts associated with ExxonMobil's restart of its offshore oil platforms and proposed trucking.

If this project goes forward, ExxonMobil would truck crude oil 24 hours a day, 7 days a week, with 140 one way trucks per day. Offshore drilling would resume in areas which have a history of risky well stimulation practices, including fracking and acidizing. These projects will undoubtedly increase risk of tanker truck accidents on our highways, threatening public safety. It would also contribute to climate change, threatening our clean air, clean water, and wildlife. BRK-2

The just released U N report tells us that nature is declining globally at rates unprecedented in human history. We cannot keep doing the same things. What is lost will be lost forever. The only people who want to risk the inevitable direct environmental damages are the corporations who will profit from the project and employees who fear losing their jobs. We have alternative sources of energy that will boost the economy. It is time to develop them, not continue to use fossil fuels which are a dwindling resource and threaten our health and the earth that sustains us. We must protect our healthy environment for future generations. BRK-3

Respectfully,

Karen Brill
Climate Reality Project Santa Barbara
Chapter Chair

Comment Code	Response
BRK-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BRK-2	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
BRK-3	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Sharon Broberg <slbroberg@gmail.com>
Sent: Monday, June 3, 2019 4:17 PM
To: Lehr, Kathryn
Subject: ExxonMobil's Application to Truck Oil

The EIR for this project to allow ExxonMobil to truck oil is inadequate.

The EIR does not analyze the impacts of restarting the Exxon offshore platforms and onshore facilities, such as the risk of offshore oil spills. Hwy 101 and the Gaviota coast are critical transportation corridors and are situated along the coast. The EIR should note that many counties and cities prohibit hazardous chemicals from being transported along such highways. BRS-1

Staff should recommend a denial of the project.

Sharon Broberg

PO Box 41339

Santa Barbara CA 93140

Comment Code	Response
BRS-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR. The major roadways that would be used by the proposed Project trucks would be U.S. Highway 101 and State Route 166. Both roads are controlled by Caltrans and there are no limits on the transportation of crude oil on these roadways.

From: Brad Brown <bradleywbrown16@gmail.com>
Sent: Tuesday, May 21, 2019 2:04 PM
To: Lehr, Kathryn
Subject: Temporary Trucking Permit – Supplemental DEIR Comments

Dear Planner Lehr,

Thank you to all who have taken the time to listen to people regarding this permitting process.

I would like to lend my voice in support of this permit so that ExxonMobil will be able to safely resume production and shipping of vital resources. I live in Santa Monica and see cost of living in this great state rising with every passing year. Any amount of assistance from an increase in supply of things such as crude oil will alleviate some of these rising costs. BRB-1

With ExxonMobil being so widely recognized across the globe for their safety culture and best practice of choosing contractors and partners that uphold the same level of safety performance, I am in full support of ExxonMobil's plans for trucking and re initiating the SYU.

Regards,
Brad Brown

Sincerely,

Brad Brown
2636 28th St Apt 4
Santa Monica, CA 90405
bradleywbrown16@gmail.com

Comment Code	Response
BRB-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Carolyn Chaney <cchaney@sfsu.edu>
Sent: Sunday, May 5, 2019 2:01 PM
To: Lehr, Kathryn
Subject: plans by ExxonMobil

The ExxonMobil oil platforms along our beautiful coast have been shut down since the Plains All American Pipeline spill in May 2015. And there is a good reason to keep the platforms shuttered.

Santa Barbara and Goleta do not want Exxon's dirty offshore oil; not in trucks, not through pipelines, not on its beaches. We do not need more tar on our beaches, more oil-covered birds, more damage to our delicate eco-systems.

CHC-1

Carolyn Chaney
<cchaney@sfsu.edu>

"Tell me, what is it you plan to do with your one wild and precious life?" Mary Oliver

Comment Code	Response
CHC-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Susanne Chess <susannechess@gmail.com>
Sent: Tuesday, June 4, 2019 10:53 AM
To: Lehr, Kathryn
Subject: ExxonMobil Interim Trucking for SYU Phased Restart Project

Re: ExxonMobil Interim Trucking for SYU Phased Restart Project
Case Number: 17RVP-00000-00081
Project Location: Gaviota Area, Santa Barbara County

We understand this is not a vote. However, the institutional and organized rallying against the permit, not on its merits, but as a political platform, compels us to weigh in. We appreciate the extension of time to submit requests from May 28 to June 4, 2019, as that gave us the time to research and formulate our position. We do, however, ask for full disclosure of the participating parties included in the discussion, and the content and context of discussions that led to grant of extension.

We understand how well organized and impassioned our environmental community is. We too are "environmentalists." I am a life-long civil rights and environmental activist. Out of college I worked for both the Legal Defense Center and the Environmental Defense Center. I also was an acting Secretary for the local meetings of the Seashell Alliance, which staged events against Diablo Canyon. I drew up the documents for incorporation of Energy Cyclists, which was instrumental in establishing our bike lane system. Throughout our professional careers we have acted as stewards of the Ocean and have received International awards for so doing.

We consider ourselves naturalized citizens of the City of Santa Barbara. Our 40-year old son was born at Cottage Hospital. He is one of the top climate scientists the world today, with a PhD in geochemistry from Cal Tech. He met with Obama for an hour and discussed research surrounding ocean acidification. We are most well informed about the state of our Oceans and have first-hand communication about climate change from top scientists in the field.

We learned at the Transportation panel sponsored by the World Business Academy last week that 37,500 drivers currently commute to Santa Barbara. Most fueled by gasoline or diesel. Best intentions aside, California is one the largest consumers of fossil fuels: 2 million barrels a day.

Even the electric vehicles recharged by solar are made of plastic. Most in our community prefer clothes made using microfiber or blended with the various tradenames for polyester: Lycra, Spandex, Elastic, all petroleum products. Most prefer not to wear cotton, linen or silk, because it wrinkles. You can't even find all cotton underwear in town anymore. Fossil fuels are in our lifestyle for decades to come.

Our Coastal population is growing. The alternatives to natural gas/fossil fuels are not yet ripe to adequately power our growth. We have a better chance for survival and control of the impact of our consumption producing in the US, California where we have the highest operational environmental and occupational standards. CHS-1

As a result of our stringent controls, gasoline, diesel, aviation fuel, processed using product from SYU are among the cleanest in the world. SYU has less than half the carbon intensity of oil imported from overseas. (California Air Resources Board) It is therefore more expensive, and for that reason much of the product made in California is sold here. Natural gas from SYU is distributed locally through Southern California Gas. I shop at Farmers Market and I'd

rather cook with local natural gas, and fill my car with gasoline made in California for Californians than that imported from the South China Sea, Arctic or any of these locations: https://geology.com/articles/oil-fields-from-space/

CHS-1 (con't)

Pending a realistic and executable pathway to conversion, we believe it best to show the fossil fuel producers of the World that production can exist with high environmental standards. That is a win for the economy and the environment!

Bob Evans and Susanne Chess
27 West Anapamu Street #318
Santa Barbara, CA 93101
805.687.6760

Virus-free. www.avg.com

Comment Code	Response
CHS-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Kevin Cook <kcook@aegion.com>
Sent: Monday, May 20, 2019 11:33 AM
To: Lehr, Kathryn
Cc: Villalobos, David; jparke@aklaw.net
Subject: Temporary Trucking Permit – Supplemental DEIR Comments

Katherine,

I believe county staff have appropriately determined the baseline for this project, and the SEIR has made many good points that support the temporary trucking permit.
As a Safety Manager at Brinderson, I have worked with ExxonMobil in the Santa Barbara region for many years, and am very supportive of their efforts to restart operations. The county's thorough report and analysis demonstrates that the public safety risk of transporting crude was less than significant.
The SYU facility is a major generator of well-paying jobs in the region. Currently, I have nine employees working at the SYU facility, a far cry from over a hundred we previously employed at the facility. These local jobs are important to us, and to the Santa Barbara region. COK-1
It will take several years to get the pipeline up and running. In the meantime, the temporary trucking of crude will restore these much-needed jobs back into the region. A no project alternative is not a reasonable alternative, and the county staff's draft SEIR has put forward the many reasons as to why the temporary trucking of crude is necessary.
Thank you for your kind attention to these comments,

Kevin D. Cook

Kevin D. Cook | Manager | **Brinderson**
ExxonMobil SYU Project
6851 McDivitt Drive Suite D | Bakersfield CA 93313
Office: 661.473.2486 | **Mobile: 661.381.0295** | **www.Aegion.com**
kcook@aegion.com

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1

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Comment Code	Response
COK-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: lcranellc@everyactioncustom.com on behalf of Linda Crane <lcranellc@everyactioncustom.com>
Sent: Tuesday, May 14, 2019 5:40 AM
To: Lehr, Kathryn
Subject: Reject Exxon's Application to Truck Dangerous Oil

Dear Kathryn Lehr,

I'm writing to urge Santa Barbara County to support ExxonMobil's trucking permit application 17RVP-00000-00081. CRL-1

I'd rather we get oil from California than from Saudi Arabia.

Sincerely,
Linda Crane
Santa Barbara, CA 93107
lcranellc@gmail.com

1

Comment Code	Response
CRL-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Margot Davis <wally97@hotmail.com>
Sent: Wednesday, May 15, 2019 3:44 PM
To: Lehr, Kathryn
Subject: Please deny exxon request to truck oil

I feel it my personal duty to stand up and say there is no reason on earth to allow this trucking. I cannot see why it was not summarily dismissed, why it is even considered in light of the current climate emergency. Margot davis Sent from Margot's iPad DAM-1

1

Comment Code	Response
DAM-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Chris DeVries <chrisdevries314@gmail.com>
Sent: Tuesday, May 28, 2019 8:37 AM
To: Lehr, Kathryn
Subject: Must disclose all impacts

Dear Kathryn,
I am writing to express my concern and opposition to ExxonMobil's plan to resume production of the offshore oil platforms and truck crude oil along the coastline.
It is imperative that the County disclose all impacts to this plan. The threat to our safety, clean air, water and wildlife is unacceptable. Likewise it is hard to believe that after the disasters we have experienced in the past, that the County would take this risk. DEC-1
Please add my name to the long list of County residents that oppose this project.
Respectfully,
Christine DeVries
Carpinteria
--
Chris DeVries
chrisdevries314@gmail.com

Comment Code	Response
DEC-1	The SEIR provides a discussion of the impacts associated with the proposed Project and provides mitigation measures for significant impacts. The rest of the comment does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Karen <vintageartifactsca@cox.net>
Sent: Wednesday, May 1, 2019 1:07 PM
To: Lehr, Kathryn
Subject: Please Say NO to ExxonMobil's Risky Dangerous Proposals

And please disclose all impacts associated with ExxonMobil's proposed restart of its offshore oil platforms and trucking. I've seen too many accidents with horrible devastation! DOK-1

Thank you,
Karen Dorfman
Goleta

Comment Code	Response
DOK-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.

From: John Douglas <jed805@gmail.com>
Sent: Thursday, May 2, 2019 3:57 PM
To: Lehr, Kathryn
Subject: NO on ExxonMobil oil trucking project

Kathryn Lehr, Santa Barbara County Energy, Minerals and Compliance Division

Project Title: ExxonMobil Interim Trucking for SYU Phased Restart Project
Case Number: 7RVP-00000-00081

Ms. Lehr:

I oppose ExxonMobil's application. The proposal poses an extreme danger to the health and welfare of Santa Barbara County residents, and is completely contrary to stated policies of the county and state to reduce fossil fuel extraction and consumption in the face of catastrophic climate change worldwide. DOJ-1

Thanks for considering my views.

John E. Douglas
259 Loma Media Rd.
Santa Barbara, CA 93103

--
John Enrico Douglas
(805) 284-2082
jed805@gmail.com

From: John Douglas <jed805@gmail.com>
Sent: Saturday, May 25, 2019 12:05 PM
To: Lehr, Kathryn
Subject: Oppose ExxonMobil trucking plan

Re: ExxonMobil Interim Trucking for SYU Phased Restart Project 17RVP-00000-00081

Ms. Lehr: I urge the County to deny ExxonMobil's oil trucking proposal. Thanks for noting my opposition. DOJ-1 (con't)

Sincerely,
John E. Douglas
259 Loma Media Road
Santa Barbara, CA 93103

--
John Enrico Douglas
(805) 284-2082
jed805@gmail.com

Comment Code	Response
DOJ-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Louise Draucker <ldraucker@gmail.com>
Sent: Wednesday, May 29, 2019 8:30 PM
To: Lehr, Kathryn
Subject: Tankers on Hwy. 166

Klehr@countyofsb.org

I am writing this to take a position against permitting more oil tankers on Hwy. 166. I feel that the environmental review was inadequate, particularly in regard to the human toll.

People who live inland from Santa Maria need to drive long distances for services that people closer to the coast take for granted as being near-by. I live in New Cuyama. We are more or less midway between Santa Maria and Bakersfield. So we drive Hwy. 166 regularly – for groceries, banking, clothes shopping, entertainment, etc. There isn't much here. We trade our appreciation of open spaces and the weather for having to drive so far for necessities, and we plan trips to either direction to avoid having to go right back again. When we go to the doctor, we also go to the grocery store, or a clothing store, etc.

Most local people avoid going to town on Fridays and Sundays because of the crazy traffic. On Fridays, people from Bakersfield drive to the coast – and they are in a hurry. On Sundays they drive back, and they are in a hurry again. People on the coast do the same in the opposite direction. Many of them take the curves in the road as a challenge. Others are driving very large trailers, but they often drive as if they were in a race. Response time to accidents can stop traffic for a long time with no emergency services close by. DRL-1

Ever since the fires and flooding in Montecito, Hwy. 166 has been "discovered." The big trucks are the worst. Hwy 166 was not designed for the big trucks; there are too many curves. The oil tankers usually drive at reasonable speeds, but some people don't want to drive at reasonable speeds. So, while big trucks may not be involved directly in accidents, they often are the instigating factor in accidents when people get impatient and pass recklessly. The box trucks seem to have no speed limits or driver safety knowledge; they pass on blind curves and uphill, which at the very least causes everyone to have to slow down. There are no passing lanes except for one that is about ½ mile east of Hwy. 101. There are **no** safe, paved pull-outs. So drivers get irritated and pass dangerously. The trucks can be particularly scary after dark when they are very close behind you and there is no place to go!

In addition, the trucks are very hard on the roadway. CalTrans cannot keep up with repairs, which causes more wear and tear on both trucks and personal vehicles, which, of course can lead to accidents. DRL-2

The point of all of this is that adding 140 more truck runs to this mix is a recipe for disaster. The CHP has increased its presence, and it is really appreciated, but they can't be everywhere, and people tend to find it hard to change their ways.

Did the EIR researchers consider that we have two schools whose driveways open onto Hwy. 166? They are on straight sections of the highway, but the busses have to pull out slowly. Also, the townsites of Cuyama and New Cuyama are right on the highway. There are some streets that enter the highway directly, DRL-3

plus turn lanes into New Cuyama and the elementary school, but many travelers use them as passing lanes. The trucks that take harvests to market enter the highway slowly, too, but on unmarked dirt roads. DRL-3 (con't)

There appear to be other omissions in the EIR, such as pollution from **all** of the trucks. With the increase in farming we've had in the valley, our night skies are not so clear anymore. More tankers will only add more particulates to our air. And thinking that tanker spills will only happen once in 30 years is unrealistic. There has already been one spill this year – will there be no more for 30 years? Waterways on Hwy. 101 were considered; there was no mention of the waterways that Hwy. 166 crosses, and there are several. The one spill so far this year was close to a crossing over the river. DRL-4

My husband and I have lived in Cuyama Valley for 46 years. We raised four children here, and we love it. But it has changed so much. We were here before Hwy. 166 was completely "straightened," before we had to worry about farmers over-pumping and maniac drivers. We have grandchildren to the east and to the west, and we like to visit them, but it is becoming more and more dangerous. Please don't increase that danger by adding so many more trucks. ExxonMobil has the resources to wait for that pipeline!

Louise Draucker ldraucker@gmail.com

Comment Code	Response
DRL-1	The Project's potential impacts to State Route 166 are described in Table 4.5-16, which shows that the addition of Project traffic would not result in a significant impact. The analysis reports the percent time spent following on State Route 166, consistent with guidance in the Highway Capacity Manual, 6th Edition for this roadway type. The SEIR's collision analysis included all reported collisions along State Route 166 and concluded that the collision rate along State Route 166 was not statistically significant. As discussed in the Traffic and Circulation Study (See Appendix D.1), the rate of accidents on State Route 166 between the U.S. Highway 101 interchange and the State Route 33 South Junction is slightly higher than the California statewide average for similar facilities (accident rate=0.82; statewide average rate=0.70). The Caltrans significance test shows that the number of accidents required to be statistically significant is 175 accidents within the three year period and the number that occurred was 167 accidents. Therefore, based upon the Caltrans criteria, the slightly higher baseline accident rate is not considered statistically significant. The expected number of additional accidents for 86 round trips per day for the cumulative oil trucks has been estimated at 4.57 accidents over a three year period based upon the project specific accident rates provided in Appendix C.1. This increase in accidents would still be below the statistically significant baseline threshold of 175 accidents over a three year period. Also, the proposed Project would have a limited duration of no more than seven years. Therefore, cumulative oil truck accidents along State Route 166 would be less than significant. Also, as discussed in the SEIR, it is likely that most of the proposed Project oil trucks will go to the SMPS, which would reduce the baseline trucks that are currently traveling from the east to the SMPS via State Route 166. This would serve to reduce overall oil truck traffic along State Route 166. As discussed in the Land Use Section (Section 4.4), trucking impacts along State Route 166 from the proposed Project impacts can be reduced by requiring the use of the Trucking to the SMPS Only Alternative. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
DRL-2	Impact TR.4 describes potential impacts related to roadway damage. The Project would require Haul Permits from County Public Works. The Haul Permits contain provisions for the Applicant to cover their share of County roadway repairs. With the Haul Permits, the impacts to roadway damage would be less than significant. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
DRL-3	The SEIR looked at overall accident rates along State Route 166 including in the area of the schools. As discussed in the Traffic and Circulation Study (See Appendix D.1), the rate of accidents on State Route 166 between the US Highway 101 interchange and the State Route

Comment Code	Response
	33 South Junction is slightly higher than the California statewide average for similar facilities (accident rate=0.82; statewide average rate=0.70). The Caltrans significance test shows that the number of accidents required to be statistically significant is 175 accidents within the three year period and the number that occurred was 167 accidents. Therefore, based upon the Caltrans criteria, the slightly higher baseline accident rate is not considered statistically significant. The expected number of additional accidents for 86 round trips per day for the cumulative oil trucks has been estimated at 4.57 accidents over a three year period based upon the project specific accident rates provided in Appendix C.1. This increase in accidents would still be below the statistically significant baseline threshold of 175 accidents over a three year period. Also, the proposed trucking Project would have a limited duration of no more than seven years. Therefore, cumulative oil truck accidents along State Route 166 would be less than significant. Also, as discussed in the SEIR, it is likely that most of the proposed Project oil trucks will go to the SMPS, which would reduce the baseline trucks that are currently traveling from the east to the SMPS via State Route 166. This would serve to reduce overall oil truck traffic along State Route 166. As discussed in Section 4.4, *Land Use and Policy Consistency*, trucking impacts along State Route 166 from the proposed Project impacts can be reduced by requiring the use of the Trucking to the SMPS Only Alternative.
DRL-4	Impact AQ.2 in Section 4.1, *Air Quality*, addresses the air emissions associated with the trucks, including particulate matter. The particulate matter emissions from the trucks was found to be below the County CEQA thresholds of 80 lbs/day. Impact AQ.5 in Section 4.1, *Air Quality*, addresses the health risk impacts to people in the vicinity of the proposed trucking routes from diesel particulate matter. These impacts were found to be below the SBCAPCD health risk thresholds. The spill probabilities for an oil tanker are based upon historical data. For the proposed Project trucks, the annual probability of a spill of about five gallons or more was estimated to be once in 34 years for trucks going to the SMPS and once in 12 years for trucks going to the Plains Pentland Terminal. These numbers assume the implementation of Mitigation RISK-1, which includes the Applicant-proposed avoidance and minimization measures. These spill probabilities are for the proposed Project trucks and do not represent the overall spill probability of all trucks using State Route 166. The spill probabilities for all trucks using State Route 166 would be higher. Table 4.3-8 in Section 4.3, *Hazardous Material and Risk of Upset*, provides a list of the perennial streams, major drainages, and other water bodies along State Route 166 such as Cuyama River, Aliso Creek, Twitchell Reservoir, etc.

From: maureen earls <maureenearls00@gmail.com>
Sent: Friday, May 31, 2019 5:27 PM
To: Lehr, Kathryn
Subject: Exxon Project :Trucking Oil

Dear Ms. Lehr,
I am a resident of Santa Barbara County. I have followed the pros and cons of trucking oil in our county.
I believe the truth is not fully addressed in the documentation for this project. It is critical we present the full facts, like the actual current air polution 2016-2019. We can then accurately assess the impacts from this project. Reading the other objections listed below, I agree that the risks far outweigh the benefits and no decision should be made on incomplete information. EAM-1

We all care about the truth of the impact, as our families and particularly our grandchildren, will suffer the consequences of a poorly reviewed project.

I believe staff should recommend denial of this project to the Planning Commission.

Sincerely,
Maureen Earls

Points I considered:

- Even though the project is about restarting Exxon's offshore platforms and onshore facilities, it fails to analyze the impacts of restarting these facilities, such as the risk of offshore oil spills. EAM-2

- The EIR cites air pollution from 2012-2014, prior to the 2015 spill as the baseline, and leaves out the real current baseline conditions. This radically understates the real increase in emissions and other impacts from the project. The EIR should include current conditions from 2016-2019. EAM-3
- The EIR should note that many jurisdictions prohibit hazardous chemicals from being transported along waterways, over bridges and tunnels and along critical transportation corridors. The 101 and Gaviota coast fit all of these categories. The project presents unacceptable risks. EAM-4
- The Transportation and Circulation section of the EIR fails to include the risks of an oil truck accident shutting down the 101 where there is no way around it, even though there are numerous examples of this happening. A tanker truck shut down the 101 in Goleta during the Thomas fire when people were trying to evacuate. EAM-5
- Staff should recommend denial of the project to the Planning Commission.

Comment Code	Response
EAM-1	The SEIR provides a discussion of the impacts associated with the proposed Project and provides mitigation measures for significant impacts. The rest of the comment does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
EAM-2	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions*

Comment Code	Response
	expected when the project becomes operational, or both, that are supported with substantial evidence." The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval.

Comment Code	Response
	2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline). Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
EAM-3	See Response to Comment EAM-2.
EAM-4	The major roadways that would be used by the Proposed Project trucks would be U.S. Highway 101 and State Route 166. Both roads are controlled by Caltrans and there are no limits on the transportation of crude oil on these roadways. This comment does not address an issue associated with the adequacy of the SEIR, but rather discusses concerns about transport of crude oil local highways. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
EAM-5	Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed truck routes. Two of these closures were along U.S. Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the U.S. Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.

From: Emily Engel <emilyaengel@gmail.com>
Sent: Thursday, May 23, 2019 8:17 AM
To: Lehr, Kathryn
Subject: Public Comment: ExxonMobil Interim Trucking 17RVP-00000-00081

Project Title: ExxonMobil Interim Trucking for SYU Phased Restart Project
Case Number: 17RVP-00000-00081
Project Location: Gaviota Area, Santa Barbara County

To the County of Santa Barbara:

I am writing in opposition to the ExxonMobil Interim trucking proposal (17RVP-00000-00081.

I am a Santa Barbara resident, my children Casey and Willow attend Montessori Center School in Goleta. My husband and I love MCS, and we enjoy our time in Goleta every day. We drive to MCS via the 101 Freeway on a daily basis.

As you know, trucking is the most dangerous way to transport oil with the greatest potential threat to human life and well-being. Allowing ExxonMobil to truck oil through our communities would increase the potential for local hazards from increased traffic to devastating accidents.

As parents who travel with our children by car to Goleta every day, and who leave our children in Goleta at their school, we are deeply concerned about the Exxon trucking proposal. We rely on the 101 as our primary mode of reaching Goleta. Were an accident to happen with an oil tanker truck and the 101 was shut down, our family would be directly impacted as there are limited alternative routes and access to Goleta and our children would be impeded. We are deeply concerned about the potential impact on local families, our environment, and our communities in both north and south counties. ENE-1

I hope you will consider the very high cost of allowing ExxonMobil to use our shared community infrastructure and recommend to the Planning Commission that this project be denied in order to provide valuable protections for our children, environment, and infrastructure.

Thank you for considering my comments.

Sincerely,

Emily Engel

Zip Code 93103

Emily A. Engel, Ph.D.

Independent Scholar
Santa Barbara, CA

@engelbrite

Webpage

Recent book: Manuscript Cultures in Colonial Mexico and Peru: New Questions and Approaches

Associate Editor: Latin American and Latinx Visual Culture

Comment Code	Response
ENE-1	The SEIR documents baseline conditions along U.S. Highway 101 and State Route 166 and key intersections along the planned trucking routes. Collision rates and traffic operating conditions are evaluated along all the proposed Project routes. Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed truck routes. Two of these closures were along US Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the US Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident. The remainder of this comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Foster, Matthew R <matthew.r.foster@exxonmobil.com>
Sent: Tuesday, May 21, 2019 3:48 PM
To: Lehr, Kathryn
Cc: Villalobos, David; jparke@aklaw.net
Subject: Temporary Trucking Permit – Supplemental DEIR Comments

My name is Matt Foster, and last year I became the Off-Shore Superintendent for the ExxonMobil SYU Offshore Facilities. I started my career with ExxonMobil twelve years ago at SYU as an Operator on Heritage Platform, and I've been fortunate enough to be one of the few employees that have stayed on-site.

I am also one of the many veterans who served our country honorably and work here at SYU. Finding employers who understand the value veterans bring to their workforce is one of the most significant challenges we face when transitioning out of the service. I am fortunate to work for ExxonMobil, a company that appreciate the skills, training, and dedication that characterize veterans.

We at SYU are a part of the Santa Barbara community. We have families and friends here - my own parents are retired in Santa Maria, my sister lives in Orcutt, and my brother is a law enforcement officer in the county.
Hundreds of our employees have been sent halfway around the world, spending many months out of the year away from their families. I get calls each week from these displaced employees inquiring on the status of SYU's Restart, checking to see when we can bring them back and bring them home. FOM-1

Our livelihood depends on restarting SYU, and no project alternative is not an option for the many employees and families that depend on us. This permit is a step towards getting our family back home.

Thank you.

Matt Foster, Off-shore Superintendent, SYU Offshore Facilities

Comment Code	Response
FOM-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Sage Gerson <sgerson@ucsb.edu>
Sent: Tuesday, May 28, 2019 10:45 PM
To: Lehr, Kathryn
Subject: Exxon Trucking EIR Public Comment

Hello,

I am submitting a public comment on the Exxon trucking proposal EIR. I crafted the below four points stating my public opinion on the flaws of the EIR that was conducted by the County consultants. Some of the facts I state reference notes I took during the May 7th late afternoon public comment event.I believe the proposal is limited in scope in a way that locks in fossil fuel production as the only option for the area, when renewable production in other supporting areas must be considered. The biggest flaw is that it fails the consider the endogenic environmental damages of resuming offshore oil drilling. GES-1

1. The EIR does not account for the climate and ocean safety hazards of starting back up oil production on the offshore platforms again. GES-2

2. The EIR does not account for real alternatives (such as renewables). My understanding from notes I took on an environmental lawyer's remarks at the May 7th public comment is the following: the EIR under CEQA is supposed to consider alternative energy sources in other areas when the project area would not support such alternatives. The area for trucking would not support those renewable sources but the EIR is legally obligated to consider energy alternatives. GES-3

3. The rainy day alternative does not prevent accidents as less than 1/30 truck spills (in California I believe) are actually due to rain (I also recall hearing this statistic from an intern at NRD during the 5/7 public comment). GES-4

4. Trucking spills are super dangerous, shut down 101 during Thomas fire evacuations. GES-5

Let me know if you have any questions.

Best,

Sage Gerson
Residence: 715 Gayley Walk
Apt 201
Goleta, CA 93117

Comment Code	Response
GES-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
GES-2	See Response to Comment GES-1.
GES-3	Alternatives, in the context of the CEQA, are ways that the project proponent could achieve most of their objectives, while also reducing or eliminating the environmental impacts of the proposed project (California Public Resources Code [PRC] Section 210020). CEQA Guidelines Section 15126.6(a) states: "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible." Apart from the analysis of the No Project alternative, there is no ironclad rule governing the nature or scope of the "reasonable range" of other alternatives to be discussed, other than the "rule of reason" (CEQA Guidelines Section 15126.6(a) & (f). An analysis of alternatives in an EIR should include a list of alternatives considered but rejected and include an explanation of why alternatives were rejected. (If this discussion is not included in an EIR, it must exist elsewhere in the administrative record). The Lead Agency may, as part of the scoping process, make an initial determination as to which alternatives are potentially feasible and merit in-depth consideration, and which do not . (CEQA Guidelines Section 15126.6(c)). An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. The alternatives analysis in the SEIR meets all these CEQA requirements. An EIR is not required to include alternatives that are not feasible. The term "feasible" is defined in CEQA Guidelines § 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (see Public Resources Code § 21061.1). CEQA Guidelines § 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the proponent can reasonably acquire, control, or otherwise have access to potential alternative sites. The Renewable Energy Alternatives would not meet the underlying objectives of the Project, and it is not at all clear that a solar or wind facility is feasible alternative since neither could be accomplished in a reasonable period of time (it would likely take more than seven years to design, permit and construct a solar or wind facility). It is speculative to assume that the Applicant could reasonably acquire control or otherwise have access to

Comment Code	Response
	alternative sites in the County that would be suitable and of sufficient size (approximately 6,650 acres as discussed in Section 2.7.2.4) for wind or solar installations. There are also several regulatory issues that affect the feasibility of renewable energy alternatives, as outlined in the County of Santa Barbara Strategic Energy Plan (2019). The County Land Use and Development Code limits utility-scale solar photovoltaic projects to the Cuyama Valley, Agricultural Land under the Williamson Act cannot be use for utility-scale renewable projects, and utility-scale renewable energy project are prohibited in coastal areas (Santa Barbara County, 2019). A number of these regulatory hurdles could be overcome by modifications to County ordinances and rules. However, this would require time to process and approve the regulatory changes.
GES-4	The SEIR does not assume that the No Trucking During Rainy Day Alternative would reduce the frequency of a truck accident. Section 5.2.3.3 of the SEIR states the following: "It is likely that not trucking during period of heavy rain would reduce the likelihood of a truck accident. However, the accident data for trucks is not detailed enough to determine the effects due to wet weather. Therefore, no adjustment has been made to the accident rate". The advantage of the No Trucking During Rainy Day Alternative is that it could reduce the severity of the impacts of an oil spill. Spills that occurred near drainages or waterways during a rain event could be transported more readily downstream increasing the severity of the impacts to biological and water resources. As discussed in Section 4.3.1.5 of the SEIR, the truck transportation routes cross many perennial streams and major drainages. In the event a spill enters these waterways, there could be impacts to water quality and the aquatic habitat. Some of the creeks that could be affected by an oil spill flow into major waterways such as the Santa Ynez River, Cuyama River, Santa Maria River, and Twitchell Reservoir. If the oil spill occurred during periods when these creeks and drainages and storm drain systems were flowing, it is possible that oil could enter these major waterways and impact biological and water resources. Under the No Trucking During Rainy Periods Alternative, the probability of a spill impacting waterways would be reduced since it would be less likely that the spilled oil would be transported via the rainwater into nearby creeks and other drainages.
GES-5	The SEIR documents baseline conditions along U.S. Highway 101 and State Route 166 and key intersections along the planned trucking routes. Collision rates and traffic operating conditions are evaluated along all the proposed routes. Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed truck routes. Two of these closures were along US Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the US Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.

From: Valerie Girard <dr.valeriegirard@gmail.com>
Sent: Sunday, June 2, 2019 7:07 AM
Subject: Fwd: MUST DISCLOSE IMPACT OF EXXONMOBIL'S COASTAL OIL PRODUCTION

Dear Kathryn,

This letter is in regard to ExxonMobil's intention to resume operation of offshore oil platforms and trucking of crude oil in our coastline area.

I am deeply concerned regarding the negative potential of this issue and want the County to provide transparency making public aware of the negative impacts ExxonMobil's resumed production will incur on our local coastline.

Resuming production will impact the safety of our residents, our air quality, water and our fragile wildlife. With the history of oil drilling disasters in our area it is inconceivable we would allow it to begin again. We are putting so much and so many at high risk.

Please, include my name to the list of our County residents who strongly oppose this project.

A concerned citizen,

GIV-1

Dr. Valerie Girard
dr.valeriegirard@gmail.com

1725 State St. B
Santa Barbara, CA 93101

www.drvaleriegirard.com

Comment Code	Response
GIV-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

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	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.

To Whom it May Concern,

Thank you for the opportunity to comment on the ExxonMobil Interim Trucking for SYU Phased Restart Project. As a University of Santa Barbara Environmental Studies Student, a community member, and a student activist there are aspects of this project that I would like the further comment on in regards to the possible consequences that they present to the community.

My main concerns stem from research that my peers and I have conducted and believe need to be addressed before this project is even considered to move forward:

(1) A lack of alternatives presented in the Environmental Impact Report (EIR) that address externalities associated with: GOK-1
   (a) Awareness of public health and well-being
   (b) Environmental well-being
   (c) Mitigation efforts
(2) A proposed list of alternatives that do NOT effectively mitigate the consequences that are associated with the Exxon Trucking proposal in the EIR GOK-2
(3) The overall lack to examine the broader picture such as increased particulate matter that would play into global warming of the planet within the EIR GOK-3

Thank you again for the opportunity to comment on the project.

Best,

Kayla Gorman
krg2415@gmail.com

Comment Code	Response
GOK-1	Alternatives, in the context of the CEQA, are ways that the project proponent could achieve most of their objectives, while also reducing or eliminating the environmental impacts of the proposed project (California Public Resources Code [PRC] Section 210020). CEQA Guidelines Section 15126.6(a) states: "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible." Apart from the analysis of the No Project Alternative, there is no ironclad rule governing the nature or scope of the "reasonable range" of other alternatives to be discussed, other than the "rule of reason" (CEQA Guidelines Section 15126.6(a) & (f). An analysis of alternatives in an EIR should include a list of alternatives considered but rejected and include an explanation of why alternatives were rejected. (If this discussion is not included in an EIR, it must exist elsewhere in the administrative record). The Lead Agency may, as part of the scoping process, make an initial determination as to which alternatives are potentially feasible and merit in-depth consideration, and which do not. (CEQA Guidelines Section 15126.6(c)). An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. The alternatives analysis in the SEIR meets all these CEQA requirements.
GOK-2	See Response to Comment GOK-1.
GOK-3	The GHG analysis utilizes the GHG emissions calculations as developed by the California Air Resource Board and the Federal EPA. While the role of particulate matter and other potential GHG pollutants are currently being debated, until a protocol and establish methodology for accessing the impacts is adopted, the established California approach has been utilized in the SEIR.

From: Cathy Green <grngodus@aol.com>
Sent: Tuesday, May 28, 2019 10:45 AM
To: Lehr, Kathryn
Cc: chrisdevries314@gmail.com
Subject: Fwd: MUST DISCLOSE IMPACT OF EXXONMOBIL'S COASTAL OIL PRODUCTION

Dear Kathryn,

This letter is in regard to ExxonMobil's intention to resume operation of offshore oil platforms and trucking of crude oil in our coastline area.

I am deeply concerned regarding the negative potential of this issue and want the County to provide transparency making public aware of the negative impacts ExxonMobil's resumed production will incur on our local coastline.

Resuming production will impact the safety of our residents, our air quality, water and our fragile wildlife. With the history of oil drilling disasters in our area it is inconceivable we would allow it to begin again. We are putting so much and so many at high risk.

Please, include my name to the list of our County residents who strongly oppose this project.

GRC-1

A concerned citizen,

Cathy Green

Santa Barbara

Comment Code	Response
GRC-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

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Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.

Public Comments on ExxonMobil Interim Trucking Project Draft SEIR

From Lad Handelman, resident and property owner, Santa Barbara, California

To: County of Santa Barbara Department of Planning and Development and Other County Officials passing judgment on 7RVP-00000-00081 – ExxonMobil Interim Trucking Project Draft SEIR

Submitter's Position: It is essential that the aforementioned Permit be granted in order to protect and advance the best interest of Santa Barbara County residents.

THE SEIR IS COMPLETE… IT IS DONE. A large amount of work and expertise has been spent compiling and presenting the findings as very well elicited within the document itself. All the direct and indirect risks are analyzed, and the results described from each risk analyses appear logical, reasonable and thorough. SEIR Section 5 identifies each and every related risk followed by conclusions such as "insignificant" where applicable. In cases where that description cannot apply, the investigators instead comment on the risk by presenting the result of their analytical work and likelihood of a significant risk (a tanker truck crash causing a fire) were measured in terms of likelihood of occurrence. HAL-1

This preponderance of evidence leads to the conclusion that the risk level of this Project is demenimous and therefore should not be the basis for denying this Permit. I ask you to ignore any unsupported allegations and pressures. The County's limited resources should not be wasted on addressing those concerns which are unrealistic, unproven, unsupported and emotion driven.

Below are my responses to allegations from opposition to the trucking permit.

ALLEGATION: 70 fuel trucks per day will create new levels of hazards and should not be allowed.

RESPONSE: According to local sources, each major gas station in the County requires having its underground holding tanks refilled once each 24 hours. Lesser sized stations require refilling 3-4 times each week. On top of that, propane stations need regular refilling. Throughout the whole County, there are at least 100-200 such stations which have been operating for years without experiencing tanker blow-ups. ExxonMobil's plan of adding 70 more trucks to this existing daily flow can only be described as being piddly. The thrust of the SEIR is to examine the likelihood of such risks actually occurring. In almost every instance, such risks are identified as being" less than significant". The largest fear is a tanker truck catching fire. HAL-2

The SEIR report states: "Table 5-6. Page 5-9 Truck Route to SMPS [Santa Maria] - Frequency of Crude Oil Fires Due to Laden Truck Accident... **equivalent to once in 607 years**." This conclusion among the many other conclusions reached are not arbitrary estimates or unfounded predictions. They are the result of a massive amount of independent supported analysis as follows:

> *QUANTITATIVE RISK ANALYSIS* section from applicant's Permit request:
>
> 3.0 Methodology
> "Thus the potential consequence from transporting the LFC product by truck is not greater than the consequence of transporting any other similar material by trucks of the same volume that are currently on the roads." Discriminating against one transporter with similar material amounts to selective, unlawful decision-making and abuse and unfair application of the applicable regulations.
>
> 4.0 Probability and consequence analysis
> "Fatality and Injury F-N curves were constructed to show public safety risks from the proposed Interim Trucking, see Figures in Appendix 5. The calculated public risk was found to be less than 10-5 (frequency/year) of 1 or more fatalities and less than 10-3 (frequency/year) of 1 or more injuries for both trucking scenarios. Therefore, **the risk curves for both scenarios fall inside the low risk criteria (green zone)."**
>
> 5.0 Conclusions
> "Public safety risks were calculated to be below the Santa Barbara County thresholds. The resulting F-N curves are entirely in the "Green" zone of the constructed F-N curves for injuries and fatalities for both transportation scenarios. Therefore, **the impacts to public risk from the proposed Interim Trucking are considered less than significant in the context of CEQA (Class III)."**

HAL-2 (con't)

ALLEGATION: Each tanker truck is a rolling time bomb. Any collision can result in a fireball.

RESPONSE: This allegation amounts to an emotional and dramatic effort to deter decision-makers from the facts. Every single vehicle (except all electric) has an undercarriage with a tank containing 15-30 gallons of fuel. Any collision can theoretically result in a fireball. There are many thousands of such vehicles traveling our highways and city streets every single day. We all accept this risk because "we need to get from Point A to Point B". This is our modern day norm. Adding 70 trucks to this many-thousand vehicle number is

HAL-3

inconsequential. Furthermore, each tanker truck has added important safety features including speed controls. Each driver is highly trained and safety-certified when it comes to collision avoidance. They must pass regular inspections and testing over and above that of other drivers.

HAL-3 (con't)

Except for the inflammatory verbiage easily attached to tanker trucks, there is no more risk – in fact less risk of tanker accidents versus risk levels of any other vehicles. The Permit should not be denied based on this allegation.

ALLEGATION: 70 additional tanker trucks will cause more air pollution and enhance climate change.

RESPONSE: This additional amount of air pollution from these 70 trucks, compared to the every day pollution level coming from many thousands of other vehicles, would be so demenimous as not to be even measurable - compared to the existing pollution level. The Permit should not be denied based on this allegation.

HAL-4

And of greatest importance, we must face the challenge that to fill California's daily requirement of fuel now requires ocean tanker shipments from Saudi Arabia (or other Mideast sources) of 1-2 million barrels each day. These tankers are ocean-going monsters and spew pollution levels far greater than 70 tanker trucks. Furthermore, this oil from Saudi Arabia does not just appear in the tankers. It must be drilled, then transported. The pollution levels caused from unregulated drilling are in addition to the ocean tanker pollution. To me the choice between unregulated drilling and pollution-spewing ocean tankers versus 70 trucks per day is a no-brainer. Not to mention that ExxonMobil property taxes are badly needed in our County and can be made available simply by issuing this Permit - versus denying this Permit and being forced to buy oil from other countries who pay no property taxes.

Respectfully Submitted:

Lad Handelman
121 Via Del Cielo
Santa Barbara, CA 93109
(805) 966-0097
laddieh@cox.net

Comment Code	Response
HAL-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
HAL-2	This comment does not address an issue associated with the adequacy of the SEIR, but rather provides a general rebuttal to the hazard concerns that have been raised about the proposed Project. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
HAL-3	This comment does not address an issue associated with the adequacy of the SEIR, but rather provides a general rebuttal to the issue of explosions that have been raised about the proposed Project. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
HAL-4	Trucking emissions and potential health risk impacts are discussed and analyzed in Section 4.1 of the SEIR. Truck emissions have been reduced substantially with regulations promulgated in California over the last few years. The Applicant is proposing the use of the recent model year trucks (2017), which will maintain air quality impacts to a minimum utilizing the most recent technology. Impacts from truck emissions are estimated to be well below the thresholds for diesel particulate matter and cancer-causing pollutants. Based on the CARB EMFAC2017 model for emissions from on-road vehicles, the Applicant-proposed trucks would be 5 times cleaner than the average truck on the roadway. Impacts are determined to be less than significant for trucking DPM emissions on nearby residences.

From: GEORGE HANDLER <trachand@cox.net>
Sent: Monday, May 6, 2019 9:14 PM
To: Lehr, Kathryn
Subject: Exxon Mobil's application to truck along Highway 101

I urge you to deny Exxon Mobil's proposal to send a huge number of trucks of crude along 101 every day, risking spills, road closures and other environmental dangers. HAG-1

Lila Trachtenberg, & George Handler, Santa Barbara

Comment Code	Response
HAG-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Lee Heller <leehellerk9@gmail.com>
Sent: Friday, May 3, 2019 6:24 AM
To: Lehr, Kathryn
Subject: DEIR on Exxon Mobil trucking

To whom it may concern,

I am writing to express my deep concern about Exxon Mobil's application for a permit to truck large volumes of crude oil 24 hours a day on our county's streets.

HEL-1

The DEIR needs to include a comprehensive discussion of all of the environmental impacts of this project. CEQA is clear on what should be considered and made available for public information. Please sure that the DEIR does this.

Thank you,

Lee E. Heller, Ph.D., J.D.
PO Box 1592
Summerland CA 93067

Sent from my iPhone

Comment Code	Response
HEL-1	The SEIR provides a discussion of the impacts associated with the proposed Project and provides mitigation measures for significant impacts. The rest of the comment does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Harold Hill <haroldhill770@hotmail.com>
Sent: Sunday, May 5, 2019 2:59 PM
To: Lehr, Kathryn
Subject: Exxon Proposal

Dear Ms. Lehr,
I am a retired civil engineer that has worked for an oil company using steam injection in oil wells. As you know, these off-shore oil wells have been shut down for a long time which tells me, now that oil prices are going up Exxon intends to use more costly extreme measures to extract oil, like fracking. This will usher in a much higher risk of creating oil spills that are out of control and could do billions of dollars worth of damage. We know that burning fossil fuels is causing devastating climate change. We must decide what oil to leave in the ground to avoid climate catastrophe and I say it should be all oil that requires extraction by costly & risky extreme measures that endanger wild life. I demand that you say NO to Exxon's proposal to reopen these wells! 💪 HIH-1
Harold Hill
Santa Barbara

Comment Code	Response
HIH-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

La Paloma Ranch
1111 Venadito Canyon Road
Gaviota, California 93117-8711

May 7, 2019

Ms. Kathryn Lehr
Planning and Development Department
County of Santa Barbara
123 East Anapamu Street
Santa Barbara, CA 93101

Comments on Draft SEIR for ExxonMobil Trucking Proposal
17 RVP 00000 00081
SCH 2018061035
19 EIR 00000 00001

Dear Ms. Lehr:

I am writing about the above referenced draft SEIR.

My sister and I own La Paloma Ranch, which is immediately west of and adjacent to the ExxonMobil facility in Las Flores Canyon. Our family has lived in Venadito Canyon, between Las Flores/Corral Canyons and Refugio Canyon, since the 1800s and we are very familiar with traffic in the neighborhood. Access to our ranch and home is Venadito Canyon Road, which terminates on Calle Real mid-way between Corral Canyon Road and Refugio Road.

We do not oppose ExxonMobil's plans to use trucks as generally described in the draft SEIR.

I am writing only to point out serious traffic safety challenges on Calle Real between Corral Canyon Road and the Refugio Road/U.S. 101/Calle Real interchange based on my personal knowledge and experience as a neighboring resident and daily user of the road.

Speed limit and enforcement. First, there are no posted speed limits on Calle Real. There are two yellow "suggested" 35 MPH speed signs both east and west of Venadito Canyon Road. There is no way to know what the actual speed limit is on Calle Real, if any. My experience is that vehicles travel typically approximately 45 - 50 MPH on Calle Real, including State Parks and ExxonMobil plant vehicles. In addition to there being no posted speed limit, there is no observable law enforcement presence to enforce a speed limit even if one were posted. I do not believe the California Highway Patrol or County Sheriff patrol Calle Real except during emergencies such as fires or freeway accidents. There are often State Parks law enforcement vehicles using the road, we do not know if they have authority or direction to enforce speed limits if such limits were posted. HVE-1

The SEIR should examine the need for both a posted – safe - speed limit and its enforcement, as well as consider traffic safety impacts based on vehicles traveling 45 - 50 MPH. HVE-1 (con't)

Type of travel on Calle Real – pedestrians, joggers, bicyclists, children. Second, there is no discussion in the draft SEIR of the type of use of Calle Real except that it is not used by farm equipment, livestock or horseback riding (p. 4.5-21). What the SEIR omits is the fact that Calle Real is regularly and often used by pedestrians (walking and jogging) and bicyclists, including many children, visitors traveling between Refugio State Beach and El Capitan State Beach and/or El Capitan Canyon Campground/Ocean Mesa RV Campground. (In fact, the private campground at El Capitan provides bicycles to its guests for use on Calle Real.) Use of Calle Real by vacationers to travel between the two state beach parks is amplified because the pedestrian/bikeway between the two state beach parks on the south side of the freeway has been closed for several years due to landslides; the only pedestrian/bike travel between these two very popular parks is on Calle Real. I often see groups of bicyclists, typically families with multiple small children, riding on Calle Real, in a holiday/vacation mood, and taking up entire lanes of traffic. For example, two to four or five bicycles or joggers abreast, taking up the entire east or west bound lane. These people appear - understandably - to be focused on enjoying their recreation and often appear to be unaware of the vehicular traffic they completely obstruct. The draft SEIR does not describe Calle Real as having *no shoulders at all, no sidewalk or bikeway*. At the edge of the traffic lane are weeds, today about four feet high. When a pedestrian or bicyclist is using Calle Real they have no choice but to walk or ride in a traffic lane, there is no place else to go. For example, if a truck is travelling 50 MPH and comes upon a family, five-abreast, bicycling from El Capitan to Refugio, the truck may not be able to stop before hitting the bicyclists. The truck driver will have three choices: 1) hit the bicyclists; 2) veer into the oncoming traffic (hoping there is no oncoming traffic or if there is oncoming traffic a collision will result); or 3) drive off the road into the field/hill/fence/weeds. HVE-2 There are two mitigations which the County must require to address this existing traffic safety issue. First, the County should install a pedestrian/bikeway along Calle Real between the two popular state beach parks and El Capitan area private campground, whether or not ExxonMobil's proposal is approved. The pedestrian/bikeway should be put in the existing right of way on the south side of Calle Real so that it avoids the dozen or so driveways/roads which put traffic on and off Calle Real from the ranches and oil facilities along the north side of Calle Real. Second, the County should require State Parks to repair the pedestrian/bikeway between the two state beach parks south of U.S. 101 along the beach bluff. This pedestrian/bikeway has been closed for several years so the State Parks department has had ample time to plan/engineer/budget for the long–needed repair. HVE-3

Venadito Canyon Road intersection. Third, the traffic safety of the Venadito Canyon Road/Calle Real intersection is not evaluated in the draft SEIR. The preparers should visit this intersection and evaluate it from a traffic safety perspective. There is an oak tree on the north side of Calle Real just east of Venadito Canyon Road. When a vehicle is stopped at the terminus of Venadito Canyon Road, the tree blocks the driver's view of oncoming traffic from the east, which is accelerating down the Orella Ranch hill. What is even more dangerous is the lack of *any safe* sight line on the west. If a vehicle is stopped on Venadito Canyon Road, waiting to turn left (east) on to Calle Real, there is almost no safe sight distance to the west, I would guess about 250 – 300 feet. If a vehicle is traveling east on Calle Real from Refugio towards Corral Canyon, at 50 MPH, by the time the driver can see a car leaving Venadito Canyon Road turning left into the same, eastbound lane of Calle Real, it is too late to stop. The SEIR should evaluate this traffic safety problem. There was a vehicle accident at this intersection several years ago. A three-way stop sign at the Calle Real/Venadito Canyon Road intersection would probably solve this problem. HVE-4

Refugio Road/U.S. 101/Calle Real intersection and beach traffic. Fourth, the draft SEIR does not discuss the very real situation of dozens of pedestrians who walk through the Calle Real/Refugio Road/U.S. 101 intersection every summer day and weekends throughout the year. There are sometimes dozens of cars parked on both sides of Refugio Road, north of Calle Real. The people from the cars access Refugio Beach for free by walking on a pathway on the east side of Refugio Creek. These groups of pedestrians often take up almost all of Refugio Road, walking many abreast, hauling ice chests, beach toys, etc., enjoying their visit to the beach, completely oblivious to the fact they are walking in the middle of a travelled road. The intersection has no pedestrian walkway, so they must walk directly in the road, there is no other choice. HVE-5

Facility traffic pattern. Last, the draft SEIR assumes that trucks and workers accessing the ExxonMobil facility all use the Refugio exit. This is incorrect. Trucks/cars/pickups coming to Corral Canyon from the south (Goleta, Santa Barbara) typically use the El Capitan Beach exit. There is an enormous traffic safety issue at the west end of that off ramp, where dozens and dozens of pedestrians and bicyclists cross Calle Real and under the freeway from the private campgrounds to El Capitan Beach. The County was negligent in creating the existing serious traffic safety problem by approving dozens of campsites/cabins/RV sites north of Calle Real, separated from El Capitan Beach by a busy road with no sidewalk/bikeway and poor visibility. HVE-6

As proposed, the SEIR does not provide any factual basis for the County to make accurate traffic safety or neighborhood compatibility findings. In addition to providing a more thorough and accurate description of the traffic safety issues affecting Calle Real, the SEIR should consider - and not dismiss as impractical - additional mitigations: HVE-7

1. The ideal solution would be to re-open access to northbound U.S. 101 lanes at Corral Canyon Road. This would eliminate all of the traffic safety concerns along Calle Real related to additional trucks. It would take all the oil related traffic off of Calle Real, which is impacted heavily by recreational users between the two beach parks as described above. For many years there was a freeway access at Corral Canyon, I used it many, many times in the past. It could work like the exit/entrance on El Sueno Road to the east – access only to the northbound lanes. There would be no real engineering required as the topography hasn't changed since the days that exit/entrance was used, all that needs to be done is remove the fence and install pavement which would take only a day or two, and put in a three way stop at Corral Canyon Road/Calle Real/U.S. 101. It is simple, 100% effective, inexpensive and quick. HVE-8

2. Establish and post safe speed limit signs on Calle Real.
3. Enforce posted speed limits on Calle Real – designate which law enforcement agency will do this and require a plan and schedule of enforcement.
4. Remove the oak tree on the north side of Calle Real just east of Venadito Canyon Road.
5. Install a three way stop at Calle Real and Venadito Canyon Road.
6. Install a pedestrian/bikeway in the existing right of way on the south side of Calle Real between Refugio Road and El Capitan Beach Road.
7. Repair and reopen the historic pedestrian/bikeway on state park property south of U. S. 101 on the bluffs between El Capitan and Refugio State Beaches.
8. Install a pedestrian/bikeway along the west side of Refugio Road from the pathway to Refugio Beach north to the northernmost extent of weekend and summer holiday parallel parking on Refugio Road, consider crosswalks at this complicated intersection. HVE-9

Thank you for considering my comments. I would like to close by reiterating we do not oppose ExxonMobil's plans. They have been good neighbors to us and we do not object to trucking their products until the pipeline(s) are back in service.

Sincerely,

Eric Hvolboll
La Paloma Ranch
eph@ppplaw.com
805.962.0011

cc: Orella Ranch
Erro Ranch

La Paloma Ranch
1111 Venadito Canyon Road
Gaviota, California 93117-8711

May 22, 2019

Ms. Kathryn Lehr
Planning and Development Department
County of Santa Barbara
123 East Anapamu Street
Santa Barbara, CA 93101

Comments on Draft SEIR for ExxonMobil Trucking Proposal
17 RVP 00000 00081
SCH 2018061035
19 EIR 00000 00001

Dear Ms. Lehr:

I am writing supplement my letter of May 7 about the above referenced draft SEIR.

When the SEIR consultant prepares the traffic safety section, s/he should assume that traffic, including ExxonMobil trucks, travel at 55 MPH on Calle Real between Refugio Road and Corral Canyon Road. When s/he considers safe sight distances for traffic entering or exiting Calle Real, 55 MPH should be used.

I base this on my daily use of the road as well as a specific truck which I followed on Calle Real from Venadito Canyon Road to Corral Canyon Road at approximately 8:06 a.m. on Monday, May 20, 2019. The truck turned into ExxonMobil's plant site and was marked "Cannon". It is important that the SEIR's consideration of traffic and pedestrian safety be based on real-world speeds. This truck drove by the "suggested 35 MPH" signs at 55 MPH. HVE-10

The only way to solve traffic safety challenges on Calle Real is to have the trucks enter and exit Corral Canyon Road directly from south bound U.S. 101 by reopening the historic freeway access at that location. HVE-11

Sincerely,

Eric Hvolboll
La Paloma Ranch

Comment Code	Response
HVE-1	Per the California Vehicle Code, the maximum speed limit on two lane undivided highway is 55 mph. Based upon discussions with County Public Works, the County does not post maximum speed limits related to the 55 maximum speed limit law other than at the County boundaries where it applies. Therefore, the maximum speed limit on this portion of Calle Real is 55 mph. To post a different speed limit the County would need to conduct engineering and traffic surveys, which are reserved for roadways with traffic volumes of 2,000 or more vehicles per day. This portion of Calle Real would not meet that criteria. However, to address safety concerns along Calle Real, a mitigation measure has been added to the Land Use Section (Section 4.4) of the Final SEIR that would require the project related oil trucks to operate at or below 35 miles per hour along Calle Real. This measure would be enforced by the County by reviewing the truck speed logs and GPS data.
HVE-2	Pedestrian, bicycle, and vehicle counts were collected on Friday July 5, 2019 through Sunday July 7, 2019 (the peak fourth of July weekend) on Calle Real at the El Capitan Beach Road and Refugio Road intersections. Counts were also collected at the same locations on Wednesday July 18, 2019 and Thursday July 19, 2019. For each day, counts were collected in 15 minute increments over a 12 hour period (7:00 AM to 7:00 PM). This data was used to estimate the number of pedestrians and bicyclists traveling along Calle Real between Refugio Road and El Capitan Terrace Lane. During the peak fourth of July weekend the total number of pedestrians along this portion of Calle Real during the 12 hour period ranged between seven and nine. For bikes the total numbers ranges between 17 and 24, with the peak hour being five bikes. These represent low numbers of pedestrians and bicyclists even during a peak holiday weekend. The pedestrian and bicycle count for the weekdays were much lower. Total vehicle counts along this portion of Calle Real during the fourth of July weekend over the 12-hour period ranges from 244 vehicles to 373 vehicles, with a peak hour of 47 vehicles. Many of these vehicles travel as speed of 50 to 55 mph. The proposed Project would add a total of six trips to this peak hour. Trucks traveling at the allowed speed limit (55 mph) could present a significant safety hazard to the pedestrians and bicyclists along Calle Real. To address safety concerns along Calle Real a mitigation measure (TR-3) has been added to the Final SEIR that would require the Project related oil trucks to operate at or below 35 miles per hour along Calle Real. This measure would be enforced by the County by reviewing the truck speed logs and GPS data.
HVE-3	Based upon discussion with California State Parks, they are beginning to assess what would be required to repair the bikeway between El Capitan State Beach and Refugio State Beach. As discussed in Response to Comment HVE-2, the level of pedestrian and bicycle traffic along Calle Real in the vicinity of the proposed Project is low. Mitigation Measure (TR-3) has been added to the Final SEIR that would require the Project-related oil trucks to operate at or below 35 miles per hour along Calle Real. This measure would be enforced by the County by reviewing the truck speed logs and GPS data.
HVE-4	Collision records along Calle Real were reviewed for the three year period from 2015 through 2017. No collisions were reported along Calle Real during this period. Mitigation

Comment Code	Response
	Measure (TR-3) has been added to the Final SEIR that would require the Project- related oil trucks to operate at or below 35 miles per hour along Calle Real. This measure would be enforced by the County by reviewing the truck speed logs and GPS data. The traffic volumes at the intersection of Venadito Canyon and Calle Real would not be enough to meet the warrant requirements for installation of a three-way stop sign.
HVE-5	Pedestrian, bicycle, and vehicle counts were collected on Friday July 5, 2019 through Sunday July 7, 2019 (the peak fourth of July weekend) on Calle Real at the El Capitan Beach Road and Refugio Road intersections. Counts were also collected at the same locations on Wednesday July 18, 2019 and Thursday July 19, 2019. For each day, counts were collected in 15 minute increments over a 12 hour period (7:00 AM to 7:00 PM). The highest pedestrian volumes at the Calle Real/Refugio Road intersection occurred on Saturday 7/6/2019, when 272 pedestrians were counted between 7 AM and 7 PM and the highest hourly volume was 73 crossings from 5:00-6:00 PM. The peak pedestrians counted over the 12-hour period for the El Capitan State Beach Road/Calle Real intersection was 258 on Friday 7/5/2019, with a highest hourly volume of 43 crossings from 3:15-4:15 PM. The California Manual on Uniform Traffic Control Devices (CAMUTCD, section 4N.02) provides guidance for installation of in-roadway warning lights at crosswalks. The guidance recommends a minimum of 40 pedestrians per hour regularly for at least two hours. None of the counted locations meet this threshold, even during the July 4th weekend. The volume of pedestrians and bicycles at the Calle Real/Refugio Road intersection during the weekdays were found to be much lower. All vehicles must stop at the end of Calle Real before they turn on to Refugio Road. This would serve to reduce the potential for accidents involving trucks and pedestrians/bicyclists. Also, trucks would be moving at slow speeds when traveling on Refugio Road since they will have just existed U.S. Highway South.
HVE-6	The SEIR only states that the proposed Project oil trucks would use the U.S. Highway 101/Refugio interchange. It is acknowledged that some of the existing LFC traffic use the U.S. Highway 101/El Capitan interchange, but this would not be an impact of the Proposed Project since this traffic is part of the baseline. The SEIR has been updated to include an evaluation of the U.S. Highway 101/El Capitan interchange, which would be used by the proposed Project trucks coming south when the U.S. Highway 101/Refugio Road interchange is under construction. Caltrans estimates that the U.S. Highway 101 Southbound exist to Refugio Road would not be available for the project trucks for about one week per year over a three year period. The analysis shows that the Project would not impact operations at the U.S. Highway 101/El Capitan interchange.
HVE-7	Additional analysis on Calle Real has been added to the Final SEIR. See Response to Comments HVE-1 through HVE-06.
HVE-8	The alternative was looked at the SEIR and was eliminated from further consideration (see Section 2.7.2.6). The Caltrans Highway Design Manual, Chapter 500 covers the requirements for traffic interchanges. This document specifies that the minimum interchange spacing shall be two miles outside of urban areas. The placement of a new interchange at mouth of Las Flores Canyon would result in a spacing of less than two miles between interchanges.

Comment Code	Response
	The distance from the southern edge of Calle Real to the northern edge of U.S. Highway 101 is about 85 feet. It is likely that the curve needed for the entrance ramp would require more than the 85 feet to meet the Caltrans design requirements. This alternative would require funding, additional permits, and environmental review which would likely take four to ten years or more, which is longer than the proposed Project's timeframe, and the anticipated time for the Plains Replacement Pipeline to become available. Based upon the Caltrans requirements for the installation of new interchanges to freeways, it is unlikely that a new interchange across from the entrance road to the LFC facility would be permitted by Caltrans. Also, Caltrans typically looks at the need for new interchanges based upon traffic levels at the adjacent interchanges. Both adjacent interchanges operate at acceptable levels of service. Therefore, this alternative has been dropped from further consideration.
HVE-9	The SEIR and Traffic Addendum evaluated traffic operations and safety at both the Refugio Road and El Capitan interchanges and concluded that there were no statistically significant high collision rates and traffic operations are acceptable. Therefore, no further mitigation is required.
HVE-10	See Response to Comment HVE-1 regarding posting speed limit signs on Calle Real. Mitigation measure (TR-3) has been added to the Final SEIR that would require the project related oil trucks to operate at or below 35 miles per hour along Calle Real. This measure would be enforced by the County by reviewing the truck speed logs and GPS data. A measure has been added to the Land Use Section (Section 4.4) that would require the trimming of the oak tree on the northside of Calle Real just east of Venadito Canyon Road to improve sightlines. The impacts and duration of the Project did not provide a nexus for the installation of a bike path along the south side of Calle Real. Also, installation of a bike path in this area would in various locations encroach into the Caltrans right of way. Based upon discussion with California State Parks, they are beginning to assess what would be required to repair the bikeway between El Capitan State Beach and Refugio State Beach. The impacts of the proposed Project do not provide a nexus for repairing this bikeway on State Park's property. The Refugio Bridge Replacement Project proposed by Caltrans includes rehabilitation and upgrades to the existing pedestrian pathway beneath the Refugio bridges.
HVE-11	See Response to Comment HVE-8.

From: Melanja Jones <melanjaj@gmail.com>
Sent: Saturday, May 4, 2019 1:06 PM
To: Lehr, Kathryn
Subject: Exxon and off shore drilling in the SB Channel

To the SB County Supervisors,

I read that Exxon has applied to truck off shore oil pumped from its offshore rigs in the Channel. I am opposed to this for many reasons:

Even though the project is about restarting Exxon's offshore platforms and onshore facilities, it fails to analyze the impacts of restarting these facilities, such as the risk of offshore oil spills.
The EIR cites air pollution from 2012-2014, prior to the 2015 spill as the baseline, and leaves out the real current baseline conditions. This radically understates the real increase in emissions and other impacts from the project. The EIR should include current conditions from 2016-2019. JOM-1
The EIR should note that many jurisdictions prohibit hazardous chemicals from being transported along waterways, over bridges and tunnels and along critical transportation corridors. The 101 and Gaviota coast fit all of these categories. The project presents unacceptable risks. JOM-2
The Transportation and Circulation section of the EIR fails to include the risks of an oil truck accident shutting down the 101 where there is no way around it, even though there are numerous examples of this happening. A tanker truck shut down the 101 in Goleta during the Thomas fire when people were trying to evacuate. JOM-3
Staff should recommend denial of the project to the Planning Commission.

Thank you for your consideration

Melanja Jones
3375 Foothill Rd #1200
Carpinteria CA

Comment Code	Response
JOM-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
JOM-2	The major roadways that would be used by the Proposed Project trucks would be U.S. Highway 101 and State Route 166. Both roads are controlled by Caltrans and there are no limits on the transportation of crude oil on these roadways. This comment does not address an issue associated with the adequacy of the SEIR, but rather discusses concerns about transport of crude oil local highways. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
JOM-3	Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed Project truck routes. Two of these closures were along U.S. Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the U.S. Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.

From: bernajean@aol.com
Sent: Tuesday, May 28, 2019 10:19 AM
To: Lehr, Kathryn
Cc: chrisdevries314@gmail.com; DAVIDDEBIN@COX.NET; clink50@yahoo.com; BNS100@aol.com; JULIANNAKF@GMAIL.COM; TomDain@GMAIL.COM; gabyartist@hotmail.com; GRNGODUS@AOL.COM; taiana@taiana.com; CHERYLGIEFER@COX.NET; sheri@styleofsb.com; judi@weisbart.com
Subject: MUST DISCLOSE IMPACT OF EXXONMOBIL'S COASTAL OIL PRODUCTION

Dear Kathryn,
This letter is in regard to ExxonMobil's intention to resume operation of offshore oil platforms and trucking of crude oil in our coastline area.

I am deeply concerned regarding the negative potential of this issue and want the County to provide transparency making public aware of the negative impacts ExxonMobil's resumed production will incur on our local coastline.

KIB-1

Resuming production will impact the safety of our residents, our air quality, water and our fragile wildlife. With the history of oil drilling disasters in our area it is inconceivable we would allow it to begin again. We are putting so much and so many at high risk.

Please, include my name to the list of our County residents who strongly oppose this project.

A concerned citizen,
Berna Kieler
Montecito

Comment Code	Response
KIB-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

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	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.

From: Gwendolyn Kilfoyle <gwendolyn.j.kilfoyle@gmail.com>
Sent: Monday, June 3, 2019 8:40 AM
To: Lehr, Kathryn
Subject: SB Resident - Opposed to ExxonMobil's application

Dear County Staff,

I am a Santa Barbara Native and I strongly oppose ExxonMobil's application to truck oil. We need to be investing in Green Energy, not moving backwards by expanding fossil fuel production and transport in the area. In addition, the Environmental Impact Report on this particular application, misses crucial points, such as the impact of restarting offshore platforms and onshore facilities and the risks of an oil truck accident shutting down the 101 where there is no way around it. KIG-1

Staff should recommend denial of the project to the Planning Commission.

Thank you,
Gwendolyn Kilfoyle

Comment Code	Response
KIG-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

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	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR. The SEIR documents baseline conditions along U.S. Highway 101 and State Route 166 and key intersections along the planned trucking routes. Collision rates and traffic operating conditions are evaluated along all the proposed Project routes. Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed truck routes. Two of these closures were along US Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the US Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.

From: Amy Lagerquist <amylagerquist@ucsb.edu>
Sent: Tuesday, June 4, 2019 12:12 PM
To: Lehr, Kathryn
Subject: Exxon Mobil Public Comment

To Whom It May Concern:

I am writing to express my concerns regarding the Environmental Impact Report for Exxon Mobil's proposed Interim Trucking Project. I am a student at UCSB and I have been working with a group of undergraduates, graduate students, and community leaders throughout the quarter to analyze this EIR to break down the details and determine whether it is sufficient. What we have found is that the EIR fails to adequately express the inherent risks that come with transport of oil, via trucks or otherwise, and it does not address the broader impacts of the project, such as contributions to global climate change. LAA-1

Santa Barbara, as I'm sure you are aware, has had a notoriously toxic relationship with oil. We commemorated the 50th anniversary of the catastrophic Unocal oil spill just this year. The very oil spill that led to the shutdown of the oil platforms involved in this project had devastating impacts for marine ecosystems and cost the county millions of dollars. And more recently, an overturned oil truck on Highway 101 shut down the road during Thomas Fire evacuations and made an already desperate situation that much more dangerous. LAA-2

What I am trying to express here is that there is no "safe" way to drill, transport, or process oil, and the EIR fails to recognize this. The "environmentally superior" alternative, as determined by the EIR, is to stop trucking during rainy periods in an attempt to minimize the risk of accidents. However, only 1 out of 30 recent oil truck accidents in California occurred during a rainy period, so by these statistics, this alternative would make a minuscule difference, if any. The roads involved in this trucking route are inherently dangerous and sending up to 78 trucks up and down them every single day is a recipe for disaster. With a project this risky, accidents are not a matter of if, they are a matter of when, and when they happen, they could be catastrophic. LAA-3

In addition, the EIR quantifies any changes that this project would have on air quality, water quality, etc. as related to pre-2015 conditions. This is a deceiving way to express the impacts of this project, as the three oil platforms were shut down in 2015 and conditions presumably improved thereafter. A truly transparent EIR would express these data in comparison to current conditions so that the people are aware of how this will actually affect their current lives. LAA-4

While the EIR is technically only obligated to address the impacts of the trucking itself, I believe it has a moral obligation to address the impacts of reopening three derelict oil platforms, as this is only made possible if the trucking project goes forward. These platforms are old and outdated and extremely susceptible to accidents. Neglecting to include the potential impacts of reopening these platforms failing to present the full picture of the implications of this project. LAA-5

Finally, we need to think about where this project would put us in the fight against global climate change. Oil is not the way forward. While it may seem like a good temporary fix to bring prices down, we will ultimately end up paying for it in the future. It is time for Santa Barbara to take a stand against the fossil fuel industry and be a part of the battle on climate change. Approval of this project would put Santa Barbara on the wrong side of history. LAA-6

I hope you take all of these things into serious consideration when deliberating over this permit, and I urge you to think about the long-term implications of allowing fossil fuel expansion in our county.

Sincerely,

Amy Lagerquist

Comment Code	Response
LAA-1	Impact GHG.1 in Section 4.2, *Climate Change/Greenhouse Gas Emissions*, addresses the impact of the trucks GHG emissions. The rest of the comment does not address specific issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
LAA-2	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
LAA-3	The SEIR identified the No Project Alternative as the Environmentally Superior Alternative. However, since the No Project Alternative would not meet the basic objectives of the Project, CEQA requires the identification of the next environmentally Superior Alternative, which was found to be the No Trucking During Rainy Day Alternative. The SEIR does not assume that the No Trucking During Rainy Day Alternative would reduce the frequency of a truck accident. Section 5.2.3.3 of the SEIR states the following: “It is likely that not trucking during period of heavy rain would reduce the likelihood of a truck accident since overall accidents tend to be higher during wet conditions. However, the accident data for trucks is not detailed enough to determine the effects due to wet weather. Therefore, no adjustment has been made to the accident rate”. The advantage of the No Trucking During Rainy Day Alternative is that it could reduce the severity of the impacts of an oil spill. Spills that occurred near drainages or waterways during a rain event could be transported more readily downstream increasing the severity of the impacts to biological and water resources. As discussed in Section 4.3.1.5, the truck transportation routes cross many perennial streams and major drainages. In the event of a spill that enters these waterways, there could be impacts to water quality and the aquatic habitat. Some of the creeks that could be affected by an oil spill flow into major waterways such as the Santa Ynez River, Cuyama River, Santa Maria River, and Twitchell Reservoir. If the oil spill occurred during periods when these creeks and drainages and storm drain systems were flowing, it is possible that oil could enter these major waterways and impact biological and water resources. Under the No Trucking During Rainy Periods Alternative, the probability of a spill impacting waterways would be reduced since it would be less likely that the spilled oil would be transported via the rainwater into nearby creeks and other drainages.
LAA-4	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, “to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to

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LAA-5	The SEIR has been prepared to comply with the requirements of CEQA. The restart and operation of the existing and permitted SYU facilities is considered part of the baseline as discussed in Response to Comment LAA-1. The impact of operating the SYU facilities had

Comment Code	Response
	been documented in the previous CEQA documents that the County prepared for the SYU Project.
LAA-6	This comment does not address issues associated with the scope or adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Brendan Leonard <brendanl@uchicago.edu>
Sent: Tuesday, May 28, 2019 9:11 PM
To: Lehr, Kathryn
Subject: Fwd: Public Comment on Exxon Trucking EIR

---------- Forwarded message ---------
From: **Brendan Leonard** <brendanl@uchicago.edu>
Date: Tue, May 28, 2019 at 9:09 PM
Subject:
To: Klehr@countyofsb.org <Klehr@countyofsb.org>

Hello,

I am submitting a public comment on the Exxon trucking proposal EIR. I crafted the below four points stating my public opinion on the flaws of the EIR that was conducted by the County consultants. Some of the facts I state reference notes I took during the May 7th late afternoon public comment event.I believe the proposal is limited in scope in a way that locks in fossil fuel production as the only option for the area, when renewable production in other supporting areas must be considered. The biggest flaw is that it fails the consider the endogenic environmental damages of resuming offshore oil drilling. LEB-1

1. The EIR does not account for the climate and ocean safety hazards of starting back up oil production on the offshore platforms again. LEB-2

2. The EIR does not account for real alternatives (such as renewables). My understanding from notes I took on an environmental lawyer's remarks at the May 7th public comment is the following: the EIR under CEQA is supposed to consider alternative energy sources in other areas when the project area would not support such alternatives. The area for trucking would not support those renewable sources but the EIR is legally obligated to consider energy alternatives. LEB-3

3. The rainy day alternative does not prevent accidents as less than 1/30 truck spills (in California I believe) are actually due to rain (I also recall hearing this statistic from an intern at NRD during the 5/7 public comment). LEB-4

4. Trucking spills are super dangerous, shut down 101 during Thomas fire evacuations. LEB-5

Let me know if you have any questions.

Best,

Brendan Leonard
Residence: 715 Gayley Walk
Apt 201
Goleta, CA 93117

Comment Code	Response
LEB-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

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	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
LEB-2	See Response to Comment LEB-1.
LEB-3	Alternatives, in the context of CEQA, are optional ways that the project proponent could achieve most of their objectives, while also reducing or eliminating the environmental impacts of the proposed project (California Public Resources Code [PRC] Section 210020). CEQA Guidelines Section 15126.6(a) states: "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible." Apart from the analysis of the No Project Alternative, there is no ironclad rule governing the nature or scope of the "reasonable range" of other alternatives to be discussed, other than the "rule of reason" (CEQA Guidelines Section 15126.6(a) & (f). An analysis of alternatives in an EIR should include a list of alternatives considered but rejected and include an explanation of why alternatives were rejected. (If this discussion is not included in an EIR, it must exist elsewhere in the administrative record). The Lead Agency may, as part of the scoping process, make an initial determination as to which alternatives are potentially feasible and merit in-depth consideration, and which do not. (CEQA Guidelines Section 15126.6(c)). An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. The alternatives analysis in the SEIR meets all these CEQA requirements. An EIR is not required to include alternatives that are not feasible. The term "feasible" is defined in CEQA Guidelines § 15364 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (see Public Resources Code § 21061.1). CEQA Guidelines § 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include: site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the proponent can reasonably acquire, control, or otherwise have access to potential alternative sites. The Renewable Energy Alternatives would not meet the underlying objectives of the Project, and it is not clear that a solar or wind facility is feasible alternative since neither could not be accomplished in a reasonable period of time (it would likely take more than seven years to design, permit and construct a solar or wind facility). It is speculative to assume that the Applicant could reasonably acquire control or otherwise have access to

Comment Code	Response
	alternative sites in the County that would be suitable and be of sufficient size (approximately 6,650 acres as discussed in Section 2.7.2.4) for wind or solar installations. There are also several regulatory issues that affect the feasibility of renewable energy alternatives as outlined in the County of Santa Barbara Strategic Energy Plan (2019). The County Land Use and Development Code limits utility-scale solar photovoltaic projects to the Cuyama Valley, Agricultural Land under the Williamson Act cannot be use for utility-scale renewable projects, and utility-scale renewable energy project are prohibited in coastal areas (Santa Barbara County, 2019). A number of these regulatory hurdles could be overcome by modifications to County ordinances and rules. However, this would require time to process and approve the regulatory changes.
LEB-4	The SEIR does not assume that the No Trucking During Rainy Day Alternative would reduce the frequency of a truck accident. Section 5.2.3.3 of the SEIR states the following: "It is likely that not trucking during period of heavy rain would reduce the likelihood of a truck accident. However, the accident data for trucks is not detailed enough to determine the effects due to wet weather. Therefore, no adjustment has been made to the accident rate". The advantage of the No Trucking During Rainy Day Alternative is that it could reduce the severity of the impacts of an oil spill. Spills that occurred near drainages or waterways during a rain event could be transported more readily downstream increasing the severity of the impacts to biological and water resources. As discussed in Section 4.3.1.5, the truck transportation routes cross many perennial streams and major drainages. In the event of a spill that enters these waterways, there could be impacts to water quality and the aquatic habitat. Some of the creeks that could be affected by an oil spill flow into major waterways such as the Santa Ynez River, Cuyama River, Santa Maria River, and Twitchell Reservoir. If the oil spill occurred during periods when these creeks and drainages and storm drain systems were flowing, it is possible that oil could enter these major waterways and impact biological and water resources. Under the No Trucking During Rainy Periods Alternative, the probability of a spill impacting waterways would be reduced since it would be less likely that the spilled oil would be transported via the rainwater into nearby creeks and other drainages.
LEB-5	The SEIR documents baseline conditions along U.S. Highway 101 and State Route 166 and key intersections along the planned trucking routes. Collision rates and traffic operating conditions are evaluated along all the proposed routes. Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed truck routes. Two of these closures were along US Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the US Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.

From: Libis, Kyle C <kyle.c.libis@exxonmobil.com>
Sent: Monday, May 20, 2019 1:37 PM
To: Lehr, Kathryn
Cc: jparke@aklaw.net; Villalobos, David
Subject: Temporary Trucking Permit- Supplemental DEIR Comments

After reviewing the supplemental EIR, I've found in-depth points and supportive analysis of the temporary trucking permit project. I currently am a Maintenance Supervisor at the ExxonMobil onshore facility, and represent the employees at the Santa Ynez Unit as their Federation President. I have proudly worked for ExxonMobil for over 13 years and am a lifelong resident of Santa Barbara county.

As a Maintenance Supervisor, I will be responsible for the safety and integrity of the truck-loading facility, as well as the operations of the onshore facility. I would like to emphasize the county's findings that a public safety risk of transporting crude was less than significant, as well as highlight the Santa Ynez Unit's winning of 14 national safety awards. The safety of our employees and the protection of our environment is a top priority at our facility, and we appreciate the county's feedback in how we can build upon our reputation of many years of safe operations in Santa Barbara County. LIK-1

I agree with and support the county's determination of establishing the baseline at the last 3 full years of production. The Santa Ynez Unit has been operating in the county since 1993, and our facility's safety record is held to the highest standards.

We look forward to the approval of this application, restarting our facility and bringing back displaced employees back home.

Thank you,

Kyle Libis

Comment Code	Response
LIK-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: julie Lumley <julie.lumley1@icloud.com>
Sent: Friday, May 3, 2019 8:07 AM
To: Lehr, Kathryn
Subject: Stop Exxon Project

Even though the project is about restarting Exxon's offshore platforms and onshore facilities, it fails to analyze the impacts of restarting these facilities, such as the risk of offshore oil spills.

The EIR cites air pollution from 2012-2014, prior to the 2015 spill as the baseline, and leaves out the real current baseline conditions. This radically understates the real increase in emissions and other impacts from the project. The EIR should include current conditions from 2016-2019. LUJ-1

The EIR should note that many jurisdictions prohibit hazardous chemicals from being transported along waterways, over bridges and tunnels and along critical transportation corridors. The 101 and Gaviota coast fit all of these categories. The project presents unacceptable risks. LUJ-2

The Transportation and Circulation section of the EIR fails to include the risks of an oil truck accident shutting down the 101 where there is no way around it, even though there are numerous examples of this happening. A tanker truck shut down the 101 in Goleta during the Thomas fire when people were trying to evacuate. LUJ-3

Staff should recommend denial of the project to the Planning Commission.

Thank you,

Julie Lumley

Sent from my iPad

Comment Code	Response
LUJ-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
LUJ-2	The major roadways that would be used by the Proposed Project trucks would be U.S. Highway 101 and State Route 166. Both roads are controlled by Caltrans and there are no limits on the transportation of crude oil on these roadways. This comment does not address an issue associated with the adequacy of the SEIR, but rather discusses concerns about transport of crude oil local highways. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
LUJ-3	Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed Project truck routes. Two of these closures were along U.S. Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the U.S. Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.

From: Kelsey Maloney <kelsey@thewriteteam.net>
Sent: Wednesday, May 1, 2019 10:07 AM
To: Lehr, Kathryn
Subject: No on ExxonMobil Project

I'm writing to oppose the ExxonMobil project that is proposing to resume production from three existing oil platforms and to truck crude oil along our sensitive California coastline. I am writing to express my concerns about this dangerous proposal. Thank you. MAK-1

--
Kelsey Maloney
Grant Writer
805-946-0504

Comment Code	Response
MAK-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Priscilla Marchus <pmarchus1@cox.net>
Sent: Thursday, May 2, 2019 7:03 PM
To: Lehr, Kathryn
Subject: Exxon Mobil Interim Trucking...

Kathryn Lehr, Santa Barbara County Energy, Minerals and Compliance Division

Project Title: ExxonMobil Interim Trucking for SYU Phased Restart Project
Case Number: 7RVP-00000-00081

Ms. Lehr:

I oppose ExxonMobil's application. The proposal poses an extreme danger to the health and welfare of Santa Barbara County residents, and is completely contrary to stated policies of the county and state to reduce fossil fuel extraction and consumption in the face of catastrophic climate change worldwide. MAP-1

Thanks for considering my views.

Priscilla Marchus
650 Andamar Way, Goleta, CA 93117

Comment Code	Response
MAP-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: marge105@verizon.net
Sent: Friday, May 3, 2019 8:50 AM
To: Lehr, Kathryn
Subject: Protect us from offshore oil drilling.

Please deny attempts to reinstate offshore oil drilling due to pollution, air quality, spills, and accidents. MAR-1

Comment Code	Response
MAR-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

May 1, 2019

Hello Santa Barbara Planning and Development,

I am a Santa Barbara County resident and I strongly oppose permitting ExxonMobile to truck oil through our county. I also oppose allowing them to build a new pipeline.

Unless they are decommissioning the eyesores that dot our otherwise beautiful coast, building a more efficient and robust electric grid, or installing renewable energy infrastructure, I would rather not have ExxonMobile doing anything, at all, in the state of California or our wonderful County.

Exxon has known about climate change and the rise of sea level for decades and has advocated against collectively acting on it.

There is no reason, whatsoever, to believe them when they say they have anything in their minds other than turning a profit. Previous action has shown that this is the company's sole motivation, at the expanse of all our well-being. MIL-1

Trucks degrade our roads and make a precarious situation in the event of a disaster even more dangerous. This happened during the Thomas fire when an oil truck got in a wreck, shutting down the 101 at a crucial time.

As far as a new pipeline goes, we have seen that story play out already.

Please deny all proposals put forward by ExxonMobile.

Thank you,

Loren Mindell
746 Camino Del Sur #6
Goleta, CA 93117

Comment Code	Response
MIL-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

RANDALL T. MOON, Ph.D.
5512 Calle Arena
Carpinteria, CA 93013

206.475.8213
rtmoon@gmail.com

15 May, 2019

ATTENTION: COUNTY OF SB

RE: COMMENTS ON EXXONMOBIL INTERIM TRUCKING...

I am writing to ask that you NOT APPROVE this application for increased transportation of oil in the county of Santa Barbara. These oil companies have proven themselves untrustworthy, and their product is hazardous to life on the planet. It is time to switch to non fossil fuel sources of energy before climate change renders the planet uninhabitable. One of the quickest ways to reduce fossil fuel useage is to oppose the oil companies continued exploration, production, and transportation of oil hence I oppose their current proposal. MOR-1

Sincerely,

RANDALL T. MOON, Ph.D.

RECEIVED
MAY 17 2019
S B COUNTY
PLANNING & DEVELOPMENT

Comment Code	Response
MOR-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Kesh Mullen <kesh.mullen@gmail.com>
Sent: Monday, May 27, 2019 11:48 PM
To: Lehr, Kathryn
Subject: Public Comment for the Exxon Mobil Interim Trucking for SYU Phased Restart Project draft EIR

Dear Ms. Lehr:

My name is Kesh Mullen, and I am a fourth year Environmental Studies Major and French minor at UCSB. I am a part of the undergraduate research team working under Dr. David Pellow and graduate student coordinator, Sage Gerson for the Energy Justice in Global Perspective Mellon Sawyer Spring Seminar. I have had the privilege this quarter of working closely with a group of students, advisors and community partners to advocate against the ExxonMobil Interim Trucking for SYU Phased Restart Project.

This past month, myself and UCSB undergraduate students Kayla Gorman, Amy Lagerquist, Melissa Perez and Amanda Pantoja, have carefully read and analyzed the draft supplemental environmental impact report for this project. In addition, we attended the scoping meeting on May 6 to hear the various concerns of community members regarding the EIR. I wanted to address a few of my concerns about the draft EIR in this public comment. I believe the EIR fails to adequately address the serious concerns that this project raises.

The following are my concerns regarding the EIR:

1) The EIR does not adequately address the broader impact that this project implies. Approval of the trucking project means that three currently shut down oil platforms will be reopened. The impacts of enlisting old equipment need to at least be noted along with the impacts of the new trucking. MUK-1
2) The alternatives listed are no safer or less harmful than the original plan. The so- called environmentally superior alternatives keeps trucks off the road on rainy days but makes up for it by increasing the number of trucks per day from 70- 78. However, only one out of 30 recent oil truck accidents occurred during a rainy period. Stopping trucking on rainy days would hardly decrease the risk of accidents and more trucks on the road would equal more risks. MUK-2
3) Mitigation of the climate impacts of this project is simply not possible. The increase in trucking and use of fossil fuels will contribute significantly to climate disruption and there is no way to compensate at this level. MUK-3
4) The EIR evaluates the changes in environmental quality that would result from this project, but it uses pre- 2015 conditions as a baseline. It should be using 2019 conditions as the baseline if it is going to quantify the difference that this project would make for the environment. MUK-4

Thank you for taking the time to read my public comment. Please take my and the rest of the public comments made by Santa Barbara community members into careful consideration before moving forward with this project.

Sincerely,

Kesh Mullen

--
Kesh

Comment Code	Response
MUK-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
MUK-2	The SEIR identified the No Project Alternative as the Environmentally Superior Alternative. However, since the No Project Alternative would not meet the basic objectives of the Project, CEQA requires the identification of the next environmentally Superior Alternative, which was found to be the No Trucking During Rainy Day Alternative. The SEIR does not assume that the No Trucking During Rainy Day Alternative would reduce the frequency of a truck accident. Section 5.2.3.3 of the SEIR states the following: "It is likely that not trucking during period of heavy rain would reduce the likelihood of a truck accident. However, the accident data for trucks is not detailed enough to determine the effects due to wet weather. Therefore, no adjustment has been made to the accident rate". The advantage of the No Trucking During Rainy Day Alternative is that it could reduce the severity of the impacts of an oil spill. Spills that occurred near drainages or waterways during a rain event could be transported more readily downstream increasing the severity of the impacts to biological and water resources. As discussed in Section 4.3.1.5 of the SEIR, the truck transportation routes cross many perennial streams and major drainages. In the event of a spill that enters these waterways, there could be impacts to water quality and the aquatic habitat. Some of the creeks that could be affected by an oil spill flow into major waterways such as the Santa Ynez River, Cuyama River, Santa Maria River, and Twitchell Reservoir. If the oil spill occurred during periods when these creeks and drainages and storm drain systems were flowing, it is possible that oil could enter these major waterways and impact biological and water resources. Under the No Trucking During Rainy Periods Alternative, the probability of a spill impacting waterways would be reduced since it would be less likely that the spilled oil would be transported via the rainwater into nearby creeks and other drainages.
MUK-3	As GHG emissions and impacts are a global issue, and almost all Statewide GHG emissions are a part of the Cap-and-Trade program (approximately 80% as per the 2017 CARB Scoping Report Page ES16), while local jurisdictions and some areas may experience increases in GHG emissions, regional and state-wide emissions reductions are part of the larger programs to ensure long term reductions.
MUK-4	See Response to Comment MUK-1.

From: Cecelia Osborn <ceceliaosborn@gmail.com>
Sent: Thursday, May 2, 2019 5:07 PM
To: Lehr, Kathryn
Subject: Stop Exxon

No drill, no spill. I, a 10-year Santa Barbara resident, don't want Exxon on our shores nor on our roads.

Oil companies, including Exxon, continue to neglect the risks and consequences that their extraction has placed on our community and others. Their EIR fails to analyze the impacts of restarting the offshore facilities.

The EIR cites air pollution from 2012-2014, prior to the 2015 spill as the baseline, and leaves out the real current baseline conditions. This radically understates the real increase in emissions and other impacts from the project. The EIR should include current conditions from 2016-2019. OSC-1

The EIR should note that many jurisdictions prohibit hazardous chemicals from being transported along waterways, over bridges and tunnels and along critical transportation corridors. The 101 and Gaviota coast fit all of these categories. The project presents unacceptable risks. OSC-2

The Transportation and Circulation section of the EIR fails to include the risks of an oil truck accident shutting down the 101 where there is no way around it, even though there are numerous examples of this happening. A tanker truck shut down the 101 in Goleta during the Thomas fire when people were trying to evacuate. OSC-3

Staff should recommend denial of the project to the Planning Commission.

Thank you for your time,
Cecelia Osborn

Comment Code	Response
OSC-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
OSC-2	The major roadways that would be used by the Proposed Project trucks would be U.S. Highway 101 and State Route 166. Both roads are controlled by Caltrans and there are no limits on the transportation of crude oil on these roadways. This comment does not address an issue associated with the adequacy of the SEIR, but rather discusses concerns about transport of crude oil local highways. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
OSC-3	Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed Project truck routes. Two of these closures were along U.S. Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the U.S. Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.

From: Roberta Parkinson <robertaparkinson@yahoo.com>
Sent: Monday, May 6, 2019 11:19 PM
To: Lehr, Kathryn
Cc: Citizens' Climate Sara Wanous; Owen Bailey - Environmental Defense Center
Subject: Exxon Trucking project

Hi Kathy,
Thank you for your power point presentation tonight and for taking notes from the public.
I spoke about the practical, dangerous highway conditions on the 166, quoting Trip Advisor. I looked up the SB County Assoc. of Governments Route 166 Safety and Operational Improvements projects Measure A, 2012. It had 26 safety recommendations, and a few were already started by the date. 26 appears to be a large number of safety problems, and the articles I've read give credence to the many accidents: one man wrote about counting 30 deaths in last 10 years, and his math; one death every 2.2 miles, and another article reports 10 deaths in 1998, 2003, and 2006. Noozhawk had 4 crash accident reports from 4-06 to 4-11-19, alone, on 166, and so here we are in recent, last month's history. PAR-1
Your final speaker mentioned that Exxon should provide a bond. I'm concluding that the danger is even worse than I first suspected, and it's not a matter of if, but When an oil tanker is involved in another accident, (and probable spill) and the stats point to this trucking project with the increase of it's 144 one way trips.
My brother has worked in the oil industry for 40 years, and he just retired last year. He recently sent an article about natural gas exports from the US, to me. I know oil and gas are not the same, but the point is we have gas energy sufficient to export by super immense amounts. And if we are able to keep finding the cheese, (as in Who Moved the Cheese? by Spencer Johnson), other renewable sources of energy need to be developed and oil workers retrained to help develop these if possible, since climate change is upon us. This is my soap box paragraph, but really the dangerous highway is my real and substantial, risk point to voice. PAR-2
Thank you for your time and careful consideration.
Sincerely,
Roberta Parkinson, PT

Comment Code	Response
PAR-1	The Project's potential impacts to State Route 166 are described in Table 4.5-16, which shows that the addition of Project traffic would not result in a significant impact. The analysis reports the percent time spent following on State Route 166, consistent with guidance in the Highway Capacity Manual, 6th Edition for this roadway type. The SEIR's collision analysis included all reported collisions along State Route 166 and concluded that the collision rate along State Route 166 was not statistically significant.
PAR-2	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Tristan Partridge <tristan.partridge@ucsb.edu>
Sent: Monday, June 3, 2019 10:43 PM
To: Lehr, Kathryn
Subject: [comment] ExxonMobil Interim Trucking for SYU Phased Restart Project

Re. public comment on project title:
ExxonMobil Interim Trucking for SYU Phased Restart Project

Case Number: 17RVP-00000-00081
Project Location:
Gaviota Area, Santa Barbara County

Assigned Staff and Division:

Kathryn Lehr, Energy, Minerals and Compliance Division

Based on the Draft Supplemental Environmental Impact Report (SEIR) issued 12 April 2019, I am writing to oppose the **ExxonMobil Interim Trucking for SYU Phased Restart Project** (17RVP-00000-00081) in the strongest possible terms, and to urge all concerned within the Department of Planning & Development to ensure that this project is not approved. Staff should recommend denial of the project to the Planning Commission.

EIR baseline figures are inaccurate and misleading: the EIR cites air pollution from 2012-2014, prior to the 2015 spill as the baseline. This leaves out the actual, current baseline conditions. Doing so radically understates the real increase in emissions and other impacts from the project - presenting an incomplete, inaccurate and ultimately misleading picture. The EIR should instead include current conditions from 2016-2019. PAT-1

The EIR fails to note that many jurisdictions prohibit hazardous chemicals from being transported along waterways, over bridges and tunnels and along critical transportation corridors. The 101 and Gaviota coast fit all of these categories. The project presents unacceptable risks, and should therefore be denied. PAT-2

The Transportation and Circulation section of the EIR fails to include the risks of an oil truck accident shutting down the 101 where there is no way around it, even though there are numerous examples of this happening. A tanker truck shut down the 101 in Goleta during the Thomas fire when people were trying to evacuate. PAT-3

The EIR should include assessment of the broader oil extraction and transportation operations that this project would enable. The project would enable Exxon to restart operations at their offshore platforms and onshore facilities. The EIR, however, fails to analyze the impacts of restarting these facilities, such as the increased risk of offshore oil spills. PAT-4

The EIR must consider the substantial risks and impacts of truck accidents and oil spills. The EIR should recognize that California normally prohibits transporting oil drilled offshore by truck, citing the extremely high rate of accidents that makes trucking one of the worst forms of oil transport. Oil truck accidents cause fires and explosions, injure and kill people, and spill hundreds of thousands of gallons of crude a year onto roads and into waterways. PAT-5

The EIR should recognize that the rate of accidents along ExxonMobil's proposed route is already higher than the state average and then also include calculations of just how much worse ExxonMobil's project will make this situation. While PAT-6

tanker trucks account for only 4% of the total crude transport in the United States, the high incident and fatality rates compared with other modes of transport create a higher probability for a catastrophic event every time they're on the road. ExxonMobil's proposal to put 70 oil tanker trucks carrying nearly half-a-million gallons of highly flammable crude on our highways every day is therefore a disaster waiting to happen, particularly since the highways concerned are windy and dangerous under the best conditions. PAT-6 (con't)

More comparative data should be included in the EIR: A 2014 study of six states where truck traffic increased because of increased oil and gas drilling found that fatalities in traffic accidents more than quadrupled since 2004 in some counties. Statewide figures are also relevant: California already suffers hundreds of oil truck incidents a year, and many result in oil spills. One accident in 2000, for example, killed the driver and spilled nearly 7,000 gallons of oil, a substantial portion of which entered a river and spread to the ocean. These are unacceptable risks. A huge local increase in oil truck traffic would also create unacceptable new risks to imperiled wildlife and public health. PAT-7

Potential impacts on diverse and under-threat wildlife are insufficiently detailed in the EIR. ExxonMobil's oil-truck routes would pass through critical habitat for several species protected as threatened or endangered under the federal ESA, including red-legged frogs, California tiger salamanders and Southern California steelhead, which are highly susceptible to highly toxic crude oil. And oil spilled into the ocean threatens marine life, including endangered whales, sea turtles and sea otters. PAT-8

The EIR must detail the public health impacts of the harmful air pollution to be emitted by the heavy-duty diesel trucks. This is because the project would cause a huge volume of air pollution that makes people sick and fuels climate change. The heavy-duty diesel trucks carrying the oil would emit noxious pollutants that threaten the health of Santa Barbara County residents and others living along the proposed route, such as particulate matter and noxious oxide, a precursor to PM. California has identified diesel PM as a toxic air contaminant and has estimated that 70 percent of the cancer risk from the air Californians breathe is attributable to diesel PM. PAT-9

The EIR must consider the substantial risks and impacts of bringing aging offshore drilling platforms back online, particularly with regard to climate change. ExxonMobil's proposal will exacerbate climate change by emitting a significant amount of greenhouse gases that are already cooking our climate, both from the transport of the crude oil cargo and the consumption of that oil. Burning the 4 million barrels of oil ExxonMobil could truck in a year would result in over 1.7 million metric tons of carbon pollution -- the same amount as burning nearly 2 billion pounds of coal. The whole point of the proposal is to bring aging offshore platforms back online and is inconsistent with Santa Barbara County's efforts to reduce greenhouse gas emissions. A recent scientific study confirmed that every barrel of California oil left in the ground will result in a net decrease of about half a barrel of oil consumption globally. PAT-10

The commission should reject this dangerous application. If the commission moves forward with the application, it must complete a comprehensive EIR that considers the numerous significant impacts of this proposal - some of which are mentioned above.

The commission must also quantify the greenhouse gases to be emitted by the heavy-duty diesel trucks transporting the oil and the greenhouse gases emitted by consuming that oil; and it must disclose the environmental impacts from these emissions.

Any comprehensive EIR will reveal that there is no way to adequately avoid the harm from the project and that the only safe course of action is to deny the permit.

I conclude: staff should recommend denial of the project to the Planning Commission.

Sincerely,

Tristan Partridge, Ph.D.

Research Fellow
Institute for Social, Behavioral and Economic Research
University of California, Santa Barbara

Comment Code	Response
PAT-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
PAT-2	The major roadways that would be used by the Proposed Project trucks would be U.S. Highway 101 and State Route 166. Both roads are controlled by Caltrans and there are no limits on the transportation of crude oil on these roadways. This comment does not address an issue associated with the adequacy of the SEIR, but rather discusses concerns about transport of crude oil local highways. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
PAT-3	Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed Project truck routes. Two of these closures were along U.S. Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the U.S. Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.
PAT-4	See Response to Comment PAT-1.
PAT-5	The SEIR evaluates the public safety risks associated with transporting crude oil (See Section 4.3, *Hazardous Material and Risk of Upset*). Santa Barbara County local ordinances requires that offshore oil that is processed onshore must be transported by pipeline if one is available. The County ordinances allow for the use of other modes of transportation if a pipeline is not available and the Applicant commits to using one when it becomes available.
PAT-6	Section 4.5, *Transportation and Circulation*, provides a comparison of the accident rates for the roadway and intersections that would be used by the proposed Project in comparison to the State average for similar roadways and identifies the areas of the proposed route were the accident rate is statistically significantly higher based upon the Caltrans approved methodology. Section 4.3, *Hazardous Materials and Risk of Upset* and the TQRA (Appendix C), provide a detailed assessment of the probability of a crude oil truck accident for each of the proposed Project truck routes. The analysis addresses the probability of an oil spill and resultant fire if an accident were to occur.
PAT-7	The calculation of risk associated with a potential acute public exposure to a crude oil truck accident and release were not limited to analysis of the specific truck routes proposed, nor to the years 2012-2016. The calculation process is complex and described in detail in the TQRA (Appendix C) and the results of the risk analysis are summarized in Section 4.3.4 of the DSEIR. The following methodology was used:

Comment Code	Response
	• Evaluation of proposed truck routes for road characteristics. The routes were divided into segments with similar characteristics. • Quantification of vehicle and truck traffic volumes along the proposed routes, using published Caltrans data. • Development of route specific vehicle and truck accident rates utilizing California accident data for the years 2012-2016 on the proposed routes, California state-wide vehicle and truck accident data, and national vehicle and truck accident data. • Assessment of national trends in vehicle and truck accident rates over 25 years. This included an assessment of national accident rates associated with hazardous material trucks compared to the average truck on the road. National hazardous material truck accident data over the 25 year period 1991 to 2015 was analyzed to estimate the probability of release, size of release, and probability of ignition on release. • Determination of the consequences and potential impact of a crude oil release, using published spill and fire models. Combine the likelihood and consequences of a release to calculate the societal risk for the highest one kilometer segment, and present as a risk profile. • Assessment of the significance of risk of serious injury or fatality against the Santa Barbara County (SBC) Risk Profile Criteria. Using this criteria, the risk to public safety was found to be less than significant as detailed in the TQRA (See Appendix C). Road specific data for the years 2012 to 2016 was used to establish vehicle and truck accident rates, not calculate the risk of a hazardous material truck incident and release. As discussed above, the risk of hazardous material incidents and releases were based upon a much larger and longer data set that looked at California and with the wider United States. The TQRA that was performed for the SEIR meets all the Santa Barbara County requirements for assessing risk using a quantitative risk assessment.
PAT-8	The potential for, and the impacts from, an accidental spill are presented in Section 4.3, *Hazardous Materials and Risk of Upset*. The TQRA provides an estimate of the probability of an oil spill from a tanker truck. The annual probability of a spill of about one gallon or more has been estimated to be once in 34 years for trucks going to the SMPS and once in 12 years for trucks going to the Plains Pentland Terminal. This assumes no mitigation or Applicant-proposed avoidance or minimization measures. With Mitigation Measure RISK-1, which includes the Applicant-proposed avoidance or minimization measures, the annual probability of a spill of about one gallon or more would drop to once in 52 years for trucks going to the SMPS and once in 17 years for trucks going to the Plains Pentland Terminal. Given these probabilities, the SEIR preparers agree that impacts of an oil-spill to wildlife are important. The potential remains for a spill and the associated environmental effects and its clean-up. Even with implementation of mitigation, in the event of a spill associated with the trucking operations, the impacts to biological, water, and cultural resources could be significant and unavoidable (Class I) particularly if a spill was to enter a waterway or occur during a rainy period.”

Comment Code	Response
	The following text has been added to Section 4.5.4, Risk.3. *"In the most likely scenarios, the maximum extent of a spill of a full tanker would extend approximately 0.25 acre (11,000 ft^2) and would be confined to the road surface and habitat within an area about 500 feet of the roadway. Many spills could affect less area if cleanup efforts begin immediately or if more of the spill is constrained by the road. However, the volume, location, and timing (seasonal) of any potential spill could influence the severity of impacts to biological resources. Spills that occurred near drainages or waterways during the rainy season could result in oil being transported downstream, increasing the severity of the impacts to biological and water resources, and increasing the area of effect associated with cleanup. In general, the risk of a trucking accident is greater in the urban environments where traffic is greater such as the roads in the immediate vicinity of the loading facilities, including on and off ramps. However, should an accident occur in the rural environments along U.S. Highway 101 and State Route 166, and result in an oil spill into adjacent native habitats, the oil spill and associated cleanup effort could significantly affect biological resources through the removal or degradation of native habitats, the reduction of a population of special status species, or the take of a federal or state-listed species directly (e.g. by burying or coating individuals), or indirectly (e.g. through ingestion or contamination). Should the spill and/or subsequent cleanup effort result in a fire or contamination or waterways, there could be regional affects and potentially long-term consequences should there be a reduction in breeding success or nest failures, especially for species that are restricted in distribution, less mobile, considered regionally important, and federal and state-listed species. Therefore, however low the risk, depending on the location of the spill, the environmental conditions, and the biological resources present, the short and long-term effects to biological resources associated with a truck accident has the potential to be significant and unavoidable."*
PAT-9	Trucking emissions and potential health risk impacts are discussed and analyzed in Section 4.1 of the SEIR under Impact AQ.5 and Figure 4.1.3. Truck emissions have been reduced substantially with regulations promulgated in California over the last few years. The Applicant is proposing the use of the recent model year trucks (2017), which will maintain air quality impacts to a minimum utilizing the most recent technology. Impacts from truck emissions are estimated to be well below the thresholds for diesel particulate matter and cancer-causing pollutants. Based on the CARB EMFAC2017 model for emissions from on-road vehicles, the Applicant-p proposed trucks would be 5 times cleaner than the average truck on the roadway. Impacts are determined to be less than significant for trucking DPM emissions on nearby residences.
PAT-10	The operation of the SYU and LFC facilities are considered baseline, and as such the associated GHG emissions are not part of the proposed Project impacts. GHG emissions from these facilities are discussed in the cumulative section (Section 4.3.5). As GHG emissions and impacts are a global issue, and almost all Statewide GHG emissions are a part of the Cap-and-Trade program (approximately 80% as per the 2017 CARB Scoping Report Page ES16), while local jurisdictions and some areas may experience increases in GHG emissions, regional and state-wide emissions reduction are part of the larger programs to ensure long term reductions.

From: Sara Patchen <slpatchen@cox.net>
Sent: Friday, May 31, 2019 6:42 PM
To: Lehr, Kathryn
Subject: Stop Exxon

To whom it May Concern:

Please recommend denial of the Exxon Project to the Planning Commission.I moved to Santa Batbara in 1965 and experienced the horrendous local oil spill that happened a short time after. As a veterinary tech, I tried to remove oil from hundreds of birds and watched hundreds more die. Please DO NOT allow Exxon's offshore platforms and onshore facilities to restart. PAS-1

- We can’t risk another oil disaster
- The increase in emissions and other impacts from the project will be harmful to health, not to mention the danger posed by transporting chemical along the coast.

Thank you,
Sara Patchen
Santa Bárbara Resident

Comment Code	Response
PAS-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Patterson, Jeff S <jeff.s.patterson@exxonmobil.com>
Sent: Monday, May 20, 2019 3:46 PM
To: Lehr, Kathryn
Cc: Villalobos, David; jparke@aklaw.net
Subject: Temporary Trucking Permit – Supplemental EIR Comments

I am the Onshore Sr. Field Superintendent for the ExxonMobil SYU facilities. I'd like to thank the staff for hearing my comments at the public hearing held on May 6th. The county's determination of baseline as the last full three years of production is an appropriate conclusion, and I appreciate the opportunity to reiterate my comments on this report.

I wish to emphasize that the 'no project alternative' is not a solution for our displaced employees and their families. At SYU, we go above and beyond to ensure the safe operation of our facility. I started at ExxonMobil thirty years ago, right here in Santa Barbara County. I've worked my entire career at SYU. I am proud to be a part of a company whose dedication and commitment to safety and environmental excellence has been recognized with 14 safety awards. Additionally, ExxonMobil continues to be recognized by BSEE as the operator with the best safety performance. The SEIR document aptly concludes that the public safety risk of transporting crude is less than significant. PAJ-1

Delay on this project exacerbates the very real burdens and uncertainties our displaced employees and their families face every day. With the release of the draft supplemental EIR, it's clear that the 'no project alternative' is not an option.

With hundreds of our employees scattered across the country and the world, separated from families and friends, this permit is a chance to bring our SYU family back home to Santa Barbara.

Thank you for your consideration and attention.

Jeff Patterson

Onshore Sr. Field Superintendent

Comment Code	Response
PAJ-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Phillips, David <david.phillips@suez.com>
Sent: Thursday, May 30, 2019 9:18 AM
To: Lehr, Kathryn
Cc: Lehr, Kathryn; Phillips, David
Subject: Fw: Project Title: ExxonMobil Interim Trucking for SYU Phased Restart Project (Case Number: 17RVP-00000-00081) - Draft Supplemental Environmental Impact Report

Attention: Kathryn Lehr - Energy, Minerals and Compliance Division

Hello, my name is David Phillips. I currently work for SUEZ Water Technologies & Solutions.

Education: Degree in Chemical Engineering

Oil & Gas Work Experience: Over thirty (30) years of Oil & Gas Industry work experience, including Upstream (Oil Production) & Downstream (Refining). I am considered to be a "Subject Matter Expert" in these two (2) Oil & Gas business sectors …

First, I wanted to thank the County of Santa Barbara - Energy, Minerals and Compliance Division; Department of Planning & Development for the generation of the Project Title: ExxonMobil Interim Trucking for SYU Phased Restart Project (Case Number: 17RVP-00000-00081) - Draft Supplemental Environmental Impact Report (SEIR) released on April 12, 2019. I have read the document in it's entirety. It is comprehensive and thorough …

Second, my experience at the ExxonMobil Santa Ynez Unit (SYU) - Las Flores Canyon Facility … I have been involved since 2006, as a "Contractor". PHD-1

I would like to make comments in the following two (2) areas:

- ExxonMobil SYU's "Safety Culture"

- ExxonMobil SYU's "Environmental Awareness"

Overall, I would give ExxonMobil SYU Las Flores Canyon a grade of "A" in both areas!

Safety Culture: Over my career, I have been actively involved in over 100 of the 135 currently operating refineries in the United States. Additionally, I have been directly involved in the majority of the California Oil Leases in Orange County, Los Angeles County, Ventura County, Santa Barbara County, SLO County, Monterey County, and Kern County.

Compelling Statement ("Safety Culture"): The ExxonMobil SYU Las Flores Canyon On-Shore Facility is one of the "Safest" Plants that I have been in. They are truly "Best-in-Class" when it comes to Safety!

Environmental Awareness: Prior to the 2015 ExxonMobil SYU Shutdown, I worked full-time in a Laboratory Services and Optimization Capacity for approximately three (3) years … On-site 12 hours/day, 7 days on/7 days off.

PHD-1 (con't)

Compelling Statement ("Environmental Awareness"): Since 2006, I have never seen a "single drop" of either Crude Oil or Produced Water hit the ground. Every sample tap in the plant is either capped and/or fully contained!

Close/Conclusion: Please grant the Interim Trucking Permit for the Phased Restart of the ExxonMobil SYU Las Flores Canyon Facility. In doing so, hundreds of jobs will be brought back to Santa Barbara County. Prior to the 2015 ExxonMobil SYU Shutdown, ExxonMobil employed approximately 200 Employees & over 125 Contractors.

Kathryn, thank you and the Minerals and Compliance Division for all the hard work that you have put in on this initiative …

Best Regards,

David Phillips

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Comment Code	Response
PHD-1	This letter does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Rebecca Phillips <twinlakes777@msn.com>
Sent: Thursday, May 2, 2019 7:42 PM
To: Lehr, Kathryn
Subject: Opposed to Exxon Trucking in SB County

I am strongly opposed to Exxon gaining authorization for trucking up to 70 trucks per day along our coastal highways. As pointed out by the Sierra Club, "The EIR should note that many jurisdictions prohibit hazardous chemicals from being transported along waterways, over bridges and tunnels and along critical transportation corridors. The 101 and Gaviota coast fit all of these categories. The project presents unacceptable risks." PHR-1

Respectfully,
Rebecca Phillips
Santa Barbara

Comment Code	Response
PHR-1	The major roadways that would be used by the Proposed Project trucks would be U.S. Highway 101 and State Route 166. Both roads are controlled by Caltrans and there are no limits on the transportation of crude oil on these roadways. This comment does not address an issue associated with the adequacy of the SEIR, but rather discusses concerns about transport of crude oil local highways. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Reed <rnsnsn@comcast.net>
Sent: Friday, May 24, 2019 12:26 PM
To: Lehr, Kathryn
Cc: John Parke; Villalobos, David
Subject: Exxon Temporary Trucking Permit- Draft SEIR Comments

Ms. Lehr:

I am writing to express my support for approval of Exxon's temporary trucking permit for transport of crude oil from its Las Flores Canyon facility.

As I stated in my previous comments during the May 6 public comment session in Santa Maria, there was a time about 30 years past when I could not have imagined myself speaking out in favor of Exxon. However, as I also stated, times and knowledge change. I have, over the past few years, come to know many of Exxon's employees and managers in their Santa Ynez Unit and have been very impressed with their commitment to excellence, as well as their many contributions to the County of Santa Barbara. Though blameless, they and their families, some 200 strong, as well as nearly 100 contractors, saw their way of life come to a halt, as the flow of oil stopped. Proud and valuable members of our local community saw their income and security vanish in just a few minutes on a sunny morning in May, 2015.

A remedy to their plight is before you, and that is the application for the temporary trucking permit which would allow the return of the Las Flores Canyon facility to function, and to make those families, our neighbors and, often, friends, whole again. RER-1

The trucking plan before you is the result of extensive planning and analysis, carefully evaluated in the SEIR, and will be subject to careful and judicious implementation, subject to some 147 laws, regulations, and ordinances administered and monitored by over 14 agencies at all levels of government. The professional drivers and modern, well-maintained trucks will be superior to what we often see sharing our locals roads. The volume of traffic generated will have little impact given the existing traffic on our roads.

I would ask that you approve the temporary trucking plan to restore this vital part of our County's economic engine.

I am disturbed that the core of the opposition expressed by opponents of the plan seems inspired not so much by the trucking plan itself, but by their longstanding hatred of offshore oil production. Foundational to their opposition is the 1969 oil spill. While everyone will agree that the 1969 spill was disastrous, it occurred 50 years ago. Exxon was not involved. Times and technology have certainly changed. 1969 - the Environmental Protection Agency and the Endangered Species Act did not yet exist; automotive emission controls were mostly on the drawing board, laptops, cell phones, and the internet did not exist and your pocket calculator was a slide rule. Some of us with new Selective Service cards worried about Viet Nam. Richard Nixon was a new President and Watergate was just a building complex in Washington. Even the most jaded opponents of offshore production must admit that times and technology have certainly changed over the last 50 years. To contest that is to deny reality. To contend that today's production methods should be opposed because of what occurred in 1969 is simply ludicrous. RER-2

Those opposed to the temporary trucking plan express an idealogical and intractable opposition. In their view no EIR would be acceptable, no degree of mitigation would be sufficient, and no project would be approvable if it would result in additional off shore oil production.

I ask you, then, to look beyond their hyperbole, to address the facts that lay before you, and to approve the temporary trucking application. This is not about the 1969 oil spill. This is about the here and now, about local employees and their families who look to you for help. Finally, this is about a valuable contributor to our local economy which warrants restoration to its rightful status.

Thank you for your consideration.

Roy Reed
Director
National Association of Royalty Owners, California

Santa Maria, CA

Comment Code	Response
RER-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
RER-2	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Antonia Robertson <nzantoniarob@gmail.com>
Sent: Tuesday, May 7, 2019 4:29 AM
To: Lehr, Kathryn
Subject: ExxonMobil Interim Trucking for SYU Phased Restart Project

DEAR MS. LEHR:
MY HUSBAND AND I LIVE IN SANTA BARBARA COUNTY (TORO CANYON)
AND WE ARE EXTREMELY OPPOSED TO EXXON BEING PERMITTED
TO TRUCK OIL FROM THE GAVIOTA COAST TO REFINING FACILIIES.
IT IS A TERRIBLE IDEA ENVIRNMENTALLY AND IN THE AGE OF RAPID
CLIMATE CHANGE SHOCKING THAT IT IS EVEN BEING CONSOIDERED.
WOULD YOU BE KIND ENOUGH TO FORWARD THIS TO THE APPRO-
PRIATE PARTIES WHO WILL VOTE ON THE MATTER.
THJANK YOU
ANTONIA ROBERTSON J.D.
LAURENCE DWORET M.D.

ROA-1

Comment Code	Response
ROA-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Carol Roe <orin_h@hotmail.com>
Sent: Sunday, June 2, 2019 11:13 AM
To: Lehr, Kathryn
Subject: Plans for Exxon's trucking of oil on 101

As a property owner at 940 Vista De Lejos in Santa Barbara 93110, I am vehemently opposed to ExxonMobil's plan is to truck crude oil 24 hours a day, 7 days a week on our 101 coastal highways through Santa Barbara County. I urge the County to prohibit this action and separately to encourage, through tax relief, renewable energy efforts in our county.

ROC-1

I am also opposed to Exxon's plan to start its three offshore oil platforms in the Santa Barbara Channel. Blowouts and breaks in oil lines are inevitable and disasterous for our citizens and ocean wildlife.

Thank you for registering my complaint.

Carol Roe
940 Vista De Lejos
Santa Barbara, CA 93110

Comment Code	Response
ROC-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: david rowell <davidrowell10@gmail.com>
Sent: Sunday, May 5, 2019 11:58 AM
To: Lehr, Kathryn
Subject: Exxon Mobil Proposal

As a long time native of Santa Barbara and SCUBA diver I am very much opposed to the proposal by Exxon Mobil to resume production at three platforms but also truck oil along our sensitive coastline. You would think that by now Santa Barbara would have learned a lesson. The future is not fossil fuel extraction. Please review any and all potential environmental impacts of this proposal which includes the direct contribution to global climate change. The funds received and the additional employment from this proposal is not worth the potential for a very large and devastating environmental disaster. ROD-1

It is the County's responsibility to represent all of its citizens and not the interest of a few, especially if those few have deep pockets of influence.

Do the right thing and shut it down.

Thank You
David Rowell
717 Via Airosa
Santa Barbara, CA

Comment Code	Response
ROD-1	The SEIR provides a discussion of the impacts associated with the proposed Project and provides mitigation measures for significant impacts. Impact GHG.1 in Section 4.2, *Climate Change/Greenhouse Gas Emissions*, addresses the impact of the trucks GHG emissions. The rest of the comment does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: ehrs98@everyactioncustom.com on behalf of Ethan Sayers <ehrs98@everyactioncustom.com>
Sent: Friday, May 24, 2019 12:44 AM
To: Lehr, Kathryn
Subject: Reject Exxon's Application to Truck Dangerous Oil

Dear Kathryn Lehr,

Please make sure that opening/drilling commences as planned. So many jobs in this area rely on these drills being open, and radical environmentalism should not be a deterrent. SAE-1

Sincerely,
Ethan Sayers
Goleta, CA 93117
ehrs98@gmail.com

Comment Code	Response
SAE-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: b_schaal@yahoo.com
Sent: Tuesday, May 7, 2019 11:59 AM
To: Lehr, Kathryn; sbcob
Subject: Support for ExxonMobil Trucking in Santa Barbara County

Dear Ms. Lehr and SB County Supervisors,

It is time to resume oil production from the Heritage, Harmony and Hondo platforms. Human health and ecological protection is provided by long standing, enforceable regulations promulgated by the Department of Transpiration (DOT), multiple federal and stated environmental agencies, State of California Division of Oil, Gas, and Geothermal Resources (DOGGR), and others. These regulations assure standards are more stringent than any other nation and any other state. The proposed tanker transportation will provide the temporary and vital link necessary to deliver crude to permitted and regulated refineries.

Our society and its welfare require petroleum. While true that California collects tax on in-place crude resources, far more economic benefit is provided by actual production. A tremendous amount of tax revenue is generated when oil is produced. Well-paying jobs benefit our community, including families, schools, local businesses, arts, sports, and more. It is impossible to live in the society and receive the benefits we are accustomed to without petroleum.

The Goleta Valley Chamber of Commerce reportedly supports increased local jobs and local school revenue from ExxonMobile's proposed oil production and acknowledges the adequacy of the ExxonMobile Environmental Impact Report (EIR). It is not in ExxonMobile's best interest to experience leaks, spills, releases, transportation accidents, and the like. These experience cause profit loss and negative environmental impacts. These experiences may also result in fines and other penalties. Contrary to some opinions, oil producers like ExxonMobile significantly focus to minimize undesirable experiences like these. It appears the Goleta Valley Chamber of Commerce reviewed the pros and cons for resumed oil production and carefully determined the benefits are greater than controlled risks. SCB-1

Please also know, I'm a devout nature lover. I cherish the pristine Gaviota Coast, as well as surf breaks in our Santa Barbara county. I cherish the Los Padres National Forest and the mountain ranges associated with it. You'll find me enjoying these locations in-person every week. Please also know, I believe oil production and transportation can co-exist with these natural wonders.

Sincerely,
Bill Schaal
3630 Santa Maria Lane
Santa Barbara, CA 93105
b_schaal@yahoo.com

Comment Code	Response
SCB-1	This letter does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Susan Shields <shields3033@netscape.net>
Sent: Thursday, May 2, 2019 9:03 PM
To: Lehr, Kathryn
Subject: Exxon application for reopening oil platforms

To the board of Supervisors, Santa Barbara County:
I am opposed to approving Exxon's application to restart oil wells off the coast. There are too many risks. Aside from the potential for spills, driving tankers down the 101 at frequent intervals is asking for trouble. One accident and the freeway would be closed again. We all know how serious that would be. SHS-1
Susan Shields
3033 Calle Rosales, S.B. 93105

Comment Code	Response
SHS-1	Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed Project truck routes. Two of these closures were along U.S. Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the U.S. Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

May 28th, 2019

To Kathryn Lehr and the Department Planning and Development,

I am a Santa Barbara resident and a PhD student at UCSB, focusing on power grid stability during the transition to renewable energy. I am writing in regard to the Exxon trucking project EIR. Specifically, I am writing to comment on the report's failure to address end-use emissions.

The EIR explicitly does not consider end-use emissions from oil products produced by this project. The EIR shows that Exxon must mitigate the 9,000 (metric) tons of CO2e by which *direct* emissions exceed the county threshold every year. However, the report is silent on end-use emissions, which are far greater in scale. Burning the gasoline and diesel produced by a typical barrel of crude oil releases about 300 kg of CO2 (ignoring additional emissions from energy-intensive refinement and distribution)[i]. This quantity, multiplied by the project target of 10,000 barrels per day, leads to an estimate of 3,000 (metric) tons per day in end-use emissions. While the EIR is clear on Exxon's duty to mitigate 9,000 tons of direct emissions per year, it ignores the 9,000 tons in end-use emissions exported by the project *every three days*.

The EIR claims that the project has zero responsibility for these end-use emissions. Section 4.2.5.4 states that, because the project output is small compared to the demand it would serve, it would have no net effect on emissions from petroleum consumption. But this argument fails when the project is analyzed within its broader context. Projects like Exxon's interim trucking (and oil development at Cat Canyon) fall in line with an outdated economic strategy: facilitating economic development by improving access to energy through oil. They lead to the construction of permanent physical infrastructure, which supports local petroleum demand and entrenches oil in economy. Consequently, these projects operate simultaneously and cooperatively against decarbonization of the economy. Exxon trucking would be responsible for some proportion of the total end-use emissions that, due to continued development of petroleum infrastructure, the local economy fails to avoid. This number is certainly nonzero. SMK-1

Section 4.2.5.4 of the EIR should be reconsidered and expanded. Instead of disregarding all end-use emissions by analyzing the project in isolation, the report should consider the deeper, longer-term effects of calcifying the petroleum base of the economy through continued expansion of oil infrastructure. This effect likely cannot be quantified—but impacts on foreign oil imports are likewise difficult to quantity, yet the report discusses these effects in considerable detail on Page 4.2-26. Section 4.2.5.4 should similarly be expanded to consider the full complexity and impacts of this project on end-use emissions.

Sincerely,

Kevin D. Smith

PhD Student, Center for Control, Dynamical Systems, and Computation
UC Santa Barbara

[i] A typical barrel of crude oil produces 20 gallons of gasoline and 11 gallons of diesel. Burning 1 gallon of gasoline releases 8.9 kg of CO2, while 1 gallon of diesel yields 10.2 kg. In total, the fuel products from one barrel of crude oil release 290.2 kg of CO2. See EIA statistics at https://www.eia.gov/tools/faqs/faq.php?id=327&t=9 and https://www.eia.gov/environment/emissions/co2_vol_mass.php.

Comment Code	Response
SMK-1	End use of crude oil and the resulting emissions are discussed in the Draft SEIR section 4.2.5. As discussed in section 4.2.5.4 in the DSEIR, "The restart of oil production at the SYU would not require or create any new markets or use of new or different refineries or refining methods from those that exist today to serve California's end use demand for transportation fuels. The overall consumption of fuels and other petroleum products by end-users would likely not change as a result of the restart of the SYU facilities". Therefore, emissions associated with end-use are not included in the SEIR. Based upon data from the U.S. Energy Information Administration (EIA) during the baseline years (2012-2014) the West Coast refinery utilization ranged from 82.9% to 87%. During the period from 2015 to 2018 the West Coast refinery utilization ranged from 86.1% to 93.3%, which was higher than the baseline years even with the loss of the SYU production. The average overall gross refinery receipts of crude oil increased by one percent from the baseline years (2012-2014) to the post SYU shutdown years (2015-2018) based upon data from the EIA (EIA 2020). The table below presents data from the California Energy Commission on the historical crude supply to California Refineries.

Year	Thousands of Barrels				mmbpd	% Foreign Crude
	California	Alaska	Foreign	Total		
2012	228,173	77,150	313,675	618,999	1.70	50.7%
2013	230,476	73,628	319,581	623,685	1.71	51.2%
2014	240,108	67,359	328,222	635,688	1.74	51.6%
2015	225,435	73,182	323,336	621,953	1.70	52.0%
2016	205,582	68,765	328,513	602,860	1.65	54.5%
2017	193,781	77,084	354,119	624,984	1.71	56.7%
2018	199,658	72,945	369,386	641,990	1.76	57.5%

The data also shows that over time the crude supplies to California refineries has increased since the shutdown of the SYU facilities. The SYU crude was replaced with other crude sources, most likely foreign crude since this is the crude source to California refineries that The data also shows that over time the crude supplies to California refineries has increased since the shutdown of the SYU facilities. The SYU crude was replaced with other crude sources, most likely foreign crude since this is the crude source to California refineries that has been increasing over time. This supports the conclusion that the return of about 11,200 barrels per day to the west coast refinery market associated with the proposed Project would not be expected to affect the overall refinery gross crude recipients or utilization rate and in turn the production of end use transportation fuels.

From: Michael Steinfeld <cardiomike@aol.com>
Sent: Sunday, May 5, 2019 4:40 PM
To: Lehr, Kathryn
Subject: Oil stabilization

The oil that will be transported by truck. Will it be stabilized or unstabilized? STM-1

Michael Steinfeld
Sent from my iPhone

Comment Code	Response
STM-1	The crude oil produced at the SYU facility has been stabilized to meet the requirements for movement via truck or pipeline. The crude does not require blending with lighter material to allow for transport.

From: Surmeier, Patrice A <patrice.a.surmeier@exxonmobil.com>
Sent: Tuesday, June 4, 2019 11:41 AM
To: Lehr, Kathryn; Lehr, Kathryn
Cc: Villalobos, David; jparke@aklaw.net
Subject: ExxonMobil Temporary Trucking Permit - Supplemental DEIR Comments

Hello Ms. Lehr:

I wanted to thank the county for their in-depth analysis on the SEIR. I agree that the county has appropriately determined the baseline for this project, and look forward to the Santa Ynez Unit's restart and its operations adhering to our county's strict environmental regulations.

I've seen first-hand the changes that our facility has faced since the shuttering of operations at SYU. The no project alternative discussed in the draft EIR is not a sustainable solution for the hundreds of our displaced employees, contractors and their families, for the future operations of SYU, and SYU's role as an important source of county funding.

We are not just employees, we are a part of the community. Our children attend the same schools, we are part of the same community and faith groups. As a long-term resident of Santa Barbara, I'm proud of the role that ExxonMobil and the SYU facility have in supporting our community.

Over the last decade, ExxonMobil has put more than $45 million in taxes into the county – funds that are major sources for public safety and education. I have four children that have attended or are attending our local public school and I don't want to see the shutdown affect their education or of our neighborhood children. No project alternative is not acceptable – ExxonMobil is one of the largest taxpayers in the county, and we need to restore this important source of county funding.

SUP-1

Thank you for your consideration,

Patrice Surmeier, P.E.
Regulatory Advisor

ExxonMobil SYU Regulatory Compliance Group
12000 Calle Real
Goleta, CA 93117

(805) 961-4297 Office
(805) 450-6573 Cell

Comment Code	Response
SUP-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Carol Terry <plantnuts5@gmail.com>
Sent: Friday, May 3, 2019 10:41 AM
To: Lehr, Kathryn
Subject: ExonMobile Oil Transport Proposal

Santa Barbara County Board of Supervisors

I am strongly opposed to the proposal put forward by ExonMobile to transport oil by tanker truck through Southern Santa Barbara County. The oil would come from platforms Hondo, Harmony and Heritage which ExonMobile plans to reactivate in the near future.

The potential number of truck trips planned on Hwy.101 is staggering. The Hwy. 101 corridor is subject to frequent accidents which makes it a very dangerous conduit for petroleum transport. Potential truck accidents and related oil spills threaten our communities, our environment, and our citizens. TEC-1

Please do not approve this proposal. Protect the South Coast from the damage of further oil industry exploitation.

Carol Terry
plantnuts5@gmail.com

Comment Code	Response
TEC-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: carolethompson1@everyactioncustom.com on behalf of Carole Thompson <carolethompson1@everyactioncustom.com>
Sent: Tuesday, May 7, 2019 8:30 AM
To: Lehr, Kathryn
Subject: Reject Exxon's Application to Truck Dangerous Oil

Dear Kathryn Lehr,

I'm writing to urge Santa Barbara County to deny ExxonMobil's trucking permit application 17RVP-00000-00081. Trucking oil is inherently dangerous and poses unacceptable risks to our highways and coastline.

Putting the safety of everyone is more important than profit and wealth for the few.

I expect public representation that will protect our coastline, our community, our ecosystems and our safety.

As a taxpayer, voter and community member I expect you to eject this permit.

THC-1

Sincerely,
Carole Thompson
Camarillo, CA 93012
carolethompson1@gmail.com

Comment Code	Response
THC-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

357 Arroyo Road
Santa Barbara, CA 93110

May 9, 2019

Santa Barbara Department of Planning and Development
123 East Anapamu Street
Santa Barbara, CA.93101

RE: Input regarding Supplemental Environmental Impact Report for ExxonMobil's Proposed Interim Trucking for Santa Ynez Unit (SYU) Phased Restart Project

Dear Department of Planning and Development,

Stewardship is the careful and responsible management of something entrusted to one's care.

Due to climate change concerns, I am requesting that you do everything you can to discourage fossil fuel use in the future and take measures to discourage companies from using our beautiful lands, atmosphere, and oceans to produce fossil fuels, especially in any manner that includes fracking, high temperatures, acidification, or is in any way putting our water, aquifers, air quality, land, vegetation, and wildlife at risk. VDR-1

I am concerned that the selection of alternatives did not consider more objectives for reducing climate change. This is something that really needs to happen in all projects, since it is obvious that business as usual will not help our children enjoy the earth as we have. In particular, long range objectives for all of us need to be weighed with business' short-term objectives. The county needs to look hard at the amount of fuel we are using and consider more actions to lower that amount. To keep measuring projects by how they fulfill the current need, is to remain locked into a model of fuel use and greenhouse gas production that is not sustainable for our health. Using GHG offset credits serves to maintain the status quo, a level already known to be woefully inadequate and leading to irreversible changes. So requiring offset credits is not at all an effective tactic for reducing overall GHGs. I did, however, appreciate the comparative analyses of greenhouse gasses for various proposed alternatives. It is a great start in the right direction. Thank you! VDR-2

If you must approve the ExxonMobil proposal, here are my points of input regarding the project:

1) Concerns about the additional carbon emissions and noise created by tanker traffic, could be further mitigated with the requirement to use electric vehicles for VDR-3

transporting crude. If this is not available yet, it is a marvelous opportunity for ExxonMobil to lead the way. If you require it, they can become an industry leader. VDR-3 (con't)

2) Please reconsider permitting only the minimum distances for crude transportation. Less miles equals less emissions and greater safety. So please give a second look at the SMPS Only Alternative. Are there ways to reduce emissions from construction at the SMPS? Is it possible to ask Phillips 66 their likelihood to displace vehicles coming from the east? Is there any precedent for this? You can use 6) below to determine if Phillips 66 is in fact displacing trucks that travel from far greater distances. It may be worth a try, with positive reductions to overall GHG emissions. VDR-4
3) Please require ExxonMobil to decommission and recycle materials and metals used to construct the truck rack, transfer piping, and other activities and facilities associated with the truck loading, if they start using a pipeline. VDR-5
4) Please require new paving, and any maintenance to existing paving, to be as small a footprint as possible to minimize runoff and radiant heating of the air. Raingardens should be required to collect and disseminate water collected from non-permeable sources. After pipeline use, pavement should be decommissioned and rehabilitated to natural ecological conditions appropriate to area. VDR-6
5) Who determines which vapor reduction connections are “practical” to install? Please require all situations where vapor reduction connections are not used, to consult an independent energy engineer about practicality and other options to prevent vapor emissions. VDR-7
6) Please put a limit on the timeframe for the trucking, for instance, the proposed date for the new pipeline to be operational, or even better, a yearly or bi-yearly conditional use permit. This would allow the county to readdress the trucking impacts and make any changes necessary, in the event that the pipeline is not actually completed, emission standards change, or impacts exceed what was predicted. To do otherwise, would be to give ExxonMobil a blank check for trucking indefinitely, with no recourse for making changes to their permit that would reflect better knowledge, objectives, or improved standards as they become available or advisable. VDR-8
7) Please require a very substantial bond prior to project initiation that would be sufficient to cover the expenses of resource restoration in the future. This could be returned to ExxonMobil 20 years after project abandonment if not required. All too often, county constituents have been taxed to pay for restoration actions after companies have made their profits and abandoned the polluted sites they created. Until companies are required to pay the full and true costs of doing their business, they will continue to obtain subsidies from the public that we didn’t want to gift to them. VDR-9

Seriously, we taxpayers and voters need you to be good stewards on our behalf and on future behalf of our children and grandchildren. The air above us and the oceans beside us are not open sewers for anyone to simply spew their waste into, with the expectation that it will just go away. Now we know better. The earth is not just for VDR-10

resource extraction by a selected few at the expense of everyone else. Short-term gains in jobs or tax revenues need to be weighed with the long-term wellbeing of laborers and long-term costs to the county, as well as the health and provision for the rest of us. Resource damage and pollution affects everyone. In the past we were excited about the possibilities and opportunities that oil and gas made available to us, but now we know better how those practices negatively affect all our futures. It is time to change, and we need our officials, ourselves (the public), and the business community, to lead the way. Environmental analyses, administration, and legal fees associated with the use and abuse of public spaces are not cost effective for the public and have cost us too much money, time, and loss of future resource uses. We need a county plan for the future that will guide us all in lowering our collective impacts to climate change and reverse the damage we have already caused. VDR-10 (con't)

Thank you,

Brigitta Van Der Raay

Comment Code	Response
VDR-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
VDR-2	The selection of alternatives under CEQA requires that the alternative meet most of the basic objectives of the project and serve to eliminate or reduce significant environmental effects. Climate change is not considered one of the basis objectives of the project. Also, mitigation measures were identified that would reduce GHG emissions to less than significant levels. As GHG emissions and impacts are a global issue, and almost all Statewide GHG emissions are a part of the Cap-and-Trade program (approximately 80% as per the 2017 CARB Scoping Report Page ES16), while local jurisdictions and some areas may experience increases in GHG emissions, regional and state-wide emissions reduction are part of the larger programs to ensure long term reductions.
VDR-3	The County's understanding that any commercially viable electric truck production capable of hauling the 80,000 lbs tanker trailers is still several years away. Tesla has indicated its first limited electric semi-trucks with this capacity may be released sometime in 2020. This is a delay from the original forecast of 2019. Freightliner is developing an eCascadia all electric semi-trailer. Initial production of this model could begin sometime in 2021. It is not clear if this semi-truck would be capable of hauling an 80,000 lbs loaded tanker trailer. Given the limited information on these types of electrical semi-trucks, it is not clear whether these or other electric trucks will be commercially available or technically suitable for the Proposed Project. Because of the uncertain timing and load/compatibility uncertainties, use of electric semi-trailers was not viewed as a viable alternative or mitigation measure.
VDR-4	Santa Barbara County local ordinances requires that offshore oil that is processed onshore must be transported by pipeline if one is available. The County ordinances allow for the use of other modes of transportation if a pipeline is not available, and the Applicant commits to using one when it becomes available. The Applicant has stated that the proposed trucking would only occur until the Plains Pipeline 901/903 system is back in operations or seven years, whichever is shorter. In order to approve other means of transportation such as trucking, impacts need to be mitigated to the maximum extent feasible. Section 4.4, Land Use, provides a mitigation measure that would require the implementation of the SMPS Only Alternative to reduce impacts associated with the use of State Route 166. Phillips 66 in their comment letter on the Draft SEIR stated the following; *"It is worth noting that Santa Ynez Unit crude has a lower carbon intensity and a logistical advantage over other crudes in the region, especially crude from Kern County, and has crude characteristics that are compatible with the Phillips 66 Santa Maria Refinery. All factors that are favorable in determining a crude source".* This would indicate that Phillips 66 would prefer to take crude from the SYU than sources in Kern County.

Comment Code	Response
VDR-5	Recycling requirements for decommissioned and scrap materials would be a requirement if a pipeline is brought online and when the facilities were dismantled.
VDR-6	The only new paving for the proposed Project would be for small select areas such the truck loading rack lanes. The paving in these areas would only be sufficient to allow for adequate maneuvering of the trucks.
VDR-7	As part of the proposed Project, the Applicant proposes the use of low leak valves, welded piping connections and dual-seal pumps where feasible to reduce fugitive emissions. If this Project is approved by the County of Santa Barbra Board of Supervisors, final design drawing for the truck loading facility would have to be submitted to the County System Safety Reliability Review Committee (SSRRC) for review and approval. Also, the Santa Barbara Air Pollution Control District (SBCAPCD) will have to review emission emitting equipment as part of the Authority to Construct (ATC) Permit that would be required for the proposed Project.
VDR-8	As discussed in the Project Description (Section 2.1) trucking of crude oil would cease once a pipeline became available or after seven years, whichever is shorter, unless extended by County decision makers. It would be up to the County decision-makers to place limits on the timeframe for trucking. However, based upon the County's zoning ordinances trucking of oil from the LFC facility would not be allowed once a pipeline became available. Trucking for a period longer than seven years would require a new or modified permit from the County and would require and the required additional environmental review.
VDR-9	The proposed Project would not require removal of existing habitat or vegetation and no significant topographic alteration would be needed. Site grading would consist of only the minimum amount of soil work needed to construct pipe supports and containment (up to 500 cubic yards). Therefore, resource restoration and bonding are not required. However, requiring a performance security is within the discretion of the County's decision makers. For example, performance security in an amount enough to ensure completion of requirements of an approved revegetation and restoration plan may be applied as a development standard to the extent deemed necessary by the Planning Commission per the County's LUDC, Chapter 35.52.080(B)(2). The Conditions of Approval for the SYU Final Development Plan 87-DP-32cz describe the Socioeconomic Mitigation Program developed for the original project, which lists various performance security requirements in place. The Federal agencies that oversee the OCS have requirements in place that require current or previous operators to abandon and remove the offshore facilities. The LFC facility is required to have demonstrated financial responsibility to cover an oil spill under the California Department of Fish and Game requirements. ExxonMobil Corporation has a demonstrated financial responsibility of $300 million dollars.
VDR-10	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval

Comment Code	Response
	jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: David Velazquez <user@votervoice.net>
Sent: Monday, May 27, 2019 2:13 PM
To: Lehr, Kathryn
Subject: Temporary Trucking Permit – Supplemental DEIR Comments

Dear Planner Lehr,

I would like to start by saying that I worked for ExxonMobil for the last 27 years. I have lived in Santa Maria, Goleta and Ventura while employed with ExxonMobil in Goleta. It has been my experience that ExxonMobil has always held environmental, regulatory and safety concerns at the highest level, far surpassing production and profits. I was involved in the first trucking project to de-inventory the facility at Las Flores canyon after the pipeline failure shut us down and I can assure you all that there was nothing more important than the safety and environmental issues involved while regulatory requirements were met.

Thank you to the county for putting together a thorough analysis for this temporary trucking permit. I believe you have appropriately determined the baseline for this project. This permit will allow production to restart while adhering to California's strict environmental regulations contained in the California Environmental Quality Act.

VED-1

ExxonMobil has the ability to restart its SYU facilities at any time without approval by decision makers by availing itself of transportation options already allowed under its current permit. The draft SEIR did review alternative transportation options such as rail and marine, but the County found trucking to be the environmentally superior option. The trucking project includes minor modifications to the ExxonMobil facilities so that they can resume partial production and temporarily transport crude to refineries until a pipeline alternative becomes available

The temporary trucking permit will increase supplies of local energy, which will reduce the use of foreign imported oil and will help serve the large and existing demand for petroleum products. Approving this temporary trucking permit could also offset existing trucks that are taking longer and riskier routes.

I have included David Villalobos on this email to forward on to the Planning Commission.

Sincerely,

David Velazquez
5540 Murrieta St
Ventura, CA 93003
david.k.velazquez1@exxonmobil.com

Comment Code	Response
VED-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: barbara watts <newdaysunshine47@hotmail.com>
Sent: Tuesday, May 28, 2019 7:52 AM
To: Lehr, Kathryn
Subject: ExxonMobil Interim Trucking for SYU Phased Restart Project

Good morning,
I am writing to state that I do not believe the trucking of 70 tankers of oil a day, seven days a week, 244 hours a day is a safe or environmentally protective way to transport crude oil!
I am formally complaing about the use of county and state roads to this extent for the greed of the oil companies to be fulfilled.
I believe green energy is the only alternative for a future for our planet!
I oppose trucking oil or a pipeline through our coastal lands... Have you forgotten Refugio so quickly?

Leave the oil in the ground.. Invest in green energy, solar panels, wind turbines!

WAB-1

I live here, in Los Alamos, CA
Barbara Watts

Comment Code	Response
WAB-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Don & Sally Webb <sdwebb@cox.net>
Sent: Thursday, May 2, 2019 5:23 PM
To: Lehr, Kathryn
Subject: Say no to Exon Mobile's Application

Dear Sirs:

- Even though the project is about restarting Exxon's offshore platforms and onshore facilities, it fails to analyze the impacts of restarting these facilities, such as the risk of offshore oil spills. WED-1
- The EIR cites air pollution from 2012-2014, prior to the 2015 spill as the baseline, and leaves out the real current baseline conditions. This radically understates the real increase in emissions and other impacts from the project. The EIR should include current conditions from 2016-2019. WED-2
- The EIR should note that many jurisdictions prohibit hazardous chemicals from being transported along waterways, over bridges and tunnels and along critical transportation corridors. The 101 and Gaviota coast fit all of these categories. The project presents unacceptable risks. WED-3
- The Transportation and Circulation section of the EIR fails to include the risks of an oil truck accident shutting down the 101 where there is no way around it, even though there are numerous examples of this happening. A tanker truck shut down the 101 in Goleta during the Thomas fire when people were trying to evacuate. WED-4
- Staff should recommend denial of the project to the Planning Commission.

Please just say no.

Sally and Don Webb
621 Cowles RoadSanta Barbara CA 93108

Comment Code	Response
WED-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

Comment Code	Response
	ability to restart the SYU facilities at any time without discretionary approval by a County decision maker. To allow for a straightforward assessment of the proposed crude oil trucking Project impacts, and to avoid confusing the impacts of the proposed Project with the permitted operations of the existing SYU facilities, the baseline for purposes of environmental review was considered to be the physical environmental conditions as of 2018, with an operational baseline of the average of the last full three years of facility operations prior to the SYU shut-in (2012-2014). The average crude oil production rate from 2012 - 2014 was about 28,400 barrels per day, which is less than the historical average production rate for the past 19 years (48,866 barrels per day), and is well less than the permitted limit of 140,000 barrels per day of crude oil. In Association of Irritated Residents v. Kern County Bd. of Supervisors, the California Court of Appeal considered the appropriate baseline for analyzing a proposed expanded and updated refinery operation, although the refinery had ceased operations at the time of the NOP ((2017)17 Cal.App.5th 708.). The court's analysis considered: 1) Whether existing conditions include an operational facility; and 2) Whether the chosen baseline provides a realistic measure of the baseline physical conditions created by those operations. The court answered the first question in the affirmative because: 1) An operating refinery was permitted, and those permits were still in effect; 2) The refinery actually did historically operate at the baseline levels chosen; 3) The operations had undergone previous CEQA review; and 4) The refinery could resume operations without another discretionary approval. The court also affirmatively answered question two (2) because the chosen baseline reflected operations that actually occurred and was reasonable compared to other possible historical baselines. As discussed above and in the SEIR, the selection of the Project baseline meets all the required tests established by the California Court of Appeal, which include the following: 1) The SYU facilities are permitted to operate and can resume operation at any time without another discretionary approval. 2) The Draft SEIR used historical SYU operations that were actually achieved and that were lower than the peak historical levels and well less than the permitted levels. 3) The SYU operations previously underwent CEQA review. 4) The operational years used conservative estimated impacts (i.e., the baseline is not inflated by choosing years in the far-flung past that would have resulted in a higher baseline).

Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
WED-2	See Response to Comment WED-1.
WED-3	The major roadways that would be used by the Proposed Project trucks would be U.S. Highway 101 and State Route 166. Both roads are controlled by Caltrans and there are no limits on the transportation of crude oil on these roadways. This comment does not address an issue associated with the adequacy of the SEIR, but rather discusses concerns about transport of crude oil local highways. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.
WED-4	Based upon a review of available data for the years 2016 through 2019, a total of 11 highway closures occurred along the proposed Project truck routes. Two of these closures were along U.S. Highway 101 and nine were along State Route 166. Two of the closures of State Route 166 were due to non-accident events (flooding and downed power lines). One of the U.S. Highway 101 closure was due to wildfire near Buellton. Only one of these events was due to the release of a hazardous material (gasoline). Given that the proposed travel routes experience hundreds of accidents per year the likelihood of a road closure due to an accident is very small. In fact, many of the identified road closures were a result of a fatality, where the road had to be closed or partially closed to allow for the investigation of the accident.

From: Lesley Weinstock <lesleyweinstock@yahoo.com>
Sent: Monday, June 3, 2019 10:25 PM
To: Lehr, Kathryn
Subject: URGENT: Comment on ExxonMobil's application to truck oil

Please stop all new and re-start of oil facilities onshore and offshore and all trucking and transport of oil to protect public health and safety. We have to put the people before profit and put the environment first! Staff should recommend denial of the project to the Planning Commission.
Thank you.

- Even though the project is about restarting Exxon's offshore platforms and onshore facilities, it fails to analyze the impacts of restarting these facilities, such as the risk of offshore oil spills. WEL-1
- The EIR cites air pollution from 2012-2014, prior to the 2015 spill as the baseline, and leaves out the real current baseline conditions. This radically understates the real increase in emissions and other impacts from the project. The EIR should include current conditions from 2016-2019. WEL-2
- The EIR should note that many jurisdictions prohibit hazardous chemicals from being transported along waterways, over bridges and tunnels and along critical transportation corridors. The 101 and Gaviota coast fit all of these categories. The project presents unacceptable risks. WEL-3
- The Transportation and Circulation section of the EIR fails to include the risks of an oil truck accident shutting down the 101 where there is no way around it, even though there are numerous examples of this happening. A tanker truck shut down the 101 in Goleta during the Thomas fire when people were trying to evacuate. WEL-4

Sincerely,
Lesley Weinstock, Coordinator: representing 60 members of the Santa Barbara Green Sisters
Lesley's Family: Janet del'Giudice, Hannah Ray, Henry del'Giudice, Steve Weinstock,Lonnie Galate
Santa Barbara, CA
lesleyweinstock@yahoo.com
805-212-0052

Comment Code	Response
WEL-1	The purpose of an EIR is to identify the project's significant effects on the environment and indicate the manner in which those significant effects can be mitigated or avoided (California Public Resources Code § 21002.l(a)). In addition, "to decide whether a given project's environmental effects are likely to be significant, the Lead Agency must use some measure of the environment's state absent the project, a measure sometimes referred to as the 'baseline' for environmental analysis" (Communities for a Better Environment, supra, 48 Cal.4th at p. 315.). An EIR typically evaluates the potential physical changes to the environment by comparing existing physical conditions (i.e., the baseline) with the physical conditions that are predicted to exist with the implementation of the proposed Project. The difference between these two sets of physical conditions is the relevant physical change to the environment. After the project's predicted environmental effects have been quantified, one can then determine whether those environmental effects are "significant" for purposes of CEQA. Thus, the baseline is a fundamental component of the analysis used to determine whether a proposed project may cause environmental effects and, if so, whether those effects are significant. The County has discretion when determining the appropriate baseline based on the facts of the project as long as there is substantial evidence in the record to support the determination (Communities for a Better Environment v. South Coast Air Quality Management District (2010) 48 Cal.App.4th 310, 336.) . CEQA Guideline § 15125(a) provides the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." For the proposed Project, the Applicant has an entitlement to operate the SYU, including their existing platforms and onshore facilities, but is not currently doing so; the Applicant has indicated an intent to do so in the future when a mode of crude oil transportation becomes available. These facts take the project out of the "normal" situation and allow for consideration of other facts to support the Lead Agency's baseline determination. CEQA Guidelines § 15125(a) further states the following: *"Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."* The SYU facilities operate under a County issued Development Plan 87-DP-32cz that allow for the production of a maximum of 140,000 barrels of oil per day. The SYU Project has undergone several CEQA and NEPA reviews, including a 1984 EIR/EIS and a 1986 SEIR. Both environmental documents addressed the impact of construction and operation of both the SYU offshore and onshore facilities. Under the County permit, ExxonMobil maintains the

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Comment Code	Response
	Therefore, the adjustment of the baseline to account for the operations of the SYU facilities is appropriate and supported by the substantial evidence discussed above and in the SEIR.
WEL-2	See Response to Comment WEL-1.
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From: John Wilson <johnjwilson@sbcglobal.net>
Sent: Thursday, May 2, 2019 3:51 PM
To: Lehr, Kathryn
Subject: Argument against increasing and even continuing oil extraction in California

List of oil spills

From Wikipedia, the free encyclopedia

This article needs to be **updated**. Please update this article to reflect recent events or newly available information. *(July 2016)*

This is a reverse-chronological **list of oil spills** that have occurred throughout the world and spill(s) that are currently ongoing. Quantities are measured in tonnes of crude oil with one tonne roughly equal to 308 US gallons, 256 Imperial gallons, 7.33 barrels, or 1165 litres. This calculation uses a median value of 0.858 for the specific gravity of light crude oil; actual values can range from 0.816 to 0.893, so the amounts shown below are inexact. They are also estimates, because the actual volume of an oil spill is difficult to measure exactly. WIJ-1

[ ]

Contents

1Confirmed Spills
2Investigation underway
3Oil spills in the United States
4See also
5References
6External links

Confirmed Spills[edit]

This list is incomplete; you can help by expanding it.

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
MV *Solomon Trader* fuel oil spill	Solomon Islands, Rennell Island	5 February 2019	75	80	South Express Ltd	[1][2]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Newfoundland SeaRose platform	Canada, St. John's, Newfoundland and Labrador	16 November 2018	210	210		[3]
Doon, Iowa derailment	United States, Lyon County, Iowa	22 June 2018	520	520	BNSF Railway	[4]
Sanchi oil tanker collision with *CF Crystal*	East China Sea	6 January 2018	138,000	138,000		[5]
Keystone Pipeline	United States, Marshall County, South Dakota	16 November 2017	682	682	TransCanada Corporation	[6][7]
Delta House oil spill	United States, Gulf of Mexico, near Louisiana	11 October 2017 – 12 October 2017	1,080	1,280		[8][9]
Agia Zoni II	Greece, Saronic Gulf, Salamis	10 September 2017	2,500	2,500		[10]
Con Edison East River Oil Spill	United States, New York	7 May 2017	97	101		[11]
Energy Transfer Partners Dakota Access Pipeline Leak	United States, North Dakota	4 April 2017	0.27	0.27	Energy Transfer Partners	[12]
Ennore oil spill	India, Chennai, Ennore Port	28 January 2017	251	251	Darya Shipping Solutions	[13][14][15]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Belle Fourche pipeline leak	United States, North Dakota, Billings County, Ash Coulee Creek	5 December 2016	571	571		[16]
Fox Creek pipeline leak	Canada, Alberta, Fox Creek	6 October 2016	240	240		[17]
BP Clair production platform, North Sea	United Kingdom, Shetland, Clair platform	2 October 2016	105	105		[18]
2016 Colonial Pipeline Leak	United States, Shelby County, Alabama	12 September 2016	1,092	1,092		[19]
North Battleford pipeline spill	Canada, Saskatchewan, North Battleford	21 July 2016	170	210		[20]
ConocoPhillips Canada pipeline spill	Canada, Alberta, Grande Cache	9 June 2016	323	323	ConocoPhillips	[21]
2016 Union Pacific oil train fire	United States, Oregon, Mosier	3 June 2016	152	152		[22]
Denbury Resources Bowman County Oil SPill	United States, North Dakota Bowman County	18 May 2016	44	44	Denbury Resources	[23]
Shell Gulf of Mexico oil spill, Brutus offshore platform	United States, Gulf of Mexico, near Louisiana	12 May 2016	316	316		[24]
Keystone Pipeline	United States, Menno, South Dakota	2 April 2016	55	55	TransCanada Corporation	[25]
Refugio oil spill	United States, California, near Refugio State Beach	19 May 2015	330	330		[26]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
MV *Marathassa*	Canada, British Columbia, English Bay (Vancouver)	13 April 2015	2.3	2.3		[27]
Illinois train derailment	United States, Illinois, near Galena	5 March 2015	unknown	unknown		[28]
2015 Yellowstone River oil spill	United States, Montana, near Glendive	17 January 2015	41	160		[29][30]
Black Sea oil spill	Russia, Tuapse, near Black Sea	24 December 2014	unknown	unknown		[31]
Trans-Israel Pipeline	Israel, Eilat, Trans-Israel pipeline	6 December 2014	1,948	4,300		[32]
Mid-Valley Pipeline	United States, Louisiana, Mooringsport	13 October 2014	546	546		[33]
Lake Michigan oil spill	United States, Indiana, Whiting refinery	24 March 2014	2	5		[34][35][36]
MV *Miss Susan*/MV *Summer Wind*	United States, Texas, Houston Ship Channel	22 March 2014	546	546		[37][38]
North Dakota pipeline spill	United States, North Dakota, Hiland	21 March 2014	110	110		[39]
North Dakota train collision	United States, North Dakota, Casselton	30 December 2013	1,300	1,300		[40]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Bullenbaai	Curaçao, Bullenbaai, Isla refinery	1 November 2013	unknown	unknown		[41]
North Dakota pipeline spill	United States, North Dakota, Tioga	25 September 2013 – 29 September 2013	2,810	2,810		[42][43]
Rayong oil spill	Thailand, Rayong/Ko Samet, Gulf of Thailand	27 July 2013	43	163		[44][45]
Lac-Mégantic derailment	Canada, Québec, Lac-Mégantic	6 July 2013	4,830	4,830		[46]
Cushing storage terminal	United States, Oklahoma, Cushing	18 May 2013	340	340		[47][48]
Mayflower	United States, Arkansas, Mayflower	30 March 2013	680	950		[49]
Magnolia refinery	United States, Arkansas, Magnolia	9 March 2013	680	760		[50][51]
Bullenbaai	Curaçao, Bullenbaai	7 November 2012	unknown	unknown		[41][52]
Arthur Kill storage tank spill (Hurricane Sandy)	United States, New Jersey, Sewaren	29 October 2012	1,090	1,130		[53][54]
Curaçao	Curaçao, Isla refinery and Jan Kok nature preserve	17 August 2012	unknown	unknown		[55][56]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Sundre, Alberta	Canada, Sundre	8 June 2012	410	410		[57]
Guarapiche River	Venezuela, Maturín, Monagas	4 February 2012	680	41,000		[58][59]
Nigeria	Nigeria, Bonga Field	21 December 2011	5,500	5,500		[60]
TK Bremen	France, Brittany, Erdeven	16 December 2011	220	220		[61]
Campos Basin	Brazil, Campos Basin, Frade Field	7 November 2011 – 15 November 2011	89	400		[62] [63]
Rena oil spill	New Zealand, Tauranga, Bay of Plenty	5 October 2011 – August 2012	350	350		[64] [65]
North Sea oil	United Kingdom, North Sea, Gannet Alpha platform	10 August 2011 – 13 August 2011	216	216		[66]
Yellowstone River	United States, Billings, Montana, Yellowstone River	1 July 2011	105	140		[67]
Bohai Bay oil spill	China, Bohai Bay	4 June 2011 – 19 June 2011	204	204		[68][69]
Little Buffalo oil spill	Canada, Alberta	29 April 2011	3,800	3,800		[70][71]
Mumbai-Uran pipeline spill	India, Mumbai, Arabian Sea	21 January 2011	40	55		
Fiume Santo power station	Italy, Sardinia, Porto Torres	11 January 2011	15	15		[72]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Mumbai oil spill / MV *MSC Chitra* and MV *Khalijia 3*	India, Mumbai, Arabian Sea	7 August 2010 – 9 August 2010	400	800		[73][74][75]
Barataria Bay oil spill	United States, Barataria Bay, Gulf of Mexico	27 July 2010 – 1 August 2010	23	45		[76][77][78][79
Kalamazoo River oil spill	United States, Kalamazoo River, Calhoun County, Michigan	26 July 2010	2,800	3,250		[80][81]
Xingang Port oil spill	China, Yellow Sea	16 July 2010 – 21 July 2010	1,500	90,000		[82] [83]
Jebel al-Zayt oil spill	Egypt, Red Sea	16 June 2010 – 23 June 2010	*unknown*	*unknown*		[84]
Red Butte Creek oil spill	United States, Salt Lake City, Utah	11 June 2010 – 12 June 2010	65	107		[85][86]
Trans-Alaska Pipeline	United States, Anchorage, Alaska	25 May 2010	400	1,200		[87]
MT *Bunga Kelana 3*	Singapore, Singapore Strait	25 May 2010	2,000	2,500		[88][89][90]
ExxonMobil	Nigeria, Niger Delta	1 May 2010	3,246	95,500		[91][92][93]
Deepwater Horizon	United States, Gulf of Mexico	20 April 2010 – 15 July 2010	492,000	627,000		[94]
Great Barrier Reef / MV *Shen Neng 1*	Australia Great Keppel Island	3 April 2010	3	4		[95][96][97]
Lambro and Po rivers	Italy, Lombardy, Monza	23 February 2010	15	15		[98]
Port Arthur oil spill	United States, Port Arthur, Texas	23 January 2010	1,500	1,500		[99]
Yellow River oil spill	China, Chishui River (Shaanxi)	5 January 2010	130	130		[100]
Montara oil spill	Australia, Timor Sea	21 August 2009	4,000	30,000		[101][102]
Full City	Norway, Rognsfjorden near Såstein south of Langesund	31 July 2009	200	200		[103]
Lüderitz oil spill	Namibia, Southern coast	8 April 2009	*unknown*	*unknown*		[104]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Queensland	Australia, Queensland	10 March 2009	230	260		[105]
West Cork oil spill	Ireland, Southern coast	February 2009	300	300		[106]
2008 New Orleans oil spill	United States, New Orleans, Louisiana	28 July 2008	8,800	8,800		[107]
Shell bodo	Nigeria	1 August 2008	1,000	1,000		[108]
Statfjord oil spill	Norway, Norwegian Sea	12 December 2007	4,000	4,000		[109]
Korea oil spill	South Korea, Yellow Sea	7 December 2007	10,800	10,800		[110][111]
Kerch Strait oil spill	Ukraine Russia, Strait of Kerch	11 November 2007	1,000	1,000		[112]
COSCO Busan oil spill	United States, San Francisco, California	7 November 2007	188	188		[113]
Kab 101	Mexico, Bay of Campeche	23 October 2007 – 17 December 2007	1,869	1,869		[114]
Genmar Progress Spill	Puerto Rico, Guayanilla, Puerto Rico	30 August 2007	151	151	General Maritime Corporation (GMC) Progress LLC	[115]
Burnaby	Canada, Burnaby, British Columbia	24 July 2007	201	201		[116]
Guimaras oil spill	Philippines, Guimaras Strait	11 August 2006	172	1,540		[117]
Jiyeh power station oil spill	Lebanon	14 July 2006 – 15 July 2006	20,000	30,000		[117]
Citgo refinery	United States, Lake Charles, Louisiana	19 June 2006	6,500	6,500		[118]
Prudhoe Bay oil spill	United States, Alaska North Slope, Alaska	2 March 2006	653	689		[119]
Bass Enterprises Oil Spill (Hurricane Katrina)	United States, Cox Bay, Louisiana	30 August 2005	12,000	12,000		[120]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Shell (Hurricane Katrina)	United States, Pilottown, Louisiana	30 August 2005	3,400	3,400		[120]
Chevron (Hurricane Katrina)	United States, Empire, Louisiana	30 August 2005	3,200	3,200		[120]
Murphy Oil USA refinery spill(Hurricane Katrina)	United States, Meraux and Chalmette, Louisiana	30 August 2005	2,660	3,410		[120] [121]
Bass Enterprises (Hurricane Katrina)	United States, Pointe à la Hache, Louisiana	30 August 2005	1,500	1,500		[120]
Chevron (Hurricane Katrina)	United States, Port Fourchon, Louisiana	30 August 2005	170	170		[120]
Venice Energy Services Company (Hurricane Katrina)	United States, Venice, Louisiana	30 August 2005	81	81		[120]
Shell Pipeline Oil (Hurricane Katrina)	United States, Nairn, Louisiana	30 August 2005	44	44		[120]
Sundown Energy (Hurricane Katrina)	United States, West Potash, Louisiana	30 August 2005	42	42		[120]
MV *Selendang Ayu*	United States, Unalaska Island, Alaska	8 December 2004	1,560	1,560		[122]
Athos 1	United States, Delaware River, Paulsboro, New Jersey	26 November 2004	860	860		[123]
MP-80 Delta 20" pipeline (Hurricane Ivan)	United States, Louisiana	16 September 2004 – 19 September 2004	963	963		[124]
MP-69 Nakika 18" & MP-151 Nakika 18" pipeline (Hurricane Ivan)	United States, Louisiana	16 September 2004 – 6 October 2004	618	618		[124]
Chevron-Texaco tank collapse (Hurricane Ivan)	United States, Louisiana	16 September 2004 – 17 September 2004	423	423		[124]
Tasman Spirit	Pakistan, Karachi	28 July 2003	28,000	30,000		[125][126]
Taylor oil spill	United States, Gulf of Mexico near Louisiana	16 September	970	490,000	Taylor Energy	[127][128][129

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
		2004 – present				
Bouchard No. 120	United States, Buzzards Bay, Bourne, Massachusetts	27 April 2003	320	320		[131]
Prestige	Spain, Galicia	13 November 2002	63,000	63,000		[132][133][134
Limburg (bombing)	Yemen, Gulf of Aden	6 October 2002	12,200	12,200		[135][136]
Manguinhos refinery	Brazil, Guanabara Bay, Rio de Janeiro	23 November 2001	34	97		[137]
Trans-Alaska Pipeline gunshot spill	United States, Alaska	4 October 2001	932	932		[138]
Shell Ogbodo	Nigeria	25 June 2001	9,500	9,500		[139]
2001 Shell Ogoniland oil spill	Nigeria	May 2001	*unknown*	*unknown*		[140]
Petrobras 36	Brazil, Roncador Oil Field, Campos Basin	15 March 2001	274	274		[141]
Amorgos oil spill	Taiwan, Southern coast	14 January 2001	1,150	1,150		[142]
Jessica	Ecuador, Galapagos Islands	January 2001	568	568		[143] [144]
Pine River	Canada, Chetwynd, British Columbia	1 August 2000	850	850		[145]
Project Deep Spill	Norway, Helland Hansen ridge	June 2000	100	100		[146]
Treasure	South Africa, Cape Town	June 2000	1,400	1,400		[143]
Petrobras pipeline	Brazil, Guanabara Bay, Rio de Janeiro	January 2000	1,100	1,100		[137][143]
Erika	France, Bay of Biscay	12 December 1999	15,000	25,000		[122][143]
Port Stanvac oil spill	Port Stanvac, South Australia	28 June 1999	230	230		[147]
MV *New Carissa*	United States, Coos Bay, Oregon	4 February 1999 – 9 March 1999	230	230		[148]
Mobil Nigeria oil spill	Nigeria	12 January 1998	5,500	5,500		[122]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Nakhodka	Japan, Sea of Japan	December 1997	6,240	6,240		[149]
Julie N.	United States, Portland, Maine	27 September 1996	586	586		[150]
Sea Empress	United Kingdom, Milford Haven, Pembrokeshire	15 February 1996	40,000	72,000		[122][132]
North Cape	United States, Rhode Island	19 January 1996	2,500	2,500		[151]
MV *Iron Baron* (1985)	Hebe Reef, Tasmania	10 July 1995 – 30 July 1995	300	325		[152]
Apollo Sea	South Africa, Cape Town	June 1994	2,400	2,400		
Seki	United Arab Emirates	31 March 1994	15,900	15,900		[122]
Morris J. Berman	Puerto Rico	7 January 1994	2,600	2,600	New England Marine Services Inc.	[153]
MV *Braer*	United Kingdom, Shetland	5 January 1993	85,000	85,000		[132]
Aegean Sea	Spain, A Coruña	3 December 1992	74,000	74,000		[132]
Port Bonython oil spill	Australia, Spencer Gulf, South Australia	30 August 1992	296	296		[154]
Katina P	Mozambique, Maputo	26 April 1992	72,000	72,000		[132]
Fergana Valley	Uzbekistan	2 March 1992	285,000	285,000		[122]
Kirki	Australia, Indian Ocean, off the coast of Western Australia	21 July 1991	17,280	17,280		[155]
ABT Summer	Angola, 700 nmi (1,300 km; 810 mi) offshore	28 May 1991	260,000	260,000		[132]
MT *Haven*	Italy, Mediterranean Sea near Genoa	11 April 1991	144,000	144,000		[132]
Gulf War oil spill	Iraq, Persian Gulf	23 January 1991	270,000	820,000		[156] [157]
Mega Borg oil spill	United States, Gulf of Mexico, 57 mi (92 km) SE of Galveston, Texas	8 June 1990	16,499	16,501		[158]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
American Trader	United States, Bolsa Chica State Beach, California	7 February 1990	979	981		[122] [159]
Arthur Kill pipeline	United States, New Jersey, Sewaren	1 January 1990	1,840	1,840		[160] [161]
Khark 5	Spain, 350 nmi (650 km; 400 mi) off Las Palmas de Gran Canaria	19 December 1989	70,000	80,000		[122][132]
Presidente Rivera	United States, Delaware River, Marcus Hook, Pennsylvania	24 June 1989	993	993		[162]
World Prodigy	United States, Aquidneck Island, Rhode Island	23 June 1989	974	3,246		[163][164]
Exxon Valdez	United States, Prince William Sound, Alaska	24 March 1989	37,000	104,000		[132][165]
Odyssey	Canada, 700 nmi (1,300 km; 810 mi) off Nova Scotia	10 November 1988	132,000	132,000		[132]
Ashland oil spill	United States, Floreffe, Pennsylvania	2 January 1988	10,000	10,000		[166][167]
Tanker Barge Apex Houston	United States, California Coast from Marin County to Big Sur, San Francisco, California	28 January 1986	98	98		[168][169]
Nova	Iran, Gulf of Iran, Kharg Island	6 December 1985	70,000	70,000		[132]
Grand Eagle	United States, Delaware River, Marcus Hook, Pennsylvania	28 September 1985	1,400	1,400		[170]
Puerto Rican	United States, Golden Gate, San Francisco, California	31 October 1984	3,411	4,775		[171]
Alvenus	United States, Calcasieu Channel, Louisiana	30 July 1984	9,160	9,160		[172]
SS *Mobil Oil*	United States, Columbia River, Longview, Washington	19 March 1984	550	650		[173][174]
Castillo de Bellver	South Africa, Saldanha Bay	6 August 1983	252,000	252,000		[132]
Nowruz Field Platform	Iran, Persian Gulf	4 February 1983	260,000	260,000		[175]
Production Well D-103	Libya, Tripoli	1 August 1980	140,000	140,000		[176]
Tanio oil spill	France, Brittany	7 March 1980	13,500	13,500		[177]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Irenes Serenade	Greece, Pylos	23 February 1980	100,000	100,000		[132]
MT *Independența*	Turkey, Bosphorus	15 November 1979	95,000	95,000		[132]
Burmah Agate	United States, Galveston Bay, Texas	1 November 1979	8,440	8,440		[178]
Aphrodite	Port Stanvac, South Australia	20 July 1979	unknown	unknown		[citation neede
Atlantic Empress / *Aegean Captain*	Trinidad and Tobago	19 July 1979	287,000	287,000		[132][179][180
Ixtoc I oil spill	Mexico, Bay of Campeche, Gulf of Mexico	3 June 1979 – 23 March 1980	454,000	480,000		[181][182]
Betelgeuse	Ireland, Bantry Bay	8 January 1979	64,000	64,000		[183]
Peck Slip Spill	Puerto Rico, Cabo San Juan, Puerto Rico	19 December 1978	1,550	1,550	Sun Oil Company	[184]
Amoco Cadiz	France, Brittany	16 March 1978	223,000	227,000		[122][122][132
Trans-Alaska Pipeline sabotage by explosives	United States, Alaska	15 February 1978	2,162	2,162		[187]
Venpet / Venoil collision	South Africa, Cape St. Francis	16 December 1977	26,600	30,500		
Ekofisk oil field	Norway, North Sea	22 April 1977	27,600	27,600		[188][189]
MV *Hawaiian Patriot*	United States, 300 nmi (560 km; 350 mi) off Honolulu, Hawaii	26 February 1977	95,000	95,000		[122][132]
Borag	Taiwan, Northern coast	7 February 1977	34,000	34,000		[190]
Argo Merchant	United States, Nantucket Island, Massachusetts	15 December 1976	25,000	28,000		[191][192]
NEPCO 140	United States, Saint Lawrence River	23 June 1976	1,000	1,000		[193][194]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
Urquiola	Spain, A Coruña	12 May 1976	100,000	100,000		[132]
Niger Delta	Nigeria, Niger Delta	1976 – 1996	258,000	328,000		[195]
Epic Colocotronis Spill	Puerto Rico, Rincon, Puerto Rico	13 May 1975	61,000	61,000	Colocotronis brothers of Greece and Great Britain	[196]
Corinthos	United States, Delaware River, Marcus Hook, Pennsylvania	31 January 1975	36,000	36,000		
Jakob Maersk	Portugal, Oporto	29 January 1975	88,000	88,000		[132]
Afran Zodiac	Ireland, Bantry Bay	10 January 1975	451	451		[197][198]
VLCC *Metula*	Chile, Strait of Magellan	9 August 1974	50,000	51,000		[199]
Jawachta	Sweden, Smygehuk	20 December 1973	3,000	16,000		[200]
S.S. Zoe Colocotronis Spill	Puerto Rico, Lajas, Puerto Rico	18 March 1973	5,170	5,170	Colocotronis brothers of Greece and Great Britain	[201]
Sea Star	Iran, Gulf of Oman	19 December 1972	115,000	115,000		[122][132]
Oswego-Guardian / Texanita collision	South Africa, Stilbaai	21 August 1972	10,000	10,000		[202]
Navy tanker *Towle*	United States, New York City, New York, Gravesend Bay	14 July 1971	123	123		[203][204]
Texaco Oklahoma	United States	27 March 1971	25,700	31,500		[200][205]
Wafra	South Africa, Cape Agulhas	21 February 1971	27,000	27,000		[206]
*Arizona Standard / Oregon Standard*collision	United States, San Francisco Bay	17 January 1971	2,700	2,700		[207][208][209
Othello	Sweden, Trälhavet Bay	20 March 1970	50,000	60,000		[122][143]
Platform *Charlie*	United States, Louisiana	10 February 1970	unknown	unknown		[210]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
SS *Arrow*	Canada, Chedabucto Bay, Nova Scotia	4 February 1970	10,330	10,330		[211]
Santa Barbara	United States, Santa Barbara, California	28 January 1969	6,000	14,000		[212]
Genevieve	United States, Corpus Christi, Texas	25 April 1968	unknown	unknown		[213]
Ocean Eagle	Puerto Rico, San Juan, Puerto Rico	3 March 1968	12,000	12,500	Transocean Tankers Inc.	[214]
R.C. Stoner	United States, Pacific Ocean, Wake Island	1967	20,000	20,000		[200]
Torrey Canyon	United Kingdom, Cornwall and Isles of Scilly	18 March 1967	80,000	119,000		[122][132]
Mississippi River oil spill (1962–1963)	United States, Savage and Mankato, Minnesota	8 December 1962 – 23 January 1963	11,000	15,000		
African Queen	United States, Ocean City, Maryland	30 December 1958	21,000	21,000		[215][216]
Avila Beach pipeline	United States, Avila Beach, California	1950's – 1996	1,300	1,300		[217]
Guadalupe Oil Field	United States, Guadalupe, California	1950's – 1994	29,000	29,000		[217]
SS Jacob Luckenbach	United States, Gulf of the Farallons National Marine Sanctuary, San Francisco, California	14 July 1953 – present	1,484	1,484		[218]
Greenpoint, Brooklyn	United States, Newtown Creek, Greenpoint, Brooklyn, New York	1940s – 1950s	55,200	97,400		[219]
Seria Field 14 wells	Brunei	12 June 1945 – September 1945	unknown	unknown		[220][221][222
Port Erin beach (cause unknown - possibly shipping)	Isle of Man	23 July 2018	unknown	unknown		[223]
SS *Frank H. Buck* / SS *President Coolidge* collision	United States, San Francisco Bay, California	6 March 1937	8,870	8,870		[207][224]
Lakeview Gusher	United States, Kern County, California	14 March 1910 – 10	1,230,000	1,230,000		[225]

Spill / Vessel	Location	Dates	Min Tonnes	Max Tonnes	Owner	Link(s
		September 1911				
Thomas W. Lawson	United Kingdom, Isles of Scilly	14 December 1907	7,400	7,400		[226]

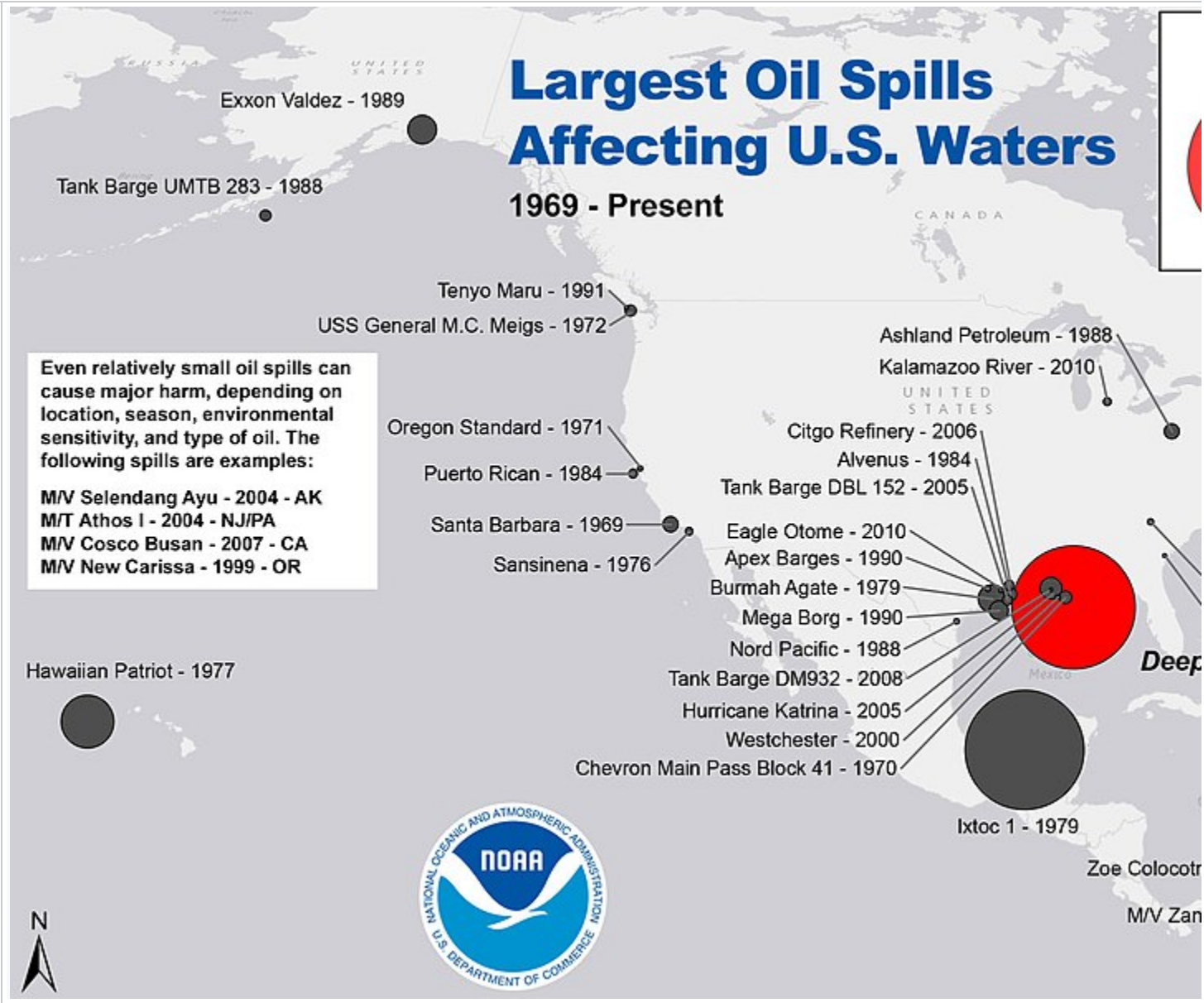
Investigation underway[edit]

Spill / vessel	Location	Dates	Estimated flow rate (tonnes/day)	Full cargo (tonnes)	Spilled (min tonnes)	Spilled (max tonnes)	Link
Lizama River oil spill	Colombia, Barrancabermeja	2 March 2018 -	n/a	n/a	3,690	unknown	[227]
Sanchi oil tanker collision with *CF Crystal*	East China Sea	6 January 2018 to present	n/a	138,000	138,000	138,000	[5]
OT *Southern Star 7*	Bangladesh, Sundarbans, Khulna Division	9 December 2014	n/a	350	300	300	[228][229][230][231]
Napocor Power Barge 103	Philippines, Estancia, Iloilo	8 November 2013	n/a	1200	170	520	[232][233][234][235]

Taylor Energy wells Platform 23051	United States, Gulf of Mexico	16 September 2004to present (14 years)	0.03–0.05	n/a	unknown	unknown	[236][237][238][239]

Note: The "flow rate" column applies to leaking wells, pipelines, etc., and is often used to estimate the total amount of oil spilled. The "full cargo" column applies to vessels, vehicles, etc., and represents the maximum amount of oil that could be spilled. The "spilled" columns indicate the total amount of oil that has been released to the environment so far, and should be based on official estimates found in referenced sources whenever possible. When official estimates vary, use the "min tonnes" and "max tonnes" columns to show the range of estimates (minimum and maximum) in metric tonnes (i.e. 1 tonne = 1,000 kg).

Oil spills in the United States[edit]


Largest Oil Spills Affecting U.S. Waters
1969 - Present
Exxon Valdez - 1989
Tank Barge UMTB 283 - 1988
Tenyo Maru - 1991
USS General M.C. Meigs - 1972
Even relatively small oil spills can cause major harm, depending on location, season, environmental sensitivity, and type of oil. The following spills are examples:
M/V Selendang Ayu - 2004 - AK
M/T Athos I - 2004 - NJ/PA
M/V Cosco Busan - 2007 - CA
M/V New Carissa - 1999 - OR
Oregon Standard - 1971
Puerto Rican - 1984
Santa Barbara - 1969
Sansinena - 1976
Hawaiian Patriot - 1977
Ashland Petroleum - 1988
Kalamazoo River - 2010
Citgo Refinery - 2006
Alvenus - 1984
Tank Barge DBL 152 - 2005
Eagle Otome - 2010
Apex Barges - 1990
Burmah Agate - 1979
Mega Borg - 1990
Nord Pacific - 1988
Tank Barge DM932 - 2008
Hurricane Katrina - 2005
Westchester - 2000
Chevron Main Pass Block 41 - 1970
Ixtoc 1 - 1979
Zoe Colocotr
M/V Zan
Deep
N
NOAA
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION
U.S. DEPARTMENT OF COMMERCE

Comment Code	Response
WIJ-1	This comment does not address an issue associated with the adequacy of the SEIR, but rather just provides a list of worldwide oil spills which cover general spills, marine spills, pipeline spills, etc. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: Bill Woodbridge <bill.woodbridge@verizon.net>
Sent: Wednesday, May 1, 2019 9:14 PM
To: Lehr, Kathryn
Subject: Exxonmobil trucking proposal

Dear Ms. Lehr:

We DON'T need ANY more oil, more pollution from 140 truck trips per day, truck accidents, potential oil spills, risks to sea life, etc.

ExxonMobil would truck crude oil 24 hours a day, 7 days a week, with 140 one-way truck trips per day. The project would also resume offshore drilling at Platforms Hondo, Harmony, and Heritage which have a history of risky well stimulation practices including fracking and acidizing. In addition, the project will restart operations at the Las Flores Canyon processing facility, located on the precious Gaviota Coast. ExxonMobil's project threatens public safety with an increased risk of tanker truck accidents on our highways. It would also contribute to climate change, threaten our clean air, clean water, and wildlife, including the Southern sea otter and Western snowy plover. WOB-1

I request that the County to disclose all impacts associated with ExxonMobil's restart of its offshore oil platforms and proposed trucking.

Thank you,

Bill Woodbridge

Goleta

Comment Code	Response
WOB-1	This comment does not address an issue associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.

From: grady zant <gzant8@gmail.com>
Sent: Saturday, June 1, 2019 2:33 PM
To: Lehr, Kathryn
Subject: Exxon's Trucking Permit

Ms. Lehr,

I'd like to voice some concerns over Exxon's permit to truck oil up and down the 101 24/7 while they attempt to get their three offshore platforms back up and running. Looking at the 2015 Refugio oil spill and runaway climate change in general I would urge the Planning Commission and the Board of Supervisors to consider both the inevitability of another spill and the drastic timeline humanity is facing in regards to the latest climate science which says we have eleven years to cut globate GHG emissions in half. I don't believe the EIR takes theses risks seriously enough into account. Additionally, transporting hazardous materials up and down the 101 posees massive risks in the likelihood of an accident potentially trapping citizens as happened during the Thomas Fire. ZAG-1

I would strongly urge the Planning Commission to deny this project.

Thank you,
Grady Zant

Comment Code	Response
ZAG-1	The SEIR provides a discussion of the impacts associated with the proposed Project and provides mitigation measures for significant impacts. Impact GHG.1 in Section 4.2, *Climate Change/Greenhouse Gas Emissions*, addresses the impact of the trucks GHG emissions and compares them to the Santa Barbara County environmental thresholds. The SEIR found that the GHG emissions would be a significant impact and provides mitigation to reduce this impact to less than significant levels. The rest of the comment does not address issues associated with the adequacy of the SEIR. The SEIR is a disclosure document for the County decision makers, responsible agencies, interest groups, and public. The Planning Commission and Board of Supervisors maintain approval jurisdiction over the Project and the public hearing process provides a forum for these decision-makers to determine the merits of the proposed Project.