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DEPARTMENT OF TRANSPORTATION

CALTRANS DISTRICT 5

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*Making Conservation
a California Way of Life.*

June 7, 2019

SB-101-35.18

SCH # 2018061035

Kathryn Lehr, Planner
County of Santa Barbara
Planning & Development
123 E. Anapamu Street
Santa Barbara, CA 93101

**COMMENTS FOR THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
(DEIR) FOR THE EXXONMOBIL INTERIM TRUCKING FOR SANTA YNEZ UNIT (SYU)
PHASED RESTART PROJECT**

Dear Ms. Lehr:

The California Department of Transportation (Caltrans) thanks you for the opportunity to review the DEIR for the ExxonMobil Interim Trucking for SYU Phased Restart Project. Caltrans has reviewed the project and offers the following comments:

General Comments:

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate inter-regional and local travel.

Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.

Currently there are several proposed related oil projects in the area including West Cat Canyon Revitalization Project, East Cat Canyon Redevelopment Project, ExxonMobil Interim Trucking Project, Phillips 66 Pipeline Project, and the Plains Replacement Pipeline Project. Caltrans has requested joint coordination with representatives of all related projects referenced, we appreciate the opportunity to have met with you on May 29, 2019, to move towards that goal.

CLTR-1

Please refer to the attached Plains Replacement Pipeline Project NOP comment letter dated March 15, 2019, all comments apply to this project as well.

Encroachment Permits:

Please be aware that if any work is completed in the State's right-of-way it will require an encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <http://www.dot.ca.gov/trafficops/ep/index.html>.

All pipelines in State right-of-way require encasement or an exception approved by the Caltrans. The applicant should familiarize themselves with the Utility Policies in the Caltrans Encroachment Permits Manual Chapter 600. http://www.dot.ca.gov/trafficops/ep/docs/Chapter_6.pdf. Utility Policy questions may be directed to the District Permit Engineer, Peter Hendrix, at Peter.Hendrix@dot.ca.gov.

CLTR-2

Please refer to Chapter 17 of the Project Development Procedures Manual (PDPM) regarding existing and proposed manholes and piping located within or adjacent to the Caltrans right of way. <http://www.dot.ca.gov/design/manuals/pdpm/chapter/chapt17.pdf>.

Your plans should provide information on any Joint Use Agreement (JUA) for your pipeline project. Plans shall be prepared by a Registered Civil Engineer and shall have a pre-submittal meeting with the District Permit Engineer prior to application due to the complexity of the proposed project. Engineering plan details may be found under "Applications/Forms" at <http://www.dot.ca.gov/trafficops/ep/>.

Traffic Operations:

The ExxonMobil Interim Trucking Project is one of the six current oil and pipeline projects in Santa Barbara and San Luis Obispo Counties. The six projects concurrently being processed and reviewed by Caltrans, has highlighted numerous interregional impacts on Caltrans Infrastructure.

The majority of the oil projects require light crude oil (LCO) be hauled into Santa Barbara County through other counties in District 5, and those impacts need to be analyzed and accounted for in the project mitigations. The DEIR needs to be updated to specify the complete hauling routes that bring in all resources to the blending facilities. The LCO haul routes need be added to the analysis including travel on SR 46E, SR 41E, SR 166E, and US 101 through San Luis Obispo County and SR33 through Kern County.

CLTR-3

Please see Attachment 1, for additional Traffic Operations comments regarding the DEIR for this project and are incorporated herein.

Design Comments:

The DEIR should address the Caltrans bridge replacement project which is located along US 101 near Refugio State Beach, and includes replacing the northbound and southbound bridges, approximately eight miles west of Goleta. The bridge replacement project will occur within the timeframe of the ExxonMobil Interim Trucking Project and the related oil and gas projects.

CLTR-4

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to enhance California's economy and livability"*

Ms. Kathryn Lehr
June 7, 2019
Page 3

Joint coordination with Caltrans Project Management will be necessary due to ramp and lane closures, project construction, and the volume of truck trips.

Please see Attachment 2 for additional Caltrans Design comments regarding the Caltrans bridge replacement project in the area of this project. Please be aware, there are other Caltrans projects scheduled in this area and coordination with Caltrans will be necessary.

CLTR-4
(con't)

We look forward to continued coordination with the County on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3131 or ingrid.mcroberts@dot.ca.gov.

Sincerely,



Ingrid McRoberts
Development Review Coordinator
District 5, LD-IGR South Branch

Attachments

Matthew Anderson, State Parks-Southern Service Center

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Attachment 1

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE EXXONMOBIL INTERIM TRUCKING FOR SYU PHASED RESTART PROJECT

Traffic Operations Comments

- SR 166E is considered a Traffic Safety Corridor in the County of San Luis Obispo. As part of the project mitigation, any oil or pipeline projects that are proposing to use SR 166E as part of the haul route should include CHP Truck Inspection areas (one in each direction), and slow vehicle pull-outs for trucks (one in each direction). Traffic signals may be warranted at the interchanges given the increased truck volumes, until ultimate improvement can be developed. The County of Santa Barbara needs to coordinate with the County of San Luis Obispo to complete these mitigations. **CLTR-5**
- All reports need consistency between the trip conversions (passenger car equivalents for heavy vehicle trips), trip generation, and distribution. At this time, if revisions to the Traffic Impacts Studies are not possible, overall mitigations and improvements will be required. **CLTR-6**
- Each project, including the ExxonMobil Interim Trucking Project, needs to complete a fair share cost calculation for the impacts they are specifically imposing on the interchanges utilized in the hauling of materials. Caltrans has projects in process at Betteravia Road and US 101, and Clark Avenue/US 101, any project utilizing those ramps need to pay the fair share costs directly to that project, in addition to any local agency traffic impact fees. **CLTR-7**

Draft EIR and Traffic Impact Study (TIS) Project specific comments:

- The Proposed Truck Routes need to include the truck hauling routes for all resources needed to blend the oil, including corridors and interchanges in San Luis Obispo County. **CLTR-8**
- The baseline traffic volumes have been calculated, not counted. Please provide information on how to corroborate the validity of the project volumes. **CLTR-9**
- The TR-1 Mitigation proposes that trucking will not be allowed from 3:00-6:00pm until the improvements are completed at Betteravia Road/US 101. If that is imposed, then the remaining 21-hours will need to have additional truck trips added per hour. The impacts of the mitigation do not appear to be reanalyzed in the TIS. Please update the report with the trips redistributed across the remaining hours, and indicate whether that results in impacts. Unless the City of Santa Maria imposes a legally enforceable City Council Resolution to restrict trucks during the hours of 3:00-6:00 pm, this is not a realistic or enforceable mitigation. Additionally, the mitigation should be continued until the end of the project unless analysis is completed to determine there will be no further impact. If this is not possible, an alternative mitigation needs to be proposed. **CLTR-10**
- A complete analysis on the impacts to the Betteravia Road/US 101 and Clark Avenue/US 101 interchanges with the future configuration needs to be prepared. **CLTR-11**
- The traffic counts provided for the US 101/SR 166E do not appear to take into consideration the close proximity of the frontage road intersections. Those counts need to be revisited and analyzed as full multi-legged intersections. **CLTR-12**

- Traffic counts recently taken by Caltrans at US 101/SR 166E has peak hours of 5:30-6:30 am, outside of 7:00-9:00 am. Both the AM and PM peak hour counts recently collected also reveal lower peak hour factors. | CLTR-13
- Please provide models for review. | CLTR-14
- Please provide information on how project trips will be managed during the construction of the Betteravia Road/US 101 ramps and Clark Avenue/US 101 projects. | CLTR-15
- A comprehensive project overlay of the six related oil and gas projects is needed to determine if they in-turn trigger regional or interregional project specific impacts and cumulative impacts. | CLTR-16

Attachment 2

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE EXXONMOBIL INTERIM TRUCKING FOR SYU PHASED RESTART PROJECT

Caltrans Design Comments

- Caltrans has a scheduled project to replace existing northbound and southbound bridges along US 101 near Refugio State Beach, approximately eight miles west of Goleta. Project limits extend from 0.6 mile east of the Refugio Road Undercrossing to 0.4 mile west of the Refugio Road Undercrossing. The two bridge spans occur near the entrance to Refugio State Beach and Campground, directly over Cañada del Refugio Creek and Refugio Road. A two-span and clear span option are being considered. The project will involve several other components that include upgrading railings, improving fish passage and habitat conditions of Cañada del Refugio Creek beneath the bridges, rehabilitating an existing pedestrian pathway, and upgrading the interchange lighting system.
- The DEIR needs to be updated to include the Caltrans bridge replacement project, which will affect the southbound truck traffic, whether coming or going from the facility. It is suggested that trucks use the El Capitan interchange, with the option of the northbound trucks using the northbound onramp near the El Capitan interchange as well.
- Please be aware the interim trucking project will likely not be allowed to use the southbound Refugio offramp during the Caltrans project. The southbound offramp is a 180 degree hook-ramp that straightens out at the end of the curve that leads into the entrance to Refugio State Beach, with no stop control. Continuing on there is a short curve-linear section and then a 90-degree tight radius curve that extends under the bridges, and through the falsework for the bridge construction.
- The falsework opening clearances may reduce the lane and shoulder widths during the bridge construction. There will be short periods when the roadway under the bridges will be closed due to bridge demolition, falsework construction/removal, and foundation work depending on which alternative to the project is chosen by Caltrans. There will be periods of time when construction work will necessitate shoulder or lane closures under the bridges requiring traffic control. There currently is very little truck traffic using this southbound offramp, and increased truck traffic would not be desirable. It is not recommended to introduce large trucks through the construction zone.
- During the southbound bridge construction/closure, the southbound US 101 traffic will cross over the median to the northbound side and use the northbound bridge to cross the creek and Refugio Road. A temporary southbound offramp will be constructed to access the campground by introducing two reversing curves with a tighter geometry to cross back over the median and connect to the existing southbound offramp. It is not recommended to introduce any additional large trucks through the temporary southbound offramp detour and construction zone.
- Caltrans strongly recommends that the interim trucking project for the southbound US 101 direction use the southbound offramp at the El Capitan interchange to access Calle

CLTR-17

CLTR-18

Real. This interchange has stop control at the end of the ramp and operates at slower speeds and will avoid the issues discussed above.

CLTR-18
(con't)

- Trucks leaving the facility heading in the southbound direction, should use the El Capitan Interchange to avoid driving through construction zone associated with the replacement of the Refugio Bridges.
- There may be intermittent delays at the northbound Refugio onramp as the bridge rails will be upgraded on the bridge over the creek near the entrance. This bridge will not be closed, but there may be occasional traffic delays, and the lane width will be 12' minimum, with no shoulders. During the northbound onramp bridge construction, trucks leaving the facility have the option of using the northbound onramp at the El Capitan interchange.

CLTR-19

CLTR-20



DEPARTMENT OF TRANSPORTATION

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Making Conservation
a California Way of Life.

March 15, 2019

SB-101-25.3
SCH# 2019029067

Kathryn Lehr, Planner
County of Santa Barbara
Planning & Development
123 E. Anapamu Street
Santa Barbara, CA 93101

**COMMENTS FOR THE NOTICE OF PREPARATION (NOP) OF THE DRAFT
ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PLAINS REPLACEMENT
PIPELINE PROJECT**

Dear Ms. Lehr:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the NOP for the Plains Replacement Pipeline Project. Caltrans has reviewed the project and offers the following comments:

General Comments:

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate inter-regional and local travel.

Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.

Current there are several proposed related oil projects in the area including West Cat Canyon Revitalization Project, East Cat Canyon Redevelopment Project, ExxonMobil Interim Trucking Project, Phillips 66 Pipeline Project, and the Plain Replacement Pipeline Project. Caltrans requests a joint coordination meeting with representatives of all related projects referenced herein be scheduled.

Encroachment Permits:

Please be aware that if any work is completed in the State's right-of-way it will require an encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <http://www.dot.ca.gov/trafficops/ep/index.html>.

All pipelines in State right-of-way require encasement or an exception approved by the Caltrans Division of Design in Sacramento. The applicant should familiarize themselves with the Utility Policies in the Caltrans Encroachment Permits Manual Chapter 600. http://www.dot.ca.gov/trafficops/ep/docs/Chapter_6.pdf. Utility Policy questions may be directed to the District Permit Engineer, Peter Hendrix, at Peter.Hendrix@dot.ca.gov.

Please refer to Chapter 17 of the Project Development Procedures Manual (PDPM) regarding existing and proposed manholes and piping located within or adjacent to the Caltrans right of way. <http://www.dot.ca.gov/design/manuals/pdpm/chapter/chapt17.pdf>.

Your plans should provide information on any Joint Use Agreement (JUA) for your pipeline project. Plans shall be prepared by a Registered Civil Engineer and shall have a pre-submittal meeting with the District Permit Engineer prior to application due to the complexity of the proposed project. Engineering plan details may be found under "Applications/Forms" at <http://www.dot.ca.gov/trafficops/ep/>.

Additionally, Caltrans Right of Way information necessary for your project may be obtained by reaching out to Jeremy Villegas at Jeremy.Villegas@dot.ca.gov.

Hydraulics:

Caltrans requests more detailed alignment and conflict plans for portions adjacent to and crossing State highways. Proposed pipelines must maintain a minimum of two feet vertical and horizontal clearance from Caltrans drainage facilities. Measures should be taken to ensure that any future spill cannot reach Caltrans drainage facilities. Encroachment Permits will not be approved until hydraulic plans have been approved.

CLTR-21

Design Comments:

The Design Branch of Caltrans District 5 currently has two project that may be affected by the Plains Replacement Pipeline Project, and more specifically, Line 901R. Both projects are in the Project Approval & Environmental Document (PA&ED) phase. See attached map for locations of these projects.

CLTR-22

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The first project ID# EA 05-1C950, Santa Barbara County, US 101, Post Mile R36.0 to R37.0, is the replacement of the Refugio Bridges on US 101 near the Refugio Beach State Park, the replacement of the bridge rails on the north bound on-ramp, and improve fish passage along Canada Del Refugio Creek. It appears that the pipeline 901R will cross a Caltrans drainage easement area at the fish passage improvement project area. Excavation work within the channel can be expected to be up to ten feet deep below the existing flow line. Plains Replacement Pipeline Project will need to coordinate with the Caltrans to ensure the new 901R pipeline will be sufficiently deep enough that it will not be impacted by our construction and that their facility can be protected in place.

CLTR-22
(con't)

The second project ID# EA 05-1H860, Santa Barbara County, US 101, Post Mile 46.2 to 52.3, is to rehabilitate the roadway. It appears that the pipeline 901R will cross the highway just south of the Gaviota Roadside Rest Stop. A transverse crossing of this nature will require an encroachment permit. Through the Caltrans design process, we will most likely be requesting pot-holing of any existing facility to insure it meets our minimum depth requirements and that Caltrans will not have any conflicts. Plains Replacement Pipeline Project will need to coordinate with Caltrans to make sure the new pipeline 901R will be sufficiently deep enough to ensure that it will not be impacted by any Caltrans construction and that it will meet Caltrans minimum depth requirements.

Traffic Operations:

Please provide us with the Applicant's Traffic Impact Analysis (TIA) mentioned in the NOP.

There are multiple Oil Pipeline Projects in development that will have impacts to the US 101 and SR-166 corridors. The SR-166 corridor is an especially sensitive corridor to additional impacts from heavy vehicles. Given the numerous projects impacting these corridors, the TIA for each project needs to have consistent methodologies, trip generation, traffic volumes and calibration factors. Mitigation measures need to be realized in project specific and the cumulative scenarios.

CLTR-23

Landscape Architecture:

Due to the project's proximity to State Routes 101 and 154, both Officially Designated State Scenic Highways, as well as the heightened degree of Viewer Sensitivity within the Coastal Zone, there is a reasonable likelihood that the project may result in Significant Impacts to visual resources. Accordingly, the EIR should include a full, in-depth Aesthetics/ Visual Resources evaluation, particularly as it relates to the State Scenic Highways and Coastal Zone.

CLTR-24

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Ms. Kathryn Lehr
March 15, 2019
Page 4

We look forward to continued coordination with the County on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3131 or ingrid.mcroberts@dot.ca.gov.

Sincerely,

A handwritten signature in cursive script, reading "Ingrid McRoberts".

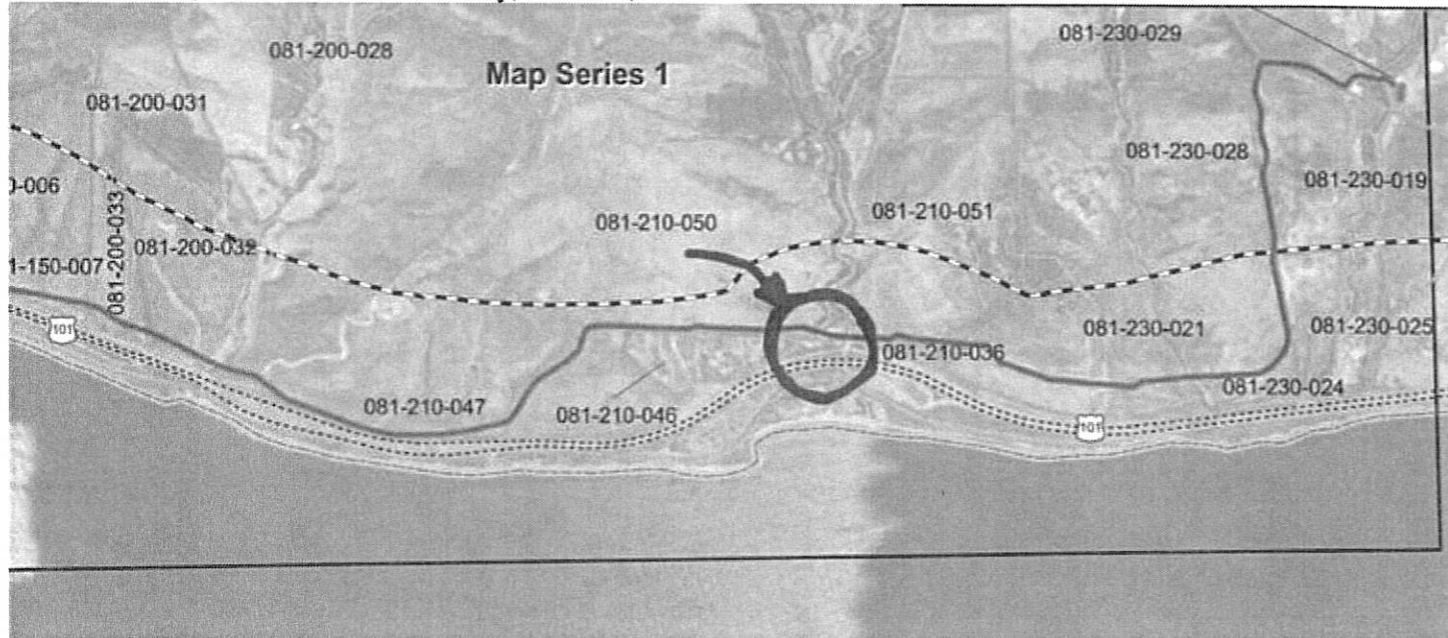
Ingrid McRoberts
Development Review Coordinator
District 5, LD-IGR South Branch

cc: Tyson Butzke, State Parks

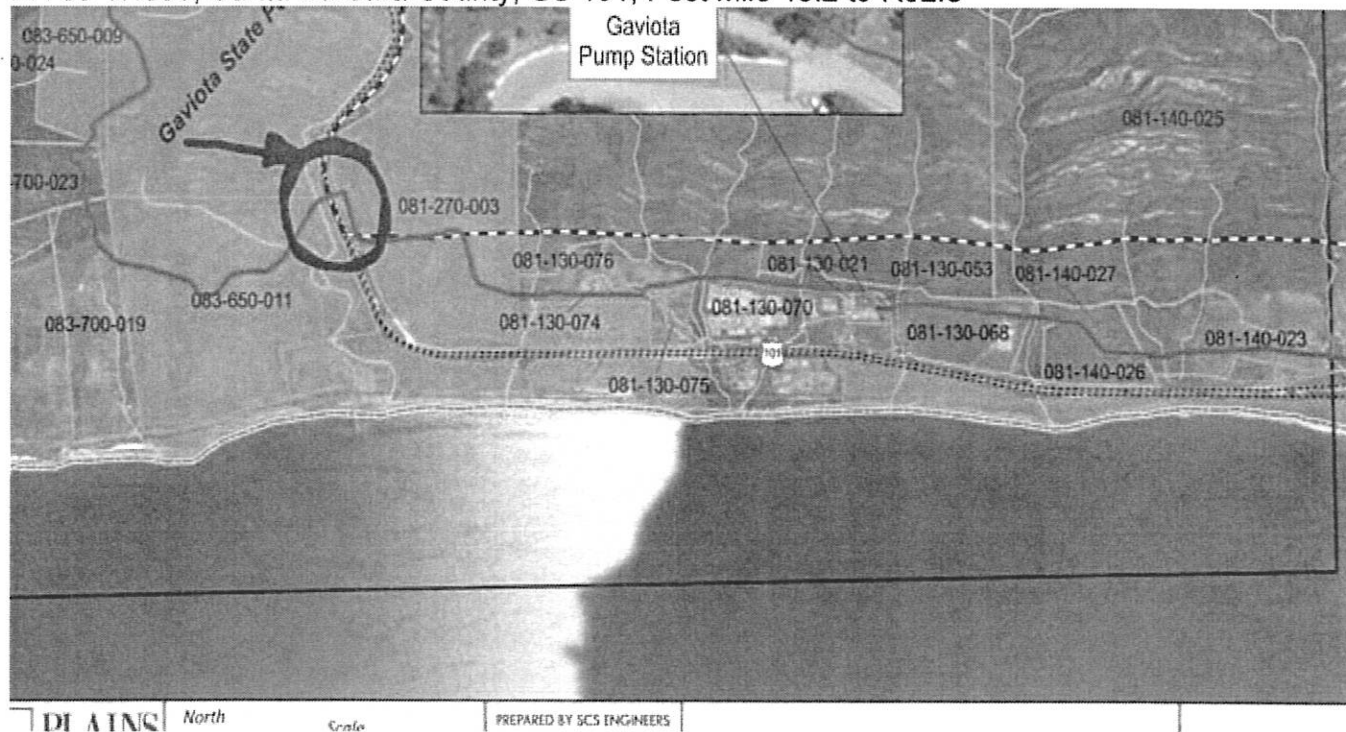
Attachment

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EA 05-1C950, Santa Barbara County, US 101, Post Mile R36.0 to R37.0



EA 05-1H860, Santa Barbara County, US 101, Post Mile 46.2 to R52.3



*"Provide a safe, sustainable, integrated and efficient transportation system
 to enhance California's economy and livability"*

Responses to Caltrans Comments

Comment Code	Response
CLTR-1	This comment does not address the adequacy of the SEIR. The County of Santa Barbara has been coordinating with Caltrans on the ExxonMobil Interim Trucking Project and has had several meetings to discuss the Project with Caltrans.
CLTR-2	The ExxonMobil Interim Trucking Project would not require any encroachment permits from Caltrans. The proposed Project does not involve any work in the State's right-of-way.
CLTR-3	The ExxonMobil Interim Trucking Project does not require the use of light crude oil (LCO) for blending. No LCO would be transported as part of the proposed Project. The SEIR has addressed all traffic corridors and interchanges that would be used by the Project in Santa Barbara, San Luis Obispo, and Kern Counties.
CLTR-4	The proposed Caltrans bridge replacement project located along US Highway 101 near Refugio State Beach has been added to the list of cumulative projects evaluated in the SEIR. In addition, possible Project impacts from the use of the US Highway 101/ El Capitan interchange has been added to the SEIR to address potential impacts to this intersection during times when the US Highway 101/ Refugio Road interchange may not be available due to bridge construction activities.
CLTR-5	<p>A State Route 166 Safety Task Force was formed by various governmental agencies to address safety issues along State Route 166. Some of the key members of this task force include the California Highway Patrol (CHP), the Santa Barbara County Association of Governments, the San Luis Obispo Council of Governments, the City of Santa Maria, Caltrans, and the Kern Council of Governments. This task force meets on an infrequent basis. The main goal of the task force is to identify ways to improve safety on State Route 166. The task force has funded several safety improvement projects for the corridor such as additional CHP units along certain areas of the highway, and the purchase of two interchangeable message signs (CMS) for use along the State Route 166 corridor. The additional CHP units along State Route 166 also conduct some additional truck inspections.</p> <p>Based upon discussion with Caltrans staff, this comment was directed at the long-term cumulative impacts along State Route 166 from increased truck traffic and not specifically regarding the proposed ExxonMobil Interim Trucking Project. While the ExxonMobil Interim Trucking Project could add additional truck traffic along State Route 166, it would be only for a limited number of years for up to 68 trucks a day. As discussed in the SEIR, the more likely receiving point for the SYU crude oil would be the Santa Maria Pump Station (SMPS), which would not require the use of State Route 166.</p> <p>Santa Barbara County Association of Governments issued a Project Development Plan for Route 166 covering safety and operational improvement projects as part of Measure A funds in June of 2012. Some of the identified projects would address issues raised in the Caltrans comments such as turn out lanes.</p> <p>Under the cumulative scenario, light oil trucks from the other cumulative oil projects are assumed to come from Kern County and use State Route 166. As discussed in Section 3.0 of the DSEIR, during the peak year of overlap with the proposed Project, an additional 14 light oil trucks per day could be using State Route 166 from the other cumulative oil projects. Therefore, the cumulative oil trucks that could be using State Route 166 would be 82 trucks</p>

Responses to Caltrans Comments

Comment Code	Response
	<p>per day assuming all 68 crude trucks from the proposed Project travel to the Plains Pentland Terminal.</p> <p>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 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.</p> <p>The approved and pending cumulative projects are expected to have a minimal effect on traffic volumes along State Route 166. Construction traffic from the proposed Plains Pipeline Replacement Pipeline Project is expected to generate as many as 206 daily trips for each of the construction spreads. One of the spreads would be accessed primarily from State Route 166. Construction along this spread has been estimated to take about one year. The proposed ExxonMobil Interim Trucking Project would increase the V/C ratio along State Route 166 by less than 0.03 and would be below the County's cumulative impact threshold. Based upon the County's significance thresholds, the proposed Project's contribution to cumulative traffic impacts along State Route 166 would be less than significant. Therefore, cumulative mitigation is not required. The cumulative traffic impacts are discussed further in Section 4.5.5 of the SEIR.</p> <p>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 can be reduced by requiring the use of the Trucking to the SMPS Only Alternative.</p>
CLTR-6	Based upon discussions with Caltrans staff, this comment was directed to all the oil projects currently undergoing review in Santa Barbara County. The specific comments related to the ExxonMobil Interim Trucking Project trip conversions, trip generation and distribution are provided in Caltrans comments CATR-8 through CATR-16. Caltrans agreed with the trip conversion numbers used in the SEIR. Caltrans has no specific comments regarding the trip generation numbers for the ExxonMobil Interim Trucking Project.
CLTR-7	The ExxonMobil Interim Project would not use the Clark Avenue/U.S. Highway 101 interchange. For the Betteravia Road/U.S. Highway 101 interchange, construction of improvements to this interchange have been completed. With these improvements in

Responses to Caltrans Comments

Comment Code	Response																										
	place, the impacts of the proposed Project would be less than significant for both Project and cumulative impacts based upon the County's and Caltrans's significance thresholds. Therefore, no mitigation is required.																										
CLTR-8	The ExxonMobil Interim Trucking Project does not require the use of light crude oil (LCO) for blending. No LCO would be transported as part of the proposed Project. The SEIR has addressed all traffic corridors and interchanges that would be used by the Project in Santa Barbara, San Luis Obispo, and Kern Counties.																										
CLTR-9	<p>This issue was discussed during the County/Caltrans conference call held on August 6, 2019. ATE, who prepared the traffic report, determined that Caltrans had not yet published traffic counts for 2017 or 2018 at the time of report preparation. The Caltrans 2016 data was the most current data available at the time of the report preparation. Thus, ATE reviewed historical Caltrans data for the past 10 years to determine annual growth rates.</p> <p>The counts used in the January 2018 traffic report were increased to represent Year 2018 baseline conditions for assessing potential traffic impacts. For U.S. 101, Caltrans historical count data shows that volumes on U.S. 101 between the U.S. 101/Refugio Road I/C and U.S. 101/State Route 166 I/C have grown at a rate of about 0.7% per year over the past 10 years. To be conservative, the older volumes were factored up to 2018 baseline conditions using a 1% per year growth factor.</p> <p>Since the traffic report publication in February 2019, Caltrans has published 2017 traffic volumes for state highways. 2017 data shows that the volumes used in the traffic study are higher than the 2017 volumes published by Caltrans. Table 1 below compares the 2018 baseline volumes used in the traffic report and the 2017 published by Caltrans.</p> <p>As shown, the 2018 baseline volumes used in the traffic report are higher than the 2017 volumes published by Caltrans. Furthermore, applying the 1% background growth factor to the Caltrans 2017 volumes results in volumes that are lower than the 2018 baseline volumes used in the traffic report.</p> <table><tr><th colspan="3">Table 1 U.S. 101 Volume Comparisons</th></tr><tr><th rowspan="2">U.S. 101 Segment</th><th colspan="2">AADT</th></tr><tr><th>2018 Baseline Volume Used in Traffic Report</th><th>2017 Caltrans Volume(a)</th></tr><tr><td>Refugio Road I/C to State Route 1 I/C</td><td>30,300</td><td>28,900</td></tr><tr><td>State Route 1 I/C to State Route 246 I/C</td><td>23,500</td><td>21,400</td></tr><tr><td>State Route 246 I/C to Clark Avenue I/C</td><td>32,200</td><td>31,900</td></tr><tr><td>Clark Avenue I/C to Santa Maria Way I/C</td><td>42,200</td><td>41,600</td></tr><tr><td>Santa Maria Way I/C to Betteravia Road I/C</td><td>59,900</td><td>51,600</td></tr><tr><td>Betteravia Road I/C to State Route 166 I/C</td><td>75,500</td><td>73,700</td></tr></table> <p>(a) Source: https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017.</p>	Table 1 U.S. 101 Volume Comparisons			U.S. 101 Segment	AADT		2018 Baseline Volume Used in Traffic Report	2017 Caltrans Volume(a)	Refugio Road I/C to State Route 1 I/C	30,300	28,900	State Route 1 I/C to State Route 246 I/C	23,500	21,400	State Route 246 I/C to Clark Avenue I/C	32,200	31,900	Clark Avenue I/C to Santa Maria Way I/C	42,200	41,600	Santa Maria Way I/C to Betteravia Road I/C	59,900	51,600	Betteravia Road I/C to State Route 166 I/C	75,500	73,700
Table 1 U.S. 101 Volume Comparisons																											
U.S. 101 Segment	AADT																										
	2018 Baseline Volume Used in Traffic Report	2017 Caltrans Volume(a)																									
Refugio Road I/C to State Route 1 I/C	30,300	28,900																									
State Route 1 I/C to State Route 246 I/C	23,500	21,400																									
State Route 246 I/C to Clark Avenue I/C	32,200	31,900																									
Clark Avenue I/C to Santa Maria Way I/C	42,200	41,600																									
Santa Maria Way I/C to Betteravia Road I/C	59,900	51,600																									
Betteravia Road I/C to State Route 166 I/C	75,500	73,700																									
CLTR-10	Mitigation Measure TR-1 covering the U.S. Highway 101/Betteravia Road interchange has been eliminated since the improvements to this interchange have been completed. As discussed in the Section 4.5 of the SEIR (<i>Transportation and Circulation</i>) with these																										

Responses to Caltrans Comments

Comment Code	Response
	completed interchange improvements, the U.S. Highway 101 Southbound Ramps /Betteravia Road intersection would operate at LOS B during the PM peak hour with the proposed Project. Therefore, the impact of Project traffic to this intersection would be less than significant.
CLTR-11	The improvement analysis for the Betteravia Road/ U.S. Highway 101 interchange was already included in the Draft SEIR in Appendix D Page 129. The analysis shows that the U.S. 101 SB Ramps/Betteravia Road intersection is forecast to operate at LOS B with the planned improvements. The ExxonMobil Interim Trucking Project would not use the Clark Avenue/ U.S. Highway 101 interchange.
CLTR-12	This issue was discussed during the County/Caltrans conference call held on August 6, 2019 and it was agreed that ATE would provide level of service calculations using the SYNCHRO software program recommended by Caltrans for analyzing multi-legged intersections and using newer count data to be provided by Caltrans. The results of this updated modeling are included as a supplement to the traffic study and is provided in Appendix D.2 of the Final SEIR.
CLTR-13	Caltrans has since provided the newer traffic counts for the U.S. Highway 101/State Route 166 interchange and ATE performed level of service analyses for the 5:30-6:30 AM peak hour using the SYNCHRO software program recommended by Caltrans. The results of this updated modeling are included as a supplement to the traffic report and is provided in Appendix D.2 of the Final SEIR.
CLTR-14	The traffic modeling files have been provided to Caltrans. Caltrans has no comments back to Santa Barbara County on the traffic modeling files.
CLTR-15	The ExxonMobil Interim Trucking Project would not use the Clark Avenue/ U.S. Highway 101 interchange. The improvements at Betteravia Road/ U.S. Highway 101 are complete. Therefore, the construction project and the proposed ExxonMobil Interim Trucking Project would not overlap.
CLTR-16	Section 4.5.5 of the Draft SEIR contains a detailed analysis of the cumulative traffic impacts of the various proposed oil and gas projects and evaluates the cumulative impacts along the various shared road segments and interchanges.
CLTR-17	The proposed Caltrans bridge replacement project located along US Highway 101 near Refugio State Beach has been added to the list of cumulative projects evaluated in the SEIR. In addition, possible Project impacts from the use of the US Highway 101/ El Capitan interchange has been added to the SEIR to address potential impacts to this intersection during times when the US Highway 101/ Refugio Road interchange may not be available due to bridge construction activities.
CLTR-18	Based upon discussions with Caltrans staff, there would be times when the southbound Refugio exist from U.S. Highway 101 would not be available for use by the crude oil trucks returning to the Las Flores Canyon Facility. During these periods, the Applicant has indicated that trucks will use the U.S. Highway 101/El Capitan ramps, which operate at LOS A. Impacts from the use of the U.S. Highway 101/ El Capitan interchange have been added to the Final

Responses to Caltrans Comments

Comment Code	Response
	<p>SEIR to address potential impacts to this intersection during times when the U.S. Highway 101/ Refugio Road interchange may not be available due to bridge construction activities.</p> <p>Based upon the meeting the County had with Caltrans, a detailed summary of the Refugio Bridge Replacement Project was developed. This summary was reviewed and approved by Caltrans and is included as Appendix D.4 in the Final SEIR.</p>
CLTR-19	None of the trucks used for transporting the crude oil would head south on U.S. Highway 101 when leaving the Las Flores Canyon Facility. All crude oil trucks would travel north on U.S. Highway 101 to either the SMPS or the Plains Pentland Terminal.
CLTR-20	The proposed Caltrans Bridge Replacement Project located along U.S. Highway 101 near Refugio State Beach has been added to the list of cumulative projects evaluated in the SEIR. In addition, possible project impacts from the use of the U.S. Highway 101/ El Capitan interchange has been added to the SEIR to address potential impacts to this intersection during times when the U.S. Highway 101/ Refugio Road interchange may not be available due to bridge construction activities. This includes the north bound entrance to U.S. Highway 101.
CLTR-21	This comment is regarding the Plains Replacement Pipeline Project and does not apply to the ExxonMobil Interim Trucking Project., since The Project would not involve the installation of pipelines in the Caltrans right-of-way.
CLTR-22	This comment is regarding the Plains Replacement Pipeline Project and does not apply to the ExxonMobil Interim Trucking Project since the Project would not involve the installation of pipelines in the Caltrans right-of-way.
CLTR-23	This comment requests a copy of the Traffic Impact Analysis (TIA) for the Plains Pipeline Replacement Pipeline Project, which is unrelated to the ExxonMobil Interim Trucking Project. See associated responses to CLTR-6 and CLTR-16.
CLTR-24	This comment is regarding the Plains Replacement Pipeline Project and does not apply to the ExxonMobil Interim Trucking Project. The proposed , since the Project would not involve the installation of pipelines in the Caltrans right-of-way.



City of Santa Barbara

Office of the Mayor

SantaBarbaraCA.gov

CMurillo@SantaBarbaraCA.gov

May 9, 2019

Cathy Murillo
Mayor

Honorable Steve Lavagnino
Chair, Santa Barbara County Board of Supervisors
105 E. Anapamu St.
Santa Barbara, CA 93101

City Hall
735 Anacapa Street
Santa Barbara, CA
93101-1990

RE: Letter of Opposition – Draft SEIR for the Proposed Interim Trucking for Santa Ynez Unit Phased Restart Project

Mailing Address:
PO Box 1990
Santa Barbara, CA
93102-1990

Tel: (805) 564-5322
Fax: (805) 564-5475

Dear Chair Lavagnino,

In 2017, the City Council adopted language in its Legislative Platform that, *"supports prohibition of offshore oil development, including hydraulic fracturing and other high-intensity petroleum operations, based, in part, on concern about the impacts to on-shore support facilities and services by offshore development activities."*

I have reviewed the Notice of Availability for the above-referenced project. The Draft SEIR identifies one significant and unavoidable Class I impact that relates to an offsite accidental spill of crude oil from a truck accident. Such an event has the potential to impact sensitive resources including biological, cultural, and water resources.

CSB-1

For this reason, I am writing this letter on behalf of the City to oppose the proposal by ExxonMobil to transport crude oil from its Las Flores Canyon facility to its receiving facilities located in Santa Barbara and Kern Counties.

Thank you for your consideration of this letter. Please feel free to contact me at CMurillo@SantaBarbaraCA.gov or by phone at (805) 564-5322 should you have any questions or need more information.

Respectfully,


Cathy Murillo
Mayor



Please consider the environment before printing this letter.

Responses to City of Santa Barbara Comments

Comment Code	Response
CSB-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.



air pollution control district
SANTA BARBARA COUNTY

June 4, 2019

Kathryn Lehr
Santa Barbara County
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: APCD Comments on the Draft Supplemental Environmental Impact Report for the Proposed Interim Trucking for Santa Ynez Unit (SYU) Phased Restart Project, 17RVP-00000-00081, 19EIR-00000-00001, SCH# 2018061035

Dear Ms. Lehr:

The Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Draft Supplemental Environmental Impact Report (SEIR) for the Proposed Interim Trucking for Santa Ynez Unit (SYU) Phased Restart Project. ExxonMobil Production Company is requesting approval for the construction and operation of a crude truck loading facility at Las Flores Canyon (LFC) to allow transfer of product from LFC to crude transport trucks for delivery to local markets. More specifically, the project would consist of the interim trucking of limited crude production from the LFC Facility until a pipeline alternative becomes available. The project proposes minor modifications to the existing LFC facilities to facilitate the transport of produced crude oil via tanker truck. The air pollutant emissions from the project include both stationary source emissions from the operation of the truck loading facilities at LFC and mobile source emissions from operation of the crude transport trucks delivering product to markets. Trucks will have 2017 or newer engines, and will travel to one or both of two designated off-site locations: Phillips 66 Santa Maria Terminal (in Santa Barbara County) and Plains Pentland Terminal (in Kern County). The subject property, a 550-acre parcel zoned M-CR and identified in the Assessor Parcel Map Book as APN 081-220-014, is located at 12000 Calle Real on the Gaviota Coast.

A new APCD Authority to Construct (ATC) permit will be required for the proposed project. The APCD is a responsible agency under the California Environmental Quality Act (CEQA) for this project, and will rely on the SEIR when issuing APCD permits. The SEIR should include the air pollutant emissions for all proposed equipment to avoid additional CEQA documentation requirements related to APCD permit issuance.

Air Pollution Control District staff has the following comments on the Draft SEIR (DEIR) for the project:

1. **Section 2.0 Proposed Project Description and Alternatives, Section 2.7.3.2 Reduced Trucking Alternative, Page 2-25 to 2-27:** This alternative discusses potential operational issues associated with the cogeneration system due to the lower level of production allowed under this alternative. One of these issues would result in operating the cogeneration system gas turbine below 31 megawatts (MW). This would result in carbon monoxide emissions that exceed SBCAPCD permitted limits. Page 2-26 states that *"it may be possible for The Applicant to obtain a variance from the SBCAPCD for the gas turbine which would allow for the cogeneration system*

APCD-1

Aeron Arlin Genet, Air Pollution Control Officer



805.961.8800



210 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110



ourair.org



ExxonMobil Interim Trucking Project
Governmental Agency Comments and Responses

July 2020
OurAirSBC
Final SEIR

to operation at a load below 31 MW.” The APCD Hearing Board would not be able to grant a variance proposed above. There are specific Health and Safety Code criteria and findings that must be made to grant a variance. For example, ExxonMobil would have to show that they would be in violation or imminent violation due to conditions beyond their reasonable control. The Hearing Board would not be able to make this finding because this project alternative would not be a result of something beyond ExxonMobil’s reasonable control. Therefore, the Hearing Board would not be able to grant a variance. Please remove any references to the possibility of an APCD Hearing Board variance for this situation.

APCD-1
(con't)

In addition, the DSEIR should explore the feasibility of using supplemental PUC quality natural gas to operate the turbine at higher necessary loads.

2. **Section 4.1 Air Quality, Section 4.1.1 Environmental Setting, Page 4.1-1:** This section states that, *“For the proposed Project, the environmental setting and baseline conditions reflect the emissions associated with a three year operational average (2013-2015) of the SYU facilities...”* It appears this sentence has misstated the three year baseline period, as other sections of this document state that the three year operational average of the SYU facilities was based on years 2012-2014.

APCD-2

3. **Section 4.1 Air Quality, Section 4.1.3.2 Construction Thresholds, Page 4.1-19:** This section states that, *“The SBCAPCD requires construction projects that would emit more than 25 tons per year to obtain emission offsets under Rule 804 and would consider these emissions to be significant under CEQA.”* The APCD’s offset threshold for construction emissions is not an adopted CEQA threshold by our agency. We suggest that the following language be removed from the referenced statement: *“and would consider these emissions to be significant under CEQA”*.

APCD-3

4. **Section 4.1 Air Quality, Section 4.1.4 Project Impacts and Mitigation Measures, Table 4.1-11, Page 4.1-22:** This table cites the threshold applied to total construction emissions from the project as *“SBCAPCD CEQA Threshold (Tons/Year)”*. As mentioned in the comment above, the APCD has not adopted a CEQA threshold for construction emissions. When lead agencies use the APCD’s offset threshold under Rule 804 as a case-by-case CEQA threshold, it should be labeled as the County’s CEQA threshold being applied to the project. Please remove reference to *“SBCAPCD”*.

APCD-4

5. **Section 4.1 Air Quality, Section 4.1.4 Project Impacts and Mitigation Measures, Page 4.1-22:** This section states that *“With the required dust control measures, construction air impacts would be less than significant (Class III).”* This seems to imply that these dust control measures are necessary to reduce the impact to less than significant, when according to Table 4.1-11 no mitigation is required as emissions are below the threshold of significance. Dust control measures are presented in this document under the regulatory setting (page 4.1-17 to 4.1-18), and not as mitigation measures. Please ensure this document is clear about what actions are required to reduce project impacts below significance, and what actions are current regulatory requirements. For any measures that are designed to reduce impacts to below significance, such measures should be included as formal mitigation measures.

APCD-5

6. **Section 4.1 Air Quality, Section 4.1.4 Project Impacts and Mitigation Measures, MM AQ-1, Page 4.1-25-26:** Under MM AQ-1 *Trucking Emissions Management Plan*, one of the options to ensure that emissions of NOx do not exceed the daily thresholds during trucking operations to the Pentland Station is option 3, *"Surrender emission offsets to the SBCAPCD in an amount equal to that needed to ensure that total emissions are below the thresholds."* The use of the word "surrender" is inconsistent with what is allowed in the APCD's Rule 806 which allows Emissions Reduction Credits (ERCs) to be re-registered for future use once the project utilizing the ERCs is terminated. If it is the County's intent to follow District Rule 806, once the County's trucking permit is cancelled and ExxonMobil returns to exclusive pipeline transportation, the ERCs could be re-registered for further use. If the County, as part of its land use approval and requirements for CEQA mitigation, would like to condition the permanent surrender of emission reduction credits used to offset NOx emissions from the proposed project, beyond the requirements of APCD rules, such a condition should be made explicit in the requirements of this measure. Otherwise, we suggest using the word "provide" instead of "surrender", as surrender implies that the ERCs are permanently retired from use.

APCD-6

7. **Section 4.1 Air Quality, Section 4.1.4 Project Impacts and Mitigation Measures, MM AQ-1, Page 4.1-25-26:** The APCD would like to emphasize its order of preference when determining appropriate mitigation for project impacts:

- Onsite efficiencies such as reductions in fuel and energy use, reduction in vehicle/truck trips or technologies to reduce emissions;
- Onsite reduction projects such as renewable energy systems;
- Emission reduction projects at nearby facilities, preferably within the same jurisdictional boundaries;
- Contribute to an offsite mitigation project or program.

APCD-7

Regarding an offsite mitigation project or program, under this option APCD could use funds provided by the applicant to implement a mitigation project or program to achieve the required reductions. Off-site emission reductions can result from either stationary or mobile sources, but should relate to the on-site impacts from the project in order to provide the proper "nexus" for the air quality mitigation. It should be noted that an offsite mitigation project or program is likely to be much more cost-effective than permanently retiring ERCs, given that the current average cost of NOx ERCs in Santa Barbara County is approximately \$125,000 per ton.

8. **Section 4.1 Air Quality, Section 4.1.4 Project Impacts and Mitigation Measures, Impact AQ-5, Page 4.1-28-30:** The APCD recommends that the health risk analysis in the DSEIR be revised due to new information that was not available at the time the application was submitted. The District is in the process of updating the AB 2588 Air Toxics "Hot Spots" Health Risk Assessment for ExxonMobil's Las Flores Canyon/POPCO facility and is nearing completion of this update process. The updated AB 2588 Health Risk Assessment, once finalized, will include more current health risk data for the facility using the latest modeling tools. The facility has not undergone an update to its required Health Risk Assessment under AB 2588 since 1995. Therefore, the base year data from 2013 used in the updated AB 2588 Health Risk Assessment could potentially result in much different risk values and risk drivers than the 1995 HRA that is referenced in the DSEIR. The updated AB 2588 Health Risk Assessment for the facility uses updated dispersion

APCD-8

modeling (AERMOD) and health risk modeling (HARP2) software, which are intended to provide more accurate results.¹

Due to this new information and data that is expected to be available soon, the APCD recommends that the DSEIR be revised. Specifically, we recommend two actions. First, that the baseline data be revised to reflect the new modeling software and the 2012-2014 baseline. Second, to evaluate the significance of Impact AQ-5, we recommend that the County conduct an HRA that analyzes the potential toxic air emissions and health risk from the proposed operations under the SYU Phased Restart (turbine, steam generator, fugitives, sulfur plant, etc.) and the proposed Project (i.e., loading racks, new fugitive emissions, and truck transport of crude). A new analysis, specific to the proposed project and the operational conditions that will exist at the time of the project's operation, will allow for a more accurate and refined assessment of health risk than the analysis included in the DSEIR provides.

In addition, conducting a new analysis of health risk will allow for the utilization of the most current risk modeling guidelines and air dispersion and risk software, namely the 2015 Office of Environmental Health Hazard Assessment (OEHHA) Guidelines and the Hotspots Analysis and Reporting Program Version 2 (HARP2), as well as EPA's dispersion model (AERMOD). The 2015 update to the Air Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for the Preparation of Health Risk Assessments (referred to as the Guidance Manual) includes methodologies that result in a more accurate representation of the potential human health risk from exposure to emissions of air toxics for individuals of all ages, and with adjustments based on new science about increased childhood sensitivity to air toxics.

Finally, if a revised health risk model is run, and in order to simplify the health risk analysis, we suggest that the mobile emissions from the onsite and offsite trucking up to 1,000 feet from the facility's property boundary be included in the new health risk assessment and not be evaluated separately.

A pre-meeting with the APCD and the County's modeling staff may be beneficial prior to conducting any modeling runs. Please contact Michael Goldman, Manager of APCD's Engineering Division and Toxics Group, at (805) 961-8821.

9. **Section 4.1 Air Quality, Section 4.1.5.1 SYU Cumulative Activities, Page 4.1-31:** This section states that one of the operational emissions characteristics that was assumed during the proposed project operations is that the POPCO plant would not be used. The POPCO plant was operational during the baseline period (2012-2014) and page 3-2 in Section 3.0 Cumulative Scenario states that, *"At an oil production rate of approximately 11,200 barrels per day, it is possible that the POPCO gas plant would not be needed since the volume of gas produced could be handled by the stripping gas treatment plant and used as fuel gas within the facility."* This statement on page 3-2 suggests that the POPCO plant *may* not be needed, with the presumption that the plant is typically needed during SYU facility operation. The document should provide an explanation as to why it was assumed that the POPCO would not be operational during the proposed project. For example, if the stripping gas treatment plant has the capacity to handle all produced gas when the facility is operating at a rate of 11,200 barrels

¹ For more information, see www.ourair.org/wp-content/uploads/apcd-15i.pdf.

of produced oil per day, data to support this assertion should be provided. We suggest that the DSEIR analysis include operations of the POPCO plant if the applicant is unable or unwilling to restrict the use of the POPCO plant as part of the project.

APCD-9
(con't)

10. **Section 4.1 Air Quality, Section 4.1.5.2 Compliance with Plans, page 4.1-32:** It is unclear why this discussion is included in the analysis of Cumulative Effects (Section 4.1.5) to Air Quality and not in the analysis of Project Impacts (Section 4.1.4) to Air Quality. This section discusses the project's consistency of the proposed project with the Ozone Plan, not the consistency of all projects included in the cumulative scenario (i.e., all of the projects discussed in Section 3.0 of the DSEIR).

APCD-10

In addition, the first two paragraphs in this section appear to most directly relate to the evaluation of cumulative operational air quality impacts. The information in these paragraphs may be more relevant for Section 4.1.5.4. Please consider and revise as needed.

11. **Section 4.1 Air Quality, Section 4.1.5.4 Other Cumulative Projects Operational Emissions-Stationary, page 4.1-33:** This section discusses the proposed Project's contribution to cumulative operational air quality impacts, but it does not consider or discuss the proposed project's contribution in conjunction with all other projects in the Cumulative Scenario. Specifically, this section does not discuss the emissions from the three Cat Canyon crude oil projects included in the Cumulative Scenario. The cumulative effect of other projects in the Cumulative Scenario should be discussed and analyzed.

APCD-11

12. **Section 4.1 Air Quality, Section 4.1.5.5 Other Cumulative Projects Operational Emissions-Mobile, page 4.1-33:** This section states that the estimated truck trips per day for other major Cat Canyon crude oil projects (ERG WCCRP, Aera ECCRP, and PetroRock UCCB) plus the proposed project are 245 trucks per day. This is based on the estimated truck trips shown in Table 3-2 in Section 3.0, *Cumulative Scenario*. The figure of 245 one-way truck trips per day includes the truck trips during the peak year of overlap with the proposed Project, assuming that each project starts in the same year. Since each project's number of daily truck trips vary year-to-year, APCD recommends that the estimated peak number of truck trips per day used in the Cumulative Effects analysis be conservatively estimated by summing each project's peak daily trucks trips to account for the fact that each project could begin at different points in time. For example, ERG's peak daily truck trips occur in Year 6, and Aera and PetroRock's peak daily truck trips occur in Year 8 and greater.

APCD-12

13. **Section 4.2 Climate Change/Greenhouse Gases, Section 4.2.1 Environmental Setting, Table 4.2-3, Page 4.2-8:** Table 4.2-8 states that the mobile source emission estimates were generated using EMFAC2014 Mobile Emissions Factor data base. Section 4.1 *Air Quality* states that baseline mobile source criteria pollutant estimates were generated based on emissions factors from EMFAC2017. Please confirm whether different EMFAC models were used to estimates greenhouse gas and criteria pollutant emissions. If the same model was used, please confirm which model and correct the source references as needed.

APCD-13

14. **Section 4.2 Climate Change/Greenhouse Gases, Section 4.2.4 Project Impacts and Mitigation Measures, Electricity, Page 4.2-21:** The discussion of indirect GHGs generated by electricity use

APCD-14

states that, “Emissions for the Cogen units were previously analyzed, permitted and offset and are accounted for in the SYU facility SBCAPCD permits. Therefore, they are not included in this analysis.” Although APCD enforces the state’s Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities and the Federal Part 70 Operating Permits² for the SYU facility have enforceable GHG limitations, APCD does not require offsets for GHG emissions. The analysis should be revised to include indirect GHG emissions from electricity use.

APCD-14
(con't)

15. **Section 4.2 Climate Change/Greenhouse Gases, Section 4.2.4 Project Impacts and Mitigation Measures, Increased Production of Crude Oil Supply, Page 4.2-21:** Please consider whether the appropriate section for the discussion of “Increased Production of Crude Oil Supply” is in the Section 4.2.4 Project Impacts or in Section 4.2.5 Cumulative Effects, as the discussion appears to relate to SYU Cumulative Activities, including the SYU Phased Restart and Operations.

APCD-15

16. **Section 4.2 Climate Change/Greenhouse Gases, Section 4.2.5.3 SYU Cumulative Activities, Page 4.2-28:** Section 4.2.5.3 states that “Restart of the SYU facilities would generate GHG emissions. However, these emissions associated with the restart would be about 40-50% of the pre-shutdown emissions due to the lower oil production rates. With the restart and operation of the SYU facilities at 11,200 bpd of crude combined with the trucking GHG emissions, the total SYU project GHG emissions would be less than the baseline.” It does not appear that supporting information has been provided for this statement. For example, Appendix B Table B-8 SYU Phased Restart and Operations Emissions Estimate, LFC Only (page B-11) does not contain GHG emission estimates for the baseline and project operations. Appendix B should be updated to include supporting information for the statement made in Section 4.2.5.3.

APCD-16

17. **Appendix B Air Quality and Greenhouse Gases Supporting Information:** Please include the calculation details for the baseline criteria pollutant and greenhouse gas emission estimates in Appendix B.

APCD-17

If you or the project applicant have any questions regarding these comments, please feel free to contact me at 961-8890 or by e-mail at BarhamC@sbcapcd.org.

Sincerely,



Carly Barham
Planning Division

cc: Michael Goldman, Manager, APCD Engineering Division [email only]
David Harris, Supervisor, APCD Engineering Division [email only]
Chron File

² For more information, see www.ourair.org/santa-ynez-unit.

Responses to Santa Barbara County Air Pollution Control District Comments

Comment Code	Response
APCD-1	<p>The text has been changed to state that a variance from the SBCAPCD would not be possible for operating the turbine generator at a CO emission level above what is allowed in the APCD permit.</p> <p>In the proposed Reduced Trucking Alternative, the Cogeneration System would be required to run at lower firing rate to balance steam in the facility. In addition to power, the Cogeneration System provides the steam necessary for processing crude oil and produced gas. At reduced rates, less steam is needed for processing. The Cogeneration System cannot be operated substantially above the level necessary for required processing steam due to the limitations in steam condensing capacity. Therefore, running the Cogeneration System at higher loads with PUC gas would not be feasible.</p>
APCD-2	The text referencing the baseline years has been modified in Section 4.1.1 to reflect 2012-2014, which were the last three full years of operation of the SYU facilities prior to shutdown of the Plains Pipeline.
APCD-3	The text “and would consider these emissions to be significant under CEQA” has been removed from Section 4.1 per the comment.
APCD-4	The text referencing the SBCAPCD thresholds has been modified in Table 4.11 to remove reference to the SBCAPCD.
APCD-5	The text referencing the implementation of dust control measures as part of achieving emissions levels under the thresholds is removed in impact AQ.1
APCD-6	The text “Surrender” has been replaced with “Provide” from Mitigation Measure AQ-1 per the comment.
APCD-7	Additional text has been added to mitigation measure AQ-1 to emphasize the SBCAPCD priority of onsite mitigation over offsite mitigation programs or the use of ERCs.
APCD-8	<p>The AB2588 HRA for the emissions year 2013 was included in the baseline discussion for the purposes of full disclosure on the baseline conditions. An HRA for the proposed Trucking Project was also conducted by the Applicant, with County and APCD review and input, which quantified the health risks associated with the SYU operations along with the trucking operations. The HRA, includes the emissions from all vehicles out to 1,000 feet from the LFC entrance gate. This proposed Trucking Project HRA is included as Appendix B.3 to the SEIR. Note that the proposed Trucking Project HRA estimated the cancer risk (MEIR) to be 7.0 per million for the LFC facility operating under the proposed Trucking Project, with the trucking operations contributing less than 1.0 per million. This is similar to the estimate in the Draft SEIR of 6.5 per million with the T trucking Project contributing also less than 1.0 per million. The most recent version of HARP2 was utilized in the analysis.</p>
APCD-9	Text has been modified throughout the document to state that POPCO could be used during the Interim Trucking Project. Potential POPCO emissions have been included in the Health Risk Assessment (HRA) and the cumulative project emissions.

Responses to Santa Barbara County Air Pollution Control District Comments

Comment Code	Response
APCD-10	Text has been modified and rearranged to incorporate the compliance with plans into section 4.1.4, Air Quality impacts, and to move the discussion of cumulative impacts from this section into section 4.1.5.3 in the Final SEIR.
APCD-11	Text has been added to Section 4.1.5.4 to address the potential cumulative impacts from the ERG and other North County Oil Projects. The Aera and PetroRock Projects have been removed from the cumulative analysis since their respective applications have been withdrawn.
APCD-12	The cumulative truck estimates provided in Table 3-2 (in Section 3.0) do not assume that each project begins in the same year. The development schedules for each of the cumulative oil projects was taken from the applicable environmental document and/or application documents. This was chosen as an appropriate way to estimate peak truck trips for the cumulative analysis since the proposed ExxonMobil Interim Trucking Project is of relatively short duration (up to seven years) compared with the other cumulative oil projects that have life expectancies of 20 to 30 years, and will not reach their peak production until after the end of the ExxonMobil Interim Trucking Project. Using this approach for estimating peak cumulative truck trips provides a reasonably conservative estimate. The defined, and short duration of the proposed Trucking Project necessitates this reasonable worst-case analysis as the peak of each of the other projects would not occur before the end of the proposed Trucking Project timeline.
APCD-13	EMFAC 2017 was utilized to calculate the GHG emissions. The footnote for Table 4.2-3 was corrected for the Final SEIR.
APCD-14	<p>The truck loading facilities in LFC would use about 2,500 to 3,000 kW-hrs. per day of electricity that would be supplied from the cogeneration facility. The cogeneration facility is expected to operate at around 32 MW during the proposed Trucking Project, which would generate 76,800 kW-hrs. per day. A portion of this electrical power would be exported to the grid.</p> <p>Indirect emissions from power generation for the proposed Project have been added to the emission estimates and are provided in Table 4.2-4 as part of the operational stationary source. The detailed calculations for the indirect emissions are provided in Appendix B.1.</p> <p>The COGEN GHG emissions are discussed under the restart emissions in the cumulative section of Section 4.2. The text discussed in the comment has been modified to indicate that the GHG emissions from the COGEN system are discussed under the restart cumulative project emissions.</p>
APCD-15	The section on the Increased Production of Crude Oil Supply has been moved to the cumulative projects' discussion in the Final SEIR.
APCD-16	A table has been added to the Final SEIR (Table 4.2-5) along with an analysis of the GHG emissions associated with SYU restart plus project emissions to provide substantial evidence that the GHG emissions would be less than the baseline emissions.

Responses to Santa Barbara County Air Pollution Control District Comments

Comment Code	Response
APCD-17	Baseline emission calculations for mobile sources has been added to the Final SEIR in Appendix B.1. The baseline emissions estimates for the SYU and LFC fixed facilities are taken from the CARB Mandatory GHG Emissions Program Data Base, 2012 to 2014 reporting years so there are no associated emission calculations.