



September 24, 2021

Mr. Larry Ferini, Chair
 Santa Barbara County Planning Commission
 123 East Anapamu Street
 Santa Barbara, CA 93101
 dvillalo@co.santa-barbara.ca.us

Re: **ExxonMobil Interim Trucking for the Santa Ynez Unit Phased Restart Project - OPPOSE**

Dear Chair Ferini and Commissioners:

On behalf of our thousands of members and supporters, we urge you to recommend **DENIAL** of ExxonMobil's proposal to restart its three platforms offshore Gaviota and truck its oil along Highway 101 and Route 166. This proposal will put our entire community at risk from offshore and onshore oil spills, accidents, air and water pollution, and climate change. Just last year an oil tanker truck crashed on Route 166, spilling 4,500 gallons of crude oil into the Cuyama River upstream from Twitchell Reservoir.

This proposal is contrary to the interests of the County and its residents. First, allowing ExxonMobil to produce oil and gas will exacerbate the current climate crisis. According to the Final Supplemental Environmental Impact Report ("FSEIR"), the project – including restart of

the platforms and associated facilities – will generate **317,043 MTCO_{2e}/year**.¹ Santa Barbara County already faces the devastating effects of unsustainable carbon emissions, as experienced through more destructive wildfires, droughts, sea level rise, and more. We simply cannot continue producing and consuming fossil fuels. Instead, we need to transition to clean sources of energy.

Second, allowing ExxonMobil to restart the Santa Ynez Unit platforms and Las Flores Canyon processing plant will generate a host of other unacceptable risks and impacts, including the threat of another major oil spill, as well as impacts to air and water quality, marine wildlife, onshore natural and cultural resources, birds, fishing, recreation, and public safety. These platforms are aging and have been used for fracking and acidizing, which only exacerbates the potential risks and impacts from the proposed project. The proposed FSEIR is deficient for omitting these activities and impacts from analysis and disclosure.

Finally, ExxonMobil's proposal to truck crude oil will put our communities and environment at great risk of accidents and spills. The project would permit 173,740 full truck trips, as well as 347,480 one-way trips, along Highway 101 and Route 166. With each truck carrying 6,720 gallons, **more than one billion gallons** of crude oil could be transported over the life of the project.²

The risks of oil trucking on Route 166 were acknowledged by County staff in August 2020, when the staff recommended against allowing trucking to the Plains Pentland Terminal. (See Santa Barbara County Planning Commission Staff Report for ExxonMobil Interim Trucking for Santa Ynez Unit Phased Project, prepared for the September 2, 2020, hearing, and released for public review on August 12, 2020 ("2020 Staff Report").) The 2020 Staff Report noted that prohibiting trucking on Route 166 would substantially reduce impacts by avoiding trucking on a longer transportation route that abuts waterways, including the Cuyama River. (2020 Staff Report at 22) The Staff Report concluded that prohibiting trucks on Route 166 would "reduce the probability of an oil spill entering a waterway." (*Id.*) Prohibiting trucking on Route 166 would also avoid impacts to cultural resources. (*Id.* at 33) Some of these same findings are included in the September 8, 2021, Staff Report.³

Trucking along Highway 101 should also be denied because of the significant risk of an accident and oil spill along the scenic Gaviota Coast, across numerous coastal watersheds and next to the Pacific Ocean, and through the dangerous Gaviota curve and tunnel. These areas include important Indigenous lands and sensitive wildlife habitat. A spill along this route would have a devastating effect on sensitive cultural and ecological resources.

¹ Proposed FSEIR at 4.2-28, 29. The FSEIR inappropriately considers emissions from the SYU restart as cumulative impacts. Such emissions, however, should be evaluated as part of the project, which is described as including the phased restart of the platforms.

² Sixty-eight trucks carrying 6,720 gallons per day results in 1,167,532,800 gallons of crude oil.

³ The September 8, 2021, Staff Report (posted on September 9, 2021) states that "[t]he environmental advantage of this alternative is that it would substantially reduce the potential for trucks to go to the Pentland Terminal, which is a longer transportation route...By substantially limiting the number of trucks that could use State Route 166, this alternative would also reduce the probability of an oil spill entering a waterway." (Staff Report at 27)

Now is not the time to turn the clock back and return to our old ways of relying on fossil fuels to meet our energy needs. The County of Santa Barbara is moving towards a clean energy future by adopting renewable energy targets and joining the Central Coast Community Energy program. Allowing ExxonMobil to resume oil production off our coast will lead to decades of fossil fuel production that we cannot afford.

For the foregoing reasons, we urge the Commission to recommend **denial** of ExxonMobil's proposal to restart the Santa Ynez Unit platforms and Las Flores Canyon processing facility, and to truck its oil through Santa Barbara County. Thank you for your consideration.

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