

# ATTACHMENT 1

## AGREEMENT FOR SERVICES OF INDEPENDENT CONTRACTOR

**THIS AGREEMENT** (hereafter Agreement) is made by and between the County of Santa Barbara, a political subdivision of the State of California (hereafter COUNTY) and MRS Environmental, Inc. with an address at 1306 Santa Barbara Street, Santa Barbara, CA 93101 (hereafter CONTRACTOR) wherein CONTRACTOR agrees to provide and COUNTY agrees to accept the services specified herein.

**WHEREAS**, CONTRACTOR represents that it is specially trained, skilled, experienced, and competent to perform the special services required by COUNTY and COUNTY desires to retain the services of CONTRACTOR pursuant to the terms, covenants, and conditions herein set forth;

**NOW, THEREFORE**, in consideration of the mutual covenants and conditions contained herein, the parties agree as follows:

### 1. DESIGNATED REPRESENTATIVE

Kathryn Lehr at phone number (805) 568-3560 is the representative of COUNTY and will administer this Agreement for and on behalf of COUNTY. John Peirson at phone number (805) 289-3923 is the authorized representative for CONTRACTOR. Changes in designated representatives shall be made only after advance written notice to the other party.

### 2. NOTICES

Any notice or consent required or permitted to be given under this Agreement shall be given to the respective parties in writing, by personal delivery or facsimile, or with postage prepaid by first class mail, registered or certified mail, or express courier service, as follows:

To COUNTY:	Kathryn Lehr, County of Santa Barbara, Planning & Development Department, 123 E. Anapamu Street, Santa Barbara, CA 93101, Fax (805) 568-2030
To CONTRACTOR:	John Peirson, MRS Environmental, 1306 Santa Barbara Street, Santa Barbara, CA 93101, (805) 289-3923

or at such other address or to such other person that the parties may from time to time designate in accordance with this Notices section. If sent by first class mail, notices and consents under this section shall be deemed to be received five (5) days following their deposit in the U.S. mail. This Notices section shall not be construed as meaning that either party agrees to service of process except as required by applicable law.

### 3. SCOPE OF SERVICES

CONTRACTOR agrees to provide services to COUNTY in accordance with EXHIBIT A attached hereto and incorporated herein by reference.

### 4. TERM

CONTRACTOR shall commence performance on July 3, 2018 and end performance upon completion, but no later than June 30, 2020 unless otherwise directed by COUNTY or unless earlier terminated.

## **5. COMPENSATION OF CONTRACTOR**

In full consideration for CONTRACTOR's services, CONTRACTOR shall be paid for performance under this Agreement in accordance with the terms of EXHIBIT B attached hereto and incorporated herein by reference. Billing shall be made by invoice, which shall include the contract number assigned by COUNTY and which is delivered to the address given in Section 2 NOTICES above following completion of the increments identified on EXHIBIT B. Unless otherwise specified on EXHIBIT B, payment shall be net thirty (30) days from presentation of invoice.

## **6. INDEPENDENT CONTRACTOR**

It is mutually understood and agreed that CONTRACTOR (including any and all of its officers, agents, and employees), shall perform all of its services under this Agreement as an independent contractor as to COUNTY and not as an officer, agent, servant, employee, joint venturer, partner, or associate of COUNTY. Furthermore, COUNTY shall have no right to control, supervise, or direct the manner or method by which CONTRACTOR shall perform its work and function. However, COUNTY shall retain the right to administer this Agreement so as to verify that CONTRACTOR is performing its obligations in accordance with the terms and conditions hereof. CONTRACTOR understands and acknowledges that it shall not be entitled to any of the benefits of a COUNTY employee, including but not limited to vacation, sick leave, administrative leave, health insurance, disability insurance, retirement, unemployment insurance, workers' compensation and protection of tenure. CONTRACTOR shall be solely liable and responsible for providing to, or on behalf of, its employees all legally-required employee benefits. In addition, CONTRACTOR shall be solely responsible and save COUNTY harmless from all matters relating to payment of CONTRACTOR's employees, including compliance with Social Security withholding and all other regulations governing such matters. It is acknowledged that during the term of this Agreement, CONTRACTOR may be providing services to others unrelated to the COUNTY or to this Agreement.

## **7. STANDARD OF PERFORMANCE**

CONTRACTOR represents that it has the skills, expertise, and licenses/permits necessary to perform the services required under this Agreement. Accordingly, CONTRACTOR shall perform all such services in the manner and according to the standards observed by a competent practitioner of the same profession in which CONTRACTOR is engaged. All products of whatsoever nature, which CONTRACTOR delivers to COUNTY pursuant to this Agreement, shall be prepared in a first class and workmanlike manner and shall conform to the standards of quality normally observed by a person practicing in CONTRACTOR's profession. CONTRACTOR shall correct or revise any errors or omissions, at COUNTY'S request without additional compensation. Permits and/or licenses shall be obtained and maintained by CONTRACTOR without additional compensation.

## **8. DEBARMENT AND SUSPENSION**

CONTRACTOR certifies to COUNTY that it and its employees and principals are not debarred, suspended, or otherwise excluded from or ineligible for, participation in federal, state, or county government contracts. CONTRACTOR certifies that it shall not contract with a subcontractor that is so debarred or suspended.

## **9. TAXES**

CONTRACTOR shall pay all taxes, levies, duties, and assessments of every nature due in connection with any work under this Agreement and shall make any and all payroll deductions required by law. COUNTY shall not be responsible for paying any taxes on CONTRACTOR's behalf, and should COUNTY be required to do so by state, federal, or local taxing agencies, CONTRACTOR agrees to promptly reimburse COUNTY for the full value of such paid taxes plus interest and penalty, if any. These taxes shall include, but not be limited to, the following: FICA (Social Security), unemployment insurance contributions, income tax, disability insurance, and workers' compensation insurance.

## **10. CONFLICT OF INTEREST**

CONTRACTOR covenants that CONTRACTOR presently has no employment or interest and shall not acquire any employment or interest, direct or indirect, including any interest in any business, property, or source of income, which would conflict in any manner or degree with the performance of services required to be performed under this Agreement. CONTRACTOR further covenants that in the performance of this Agreement, no person having any such interest shall be employed by CONTRACTOR. CONTRACTOR must promptly disclose to COUNTY, in writing, any potential conflict of interest. COUNTY retains the right to waive a conflict of interest disclosed by CONTRACTOR if COUNTY determines it to be immaterial, and such waiver is only effective if provided by COUNTY to CONTRACTOR in writing.

## **11. OWNERSHIP OF DOCUMENTS AND INTELLECTUAL PROPERTY**

COUNTY shall be the owner of the following items incidental to this Agreement upon production, whether or not completed: all data collected, all documents of any type whatsoever, all photos, designs, sound or audiovisual recordings, software code, inventions, technologies, and other materials, and any material necessary for the practical use of such items, from the time of collection and/or production whether or not performance under this Agreement is completed or terminated prior to completion. CONTRACTOR shall not release any of such items to other parties except after prior written approval of COUNTY.

Unless otherwise specified in Exhibit A, CONTRACTOR hereby assigns to COUNTY all copyright, patent, and other intellectual property and proprietary rights to all data, documents, reports, photos, designs, sound or audiovisual recordings, software code, inventions, technologies, and other materials prepared or provided by CONTRACTOR pursuant to this Agreement (collectively referred to as "Copyrightable Works and Inventions"). COUNTY shall have the unrestricted authority to copy, adapt, perform, display, publish, disclose, distribute, create derivative works from, and otherwise use in whole or in part, any Copyrightable Works and Inventions. CONTRACTOR agrees to take such actions and execute and deliver such documents as may be needed to validate, protect and confirm the rights and assignments provided hereunder. CONTRACTOR warrants that any Copyrightable Works and Inventions and other items provided under this Agreement will not infringe upon any intellectual property or proprietary rights of any third party. CONTRACTOR at its own expense shall defend, indemnify, and hold harmless COUNTY against any claim that any Copyrightable Works or Inventions or other items provided by CONTRACTOR hereunder infringe upon intellectual or other proprietary rights of a third party, and CONTRACTOR shall pay any damages, costs, settlement amounts, and fees (including attorneys' fees) that may be incurred by COUNTY in connection with any such claims. This Ownership of Documents and Intellectual Property provision shall survive expiration or termination of this Agreement.

## **12. NO PUBLICITY OR ENDORSEMENT**

CONTRACTOR shall not use COUNTY's name or logo or any variation of such name or logo in any publicity, advertising or promotional materials. CONTRACTOR shall not use COUNTY's name or logo in any manner that would give the appearance that the COUNTY is endorsing CONTRACTOR. CONTRACTOR shall not in any way contract on behalf of or in the name of COUNTY. CONTRACTOR shall not release any informational pamphlets, notices, press releases, research reports, or similar public notices concerning the COUNTY or its projects, without obtaining the prior written approval of COUNTY.

## **13. COUNTY PROPERTY AND INFORMATION**

All of COUNTY's property, documents, and information provided for CONTRACTOR's use in connection with the services shall remain COUNTY's property, and CONTRACTOR shall return any such items whenever requested by COUNTY and whenever required according to the Termination section of this Agreement. CONTRACTOR may use such items only in connection with providing the services. CONTRACTOR shall not disseminate any COUNTY property, documents, or information without COUNTY's prior written consent.

#### **14. RECORDS, AUDIT, AND REVIEW**

CONTRACTOR shall keep such business records pursuant to this Agreement as would be kept by a reasonably prudent practitioner of CONTRACTOR's profession and shall maintain such records for at least four (4) years following the termination of this Agreement. All accounting records shall be kept in accordance with generally accepted accounting principles. COUNTY shall have the right to audit and review all such documents and records at any time during CONTRACTOR's regular business hours or upon reasonable notice. In addition, if this Agreement exceeds ten thousand dollars (\$10,000.00), CONTRACTOR shall be subject to the examination and audit of the California State Auditor, at the request of the COUNTY or as part of any audit of the COUNTY, for a period of three (3) years after final payment under the Agreement (Cal. Govt. Code Section 8546.7). CONTRACTOR shall participate in any audits and reviews, whether by COUNTY or the State, at no charge to COUNTY.

If federal, state or COUNTY audit exceptions are made relating to this Agreement, CONTRACTOR shall reimburse all costs incurred by federal, state, and/or COUNTY governments associated with defending against the audit exceptions or performing any audits or follow-up audits, including but not limited to: audit fees, court costs, attorneys' fees based upon a reasonable hourly amount for attorneys in the community, travel costs, penalty assessments and all other costs of whatever nature. Immediately upon notification from COUNTY, CONTRACTOR shall reimburse the amount of the audit exceptions and any other related costs directly to COUNTY as specified by COUNTY in the notification.

#### **15. INDEMNIFICATION AND INSURANCE**

CONTRACTOR agrees to the indemnification and insurance provisions as set forth in EXHIBIT C attached hereto and incorporated herein by reference.

#### **16. NONDISCRIMINATION**

COUNTY hereby notifies CONTRACTOR that COUNTY's Unlawful Discrimination Ordinance (Article XIII of Chapter 2 of the Santa Barbara County Code) applies to this Agreement and is incorporated herein by this reference with the same force and effect as if the ordinance were specifically set out herein and CONTRACTOR agrees to comply with said ordinance.

#### **17. NONEXCLUSIVE AGREEMENT**

CONTRACTOR understands that this is not an exclusive Agreement and that COUNTY shall have the right to negotiate with and enter into contracts with others providing the same or similar services as those provided by CONTRACTOR as the COUNTY desires.

#### **18. NON-ASSIGNMENT**

CONTRACTOR shall not assign, transfer or subcontract this Agreement or any of its rights or obligations under this Agreement without the prior written consent of COUNTY and any attempt to so assign, subcontract or transfer without such consent shall be void and without legal effect and shall constitute grounds for termination.

#### **19. TERMINATION**

A. **By COUNTY.** COUNTY may, by written notice to CONTRACTOR, terminate this Agreement in whole or in part at any time, whether for COUNTY's convenience, for nonappropriation of funds, or because of the failure of CONTRACTOR to fulfill the obligations herein.

1. **For Convenience.** COUNTY may terminate this Agreement in whole or in part upon thirty (30) days written notice. During the thirty (30) day period, CONTRACTOR shall, as directed by COUNTY, wind down and cease its services as quickly and efficiently as reasonably possible, without performing

unnecessary services or activities and by minimizing negative effects on COUNTY from such winding down and cessation of services.

2. **For Nonappropriation of Funds.** Notwithstanding any other provision of this Agreement, in the event that no funds or insufficient funds are appropriated or budgeted by federal, state or COUNTY governments, or funds are not otherwise available for payments in the fiscal year(s) covered by the term of this Agreement, then COUNTY will notify CONTRACTOR of such occurrence and COUNTY may terminate or suspend this Agreement in whole or in part, with or without a prior notice period. Subsequent to termination of this Agreement under this provision, COUNTY shall have no obligation to make payments with regard to the remainder of the term.
  3. **For Cause.** Should CONTRACTOR default in the performance of this Agreement or materially breach any of its provisions, COUNTY may, at COUNTY's sole option, terminate or suspend this Agreement in whole or in part by written notice. Upon receipt of notice, CONTRACTOR shall immediately discontinue all services affected (unless the notice directs otherwise) and notify COUNTY as to the status of its performance. The date of termination shall be the date the notice is received by CONTRACTOR, unless the notice directs otherwise.
- B. By CONTRACTOR. Should COUNTY fail to pay CONTRACTOR all or any part of the payment set forth in EXHIBIT B, CONTRACTOR may, at CONTRACTOR's option terminate this Agreement if such failure is not remedied by COUNTY within thirty (30) days of written notice to COUNTY of such late payment.
- C. Upon termination, CONTRACTOR shall deliver to COUNTY all data, estimates, graphs, summaries, reports, and all other property, records, documents or papers as may have been accumulated or produced by CONTRACTOR in performing this Agreement, whether completed or in process, except such items as COUNTY may, by written permission, permit CONTRACTOR to retain. Notwithstanding any other payment provision of this Agreement, COUNTY shall pay CONTRACTOR for satisfactory services performed to the date of termination to include a prorated amount of compensation due hereunder less payments, if any, previously made. In no event shall CONTRACTOR be paid an amount in excess of the full price under this Agreement nor for profit on unperformed portions of service. CONTRACTOR shall furnish to COUNTY such financial information as in the judgment of COUNTY is necessary to determine the reasonable value of the services rendered by CONTRACTOR. In the event of a dispute as to the reasonable value of the services rendered by CONTRACTOR, the decision of COUNTY shall be final. The foregoing is cumulative and shall not affect any right or remedy which COUNTY may have in law or equity.

## 20. SECTION HEADINGS

The headings of the several sections, and any Table of Contents appended hereto, shall be solely for convenience of reference and shall not affect the meaning, construction or effect hereof.

## 21. SEVERABILITY

If any one or more of the provisions contained herein shall for any reason be held to be invalid, illegal or unenforceable in any respect, then such provision or provisions shall be deemed severable from the remaining provisions hereof, and such invalidity, illegality or unenforceability shall not affect any other provision hereof, and this Agreement shall be construed as if such invalid, illegal or unenforceable provision had never been contained herein.

**22. REMEDIES NOT EXCLUSIVE**

No remedy herein conferred upon or reserved to COUNTY is intended to be exclusive of any other remedy or remedies, and each and every such remedy, to the extent permitted by law, shall be cumulative and in addition to any other remedy given hereunder or now or hereafter existing at law or in equity or otherwise.

**23. TIME IS OF THE ESSENCE**

Time is of the essence in this Agreement and each covenant and term is a condition herein.

**24. NO WAIVER OF DEFAULT**

No delay or omission of COUNTY to exercise any right or power arising upon the occurrence of any event of default shall impair any such right or power or shall be construed to be a waiver of any such default or an acquiescence therein; and every power and remedy given by this Agreement to COUNTY shall be exercised from time to time and as often as may be deemed expedient in the sole discretion of COUNTY.

**25. ENTIRE AGREEMENT AND AMENDMENT**

In conjunction with the matters considered herein, this Agreement contains the entire understanding and agreement of the parties and there have been no promises, representations, agreements, warranties or undertakings by any of the parties, either oral or written, of any character or nature hereafter binding except as set forth herein. This Agreement may be altered, amended or modified only by an instrument in writing, executed by the parties to this Agreement and by no other means. Each party waives their future right to claim, contest or assert that this Agreement was modified, canceled, superseded, or changed by any oral agreements, course of conduct, waiver or estoppel.

**26. SUCCESSORS AND ASSIGNS**

All representations, covenants and warranties set forth in this Agreement, by or on behalf of, or for the benefit of any or all of the parties hereto, shall be binding upon and inure to the benefit of such party, its successors and assigns.

**27. COMPLIANCE WITH LAW**

CONTRACTOR shall, at its sole cost and expense, comply with all County, State and Federal ordinances and statutes now in force or which may hereafter be in force with regard to this Agreement. The judgment of any court of competent jurisdiction, or the admission of CONTRACTOR in any action or proceeding against CONTRACTOR, whether COUNTY is a party thereto or not, that CONTRACTOR has violated any such ordinance or statute, shall be conclusive of that fact as between CONTRACTOR and COUNTY.

**28. CALIFORNIA LAW AND JURISDICTION**

This Agreement shall be governed by the laws of the State of California. Any litigation regarding this Agreement or its contents shall be filed in the County of Santa Barbara, if in state court, or in the federal district court nearest to Santa Barbara County, if in federal court.

**29. EXECUTION OF COUNTERPARTS**

This Agreement may be executed in any number of counterparts and each of such counterparts shall for all purposes be deemed to be an original; and all such counterparts, or as many of them as the parties shall preserve undestroyed, shall together constitute one and the same instrument.

### 30. **AUTHORITY**

All signatories and parties to this Agreement warrant and represent that they have the power and authority to enter into this Agreement in the names, titles and capacities herein stated and on behalf of any entities, persons, or firms represented or purported to be represented by such entity(ies), person(s), or firm(s) and that all formal requirements necessary or required by any state and/or federal law in order to enter into this Agreement have been fully complied with. Furthermore, by entering into this Agreement, CONTRACTOR hereby warrants that it shall not have breached the terms or conditions of any other contract or agreement to which CONTRACTOR is obligated, which breach would have a material effect hereon.

### 31. **SURVIVAL**

All provisions of this Agreement which by their nature are intended to survive the termination or expiration of this Agreement shall survive such termination or expiration.

### 32. **PRECEDENCE**

In the event of conflict between the provisions contained in the numbered sections of this Agreement and the provisions contained in the Exhibits, the provisions of the Exhibits shall prevail over those in the numbered sections.

### 33. **SUBCONTRACTORS**

CONTRACTOR is authorized to subcontract with subcontractors identified in Contractor's Proposal. CONTRACTOR shall be fully responsible for all services performed by its subcontractor. CONTRACTOR shall secure from its subcontractor all rights for COUNTY in this Agreement, including audit rights.

### 34. **HANDLING OF PROPRIETARY INFORMATION**

CONTRACTOR understands and agrees that certain materials which may be provided by COUNTY may be classified and conspicuously labeled as proprietary confidential information. That material is to be subject to the following special provisions:

- A. All reasonable steps will be taken to prevent disclosure of the material to any person except those personnel of CONTRACTOR working on the project who have a need to use the material.
- B. Upon conclusion of CONTRACTOR'S work, CONTRACTOR shall return all copies of the material direct to party providing such material. CONTRACTOR shall contact COUNTY to obtain the name of the specific party authorized to receive the material.

### 35. **IMMATERIAL CHANGES**

CONTRACTOR and COUNTY agree that immaterial changes to the Statement of Work (time frame and mutually agreeable Statement of Work changes which will not result in a change to the total contract amount) may be authorized by Planning and Development Director, or designee in writing, and will not constitute an amendment to the Agreement.

### 36. **NEWS RELEASES/INTERVIEWS**

CONTRACTOR agrees for itself, its agents, employees and subcontractors, it will not communicate with representatives of the communications media concerning the subject matter of this Agreement without prior written approval of the COUNTY Project Coordinator. CONTRACTOR further agrees that all media requests for communication will be referred to COUNTY'S responsible personnel.

Agreement for Services of Independent Contractor between the **County of Santa Barbara** and **MRS Environmental, Inc.**

**IN WITNESS WHEREOF**, the parties have executed this Agreement to be effective on the date executed by COUNTY.

**ATTEST:**

Mona Miyasato  
County Executive Officer  
Clerk of the Board

By: \_\_\_\_\_  
Deputy Clerk

**COUNTY OF SANTA BARBARA:**

By: \_\_\_\_\_  
Chair, Board of Supervisors

Date: \_\_\_\_\_

**RECOMMENDED FOR APPROVAL:**

Dianne M. Black, Director  
Planning & Development

By: \_\_\_\_\_  
Department Head

**CONTRACTOR:**

John Peirson, Project Manager  
MRS Environmental, Inc.

By: \_\_\_\_\_  
Authorized Representative

Name: \_\_\_\_\_

Title: \_\_\_\_\_

**APPROVED AS TO FORM:**

Michael C. Ghizzoni  
County Counsel

By: \_\_\_\_\_  
Deputy County Counsel

**APPROVED AS TO ACCOUNTING FORM:**

Theodore A. Fallati, CPA  
Auditor-Controller

By: \_\_\_\_\_  
Deputy

**APPROVED AS TO FORM:**

Risk Management

By: \_\_\_\_\_  
Risk Management



**ATTACHMENT 1  
EXHIBIT A**

**STATEMENT OF WORK**

CONTRACTOR shall render services in accordance with the Proposal for Preparation of the ExxonMobil Interim Trucking for SYU Phased Restart Project Supplement to the Environmental Impact Report (SEIR), as shown in Appendix 1 and incorporated herein by reference. The Proposal describes the SEIR scope of work which includes the following: consultant qualifications and experience, key personnel and project management program, study methodology, document preparation, project schedule, and cost estimate.

John Peirson, Greg Chittick Luis Perez, Steve Radis, Lauren Brown and Joe Fernandez shall be the individual(s) personally responsible for providing all services hereunder. CONTRACTOR may not substitute other persons without the prior written approval of COUNTY's designated representative.

**Suspension for Convenience.** COUNTY may, without cause, order CONTRACTOR in writing to suspend, delay, or interrupt the services under this Agreement in whole or in part for up to 30 days. COUNTY shall incur no liability for suspension under this provision and suspension shall not constitute a breach of this Agreement.

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**ATTACHMENT 1  
EXHIBIT B**

**PAYMENT ARRANGEMENTS  
Periodic Compensation at Selected Milestones**

- A. For CONTRACTOR services to be rendered under this Agreement, CONTRACTOR shall be paid a total contract amount, including cost reimbursements, not to exceed \$163,511.00 with a contingency amount of \$24,527.00 for a total contract amount up to \$188,038.00. Contingency expenditures shall be approved in advance by the County.
- B. Payment for services and/or reimbursement of costs shall be made upon CONTRACTOR's satisfactory performance, based upon the scope and methodology contained in Appendix 1 (MRS Technical Proposal) as determined by COUNTY.
- C. Upon completion of the work for each milestone and/or delivery to COUNTY of item(s) specified below, CONTRACTOR shall submit to the COUNTY DESIGNATED REPRESENTATIVE an invoice or certified claim on the County Treasury for the service performed in accomplishing each milestone. These invoices or certified claims must cite the assigned Board Contract Number. COUNTY DESIGNATED REPRESENTATIVE shall evaluate the quality of the service performed and/or item(s) delivered and if found to be satisfactory shall initiate payment processing. COUNTY shall pay invoices or claims for satisfactory work within 30 days of receipt of correct and complete invoices or claims from CONTRACTOR.

<b>Table 6 Milestone for Not-To-Exceed Payments</b>		
<b>Milestone</b>	<b>% of Costs</b>	<b>Amount</b>
Administrative Draft SEIR	50%	\$81,756
Public Draft SEIR	70%	\$114,458
Proposed Final SEIR	90%	\$147,160
Final SEIR	100%	\$163,511

The final milestone payment above shall not be made until all services have been completed and item(s) as specified in EXHIBIT A and in Appendix 1 have been delivered and found to be satisfactory.

- D. COUNTY's failure to discover or object to any unsatisfactory work or billings prior to payment will not constitute a waiver of COUNTY's right to require CONTRACTOR to correct such work or billings or seek any other legal remedy.

**ATTACHMENT 1  
EXHIBIT C**

**Indemnification and Insurance Requirements (For  
Professional Contracts)**

**INDEMNIFICATION**

CONTRACTOR agrees to indemnify, defend (with counsel reasonably approved by COUNTY) and hold harmless COUNTY and its officers, officials, employees, agents and volunteers from and against any and all claims, actions, losses, damages, judgments and/or liabilities arising out of this Agreement from any cause whatsoever, including the acts, errors or omissions of any person or entity and for any costs or expenses (including but not limited to attorneys' fees) incurred by COUNTY on account of any claim except where such indemnification is prohibited by law. CONTRACTOR's indemnification obligation applies to COUNTY's active as well as passive negligence but does not apply to COUNTY's sole negligence or willful misconduct.

**NOTIFICATION OF ACCIDENTS AND SURVIVAL OF INDEMNIFICATION PROVISIONS**

CONTRACTOR shall notify COUNTY immediately in the event of any accident or injury arising out of or in connection with this Agreement. The indemnification provisions in this Agreement shall survive any expiration or termination of this Agreement.

**INSURANCE**

CONTRACTOR shall procure and maintain for the duration of this Agreement insurance against claims for injuries to persons or damages to property which may arise from or in connection with the performance of the work hereunder and the results of that work by the CONTRACTOR, his agents, representatives, employees or subcontractors.

A. Minimum Scope of Insurance Coverage shall be at least as broad as:

1. **Commercial General Liability (CGL):** Insurance Services Office (ISO) Form CG 00 01 covering CGL on an "occurrence" basis, including products-completed operations, personal & advertising injury, with limits no less than \$1,000,000 per occurrence and \$2,000,000 in the aggregate.
2. **Automobile Liability:** ISO Form Number CA 00 01 covering any auto (Code 1), or if CONTRACTOR has no owned autos, hired, (Code 8) and non-owned autos (Code 9), with limit no less than \$1,000,000 per accident for bodily injury and property damage.
3. **Workers' Compensation:** as required by the State of California, with Statutory Limits, and Employer's Liability Insurance with limit of no less than \$1,000,000 per accident for bodily injury or disease.
4. **Professional Liability** (Errors and Omissions) Insurance appropriate to the CONTRACTOR'S profession, with limit of no less than \$1,000,000 per occurrence or claim, \$2,000,000 aggregate.

If the CONTRACTOR maintains higher limits than the minimums shown above, the COUNTY requires and shall be entitled to coverage for the higher limits maintained by the CONTRACTOR. Any available insurance proceeds in excess of the specified minimum limits of insurance and coverage shall be available to the COUNTY.

## B. Other Insurance Provisions

The insurance policies are to contain, or be endorsed to contain, the following provisions:

1. **Additional Insured** – COUNTY, its officers, officials, employees, agents and volunteers are to be covered as additional insureds on the CGL policy with respect to liability arising out of work or operations performed by or on behalf of the CONTRACTOR including materials, parts, or equipment furnished in connection with such work or operations. General liability coverage can be provided in the form of an endorsement to the CONTRACTOR's insurance at least as broad as ISO Form CG 20 10 11 85 or if not available, through the addition of both CG 20 10 and CG 20 37 if a later edition is used).
2. **Primary Coverage** – For any claims related to this Agreement, the CONTRACTOR's insurance coverage shall be primary insurance as respects the COUNTY, its officers, officials, employees, agents and volunteers. Any insurance or self-insurance maintained by the COUNTY, its officers, officials, employees, agents or volunteers shall be excess of the CONTRACTOR's insurance and shall not contribute with it.
3. **Notice of Cancellation** – Each insurance policy required above shall provide that coverage shall not be canceled, except with notice to the COUNTY.
4. **Waiver of Subrogation Rights** – CONTRACTOR hereby grants to COUNTY a waiver of any right to subrogation which any insurer of said CONTRACTOR may acquire against the COUNTY by virtue of the payment of any loss under such insurance. CONTRACTOR agrees to obtain any endorsement that may be necessary to effect this waiver of subrogation, but this provision applies regardless of whether or not the COUNTY has received a waiver of subrogation endorsement from the insurer.
5. **Deductibles and Self-Insured Retention** – Any deductibles or self-insured retentions must be declared to and approved by the COUNTY. The COUNTY may require the CONTRACTOR to purchase coverage with a lower deductible or retention or provide proof of ability to pay losses and related investigations, claim administration, and defense expenses within the retention.
6. **Acceptability of Insurers** – Unless otherwise approved by Risk Management, insurance shall be written by insurers authorized to do business in the State of California and with a minimum A.M. Best's Insurance Guide rating of "A- VII".
7. **Verification of Coverage** – CONTRACTOR shall furnish the COUNTY with proof of insurance, original certificates and amendatory endorsements as required by this Agreement. The proof of insurance, certificates and endorsements are to be received and approved by the COUNTY before work commences. However, failure to obtain the required documents prior to the work beginning shall not waive the CONTRACTOR's obligation to provide them. The CONTRACTOR shall furnish evidence of renewal of coverage throughout the term of the Agreement. The COUNTY reserves the right to require complete, certified copies of all required insurance policies, including endorsements required by these specifications, at any time.
8. **Failure to Procure Coverage** – In the event that any policy of insurance required under this Agreement does not comply with the requirements, is not procured, or is canceled and not replaced, COUNTY has the right but not the obligation or duty to terminate the Agreement. Maintenance of required insurance coverage is a material element of the Agreement and failure to maintain or renew such coverage or to provide evidence of renewal may be treated by COUNTY as a material breach of contract.
9. **Subcontractors** – CONTRACTOR shall require and verify that all subcontractors maintain insurance meeting all the requirements stated herein, and CONTRACTOR shall ensure that COUNTY is an additional insured on insurance required from subcontractors.

10. **Claims Made Policies** – If any of the required policies provide coverage on a claims-made basis:

- i. The Retroactive Date must be shown and must be before the date of the contract or the beginning of contract work.
- ii. Insurance must be maintained and evidence of insurance must be provided for at least five (5) years after completion of contract work.
- iii. If coverage is canceled or non-renewed, and not replaced with another claims-made policy form with a Retroactive Date prior to the contract effective date, the CONTRACTOR must purchase “extended reporting” coverage for a minimum of five (5) years after completion of contract work.

11. **Special Risks or Circumstances** – COUNTY reserves the right to modify these requirements, including limits, based on the nature of the risk, prior experience, insurer, coverage, or other special circumstances.

Any change requiring additional types of insurance coverage or higher coverage limits must be made by amendment to this Agreement. CONTRACTOR agrees to execute any such amendment within thirty (30) days of receipt.

Any failure, actual or alleged, on the part of COUNTY to monitor or enforce compliance with any of the insurance and indemnification requirements will not be deemed as a waiver of any rights on the part of COUNTY.

**Attachment 1**  
**Appendix 1: MRS Technical Proposal for**  
**ExxonMobil Interim Trucking for Santa Ynez Unit**  
**(SYU) Restart Project**



***Proposal to Prepare a Supplemental  
Environmental Impact Report***

**ExxonMobil Interim Trucking SYU Phased  
Restart Project**

Case Nos. 17RVP-00000-00081

APN: 081-220-014

**May 2, 2018**



Prepared for:

***County of Santa Barbara  
Planning & Development Dept.  
123 East Anapamu Street  
Santa Barbara, CA 93101***

**MRS Environmental Inc.  
1306 Santa Barbara Street  
Santa Barbara, CA 93101**

**Contact: John Peirson  
Phone: 805.289.3923**





May 2, 2018

Kathryn Lehr, Planner  
Energy & Minerals Division  
Santa Barbara County Planning & Development Department  
123 East Anapamu Street  
Santa Barbara, CA 93101

Re: Proposal to Prepare the ExxonMobil Interim Trucking for Santa Ynez Unit (SYU) Phased Restart Project SEIR

Dear Ms. Lehr:

MRS Environmental Inc. is pleased to submit this Proposal to assist the County in preparing the ExxonMobil Interim Trucking for Santa Ynez Unit (SYU) Phased Restart Project SEIR. Per the Request for Proposal (RFP) requirements, we have included three (3) hard copies of our Technical Proposal and three (3) hard copies of our Cost Proposal in a separately sealed envelope. We have also included an electronic copy on CD of each of these submittals.

MRS Environmental staff are exceptionally well qualified to prepare the SEIR for this important project. We have a long history of demonstrated responsiveness and creativity in addressing the challenges presented by developing CEQA documents for oil related projects, including the 1986 Santa Ynez Unit (SYU) Production and Development Plan SEIR that was prepared for the County. All our team members have experience working on CEQA documents with similar crude oil transportation components.

Our cost-effective approach relies on utilizing extensive technical and managerial expertise along with a long 30+ year history of oil and gas development CEQA analysis in Santa Barbara County. This allows us to produce high-quality CEQA documents in an efficient and time-sensitive manner.

Our commitment to the project schedule is exemplified by the inclusion in the proposal of a detailed project schedule (Appendix C), developed through an application of our experience in preparing CEQA documents for similar transportation projects and the timelines provided in the RFP.

Our team members' experience in preparing CEQA documents for oil-related projects is unparalleled in Santa Barbara County, with CEQA experience reaching as far back as the Pt. Arguello EIR in 1984 and the SYU Production and Development SEIR in 1986. This "memory" of past projects and CEQA-related issues brings extensive expertise to the project. MRS Environmental also has extensive experience with industry, allowing for insight into effective CEQA and permit implementation.

MRS Environmental's proposed Project Manager has well-proven managerial experience coupled with high-quality technical expertise and writing capabilities, which ensures strong and defensible EIRs, technical studies, and effective testimony to decision makers and the public.



May 2, 2018

Kathryn Lehr, Planner  
Energy & Minerals Division  
Santa Barbara County Planning & Development Department

Page 2 of 3

MRS Environmental has a high degree of flexibility and willingness to work closely with Santa Barbara County and other County staff as exemplified by our long history with County staff and our local presence in the City of Santa Barbara.

The figure at the end of this cover letter summarizes MRS Environmental's compliance with the selection criteria specific in the RFP.

The proposal includes a not-to-exceed cost, which remains effective for a period of sixty (60) days from the proposal due date. MRS is not currently working for the Applicant, nor do we have a conflict of interest associated with the Applicant or the subject project facilities.

MRS Environmental concurs with the County's standard contract provisions included in the attached "Agreement for Services of Independent Contractor."

Thank you for inviting MRS Environmental to bid on this important project. We look forward to working with Santa Barbara County if we are the selected contractor. If you have any questions, please do not hesitate to give me a call at 805.289.3923.

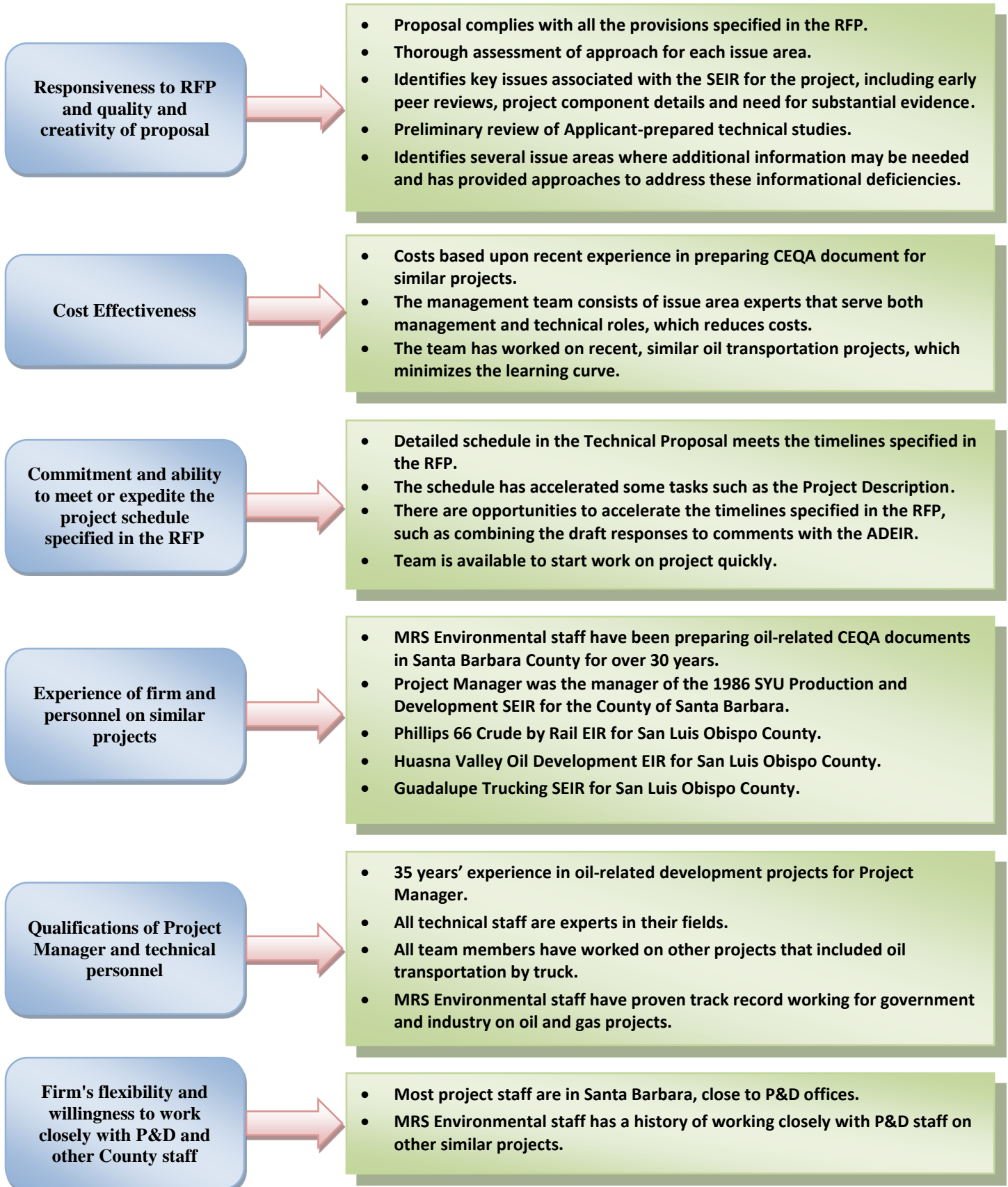
Best Regards,



John F. Peirson, Jr  
President and Project Manager



## Summary of Compliance with RFP Section Criteria





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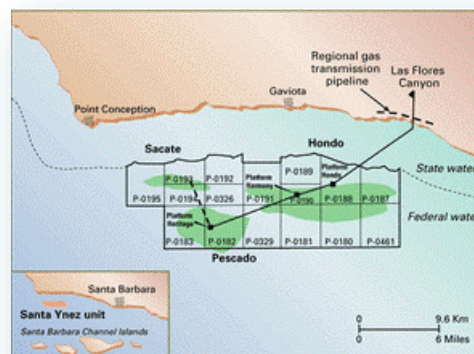
## 1.0 Introduction

MRS Environmental Inc. is pleased to submit this Proposal to Prepare a Supplemental Environmental Impact Report (SEIR) for the ExxonMobil Interim Trucking for SYU Phased Restart Project. This proposal has been written to comply with all the requirements specified in the Request for Proposal (RFP) dated April 3, 2018.

This section includes an overview of the Project; a summary of our understanding of the Project and our proposed approach; a summary of the team’s qualifications; and an explanation of the proposal structure.

### 1.1 Proposed ExxonMobil SYU Phased Trucking Project

ExxonMobil (Applicant) is proposing the Interim Trucking for Santa Ynez Unit (SYU) Phased Restart Project (Project) to take a phased approach to restart offshore oil production at the SYU platforms by initiating interim trucking of limited crude oil production until a pipeline becomes available to transport crude oil to a refinery destination. The current project request is for a revision to Development Plan 87-DP-32cz. Trucking would occur seven days per week, 24 hours per day, with no more than 70 trucks leaving the facility within a 24-hour period to one or both of the two identified crude oil truck unloading sites located in Santa Maria and Maricopa<sup>1</sup>. The project would also include minor modifications to the Las Flores Canyon facilities including the installation of four Lease Automatic Custody Transfer (LACT) Units, associated piping, electrical and communication connections, pipe and equipment supports, truck loading racks, operator shelter, paving of selected areas, and minor grading in pre-disturbed areas for containment and drainage. All loading activities and truck loading improvement would be located within the confines of the Las Flores Canyon facility. Modifications to the Las Flores Canyon facilities would include the following:



- A new truck loading rack with four loading bays to be built at an existing previously disturbed pad at the Las Flores Canyon facility, just north of the existing Transportation Terminal (TT).
- New piping to transport the truck vapors back into the Las Flores Canyon vapor recovery system for processing and use as plant fuel.
- Four Lease Automatic Custody Transfer (LACT) Units installed at the location for royalty determination purposes as required by Bureau of Safety and Environmental Enforcement (BSEE).

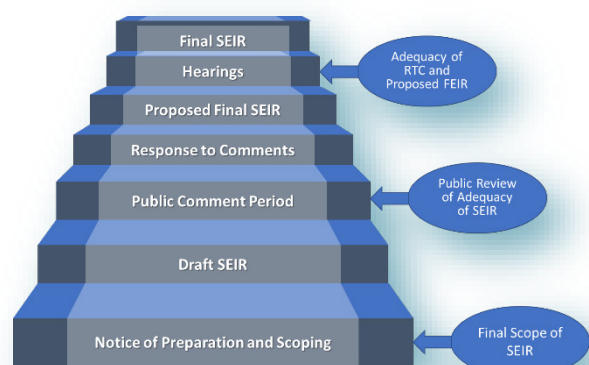
<sup>1</sup> The Application states deliveries to the Maricopa location would be limited to a maximum of 68 trucks per day.

- Associated electrical and communication connections, pipe and equipment supports, operator shelter, paving of selected areas, and minor containment and drainage grading.

The interim trucking would include the transportation of crude oil via trucks to one of the two designated facilities, which are the Phillips 66 Santa Maria Pump Station in Santa Maria and the Plains All American Pentland Pump Station in Maricopa. Both sites are currently permitted to receive crude oil by truck and have the capacity necessary to accommodate the number of trucks per day that would be generated under the proposed Project.

Each truck would be capable of transporting approximately 160 barrels of crude oil. The maximum number of loaded trucks leaving Las Flores Canyon per day would be limited to no more than 70 with an annual volume of crude oil transported not to exceed approximately four million barrels. Truck loading and transportation would occur seven days a week and 24 hours per day. After unloading at one of the two designated facilities, the trucks may return directly back to Las Flores Canyon to reload or may be reassigned to other operations.

## 1.2 Understanding of the Project Objectives



The primary objective of this process is the preparation of a Supplemental Environmental Impact Report (SEIR) under the California Environmental Quality Act (CEQA) to meet the legal requirements of a complete, adequate, and objective report of the Project’s environmental consequences. An essential element of the SEIR is the inclusion of substantial evidence and supporting information to ensure that the SEIR is defensible and does not require additional efforts, such as re-circulation.

An SEIR would be a supplement to the 1984 Environmental Impact Statement/Report (EIS/EIR) (83-EIR-22) and the 1986 SEIR (prepared for the Exxon SYU and Las Flores Canyon Oil and Gas Development Project). As per CEQA, an SEIR need only contain the information necessary to make the previous EIR adequate for the project revisions (CEQA Guidelines §15163(b)). In this case, the project revision is the addition of temporary trucking of crude oil until the Plains Pipeline system is restored. All other aspects of the SYU Project remain the same as analyzed in the 1984 EIS/EIR and the 1986 SEIR. Therefore, this SEIR need only assess the impacts associated with the construction and operation of the proposed trucking operations.

Thorough review of Project materials, dissemination of assumptions, and peer review of Applicant studies early in the process are critical steps in completing quality deliverables, as these activities will help to prevent conflicts and delays later in the process.





The SEIR will serve as an informational document for the public and County of Santa Barbara decision-makers. The process will culminate with a public comment hearing during public review of the Draft SEIR followed by a public hearing before the County Planning Commission to consider certification of the Proposed Final SEIR and approval of the Project. The Planning Commission action could then be appealed to the County Board of Supervisors.

Each member of a successful SEIR team must have a complete understanding of Project-related issues and the ability to effectively communicate their understanding thereof. Many EIRs in Santa Barbara County are controversial with regard to issues such as oil spill potential, risk of upset, water and biological resource impacts from oil spills, air and GHG emissions, coastal land use policies, and traffic impacts. The ability to communicate these complicated issues to the decision makers in an effective manner is critical to an effective and efficient SEIR and permitting process.

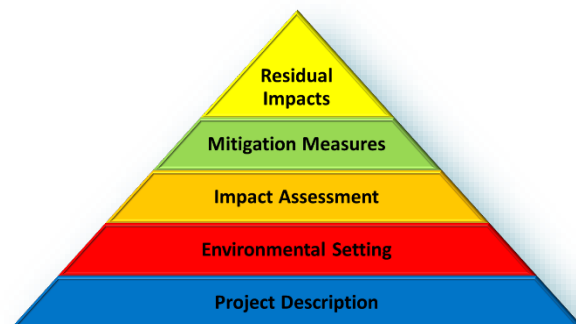
The SEIR will include sections that identify the Project setting, applicable thresholds of significance, Project impacts and, where a particular impact is potentially significant, mitigation measures that are feasible to avoid or reduce the impact below the threshold of significance. In addition, as per CEQA requirements, alternatives will also be presented and addressed, which could reduce the significant impacts of the Project. Cumulative impacts that the Project, in combination with other past, present or future projects, may produce will also be addressed. Identifying the potential for additional impacts from mitigation measures for each issue area is also a vital component of CEQA and will also be included.

Our extensive in-field and legal experience informs our ability to develop effective mitigation measures that are technically feasible, commercially available and with measurable effects that can be quantified. Problems that sometimes arise in the SEIR process, such as deferral of mitigation or the usage of ineffective criteria, can cause legal delays that can be avoided with appropriate mitigation development. One of the keys to a defensible SEIR is to assure that the effects of mitigation measures are quantified and supported by substantial evidence in the record.

As part of the Applicant's technical studies, they have proposed several Project related mitigation measures that have been incorporated into the Project. Applicant mitigation measures that are incorporated into the project does not always mean they are not "CEQA mitigation measures", because CEQA provides that "*The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR*" [CEQA Guidelines § 15126.4(a)(1)(A)]. In evaluating mitigation measures, it will be made clear which measures are proposed by the Applicant and which measures are proposed by the Lead Agency.

The project description is the foundation of an adequate EIR/SEIR. The process of establishing a comprehensive project description early on, with extensive information that can be used consistently across all issue area investigations, is a crucial element of ensuring an effective SEIR process.

MRS Environmental utilizes a “*project component*” sheet that includes the details of the features of the Project, including construction requirements, truck trips, durations, areas impacted, etc. The project component sheet is developed early in the project description process and is shared with all principal investigators to ensure consistency across the SEIR. It is recommended that this project component sheet, and the project description, be submitted to the Applicant for comment and feedback to ensure accuracy. MRS Environmental has found that this early level of attention to detail allows for a much smoother and more efficient SEIR process.



Given that the Applicant has prepared a number technical studies that will serve as the basis for portions of the SEIR impact assessment, it is critical that these undergo an independent evaluated and peer review by the SEIR consultant. The review of the Applicant studies will occur at the start of the project, and MRS Environmental will generate a *peer review report* that covers all the Applicant-prepared technical studies. This report, which will be submitted to the County, will detail the areas where the studies are adequate, and any areas where new or revised analysis is recommended to assure an adequate information for the SEIR. More discussion on the peer review is provide in Chapter 4.0 for each of the issue areas where the Applicant has prepared technical studies.

The SEIR will focus on areas where the Project could produce potentially significant and unavoidable impacts. The SEIR will also briefly address issue areas where impacts are found to be less than significant. It is important to analyze the issue areas with a wide enough scope, however, to ensure that any potential significant impacts are addressed. For example, although oil spills from trucks are not considered to have a high potential to produce significant impacts to biological or water resources, substantial evidence will need to be developed to ensure that these impacts will not exceed acceptability criteria. Any issue that may be a concern, such as oil spills from trucks, that is raised during the public review process could produce a substantial delay if not addressed with sufficient substantial evidence in the Draft SEIR documentation.

### 1.3 Background on Proposed Project

In 1976, one platform (Hondo) was constructed along with an offshore storage and treatment (OS&T) vessel, where produced crude oil was loaded on to marine tankers. Hondo and the OS&T began operations in 1981.





In April 1983 Exxon submitted an application to the Minerals Management Service (MMS) and the County of Santa Barbara for the construction and operation of up to three additional offshore platforms and either an offshore OS&T or an onshore processing facility in Las Flores Canyon and an associated marine terminal. Both of these options were evaluated in a combined Environmental Impact Statement/Report (EIS/EIR). In June 1984 a joint Final EIS/EIR (83-EIR-22) was released that analyzed the anticipated environmental impacts associated with the development of oil and gas resources within the project area for the offshore

option, with the onshore option being addressed as an alternative. A variation of the proposed onshore project was approved by the Santa Barbara County Board of Supervisors in August 1984 but included a denial of the marine terminal portion of the Project.

In February 1985, the Santa Barbara Planning Commission approved a marine terminal for Texaco, offshore of Gaviota; this decision was appealed to the Board of Supervisors by several parties, including Exxon and Texaco. In July 1985, the County gave final approval for a marine terminal at Gaviota. The oil industry proposed an alternate project to the County, which included an interim marine terminal at Gaviota and, if needed, a consolidated marine terminal at Las Flores Canyon. In March 1985, Exxon submitted a revised plan for the marine terminal at Las Flores Canyon and a supplemental EIR was initiated; the revised plan was approved by the Santa Barbara County Board of Supervisors in October 1985. The condition allowing for the construction of the Las Flores Canyon marine terminal was written to expire in 1994 if no such facilities had begun construction by that date. No such facilities were constructed, thus the approval to construct the marine terminal expired.

In February 1986, Exxon submitted to the County a revised project description and impact analysis for the SYU Development Project that eliminated one of the offshore platforms, relocated another of the platforms, and had a number of changes to the onshore facilities proposed for Las Flores Canyon. The proposed project changes were considered substantial enough to warrant an SEIR pursuant to CEQA. The final SEIR was released in August 1986. In September 1986, the County Board of Supervisors approved the onshore project<sup>2</sup>.



Construction of the onshore Las Flores Canyon components began in April 1988 and finished in May 1993, with production from platforms Harmony and

<sup>2</sup> The dates used in the chronology of events were taken from The Statement of County of Santa Barbara in Opposition to Exxon's Appeal of California Coastal Commission Finding Option A of Santa Ynez Unit Development & Production Plan is Inconsistent with California Coastal Management Program, Santa Barbara County Counsel , December 31, 1986.



Heritage starting later that year. Once the onshore facilities started up, the OS&T vessel was decommissioned and removed.

From then, oil production from all three platforms was processed at Las Flores Canyon. The Line 901 and 903 pipeline system, now owned and operated by Plains, has been used to transport the crude oil from Las Flores Canyon. This pipeline system has been the only means of transporting crude oil to the various refinery destinations.

In May 2015, Line 901, owned and operated by Plains, had a release of oil, which shutdown both Line 901 and 903. The pipelines have remained out of service since that date, thus eliminating the only transportation option that SYU has to transport crude oil to refinery destinations. Since the shutdown of the pipelines, SYU has suspended operations and preserved the facilities to maintain integrity of the facilities in a safe and environmentally responsible manner in preparation for future restart. In August 2017, Plains submitted an application to Santa Barbara County to replace the 901 and 903 pipelines. The Application is still under review by the County and has not yet been found complete.

On February 1, 2016, the County issued an Emergency Permit (16EMP-00000-00001) to ExxonMobil to truck approximately 450,000 barrels of crude oil from the Las Flores Canyon facilities to the Phillips 66 Pump Station in Santa Maria and the Plains Pentland Pump Station in Maricopa. This permit was issued to allow ExxonMobil to empty the crude oil storage tanks at the Las Flores Canyon facilities. Trucking under the emergency permit has been completed.

### **1.4 MRS Environmental Team**

MRS Environmental is exceptionally well qualified to undertake this important project. MRS Environmental staff have been performing complicated CEQA analysis for oil and gas related projects for almost 30 years in Central and Southern California. John Peirson, the proposed project manager for this SEIR, was the project manager for the 1986 SEIR for the SYU Project that was prepared by the County.

MRS Environmental staff have been working with industry and the Federal, State and local governmental agencies responsible for oil and gas development since permitting of the Pt. Arguello and Santa Ynez facilities in the 1980s, including BOEM, United States Department of Justice, California State Lands Commission (CSLC), California Coastal Commission (CCC), the Santa Barbara County Energy Division and the Air Pollution Control District (APCD), the County of San Luis Obispo Planning Department and APCD and a range of industry including Chevron, FMO&G, Venoco, Sentinel Peak Resources, and Aera Energy. This level of familiarity with technical analysis, industry and regional agencies is unparalleled.

MRS Environmental staff have also prepared several CEQA documents that had hazardous and flammable material trucking and transportation as a major component. These include the Guadalupe Trucking SEIR, The Excelaron Oil Exploration and Production EIR, the Phillips 66 Rail Spur Extension and Crude Unloading EIR, and the Tank Farm Road Remediation and Development EIR.



MRS Environmental proposes to team with Central Coast Transportation Consulting (CCTC) to prepare the traffic analysis. Mr. Joe Fernandez, PE, AICP, who is a Principal with CCTC, has prepared the transportation sections of numerous EIRs for complicated, controversial projects throughout the State, and has worked with MRS Environmental staff on several CEQA documents including Guadalupe Trucking SEIR, the Phillips 66 Rail Spur Extension and Crude Unloading EIR, and the Tank Farm Road Remediation and Development EIR.

## 1.5 Proposal Structure

Our proposal includes a comprehensive discussion of our approach to this SEIR. The proposal has been divided into the following major sections.

***Section 1 – Introduction:*** This section briefly discusses the Project and the team’s understanding of and approach to the Project. This section also provides a summary of the firms that would be working on the SEIR.

***Section 2 – Qualifications and Experience:*** This section recognizes the capabilities of the firms on the project team. It provides a brief history of the firms, their relevant experience, and the organizational structure of the firms.

***Section 3 – Personnel and Project Management:*** This section details the proposed organizational structure for the project team. This section discusses the project management team, as well as the key staff members. Brief resumes of the key staff are provided in this section. Appendix A provides more detailed resumes of the key staff. This section also discusses MRS Environmental’s approach to managing CEQA projects. The topics covered in this section include management team roles and responsibilities, program management and control systems, communication, and quality assurance/quality control.

***Section 4 – Study Methodology:*** This section provides an overview of our technical approach to preparing SEIRs and addresses the development of the project description, alternative analysis, preparing issue area baselines, impact assessments, cumulative impacts, mitigation measures, mitigation monitoring plans, and residual impact analyses. A detailed discussion of our proposed approach to each of the issue areas addressed in the RFP is also provided.

***Section 5 – Cost Quotation and Budget Summary:*** This cost proposal is presented separately from the technical proposal. This section presents the detailed cost estimate for the preparing the SEIR by issue area and task. This section also identifies the assumptions used in developing the cost estimate.

***Section 6 – Schedule:*** This section presents a detailed schedule for the preparing the SEIR, which identifies the key tasks, deliverable dates, County and public reviews, and public hearings and workshops.

***Section 7 – References:*** This section provides a list of references.



The proposal also includes three appendices:

**Appendix A – Resume of Key Staff:** This appendix contains more detailed resumes of the key principal investigators and management staff.

**Appendix B – Relevant Projects:** This appendix provides detailed descriptions of each of the projects listed in Table 1 – List of MRS Environmental Relevant Projects.

**Appendix C – Detailed Estimated SEIR Schedule:** This appendix provides a detailed schedule for the SEIR project including elements such as comment periods, review periods, peer review and section submission timelines, and workshop and hearing dates. This pre-project planning and attention to detail is important to developing an efficient and timely SEIR process.



## 2.0 Qualifications

This chapter provides a summary of the qualifications of each company that is proposed to work on the SEIR project. Information is provided on the structure of the firms, the top management, a brief history of the firms, a summary of the firm’s capabilities, and recent relevant experience.

### 2.1.1 MRS Environmental, Inc.

MRS Environmental is an S-Corporation (Tax ID # 81-5463132) that is based in Santa Barbara California. MRS Environmental was spun-off as a new company from Marine Research Specialist in April of 2017. MRS Environmental has four owners, who are all officers of the Company, and are active consultants within the Company’s environmental practice. Mr. John Peirson, who is President of MRS Environmental, would serve as the Project Manager for this project. For this project, MRS Environmental staff will be providing approximately 92 percent of the total hours.

All owners and key staff have worked together for over 10 years both at MRS Environmental and Marine Research Specialists. The firm specializes in oil and gas projects, with a focus on preparing CEQA/NEPA documents, assisting applicants with permitting, permit compliance monitoring, and code development for local governments. The main area of expertise within the firm are air quality, risk of upset and system safety, land use, biological resources, noise, aesthetic resources, preparation of CEQA/NEPA documents, oil and gas development permit applications, permit compliance monitoring, and oil and gas code development.

MRS Environmental will provide the County with a small group of highly qualified technical experts who understand the complexity of trucking projects associated with oil and gas operations. This knowledge is coupled with a strong understanding of CEQA and the local Santa Barbara County requirements. Together these skill sets will enable MRS Environmental to produce a high-quality SEIR for the Project.

MRS Environmental staff has prepared more than 90 environmental reviews for oil and gas projects. In particular, MRS Environmental has provided specialized services in the areas of risk of upset, air quality, greenhouse gases, biological resources, water quality, noise, land use, traffic, aesthetics, and fire protection. No CEQA document prepared by MRS Environmental staff members has ever been found inadequate by a court of law. Table 1 provides a summary of a select list of relevant projects that MRS Environmental staff have managed and/or conducted similar technical analysis as would be required for this project. Appendix B provides more detailed information on each of these relevant projects.

MRS Environmental staff have prepared several CEQA documents where transportation and trucking were a major component of the project. The Phillips 66 Rail Spur Extension and Crude Unloading Project, which was one of the most controversial projects on the Central Coast, included a detailed analysis of the impacts associated with trucking about 20,000 barrels per day of crude oil from Bakersfield to the Santa Maria Pump Station.



Table 1 List of MRS Environmental Relevant Projects	
Project	Relevance
<b>Project That Had Major Transportation and Trucking Components</b>	
<b>Excelaron Oil Exploration and Production</b> <b>Project:</b> County of San Luis Obispo EIR Finalized: January 2012	Prepared an EIR for the Excelaron project, which included the proposed exploration, testing and possible oil production in San Luis Obispo County. Project included the trucking of oil from the development site in Huasna Valley to refinery destinations in Southern California. The EIR analyses including air quality, biological resources, risk of upset, transportation, land use, and water resources.
<b>Phillips 66 Rail Extension and Crude Unloading</b> <b>Project:</b> County of San Luis Obispo EIR Finalized: December 2015	Prepared an EIR for the rail transport of Canadian crude oil to the Phillips 66 Santa Maria Refinery. The EIR addressed various alternatives that involved up to 196 truck trips per day for delivering crude oil to the Phillips 66 Santa Maria Pump Station. The EIR analyses including air quality, land use, biological resources, risk of upset, transportation, and water resources.
<b>Guadalupe Trucking Project:</b> County of San Luis Obispo SEIR Finalized: June 2005 Addendum Finalized: July 2012	Prepared an SEIR that addressed the impacts of truck transport of hydrocarbon impacted soil from the Guadalupe Oil Field to the Santa Maria Landfill. The project involved up to 120 trucks trips per day. The EIR analyses including air quality, biological resources, risk of upset, transportation, land use, and water resources.
<b>Chevron Tank Farm Remediation and Development Project:</b> County of San Luis Obispo/city of San Luis Obispo EIR Finalized: December 2013	Prepared an EIR for the Chevron Tank Farm Remediation and Development Project. This project involved the remediation of an old tank farm site in San Luis Obispo. The project included trucking hydrocarbon impacted soils from the site to the Santa Maria Landfill. Peak truck trips were about 40 per day. The EIR analyses including air quality, biological resources, risk of upset, transportation, land use, and water resources.
<b>Aera Energy East Cat Canyon Project EIR</b> <b>Application:</b> Aera Energy Date of Contract: April 2018-Ongoing	MRS Environmental was hired by Aera Energy to help with the risk of upset technical documents required by the County of Santa Barbara for the East Cat Canyon Project EIR. This included work on the quantitative risk assessments for crude oil trucking, and a natural gas pipeline. MRS Environmental, also assisted in helping with the air quality impact assessment as it related to the trucking of crude oil.
<b>Other Relevant Projects</b>	
<b>Orcutt Hill Resource Enhancement Plan</b> <b>Project:</b> Santa Barbara County EIR Finalized: April 2016	Prepared the EIR for the PCEC well development and steaming project in the Orcutt Hills.
<b>ERG Operating Company Foxen Petroleum Pipeline Project:</b> Santa Barbara County EIR Finalized: March 2015	Assisted the County in the preparation of the EIR, including air quality, biological resources, hazardous materials, transportation and water resources.





Table 1 List of MRS Environmental Relevant Projects	
Project	Relevance
<b>Santa Maria Energy Production Plan and Development Plan:</b> Santa Barbara County EIR Finalized: April 2013	Assisted the County in the preparation of the EIR for the SME project, including air quality, GHG analysis, risk of upset, water and geology.
<b>Venoco South Ellwood Field Project:</b> California State Lands Commission EIR Drafted: Jan 2017	Detailed EIR analysis including air quality analysis, toxics analysis, risk of upset and oil spill analysis. Extensive agency coordination.
<b>Becker and Legacy Wells Abandonment and Remediation Project:</b> California State Lands Commission EIR Finalized: July 2017	Prepared and EIR for a near shore well abandonment, vessel, barge and construction activities project.
<b>E&amp;B Oil Drilling and Production Project EIR:</b> City of Hermosa Beach EIR Finalized: Feb 2015	Developed a controversial EIR for an oil and gas project in a high density urban area, provided testimony to City Council and election material support.
<b>Assisting County of Santa Barbara for Analysis for Energy Projects:</b> Santa Barbara County Date of Contract: 6/2013 – Ongoing	Assisting County with various energy projects, including the Ellwood Marine Terminal abandonment.
<b>GHG CEQA Thresholds Development:</b> Santa Barbara County APCD Date of Contract: Dec 2016	Assisted in the development of the County GHG thresholds criteria.
<b>Air Emissions Associated with Decommissioning Operations for Pacific Outer Continental Shelf (OCS) Oil and Gas Platforms:</b> BOEM Date of Contract: March 2018-Ongoing	This project involves assessing the regulatory requirements for abandonment of Pacific OCS facilities and developing a tool that can be used to estimate the air emissions associated with decommissioning for each of the Pacific OCS platforms.
<b>Baldwin Hills Oil Field Community Standards District EIR:</b> County of Los Angeles EIR Finalized: Jan 2006	Developed an EIR for a Community Standards District that covered the drilling and operations of the Inglewood Oil Field. The EIR addressed the impacts associated with all aspects of operating the oil field including drilling, production, and associated truck transportation.

The Excelaron Exploration and Production Project assessed the impacts of trucking crude oil from the Huasna Valley in San Luis Obispo to refinery destinations in Southern California. Other CEQA projects that MRS Environmental staff managed with major transportation and trucking components are summarized in Table 1.

MRS Environmental staff specializes in and has a long history of providing specialized CEQA services related to oil and gas industrial projects to local, State, and Federal government agencies for development projects. MRS Environmental staff has also provided environmental review services to a number of private companies. MRS Environmental is currently providing environmental review services for the County of Los Angeles, County of San Luis Obispo, Santa Barbara County, California State Lands Commission, California Coastal Commission, and the Bureau of Ocean Energy Management (BOEM). MRS is also currently providing oil and gas



development and transportation environmental permitting services to a number of private companies including Aera Energy and Hellman Properties.

MRS Environmental has been working in Santa Barbara County for over 30 years, specifically conducting environmental review and compliance for oil and gas development projects located in the County. Recent EIR/SEIR projects in the County by MRS Environmental include the Santa Maria Energy Oil Drilling and Production Project, the ERG Foxen Petroleum Pipeline EIR, Pacific Coast Energy Project EIR, the Venoco Line 96 Modification Pipeline Project, and the Venoco Ellwood Lease Line Extension Project EIR. Also, John Peirson, the proposed project manager, was the project manager for the 1986 Exxon SYU Project SEIR, that was prepared for the County.

### **2.1.2 Central Coast Transportation Consulting (CCTC)**

Central Coast Transportation Consulting is a small traffic and Transportation consulting firm located in San Luis Obispo. The firm was started by Joe Fernandez, PE AICP in 2011. The firm works for both public and private sector clients. The key areas of expertise for the firm include transportation impact studies, transportation sections of general and specific plans, travel forecasting, traffic operations and corridor studies, and site circulation and parking studies.

CCTC's work has focused on transportation projects throughout California. They have successfully completed a wide variety of transportation projects including transportation impact studies, traffic operations analyses, travel forecasting, transportation planning studies, traffic engineering design, and multi-modal planning projects. CCTC has worked with MRS Environmental staff on several CEQA projects including the Chevron Tank Farm Remediation and Development EIR, the Guadalupe Trucking SEIR, and the Phillips 66 Rail Spur Extension and Crude Loading EIR. For this project CCTC staff will be providing approximately eight percent of the total hours.





### 3.0 Personnel

Given the unique nature of the Project, the limited scope of the SEIR, and the need for local knowledge on oil trucking issues, MRS Environmental has assembled a small team of highly qualified professionals. MRS Environmental staff have the expertise to conduct all the required analyses for this SEIR except for traffic and transportation. MRS Environmental has teamed with Central Coast Transportation Consulting for the traffic and transportation assessments. This SEIR team has extensive knowledge and expertise in their specific issue areas, and has a proven ability to produce extremely high-quality work that will meet the requirements of MRS Environmental, the County and CEQA. By keeping the team limited to a small group of eminently qualified professionals, the required SEIR tasks will be easier to manage and will also help insure the project meets the aggressive schedule requested in the RFP.

This section of the proposal presents a summary of the key personnel who will work on preparation of the SEIR and provides an overview of the project management program.

#### 3.1 Key Personnel

MRS Environmental has selected a specialized team for this assignment based on the project type, location, affected resources, and the key issues that will likely be of concern to the public and decision makers. MRS Environmental will manage the work for this assignment from our Santa Barbara office:

MRS Environmental, Inc.  
1306 Santa Barbara Street  
Santa Barbara, CA 93101  
805-289-3924  
EIN# 81-5463132

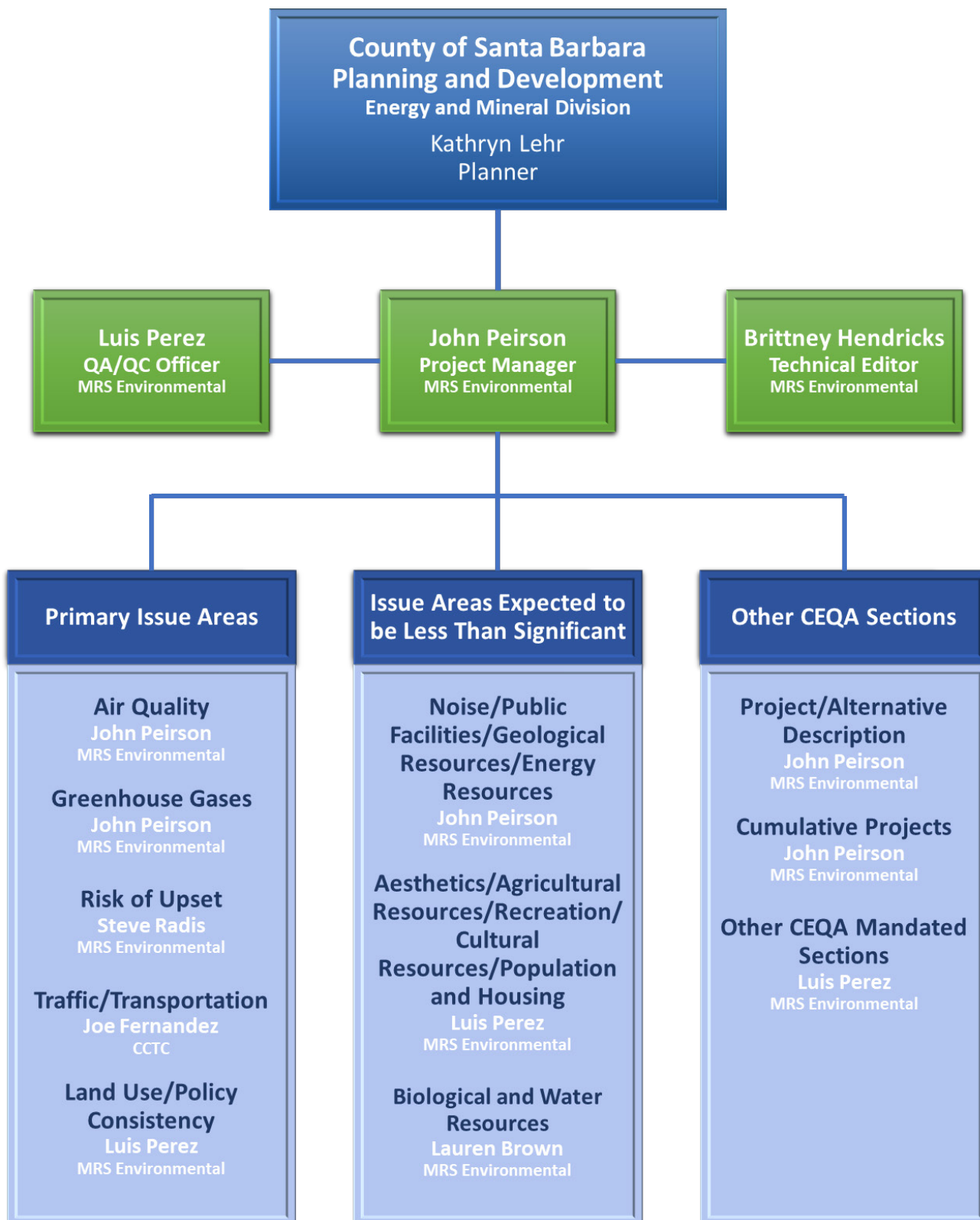
All MRS Environmental staff members can be reached at this location.

Figure 1 shows the proposed organizational structure for managing this project and identifies principal investigators and their areas of responsibility. The remainder of this section provides: (1) a discussion of the management systems MRS Environmental uses for EIRs/SEIRs and (2) brief biographical sketches of the team members that highlights their relevant experience working on similar environmental review projects. More detailed resumes for the key staff can be found in Appendix A.

#### 3.2 Management System

For this SEIR, MRS Environmental is proposing to use a two-tiered approach to manage the development of the SEIR documents. The first tier is the Project Manager who will provide day-to-day direction to the team and who will interact with the County on a regular basis. The second tier consists of the Principal Investigators, who will conduct the technical work for their respective issue areas. The Principal Investigators will be assisted as needed by other staff in developing the various sections of the SEIR.

Figure 1 Organizational Chart



### **3.2.1 Project Manager**

Mr. John Peirson, who will serve as the Project Manager, will be responsible for the following major activities:

- **Compliance with County Guidance.** Includes regular working sessions with the County regarding the overall progress of the study.
- **Contract Compliance.** Systematic review of the contract to make certain that the individual provisions and commitments are being met.
- **Progress Reporting.** Includes preparation of the status reports, which will contain information on the technical progress as well as the project expenditures.
- **Budget Tracking.** Includes monitoring expenditures and reporting this information.
- **Interdisciplinary Coordination.** Involves the identification of cross-disciplinary impacts and the coordination of information flow among the various issue areas.
- **Staffing Adequacy.** Ensures that key staff members are available when their input and participation are required.
- **Management of Subcontractors.** Includes establishing contractual agreements, as well as tracking deliverables and billing, to assure the coordination of subcontractor activities.
- **Quality Control.** Includes the review of all quality assurance guidelines and will provide a quality control function on the preparation of the environmental or technical review document.
- **Report Production Control.** Includes the organization of production requirements for the numerous draft and final report deliverables. These major deliverables will be coordinated by MRS Environmental's Santa Barbara Office.

### **3.2.2 Principal Investigators**

Serving as the key authors of their respective SEIR sections, the Principal Investigators will be responsible for all the technical work for their assigned issue area. Their major responsibilities will include:

- Preparation of the portions of the Notice of Preparation (NOP) and scoping documents that relate to their issue areas.
- Peer review of any Applicant-prepared technical studies applicable to their issue areas.
- If needed, conduct any additional technical studies that may be required in their issue areas to supplement the Applicant-prepared studies.
- Preparation of the SEIR sections that covers their respective issue areas.
  - For issue areas where the scoping process determines potentially significant impact, this would include environmental setting, regulatory setting, project impact assessment, mitigation measures, and cumulative impact assessment.



- For issue areas identified in the scoping process as having less than significant impacts this would include development of information to support the conclusion of less than significant impacts.
- Analysis of impacts for alternatives identified in the alternative project description.

All Principal Investigators will report to the Project Manager. Principal Investigators will be available to the County throughout the SEIR development process to discuss issue area specific topics or concerns.

### 3.2.3 Project Management and Control Systems

Project management, which will span the entire life of the project, is extremely important to EIR/SEIR projects, due to the considerable number of interested parties, and the complexity of the technical issues. Project management will provide the necessary interface among the County, other responsible agencies, and the consultant project team. Formal communication with the County will center on time-designated progress reports, the deliverables agreed upon, and the program of scheduled meetings. At a minimum, MRS Environmental recommends monthly meetings with the County to review progress and discuss issues. There may be times when more frequent meetings will be required. MRS Environmental will work closely with the County for the duration of the project to ensure that progress is carefully tracked, attention is drawn to any difficulties encountered, and the SEIR project is conducted in a highly professional manner.

During the course of the SEIR project, MRS Environmental's proven program management system and its associated defined controls will ensure consistent control of program costs, schedule, staffing, technical performance, deliverables, and subcontractors. The program management and control systems will ensure that the quality of the work will meet or exceed all the County's contract requirements.

#### Quality Assurance/Quality Control

MRS Environmental aims to provide every client with a high-quality product that meets or exceeds expectations, all applicable professional standards, and regulatory requirements. To meet this quality standard, Quality Assurance/Quality Control (QA/QC) procedures are developed for each project during the planning stage. QA/QC is the responsibility of the Project Manager as well as each of the Principal Investigators. In addition, Luis Perez will serve as the QA/QC officer for this project. The QA/QC officer, the Project Manager, and the Technical Editor will be responsible for assuring the SEIR documents meet or exceed all the requirement of the County and CEQA.

MRS Environmental uses several management techniques for assuring and controlling the quality of the work product. In the area of QA, the major focus is on staff integration, communication, and the development of a Style Guide that lays out guidelines for production of the SEIR documents. MRS Environmental's QC program uses a multi-tiered approach to assure that all work products are of the highest quality and meet or exceed all of the County's contractual requirements.

To facilitate coordination of the assessments and communication among staff members, MRS Environmental will implement a program of biweekly *planning and coordination meetings*. The



Project Manager will conduct these meetings to review work in progress, plans, and schedules and to ensure effective communication among the project team and with the County. The objective of these meetings is to ensure that the quality of communication—internal and external—is enhanced whenever possible.

In addition, MRS Environmental will utilize “*peer review*” *meetings* to coordinate the peer review of the different Applicant-prepared studies and to ensure that consistent analysis is conducted across all issue areas. *Peer review “reports”* will be prepared for each issue area, where the Applicant has submitted technical studies. These peer review reports will detail the results of the peer review including the following: (1) identification of any issues that are of concern, (2) areas where the studies are considered adequate, (3) and if needed, as set of recommendations for addressing any outstanding issues.

MRS Environmental recognizes *problem anticipation and management* as an explicit aspect of its Project Management Plan for this assignment. Unanticipated problems, such as a change in the project description by the Applicant, occur despite the best planning and intention. On task orders, MRS Environmental recognizes its obligation to anticipate, identify, and resolve all problems—technical and financial—as quickly as possible. Problems may be identified during the planning, execution, review, and reporting phases of the project. They can most often be avoided by thoroughly planning the program; realistically budgeting time, labor and costs; clearly communicating with County staff; and closely monitoring the actual performance of the MRS Environmental staff and any associated subcontractors.

A *style guide* will also be developed for the document preparation activities. This will cover the preparation of environmental document as well as the technical appendices. During the first month of a project, the style guide will be developed to provide a detailed outline of the SEIR document, provide a list of acceptable acronyms, specify the requirements for the development of the administrative record, and provide a standard format for figures and tables. This document will be submitted to the County for review and comment and then distributed to the project team. Once the style guide is finalized, a set of word processing templates will be produced that detail the style and structure of the report and technical appendices.

MRS Environmental maintains *cost, schedule, and resource control* via a four-step process. First, cost and schedule baselines are established, against which actual cost and schedule performance can subsequently be compared. Second, cost and schedule data are collected and reported on a weekly basis to the Project Manager. Third, actual performance is compared against baseline plans, identifying any deviations from plan. Fourth, deviations in cost or schedule performance are discussed internally and, if necessary, with County staff and corrective actions are taken. A detailed schedule has been developed for the project and included in Appendix C as a measure of the level of planning and anticipation of project coordination and efficiency recognized by MRS Environmental.



### 3.3 Key Staff Resume Summaries

MRS Environmental proposes the following key personnel for the project and commits that these personnel will be the actual personnel performing the work. Any modifications to staffing during the contract performance period will first be approved by the County.

**Mr. John Peirson, MRS Environmental**, will be the Project Manager as well as the Principal Investigator for air quality and GHGs. Mr. Peirson is President of MRS Environmental and has been preparing CEQA document for oil and gas project in California for the last 35 years. Mr. Peirson was the project manager for the 1986 Santa Ynez Unit Development SEIR. Before joining MRS Environmental, he was a Principal at Marine Research Specialists and a Director at Arthur D. Little's Environmental Health & Safety Practice. For 35 years, Mr. Peirson has been extensively involved in preparing CEQA and NEPA documents for various Federal, State and local agencies. Mr. Peirson has participated in the preparation and CEQA permitting of more than 60 major oil related projects within California. MR. Peirson has been the project manager on several recent oil transportation related CEQA documents, where he served as one of the Principal Investigators for air quality and GHG. Many of these projects have been controversial and involved considerable work in developing permitting strategies. None of the CEQA projects that Mr. Peirson has led have ever been overturned in Court. Mr. Peirson has provided more than 600 hours of testimony to local and State decision makers which have included Planning Commissions, Boards of Supervisors, the CSLC and the California Coastal Commission. He also has extensive experience in working with local and State government staff in developing permit conditions and findings associated with development projects.

**Mr. Steve Radis, MRS Environmental**, will be the Principal Investigator for the risk of upset analysis and is a senior scientist with extensive experience in hazards analysis, consequence modeling and analysis, physical oceanographic modeling and analysis, risk analysis, fire and explosion dynamics, hazard evaluation, external events analysis, fault tree analysis, and model development. Mr. Radis has worked on a wide variety of studies for utilities, commercial, and government clients involving meteorological modeling, health risk assessments, and air quality modeling (inert/photochemical pollutants, toxic air contaminants), and EIRs and EISs. Mr. Radis has conducted quantitative risk assessments on a large number of transportation projects, many of which included crude oil transportation.

**Mr. Luis Perez, MRS Environmental**, will be the Principal Investigator for the land use and policy consistency, and has been project manager for a number of complex environmental documents. Mr. Perez has extensive public agency experience working for Santa Barbara County, which included interpretation of land use and environmental policies and regulations for large development projects, recommendations to decision-makers, and public presentations. Mr. Perez was also the project manager for a number of oil and gas decommissioning projects that had reached the end of their economic life. Those projects included the abandonment of the Texaco Pipeline through Hollister Ranch, the decommissioning of the Unocal Cojo Marine Terminal and the decommissioning of the Texaco Gaviota Gas Plant, among others. Mr. Perez was also the County's representative and co-chair from 1997 to 2006 of the Interagency Decommissioning





Work Group that comprised State, Federal and local regulatory agencies involved with decommissioning of onshore and offshore oil and gas projects.

**Mr. Joe Fernandez, Central Coast Transportation Consulting**, will be the Principal Investigator for traffic and transportation and is the founder of the company. Since 2002, his work has focused on transportation projects throughout California. He has successfully completed a wide variety of transportation projects including dozens of transportation impact studies, traffic operations analyses, travel forecasting, transportation planning studies, traffic engineering designs, and multi-modal planning projects. He has prepared the transportation sections of numerous EIRs for complicated, controversial projects throughout the State. Mr. Fernandez is a registered Civil Engineer in California and a certified Planner.

**Ms. Lauren Brown, MRS Environmental**, will be the responsible for preparing the biological and water resources discussions in the SEIR. She is an experienced biologist and technical contributor with 25 years' experience conducting biological surveys, wetland delineations, habitat/vegetation mapping, and monitoring for sensitive species protection and habitat recovery; coordinating and consulting with Federal, State and local regulatory agencies on scope and impact of projects; and preparing planning documents such as environmental impact reports, initial studies, and mitigated negative declarations. She has considerable expertise in delineation of wetlands throughout California using the USACE 1987 Wetland Delineation Manual, the 2008 Supplement for the Arid West Region, and the 2010 Supplement for Western Mountains, Valleys and Coast Region, and all State and local requirements. Additional resources include familiarity with different types of wetland functional assessments, and completion of the California Rapid Assessment Method (CRAM) training for Riverine, Estuarine, and Vernal Pool Modules.

**Mr. Dean Dusette, MRS Environmental**, will provide technical assistance with the preparation of the project description, land use section, and some of the less than significant issue areas. Mr. Dusette and has experience in permitting, environmental review, permit condition compliance, field inspections, air quality source testing and fugitive emissions compliance, and environmental data analysis as well as land use planning and policy consistency analysis. Mr. Dusette has extensive public agency experience including preparation and management of a variety of CEQA documents, staff reports, recommendations to decision makers and public presentations.

**Mrs. Brittney Hendricks, MRS Environmental**, will serve as support personnel with extensive experience in preparing style guides and templates, assisting with the implementation of QA/QC measures, and ensuring consistency in formatting for all sections of environmental documents as well as editing and proofreading. She is adept at controlling report production and distribution to ensure that quality is upheld, and deadlines are met. Mrs. Hendricks has experience in the circulation of noticing to all agencies, private organizations and interested persons. Although this proposal includes this task as a County responsibility, Mrs. Hendricks would be available to complete this task upon the County's request.

Table 2 provides a listing of the personnel by issue area, with each staff member's estimated hours for the SEIR project and those hours expressed as a percentage of the total.



<b>Table 2 Summary of Project Team by Issue Area and Estimated Hours</b>		
<b>Issue Area/Personnel</b>	<b>Hours on Project</b>	<b>% of Total Hours</b>
<b>Project and Alternative Descriptions</b>		
J. Peirson	30	3.8%
D. Dusette	16	2.0%
<b>Air Quality &amp; Greenhouse Gases</b>		
J. Peirson	76	9.5%
C. Chittick	8	1.0%
<b>Risk of Upset</b>		
S. Radis	99	12.4%
G. Chittick	4	0.5%
J. Peirson	10	1.3%
<b>Transportation and Circulation</b>		
J. Fernandez (CCTC)	36	4.5%
T. Low (CCTC)	32	4.0%
<b>Land Use/Consistency Analysis</b>		
L. Perez	78	9.8%
D. Dusette	26	3.3%
<b>Issue Areas with Less than Significant Impacts</b>		
L. Perez	34	4.3%
J. Peirson	4	0.5%
D. Dusette	26	3.3%
L. Brown	9	1.2%
<b>Report Production</b>		
B. Hendricks	98	12.3%
J. Peirson	54	6.8%
L. Perez	28	3.5%
D. Dusette	16	2.0%
<b>Project Management</b>		
J. Peirson	118	14.8%
<b>Totals</b>	<b>802</b>	<b>100.0%</b>





## 4.0 Study Methodology

This chapter discusses the MRS Environmental approach to preparing the SEIR for the Project. Throughout the project, MRS Environmental will take direction from the County of Santa Barbara and follow the County's EIR/SEIR standards, practices, and guideline documents including the Santa Barbara County Environmental Thresholds and Guidelines Manual and the Santa Barbara County Guidelines for the Implementation of the California Environmental Quality Act (CEQA) consistent with the CEQA Guidelines issued by the State Office of Planning and Research.

As the Applicant has prepared several technical documents, the Applicant documents will be independently evaluated and peer reviewed, and the SEIR will utilize the peer reviewed documentation, with modifications as needed, in the preparation of the SEIR. This peer review will focus on adequacy and technical accuracy of the information. These documents are discussed below under the specific issue area discussions.

MRS Environmental will assist the County in identifying the necessary sequencing of additional technical studies, if any, deemed necessary to complete the environmental assessment.

The main purposes of the SEIR include:

- Evaluating the environmental impacts associated with the Project;
- Developing mitigation measures that can reduce the level of significance, or level of severity, of impacts associated with the Project and the alternatives; and
- Developing feasible alternatives that meet most of the basic objectives of the Project and can potentially eliminate or reduce in severity the significant impacts, if any, caused by the Project.

The results of the SEIR analysis will be used by the public and governmental agencies in making decisions regarding the Project.

This chapter of the proposal is divided into two major sections. The first section provides the general approach to each of the major tasks listed in the Request for Proposals (RFP). The second section presents the detailed scope and approach for the environmental issue areas.

### 4.1 General Approach to Project Tasks

This section briefly discusses the proposed approach to each of the major tasks listed in the RFP and typically part of an SEIR process.

#### 4.1.1 Notice of Preparation, Scoping Meeting and Scoping Meeting Comments

Using the project description provided by the Applicant, the MRS Environmental team will prepare the Notice of Preparation (NOP) and associated scoping documents for the Project. The purpose of the NOP and Scoping Document is to provide CEQA-responsible and trustee agencies, other interested agencies, community groups, and the public with information on the Project and basis for the scope of the SEIR.



The NOP and associated scoping document will provide information on (1) the Applicant, (2) the proposed location of the Project, (3) a description of the proposed Project that has been requested, (4) background on the proposed Project, (5) a summary of the environmental issues to be evaluated in the SEIR for each of the issue area with potentially significant impacts, (6) a summary of the issue areas that are likely to have less than significant impacts, and (7) a discussion of alternatives.

The results of this analysis will define the initial scope (Scoping Document) of the SEIR. A draft NOP and Scoping Document will be submitted to the County for review and comment.

Once the County has approved the final NOP and Scoping Document they will be responsible for mailing it to all the interested parties and filing it with the State Clearinghouse; MRS Environmental is available to perform the mailing if requested by the County. MRS Environmental will also work with the County in the consultation process that may be needed with the CEQA responsible and trustee agencies.

As part of the NOP process, one public scoping hearing will be conducted. MRS Environmental will assist in preparing the presentation materials if requested by the County. MRS Environmental will also be responsible for summarizing the scoping meeting and the comments received at the scoping meeting and providing an electronic copy to the County.

The input received from the agencies and the public will be used in finalizing the overall scope of the SEIR. At the end of the NOP comment period, a final scoping document will be prepared and submitted to the County and the project team. As per CEQA requirements, comments received on the NOP will be tabulated and included in the SEIR with an indication of where the comment is addressed in the SEIR.

### **4.1.2 Project Description**

MRS Environmental will develop the project description based upon the information the Applicant has submitted as part of their application with the County. The project description chapter will address the need for the Project, as well as the Applicant's proposed objectives and actions to implement the Project. The project description will include details on the construction activities at the Las Flores Canyon site, description of the proposed truck routes, and operational data such as number of trucks per day, volumes of oil moved, etc.

As MRS Environmental begins developing the project description chapter, staff will work closely with the Applicant and the County to assure that the project description accurately reflects the Project. A review of the Applicant's project description indicates that it has most of the key information needed to develop a draft project description. However, some issues such as construction requirements and a description of the fire protection system will need to be provided by the Applicant in order to ensure a complete and defensible SEIR document. As the project description is drafted, additional information may be needed from the Applicant. If additional data is needed, MRS Environmental will submit a project description data request form to the County that describes in detail the data needed and the reason for the request. This request will also include a due date for the information to maintain the overall schedule. In many cases this data can be provided by the Applicant as part of their review of the draft project description.



The Applicant has proposed several mitigation measures as part of their technical studies. Some of these measures are truly design features of the Project and will be incorporated into the project description. Examples of this include night lighting for the loading racks measure (Safe-4) and fire control systems and equipment for the loading facility (Safe-5). The handling of other Applicant-proposed mitigation measures is discussed below in Section 4.1.5.

An important aspect of the SEIR is ensuring that all issues areas work off a single set of project description components. This will be ensured by developing a “*project component*” *sheet* including items such as truck trips, route descriptions, transportation miles, truck capacity, etc. This listing will be shared with the County and Applicant for review to ensure that a single set of assumptions are propagated through the SEIR process.

Once a draft project description is developed, along with the detailed listing of the “project components”, MRS Environmental will submit it to the County for review and comment. MRS Environmental suggests that the Applicant then be given an opportunity to review the project description and the detailed project components sheet to assure that it accurately reflects their Project. This is extremely important since the project description data will serve as the basis for assessing the impacts associated with the Project.

### 4.1.3 Alternatives Analysis

The CEQA Guidelines, Section 15126.6, requires an SEIR to describe a reasonable range of alternatives to a project or to the location of a project which could feasibly attain its basic objectives and evaluate the comparative merits of the alternatives. Section 15126.6 also provides direction for the discussion of alternatives to the Project. The section requires:

- A description of “a range of reasonable alternatives to the project, or to the location of a 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” [15126.6(a)];
- Setting forth alternatives that “shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project” [15126.6(f)];
- A discussion of the “No Project” alternative, and “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” [15126.6I(2)]; and
- A discussion and analysis of alternative locations “that would substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR” [15126.6(f)(2)(B)].

For this SEIR, it is critical to develop a defensible alternatives analysis that meets the following objectives:



- The alternatives analysis is comprehensive enough to assure that it has looked at a reasonable range of feasible alternatives to the proposed action; and
- The alternatives analyzed throughout the document are limited to only those that could feasibly attain the Applicant's basic objectives for the Project and that have the ability to reduce significant impacts associated with the proposed action.

To accomplish these objectives, MRS Environmental proposes an alternative screening analysis that uses the "rule of reason" approach to alternatives as discussed in CEQA (Guidelines Section 15126.6(f)). An alternative screening analysis provides the basis for selecting alternatives that meet the second objective listed above, provides a detailed explanation of why other alternatives were rejected from further analysis, and assures that only feasible alternatives that can reduce significant impacts and meet the basic objectives of the Project are evaluated and compared in the SEIR.

In addition, CEQA states that alternatives should "attain most of the basic objectives of the project" (Section 15126.6(a)). If an alternative is found to not obtain the basic objective, then it would also be eliminated.

The use of a screening analysis for the alternatives ensures that the full spectrum of environmental concerns is adequately represented and that a reasonable choice of alternatives is selected for evaluation in the SEIR. It also provides for a broad range of alternatives to be discussed in the SEIR as to their applicability and reasons for inclusion or dismissal, thereby addressing any potential concerns of the public or decision makers that a specific alternative was not addressed.

Alternatives examined will include, at a minimum, the No Project Alternative and a reduced project alternative (that would include fewer daily truck tips), alternative truck routes, and possibly alternative modes of transportation.

The description of alternatives and the alternative screening analysis will be prepared and submitted to the County for review. MRS Environmental will also recommend that the County have the Applicant review the alternative descriptions to make sure they are technically accurate.

The principal investigators will be responsible for preparing their portion of the environmental analysis section for each of the selected alternatives.

### **4.1.4 Peer Reviews**

The Applicant has prepared several technical studies that provide a considerable amount of information associated with the baseline conditions at the site as well as the impacts of the Project. These documents will be independently evaluated and peer reviewed before the information is used as part of the SEIR. One of the first tasks that will be undertaken will be a comprehensive review of the Applicant-prepared documents. The peer review will focus on adequacy and technical accuracy of the information. These documents include:



- Air Quality Analysis, Exxon/Mobil, January 2018;
- LFC Interim Trucking Emissions SBC PD Excel Spreadsheet;
- ExxonMobil Interim Trucking Emission Calculations, January 2018;
- ExxonMobil Interim Trucking Permit Project, Traffic and Circulation Study, Associated Transportation Engineers, December 8, 2017;
- ExxonMobil SYU LFC Interim Trucking Quantitative Risk Assessment, InterAct, January 2018;
- ExxonMobil SYU LFC Interim Trucking Industrial Risk Analysis, InterAct, December 2017; and
- SYU LFC Interim Trucking Crude Oil Transportation Risk Management and Prevention Program (CO-TRMPP), ExxonMobil, December 2017.

The peer review process is a critical phase of the SEIR development. Any inconsistencies and inaccuracies in the technical reports could potentially be carried through to the Final SEIR stage and cause delays and inconsistencies in the SEIR effort. MRS Environmental proposes to conduct the independent evaluations and peer reviews very early in the process, in parallel with the project description development.

The results of the independent evaluation and peer reviews for each of the technical reports will be documented in a “*peer review summary report*”, which will (1) identify areas where the analysis is adequate, (2) identify any issues in the technical reports that are missing or need to be modified, and (3) provide recommendations for how to correct any identified deficiencies. The peer review summary report will be provided to the County for review and comment.

As a result of the peer review, MRS Environmental might determine supplemental analysis would be beneficial to assure an adequate and defensible SEIR. MRS Environmental will work with the County early in the SEIR process to identify any additional analysis that the Applicant, or the SEIR consultant, may need to prepare to allow for the completion of the SEIR. Depending upon the results of the independent evaluation and peer review, the County and MRS Environmental may need to meet with the Applicant to discuss next steps. The peer review summary report will be included as an appendix to the SEIR.

### **4.1.5 Administrative Draft SEIR and Technical Appendices**

Preparing the Administrative Draft SEIR will constitute the majority of the work effort. A possible top-level outline of the Administrative Draft SEIR is as follows:

- Executive Summary
- Impact Summary Tables
- Introduction
- Project Description
- Cumulative Methodology and Project List



- Environmental Analysis of the Proposed Project
- Alternatives Analysis
- Other CEQA-Mandated Sections

The major task for the Administrative Draft SEIR is analyzing the environmental issue areas identified as part of the scoping process that were found to have potentially significant impacts.

Environmental issue areas where potentially significant impacts have been identified as part of the scoping process will contain the following major sections:

- Environmental Setting (Baseline);
- Project Impact and Mitigation Assessment;
- Cumulative Impacts; and
- Mitigation Monitoring Plan.

The overall approach to the development of each of these major sections is discussed further below. Section 4.2 below details the methodology that will be used for each of the key issue areas that were identified as primary issue areas in the RFP. The SEIR chapter covering the environmental analysis of the Project will also include a section that discusses the issue areas where the scoping process found the effects to be less than significant. This section of the Administrative Draft SEIR will provide the substantial evidence to support the finding of less than significant effects. The approach to developing this section of the SEIR is discussed in Section 4.3 below.

Once all the issue area Principal Investigators have drafted their SEIR sections, MRS Environmental will assemble them into an Administrative Draft SEIR. As part of this process the executive summary and impact summary tables will be prepared. Part of the Administrative Draft SEIR process will also include a review of the entire draft document to assure consistency across all the issue areas and a final review to assure applicable NOP comments have been addressed. The document will also undergo to an internal QA/QC review. The technical studies used in preparing the impact analysis will be pulled together into a set of technical appendices. The Administrative Draft SEIR will then be submitted to the County for review and comment. The remainder of this section discusses the general approach to each of major sections of the impact assessment.

### **Environmental Setting**

For most issue areas, the baseline information is expected to be developed from the Applicant's technical studies, previous studies in the area, including technical studies, long-term monitoring activities, regulatory requirements, other EIRs, etc. Given the limited scope of this project, MRS Environmental does not believe that additional field surveys will be necessary to verify existing data.

The environmental setting section of the SEIR will also include a regulatory setting section for each of the relevant issue areas.





MRS Environmental proposes to submit a draft of the environmental setting section of the SEIR to the County for review and comment prior to the release of the Administrative Draft SEIR (see Chapter 6.0-Project Schedule for more information).

### **Project Impact and Mitigation Assessment**

One of the most important tasks in evaluating impacts is developing a set of well-defined significance criteria (or environmental thresholds) for each of the issue areas evaluated in the SEIR. MRS Environmental proposes to develop the significance criteria prior to the assessment of impacts and to agree on these with the County in advance. The significance criteria will be submitted along with the environmental setting sections. Where available, significance criteria will be based upon the current County environmental thresholds in the Santa Barbara County Environmental Thresholds and Guidelines Manual (County of Santa Barbara; revised July 2015). Where criteria do not exist, they will be developed based on criteria used in previous EIRs or existing CEQA Guidelines. With well-defined criteria, the impacts can be classified in terms of significance with a greater degree of confidence.

The approach to the impact assessment for each issue area is discussed in more detail in Sections 4.2 and 4.3.

One of the major goals of an SEIR is identifying potential significant impacts and then developing reasonable, feasible, and effective mitigation measures to reduce the impacts to less than significant. For each impact where mitigation is identified, the SEIR will have a discussion of the residual impact. The residual impact discussion will provide the supporting evidence needed to demonstrate the effectiveness of the mitigation measures at reducing the level of significance of the impact.

The discussion of mitigation measures for applicable impacts will include both Applicant and Lead Agency proposed measures. Mitigation measures proposed by the Applicant will be identified as such.

During preparing an SEIR, mitigation measures are identified in each issue area by impact type (e.g., emission of criteria pollutants). Coordination between issue areas is important; otherwise, mitigation measures in one issue area are not carried through into other issue areas to determine if any residual impacts exist. In order to facilitate the coordination of impacts and mitigation measures, MRS Environmental proposes incorporating a section into each issue area that specifically discusses the impacts of other issue area mitigation measures. This approach assures that each mitigation measure is evaluated thoroughly and that all potential residual impacts are addressed for each of the issue areas. Recent court cases have emphasized the importance of examining the impacts not only of the project, but also of the mitigation measures themselves.

The mitigation measures that MRS Environmental develops may be design changes, technology-based measures, new or revised management systems for Project operation, or administrative procedures to ensure that certain processes or environmental conditions are carefully monitored. The mitigation measures will address primary and secondary impacts associated with the Project.





In the approach to the evaluation of impacts, MRS Environmental will distinguish between impacts before and after mitigation. Significant impacts that cannot be mitigated to a level of less than significance will be categorized as Class I impacts. Class II impacts are those that are significant prior to mitigation but can be mitigated to a level of less than significance. Class III impacts are less than significant. For Class III impacts, mitigation measures may be recommended if they could reduce the adversity of the impact. Class IV impacts are beneficial impacts.

### **Cumulative Projects List and Impacts**

CEQA requires that an SEIR address cumulative impacts, which are defined as two or more individual effects, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact analysis needs to address the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects (CEQA Guidelines §15355).

One of the first steps in the cumulative analysis will be to work with the County and other agencies in developing a cumulative projects list. Since the Project involves truck unloading operations in the City of Santa Maria (Phillips 66 Santa Maria Pump Station) and Kern County (Plains Pentland Truck Rack), these agencies will need to be consulted in developing the cumulative projects list. MRS Environmental proposes to work with the County and other responsible agencies to determine which of these projects should be included in the cumulative analysis.

Using this information, brief descriptions of each of the cumulative projects will be developed, along with a discussion of the cumulative methodology used in the SEIR. A draft of this chapter will be submitted first to the County for review and approval, and then to the project team.

The cumulative impact assessment will follow the same basic approach as the project impact assessment discussed in Section 4.2 for the primary issue areas. If any significant cumulative impacts are identified, mitigation measures will be developed.

### **Mitigation Monitoring Plan**

Based upon the mitigation measure identified in the SEIR, a draft mitigation monitoring plan will be developed for each issue area and then consolidated into a single mitigation monitoring plan. The monitoring plan will identify the associated mitigation measure, any plan requirements and associated timing, and the method, timing, and responsible party for compliance verification, including any reporting requirements of the Applicant.

The need for subsequent verification by on-site inspection will also be defined in the monitoring program, together with any post-construction monitoring that may be required to evaluate the effectiveness of the mitigation measures. The draft mitigation monitoring plan will be provided to the County at the same time as the Administrative Draft SEIR. A summary of the plan will be included in the Executive Summary of the SEIR.

#### **4.1.6 Prepare Draft SEIR and Technical Appendices**

Preparation of the Draft SEIR will incorporate all the comments received from the County on the Administrative Draft SEIR and technical appendices and produce a “camera ready” copy of the



SEIR for final review by the County. Once the County has signed off on the “camera ready” document, MRS Environmental will be responsible for printing Draft SEIR. MRS Environmental has a large-scale CD/DVD printer which enables the production of hundreds of CDs if needed. MRS Environmental will work with the County to make sure that the Draft SEIR is available online for download. MRS Environmental will also prepare the Administrative Record ensuring that copies or links to all references in the Draft SEIR are made available to the public as part of public comment period.

All copies of the Draft SEIR will be double-sided, printed in color on recycled paper and spiral-bound. All electronic submittals will be in searchable pdf format and will be divided into chapters with file sizes that are suitable published on County’s website.

### **4.1.7 Prepare Summary of Comments from Public Hearing on Draft SEIR**

Upon completion of the public comment hearing on the Draft SEIR, MRS Environmental will prepare a written summary of the verbal comments presented at the hearing. This package will also include any written comments received at the hearing. All the comments will be numbered with unique codes.

### **4.1.8 Prepare Response to Comments**

At the close of the Public comment period, all the comments received on the Draft SEIR will be reviewed and given a unique number by the management team. The comments will then be distributed to the appropriate principal investigators, who will be responsible for developing the written responses and editing the Draft SEIR as needed.

The response to comments will include a list of all the comment letters received, the code used for each letter, and section where each comment letter and associated responses can be found. For costing purposes, it has been assumed that no new analysis will be required to respond to the comments on the Draft SEIR and that the number of unique comments to which MRS Environmental will need to respond to will not exceed 100.

The RFP from the County asks that the response to comments be submitted prior to the County receiving the Administrative Final SEIR, which is the way we have structured it in the proposal. It is MRS Environmental’s experience that development of the Administrative Final SEIR goes hand-in-hand with preparation of the response to comments. This is because if a comment requires a modification to the Draft SEIR, it is best to make that change when preparing the response to assure consistency between the response and the changes in the SEIR. Also, it is easier for the County to review these two documents together to allow for review of the changes in the SEIR that are discussed in the response to comments. This process also tends to allow the Administrative Final SEIR to be submitted to the County faster.

### **4.1.9 Prepare Administrative Final SEIR**

At the close of the public comment period on the Draft SEIR, MRS Environmental will prepare the Administrative Final SEIR. This task involves making changes to the Draft SEIR as a result of



comments, updating various sections of the SEIR to cover the discussion of the public review process, and incorporating the response to comments.

Areas of the Draft SEIR that are modified will be marked with revision marks. As needed, the Response to Comments section will guide the reader to changes in the SEIR and to additional information in the Final SEIR that addresses the comment.

MRS Environmental will submit an Administrative Final SEIR to the County that includes all the responses to comments, as well as all the changes to the Public Draft SEIR. This will allow the County to review the responses and confirm that the appropriate changes were made to the SEIR.

### **4.1.10 Prepare Proposed Final SEIR**

Preparation of the Proposed Final SEIR will incorporate all the comments received from the County on the Administrative Final SEIR and the Response to Comments. MRS Environmental will produce a “camera ready” copy of the Proposed Final SEIR for review by the County. Once the County has signed off on the “camera ready” document, MRS Environmental will be responsible for printing Proposed Final SEIR. These copies will be spiral bound. MRS Environmental will also work with the County to make sure that the Proposed Final SEIR is available online for download.

### **4.1.11 Prepare Final SEIR**

Once there has been a final decision on the project, MRS Environmental will make any final changes to the Proposed Final SEIR that may be needed and then provide the County with the Final SEIR.

### **4.1.12 Public Meetings and Hearings**

In developing the cost proposal for this project, MRS Environmental assumed that team members will participate in a number of public meetings and hearings. The detailed assumption on the number of meetings is included in the costing proposal. MRS Environmental will be available for assisting in developing presentations for these meetings/hearings/workshops. MRS Environmental will also be available for developing the agenda for all of the public meetings and documenting the results. Costing for hearing/workshops are broken out in the costing proposal.

Included in the meetings/hearings is costing for various MRS Environmental team members to attend (and assist County in planning & coordinating) one DEIR public comment hearing; and two Planning Commission/Board of Supervisors hearings. It is assumed that all these meeting would be held in the City of Santa Barbara.



MRS Environmental will be available at the County’s discretion for the possibility of additional public comment hearings or workshops in smaller settings as part of the scoping process and/or Draft SEIR outreach.

MRS Environmental has assumed that the County will be responsible for recording and transcribing the public meetings, if needed, for the official record, although MRS Environmental is available for this service if needed (at additional cost).

**4.2 Methodologies for Issue Areas with Potentially Significant Impacts as Identified in the RFP**

The RFP issued by the County identified a list of preliminary issue areas where the Project is likely to have potentially significant impacts. The approach and methodology to each of these issue areas is discussed below.

**4.2.1 Air Quality and Greenhouse Gases**

The general approach to the air quality assessment will involve addressing baseline conditions and impacts associated with the Project and alternatives in accordance with requirements and guidelines established by the County and the Santa Barbara County Air Pollution Control District (SBCAPCD). Although the air quality thresholds established by the County will be utilized since the County is the lead agency, guidelines and requirements of the APCD will be incorporated as required.

**Key Issues**

The air quality and greenhouse gases sections of the SEIR will address the fixed facility emissions (i.e., truck loading rack) that will be added to the existing emissions associated with the current equipment in Las Flores Canyon. This would cover criteria pollutants, GHG emissions, and toxic emissions. This will be done for both construction and operational emissions.

The SEIR will also address the mobile emissions associated with the truck transportation routes including criteria pollutants, GHG emissions and air toxic emissions. This will include addressing both proposed truck routes.

The SEIR will document the existing emissions from the Las Flores Canyon facilities. These emissions are available in Permit to Operate 5651-R6 and Part 70 Operating Permit 5651, prepared by the Santa Barbara County Air Pollution Control District (SBCAPCD). Knowing these emissions will be critical for assessing the air impacts.



For one of the truck routes, the air emissions from trucking will occur in three different Counties (Santa Barbara, San Luis Obispo, and Kern). The total trucking emissions for this route will be subdivided by County.

The emission estimates for the fixed and mobile sources will be taken from the final version of the peer reviewed Applicant emission calculations. Mitigation measures will be developed for any identified significant impacts. MRS Environmental will then develop a mitigation monitoring plan for the mitigation measures. Analysis of cumulative impacts will consider future activities at the affected facilities and other projects in the area.

**Peer Review of Applicant Studies**

The Applicant has prepared an Air Quality Analysis for the Project along with supporting emission calculation spreadsheets will be independently evaluated and peer reviewed to verify that (1) all emissions sources have been included; (2) the correct equations and emission factors have been used, including the use of the most recent versions of CalEEMod, EMFAC and other applicable models; and (3) the appropriate approach was followed in developing the emission estimates.

The Applicant-prepared Air Quality Analysis, dated January 2018, does not appear to include an estimate of emissions for construction of the loading rack and associated equipment, nor does it include any estimate of the air toxic emissions associated with the fixed facilities or mobile sources. Although these emission estimates are not required as part of the County thresholds, a defensible SEIR document should provide these estimates in order to provide full disclosure of the impacts. Both of these emissions estimates will be needed to ensure an adequate and defensible SEIR.

**Baseline Environmental Setting**

MRS Environmental will characterize the existing air quality and meteorological conditions to provide an environmental setting that the Project emissions will impact. The environmental setting will be based on information from the SBCAPCD, other applicable air districts, and other regional EIRs. Existing operational emissions for Las Flores Canyon will come from the most recent Permit to Operate (PTO). The attainment status in regard to the Ambient Air Quality Standards, particularly for ozone (for State and Federal standards) and particulate matter (for State standards), will indicate the area’s most sensitive to increases in ambient concentrations of the air pollutants.





Data from the SBCAPCD air monitoring station network will be utilized and characterized based on available data from the SBCAPCD and CARB.

MRS Environmental will review Federal, State, and County air quality regulations to identify those items that apply to the Project, based on the preliminary issues identified in the RFP and other potential issues such as toxic emissions and GHG. The baseline will also include information on odors at the Las Flores Canyon facility based on an assessment of violations and complaints received by the SBCAPCD.

### **Impact Assessment and Mitigation Measures**

MRS Environmental will assess both construction and operational emissions from the Project. The development of technically sound emissions inventories for the Project will be one of the most important aspects of the air quality assessment. Emissions from all equipment used in construction and operations, including pumps, mobile sources, fugitive dust and other miscellaneous sources, need to be included in the project emission inventory.

It does not appear that the Applicant's Air Quality Analysis, date January 2018, has any information on the emissions associated with the construction of the truck loading rack facilities. The Applicant's Air Quality Analysis discusses the construction requirements on page 2 of 7 but does not provide any estimate of the construction emissions. Construction emissions include those associated with installation of the truck rack, transfer piping, LACT units, electrical and communication systems, operators shed, any pipe supports and drainage systems, and paving.

### Criteria Pollutants

Estimates of the construction criteria pollutants (NO<sub>x</sub>, ROC, CO, PM, PM<sub>10</sub>, and PM<sub>2.5</sub>) would need to be made for the Project. These could be done by the Applicant or the SEIR consultant. MRS Environmental has included an optional task in the costing to develop the construction emissions estimates based upon equipment, personnel, and scheduling estimated that would need to be provided by the Applicant, as discussed in Section 4.1.2, Project Description. With this information, construction emissions will be estimated using the appropriate emission factors from the SBCAPCD, EPA's AP-42, and CARB emission factors as well as the CalEEMod version 2016.3.2 program and the EMFAC program. The construction emissions will be estimated for peak-day and total project.

The Applicant's Air Quality Analysis, dated January 2018, has detailed operational emission estimates for criteria pollutants. Once these have been independently verified and peer reviewed, they would be used as the basis for the operations criteria pollutant estimates. This will include estimates of peak-day and annual emissions.

The construction and operational emissions will be compared with the significance thresholds, and appropriate mitigation will be developed if any of the criteria pollutants are found to be significant. For criteria pollutants, mitigation measures could include offsets or emission reduction credits.

Cumulative impacts for criteria pollutants will be determined based on the cumulative project list developed for the Project and will be evaluated qualitatively.



### Odors

Odor impacts will be assessed based upon the fugitive emissions from the loading operations. Given that the fugitive emissions from the truck loading operations (58.38 lbs. per day ROC) would represent a fraction of the total fugitive emissions for the Las Flores Canyon facilities (229.28 lbs. per day ROC), and the fact that hydrogen sulfide is not an issue with the crude oil, it is unlikely odors would be a significant issue.

### Air Toxic Pollutants

The Exxon Mobil Las Flores Canyon stationary source is subject to the Air Toxics 'Hot Spots' Program (AB 2588). As required by AB 2588, a health risk assessment (HRA) for the Las Flores Canyon facility was prepared by the SBCAPCD on March 28, 1995. The HRA was based on 1993 emissions and was prepared by the District at the request of ExxonMobil.

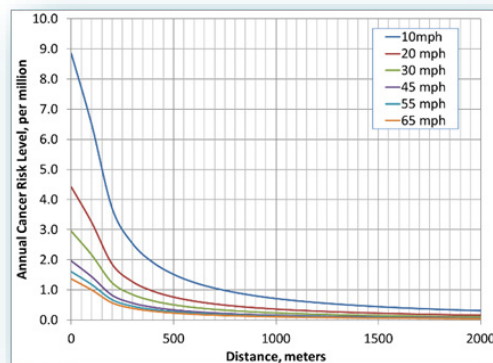
Based on the 1993 air toxics emission inventory, a cancer risk of 6 per million at the property boundary (UTM location 771981 East, 3818027 North) was estimated for the Las Flores Canyon facility, which is well below the threshold of 10 in a million. The risk is primarily due to benzene and carcinogenic polycyclic aromatic hydrocarbon (PAH) emissions from a thermal oxidizer. Emissions of hydrazine also contribute to the cancer risk estimate. Hydrazine is emitted from a steam generation/steam injection system. The 1993 facility-wide annual emissions of benzene, PAH and hydrazine were 180, 15.1 and 1.71 pounds per year, respectively. The air toxic emissions from the proposed Project in Las Flores Canyon would not be expected to change the results of this HRA due to the low level of air toxic emissions that would be associated with the Project.

The Applicant's Air Quality Analysis does not appear to provide any information on air toxic emissions from operations. While we agree with the statement in the RFP that a Health Risk Assessment (HRA) is not needed for the fixed facilities in Las Flores Canyon, it is important for full disclosure that the SEIR provide an estimate of the operational air toxic emissions. MRS Environmental will develop an estimate of the air toxic emissions from the loading operations based upon the Applicant's fugitive emission calculations, and the air toxic emission factors used by the SBCAPCD in the PTO for the Las Flores Canyon facilities. These estimates will be compared with the currently documented air toxic emissions for the Las Flores Canyon facilities to show that the increase would be de minimis.

Air toxic emissions from diesel trucks has been an issue raised by local environmental groups on other CEQA documents covering transportation related to oil projects. The major air toxic issue is associated with diesel particulate matter from the trucks, which is a cancer risk issue. Work done on other similar transportation projects by MRS Environmental has shown that this is only an issue when diesel trucks travel through heavy populated areas at low speed. Neither of the two routes proposed by the Applicant pass through heavily populated areas, and only small portions of the routes would be subject to low speeds. MRS Environmental feels the County may want to consider adding an analysis of these air toxic impacts in the SEIR to provide substantial evidence to support a finding of less than significant impact to health risk from the truck transportation. MRS Environmental has included an optional task to address this issue. The approach to this optional task is discussed below.



MRS will develop air toxic emissions for the oil trucks using CARB air toxic emissions factors. MRS Environmental will use the annual air toxic emission estimates for the trucks to develop a plot of cancer risk as a function of truck speed and distance from the road to the nearest sensitive receptor. The cancer risk estimates will be developed using the most recent approach prescribed by the State Office of Environmental Health Hazard Assessment (OEHHA).



The results of this modeling would be compared to the speed limits along the routes and the location of sensitive receptors to determine the level of significance of the impact.

### Greenhouse Gases

MRS Environmental will assess emissions of greenhouse gases (GHG) for construction and operations. The GHG analysis will be compiled into a separate section of the SEIR. The operational GHG emissions have been estimated in the Applicant's Air Quality Analysis. However, it does not appear that construction GHG emissions have been estimated by the Applicant. The County's Environmental Thresholds and Guidelines Manual (Revised July 2015) states that "*Construction-related emissions are to be accounted for in the year that they occur*". The estimation of construction GHG emissions would be included in the optional task discussed above for construction criteria pollutant emissions.

Regulatory requirements will address recent GHG emission regulations, such as recent Scoping Plan updates and revisions to long-term goals and developments at the SBCAPCD. MRS Environmental will address GHGs including carbon dioxide (from combustion), methane (from combustion and fugitive emissions), nitrous oxide, and hydro fluorocarbons. MRS Environmental will also assess GHG emissions from both direct (located on-site) and indirect (from mobile sources and electricity generation) sources and will address sources such as transportation as well as the role of the Cap-and-Trade program.

The Applicant calculations indicate the annual GHG emissions from mobile and stationary source operations would total approximately 11,000 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>). As this is above the thresholds adopted by the County, mitigation measures would be required to reduce or offset these emissions possibly using the Cap-and-Trade program.

### **4.2.2 Risk of Upset**

The general approach to the risk of upset assessment will involve addressing baseline conditions and impacts associated with the Project and alternatives in accordance with requirements and guidelines established by the County for public safety impact assessments.



### Key Issues

The proposed Project would involve the loading of crude oil on to trucks, the truck transport of the crude oil to one of two existing truck unloading facilities, where the crude oil would be unloaded. Trucking of crude oil from the Las Flores Canyon facility could occur over two transportation routes. For the first route, up to 70 trucks per day would deliver product to the Phillips 66 Pump Station in Santa Maria. For the second route, up to 68 trucks per day would deliver product to Plains Pentland Station in Maricopa. In actual operation, trucks could deliver product to one or the other or both of the two facilities on a given day. Each of the trucks would hold approximately 160 barrels (6,720 gallons) of crude oil. The Applicant is proposing to use DOT 407 tanker trucks for transporting the crude oil.

The main risk of upset issue for the Project are spills of crude oil from either the loading operations or during truck transport. Spilled crude oil has the potential to ignite resulting in a pool fire that generates thermal radiation hazards and toxic gas hazards due to the products of combustion. Spilled crude oil that does not immediately ignite has the potential to generate flammable vapor clouds that can ignite and produce thermal radiation hazards. An explosion or Boiling Liquid Expanding Vapor Explosion (BLEVE) would not be expected because the SYU crude oil has relatively low vapor pressure, thus formation of appreciable volume of flammable gas that can lead to an explosion is not expected.

Toxic vapor impacts from hydrogen sulfide (H<sub>2</sub>S) would not be expected because the SYU crude oil has a negligible H<sub>2</sub>S content, and combustion does not create appreciable amounts of H<sub>2</sub>S. However, the SYU crude oil has 5.2 percent of sulfur by weight, thus formation of sulfur dioxide (SO<sub>2</sub>), which is a toxic gas, as a combustion product in a pool fire could occur.

Crude oil spills that occur during truck transportation could also potentially impact water and biological resources, depending upon the location and size of the spill.

### Peer Review of Applicant Studies

The Applicant has prepared a Qualitative Risk Assessment (QRA) for the Project that addresses the risk of upset impacts to public safety along the two proposed transportation routes. This QRA will be reviewed to ensure that it was prepared in accordance with the requirements of the County's Environmental Thresholds and Guidelines Manual, which specifies thresholds for significant impacts to public safety. For example, the QRA does not address the risk of upset hazards associated with the truck loading operations in Las Flores Canyon.

This QRA will be independently evaluated and peer reviewed to verify that (1) all the appropriate hazard scenarios have been included; (2) the spill sizes have been properly assessed given the proposed truck size; (3) the estimated probability of a truck accidents are reasonable and based upon appropriate data sources; (4) the conditional probability of a spill given an accident are reasonable and based upon appropriate data sources; (5) the conditional probabilities of a pool fire are reasonable and based upon appropriate data sources; (6) the consequence modeling for fires, flammable and toxic vapors are accurate and based upon acceptable modeling methodologies and meteorological conditions; (7) the population data along the truck routes have been adequately classified based upon appropriate data sources; and (8) the FN curves that show probability as a



function of consequence have been constructed properly. The peer review will also verify all the calculations in the QRA.

A preliminary review of the QRA found that the hazards associated with SO<sub>2</sub> from combustion of the crude oil in the event of a pool fire are potentially overestimated. The Applicant's modeling assumed that the plume rise stops at the top of the flame jet. The plume rise actually goes considerably higher due to the temperature of the combustion gas. This has been confirmed by actual field testing. With higher plume rise values, the resulting ground concentrations of SO<sub>2</sub> would be considerably lower than what was used in the Applicant's analysis.

### **Baseline Environmental Setting**

MRS Environmental will characterize the existing baseline at the Las Flores Canyon facility with regard to the existing hazards. A summary of the key Federal, State and local regulations will be provided as they relate to the truck loading operations and the transportation of crude oil.

### **Impact Assessment and Mitigation Measures**

The risk of upset impact section will address the risks associated with the proposed crude oil loading facility and transportation routes and the impact of upset scenarios on nearby sensitive receptors (e.g., residences, schools and hospitals).

#### *Risk of Upset*

Accidental releases of crude oil could result in flammable vapor, thermal radiation or toxic hazards that have the potential to impact sensitive receptors for both the loading operations as well as during transportation. The significance of these types of impacts are typically determined using a QRA, which looks at the frequency of an accident occurring and the consequence if it does occur.

The impact section of the SEIR will discuss the possible release scenarios for the loading operations and provide an estimate of the hazard zones. While the Applicant's QRA does not address the hazards associated with the loading operations, they would be similar to the trucking hazards associated with transportation qualified in the Applicant's QRA. The thermal radiation hazard zones were estimated to have a maximum radius of about 138 feet for 5 KW/m<sup>2</sup>. This hazard distance would not extend beyond the boundary of the Las Flores Canyon facility so there would be not offsite impacts. As such, a QRA would not be required for the loading operations, but providing this analysis and justification is important to the development of a defensible SEIR.

For truck transportation, the impact section will summarize the results of the peer reviewed Applicant studies, focusing the types of hazards and possible consequences. The FN curves will be used to determine the significance of the risk of upset impacts based upon the County’s FN curve significance criteria.

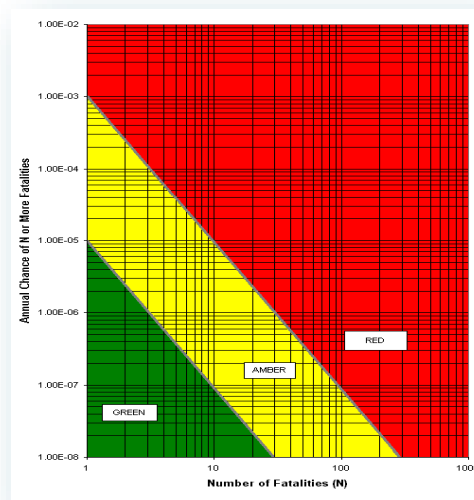
MRS Environmental will propose mitigation measures for risk levels that exceed the thresholds or for spills that increase the volume or frequency of crude oil releases. The mitigation measures will be evaluated in terms of feasibility, adequacy, and, most importantly, effectiveness.

Crude Spills

The 1984 EIS/EIR and the 1986 SEIR evaluated the impacts of accidental oil spills on biological and water resources and found that these were significant and unavoidable (Class I). The oil spills evaluated in these environmental documents covered offshore spills from the platforms and pipelines, as well as onshore spills from pipelines and the facilities in Las Flores Canyon. The crude oil spill volumes evaluated in these documents were substantially larger than the maximum spill size that would be associated with crude oil trucking. The 1986 SEIR also addressed spills of liquid petroleum gas/natural gas liquids (LPG/NGL) from trucking operations. The 1984 EIS/EIR and 1986 SEIR did not address potential impact of crude oil spills associated with the trucking.

Releases of crude oil during truck transportation could impact biological or water resources depending upon the size and locations of the spill. The RFP and the Applicant studies do not address this issue. Potential spills from trucking would be small in size (up to 160 barrels), and the likelihood that they would occur in an area that could impact biological or water resources is low. This is an issue that has been raised by local environmental groups on other crude oil transportation projects. MRS Environmental has included an optional task in the costing proposal to include a general analysis of the potential impacts to biological and water resources from a crude oil spill from trucking operations.

The oil spill impact discussion will provide an estimate of the maximum spill size, the likelihood of a spill occurring that could impact biological or water resources along the transportation routes, and the potential impacts that could occur to these resources. Given the low probability of these events and the relatively small spill size, it is not expected that oil spills from crude oil trucks would have significant long-term effects on biological or water resources. However, it is important that the SEIR discuss these issues to assure that the document is adequate and defensible.





### 4.2.3 Traffic and Transportation

The general approach to the traffic and transportation assessment will involve addressing baseline conditions and impacts associated with the Project and alternatives in accordance with requirements and guidelines established by the County for traffic impact assessments. The Applicant has prepared a Traffic and Circulation Study for the proposed Project that contains baseline and impact information covering both of the proposed truck transportation routes.

#### Key Issues

The Project would generate truck trips delivering crude oil from Las Flores Canyon in Southern Santa Barbara County to two delivery sites, which include the Phillips 66 Santa Maria Pump Station in the City of Santa Maria and the Plains Pentland Terminal in Maricopa. A maximum of 70 loaded truck trips are proposed that would result in 140 one-way truck trips per day.

Regional access to the Las Flores Canyon facility is provided by El Capitan State Beach Road and Refugio Road, which both have direct connections to Highway 101. Local access to the Las Flores Canyon facility is provided by an existing frontage road (Calle Real) which runs parallel to Highway 101 and extends between El Capitan State Beach Road and Refugio Road. Access to the Truck Loading Area is provided by existing interior facility roads. The Applicant has proposed that all trucks entering and leaving the Las Flores Canyon facility would utilize the Refugio Road ramps at Highway 101, thus avoiding vehicle and pedestrian traffic associated with the El Capitan Campground.

The Phillips 66 Santa Maria Pump Station would be accessed via the HIGHWAY 101/Betteravia Road interchange to Rosemary and Battles Roads, all located in the City of Santa Maria. The Plains Pentland Terminal, located in Kern County, would be accessed via Highway 101 and State Route 166 to Basic School Road.

Most of the non-highway roads that would be used by the Project are rural roads that mainly serve agricultural uses. The main transportation issues for the Project are the potential for impacts to intersection delay and level of service (LOS) at key intersections during AM and PM peak hours and the potential for collisions. CCTC and MRS Environmental have completed several CEQA documents that included the Highway 101/Betteravia Road interchange. This interchange has historically operated at LOS D during AM peak hours and LOS F during evening peak hours. Depending upon the number of trucks using this intersection during these hours, there could be significant impacts.

Also, traffic impacts around Refugio State Beach will need to be addressed as it relates to recreational users.

#### Peer Review of Applicant Studies

The Applicant-prepared traffic study evaluates vehicular LOS during the weekday AM and PM peak hours and calculates collision rates along the delivery routes. The document provides baseline conditions as well as baseline plus the Project.



CCTC will independently evaluate and peer review the Applicant-prepared traffic study for accuracy and adequacy. The review will focus on the adequacy of each study’s findings with respect to industry standard practice. The technical analysis will be spot-checked but will not be duplicated.

Recent count data and analysis results from other sources will be compared to the data used in the study. Study assumptions leading to the trip generation estimates will be reviewed for reasonableness.

CCTC will prepare a letter summarizing the major findings of our peer review. This will include a summary of the study, mitigation recommendations, and will note any major deficiencies identified in the course of the review. CCTC will provide recommendations for additional study if appropriate.



**Baseline Environmental Setting**

The baseline environmental setting will be described using information provided in the final peer-reviewed version of Applicant’s traffic study, which relies on data from Caltrans, the County of Santa Barbara, and other recent traffic counts. The study intersections include the Highway 101/Refugio Road ramp junctions, Highway 101/Betteravia Road ramp junctions, Highway 101/State Route 166 ramp junctions, and the State Route 166/Basic School Road intersection.

**Impact Assessment and Mitigation Measures**

The impact analysis will apply thresholds of significance from Caltrans, the County of Santa Barbara, and Kern County as appropriate using information contained in the Applicant-prepared traffic study. The analysis will include peak hour intersection LOS calculations, roadway segment LOS calculations, and an evaluation of collision rates on roadway segments. The Applicant has proposed a mitigation measure limiting truck trips during the PM peak hour to minimize impacts to the Highway 101/Betteravia Road interchange. CCTC will identify additional mitigation measures as needed to reduce or eliminate significant impacts associated with the Project. These measures may include restrictions on the timing of trucks hauling crude oil or construction materials, the timing of employee shifts, and potential roadway improvements.

The Applicant’s traffic study does not appear to address traffic associated with the construction of the proposed facilities in Las Flores Canyon. While it is likely the construction traffic will be less than the trucks for crude oil transportation, it should be discussed in the SEIR to assure an adequate and defensible document. Information on the traffic levels for construction will need to be provided by the Applicant.



#### 4.2.4 Land Use/Policy Consistency Analysis

The land use/policy consistency analysis issue area approach will include consideration of the direct and indirect impacts associated with the project activities in terms of effects on existing, planned, and future land uses in the project vicinity. The analysis will build off the impact analysis from the other issue areas to determine consistency with governing land use policies and to identify potential incompatibilities with surrounding land uses.

##### Key Issues

The key issue with land use is the potential consistency with policies related to potential impacts in other issue areas such as risk of upset and air quality that could affect land uses in the areas affected by the proposed project. In addition, the County’s Coastal Policies are very specific about the preference for pipeline transportation of crude oil within the County of Santa Barbara, and potential inconsistencies with these policies will be evaluated.

MRS proposes to utilize a multi-disciplinary approach to the land use analysis. Impacts identified in other issue areas would be combined to determine if the Project would result in any land use conflicts or constraints. This analysis will be done in close consultation with the other issue area principal investigators and Planning & Development staff. This comprehensive analysis would provide the necessary basis for evaluating if there are any short- or long-term conflicts of the Project with nearby uses and for assessing policy compliance.

##### Baseline Environmental Setting

MRS Environmental will establish the baseline environmental setting by reviewing the County’s Land Use Development Code, maps, and aerials to establish the zoning and land uses of the parcels in the vicinity of the Project site. The Las Flores Canyon facility site is currently zoned M-CR, Coastal Related Industry. MRS Environmental will also look at existing permit conditions to ensure consistency for the Project such as Condition VI 1 Oil Transportation, which requires as follows:

*“All oil processed by ExxonMobil’s oil treatment facility shall be transported from the facility and the County by pipeline in a manner consistent with Santa Barbara County Local Coastal Plan Policy 6.8. Transportation by a mode other than pipeline may be permitted only in accordance with Coastal Zoning Ordinance Section 35.154.5(i), applicable Local Coastal Plan policies and Control Measure R 12 of the Air Quality Attainment Plan, to the extent it is applicable.”*

MRS Environmental will review LCP policy 6.8, which requires oil transportation via pipeline to the refining center of choice when a pipeline is available. MRS Environmental will also include analysis of consistency with the Zoning Ordinance Section 35-154.5(i), which states that permits for modifying crude oil processing or related facilities shall be conditioned to require that all oil processed by the facility shall be transported from the facility and the County by pipeline as soon as the shipper’s oil refining center of choice is served by pipeline. This section also contains several standards under which transportation of crude oil can occur other than by pipeline. Similarly, MRS Environmental will include a review of the County’s Land Use Development Code (LUDC) sections that may be relevant to this proposal.





### **Impact Assessment and Mitigation Measures**

MRS Environmental will assess the potential land use impacts associated with the Project. MRS Environmental will assess the Project's potential impacts and compatibility with the existing and potential future land uses in the area. As required by the RFP, MRS Environmental will also provide a preliminary analysis on the Project's consistency with the governing land use plans and policies. The preliminary policy consistency analysis will include consideration of the direct and indirect impacts associated with the Project activities in terms of effects on existing, planned, and future land uses in the Project vicinity.

#### **4.3 Methodology for Issue Areas with Less than Significant Impacts**

It is important that an SEIR contain a discussion of why certain issue areas were found to have less than significant impacts. The following issue areas were identified in the RFP to have less than significant impacts and will be analyzed with only sufficient detail to ensure that the conclusion of less than significant impacts are confirmed, and substantial evidence is in the record. Based upon the results of the scoping process, issue areas that are determined to have less than significant impacts will be addressed in a separate section of the SEIR. The final decision on what issue areas can possibly be covered under the less than significant impact section can only be made once the scoping process is complete. A preliminary discussion of the issue areas likely to have less than significant impacts is provided below. The SEIR will provide additional discussion and analysis to support the conclusions presented below.

***Aesthetics/Visual Resources*** – A new truck loading facility would need to be built in Las Flores Canyon. This facility would be located on a previously disturbed area within the existing developed portions of the Truck Loading Area and the Transportation Terminal. The area of the Truck Loading Area is approximately 2.91 acres (126,588 square feet); the loading racks will be located within a consolidated 0.12 acres (5,400 square feet) portion of that area. The Las Flores Canyon contains major oil and gas processing equipment, a cogeneration facility and oil storage tanks. The addition of a truck loading rack would not change the overall visual character of the area, and the visual analysis in the 1984 EIS/EIR would not change. Some additional nighttime lighting may be required, but the facility has a substantial amount of existing lighting, and the addition of the limited lighting for the truck loading rack would affect the lighting conclusions in the 1984 EIS/EIR. Therefore, impact to aesthetics/visual resources are expected to be less than significant.

***Agricultural Resources*** – The Las Flores Canyon site is currently zoned M-CR, Coastal Related Industry. No agricultural resources would be disturbed as part of the construction or operation of the proposed project. The proposed site does not contain any Prime Farmland or other areas identified as farmland of State or Local Importance by the State Farmland Mapping and Monitoring Program or have land under Williamson Act contract. Therefore, impact to agricultural resources are expected to be less than significant.

***Biological Resources*** – The truck loading rack would be installed on a portion of an existing pad area at the Truck Loading Area and the Transportation Terminal. The Applicant's project description states that no new habitat or vegetation disturbance will be required, the area is



previously disturbed ground with at least four feet of compacted fill in place. The Project location is not in an area of Federally protected wetlands, and there are no wetlands within 100 feet of the proposed truck loading facility location. The Las Flores Canyon site is not subject to any Habitat Conservation Plan, Natural Community Conservation Plan or other habitat conservation plan. Therefore, impacts to biological resources are expected to be less than significant. Potential oil spill impacts to biological resources is discussed in Section 4.2.2, Risk of Upset.

**Cultural Resources** – The truck loading rack would be installed on a portion of an existing pad area at the Truck Loading Area and the Transportation Terminal. When the Las Flores Canyon facilities were built this area was heavily disturbed as discussed in the 1984 EIS/EIR and 1986 SEIR and is primarily made up of fill material. The Applicant has stated that the site of the proposed truck loading rack has at least four feet of compacted fill in place. The proposed Project would require limited grading mainly for containment and drainage. There are no known cultural sites in the location of the proposed truck loading facility. Given the disturbance that occurred in this area when the Las Flores Canyon facilities were constructed, unknown cultural sites would not be present. Therefore, cultural resource impacts are expected to be less than significant.

**Energy** – Construction and operation of the crude oil loading rack and operation of the trucks would require use of energy, mainly in the form of diesel fuel. MRS Environmental will make an estimate of the diesel fuel use for construction and operation. This increase in fuel use is not expected to result in a substantial increase in energy demand or result in the need for development of new energy sources.

**Geological Resources** – The geological resource impacts identified in the 1984 EIS/EIR and 1986 SEIR for the Las Flores Canyon site were associated with the massive grading activities that occur in Las Flores and Corral Canyon. These documents identified two faults near Las Flores Canyon consists of the inactive Erburu fault near the mouth of Corral Canyon, and the inactive Refugio fault immediately north of the project site. These faults were considered inactive and, consequently, were not found to present a hazard to the development at Las Flores Canyon. Construction of the truck loading facilities would not require the development of a new pad, or major earth moving activities. The earth moving activities would be limited to small amounts of grading for containment and drainage. Therefore, impacts to geological resources are expected to be less than significant.

**Noise** – The major noise sources would be trucks coming and going from the Las Flores Canyon facility and the crude oil loading pumps. Typical loading pumps have a sound level of about 80 dBA at 50 feet. Trucks moving at slow speed can have noise levels around 50 dBA at 50 feet. The 1984 EIS/EIR found that the gas plant would have noise levels as high as 120 dBA. The addition of the trucks and loading rack equipment would not increase the noise levels above what was analyzed in the 1984 EIS/EIR so noise impacts from the proposed Project are expected to be less than significant.

**Public Facilities** – As discussed under population and housing the proposed Project would not result in an increase in population. Therefore, the proposed Project would not be expected to trigger a significant increase in demand for public services, such as fire and police protection, parks,



schools, or other public facilities. MRS Environmental will need to verify the anticipated construction and operational labor requirements, but in all cases, they will be well below what was evaluated in the 1984 EIS/EIR and the 1986 SEIR. Therefore, impacts to public services are expected to be less than significant.

**Population and Housing** – The Applicant’s project description does not appear to provide information on the number of employees that would be needed for construction and operation of the truck loading rack. However, it is likely that no new employees would be needed for operations, and a limited number of construction employees would be needed, which would be well below the number evaluated in the 1984 EIS/EIR and the 1986 SEIR. As such, the Project would not result in any new population growth.

**Recreation** – the Las Flores Canyon site is currently zoned M-CR, Coastal Related Industry, is private property, and provides no recreational access for the public. As discussed for population and housing, the proposed Project is not expected to increase population, and would therefore not increase the use of existing parks or recreational facilities in the area or require the construction of new parks. The recreation discussion will also address the added truck traffic using the 101/Refugio interchange and potential impacts on recreational users of Refugio State Beach. The Applicant’s traffic study indicates that this interchange operates at LOS A with minimal delays. Therefore, impacts to recreation are expected to be less than significant.

**Water Resources** – Construction of the facilities would occur on previous disturbed areas and would not impact any surface water bodies or drainage patterns at the site. The nearest surface water body (Las Flores Creek) is located more than 500 feet from the proposed location of the truck loading facility. During construction, some limited water would be needed for dust control, but less than the water use evaluated in the 1984 EIS/EIR and 1986 SEIR. The installation of new paving could increase runoff in the location of the truck loading facility, but the Las Flores Canyon facilities have a comprehensive drainage control system, which can easily handle any additional runoff. The proposed Project site would not be in the 100-year flood hazard zone. During operations, the truck loading rack would not need additional water. Therefore, impacts to water resources are expected to be less than significant. Potential oil spill impacts to water resources are discussed in Section 4.2.2, Risk of Upset.

#### 4.4 Other CEQA Mandated Sections

The CEQA guidelines require that all phases of the project must be considered when evaluating impact on the environment. CEQA Guidelines §15126 requires that an SEIR discuss the following subjects.

- Significant Environmental Effects of the Proposed Project,
- Mitigation Measures Proposed to Minimize Significant Effects,
- Alternatives to the Proposed Project,
- Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented,



- Significant Irreversible Changes Which Would Be Involved in the Proposed Project Should it be Implemented, and
- Growth-Inducing Impacts of the Proposed Project.

The first two items will be addressed in the project impact chapter of the SIER. The third item will be discussed in the alternative analysis chapter. The last three items will be covered in a separate chapter of the SEIR and will address the following.

***Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented (CEQA Guidelines §15126.2(b))*** – The discussion will provide a brief description of any identified Class I impacts (significant impacts that cannot be mitigated to a level of less than significant). If Class I impacts are identified, the implication of these impacts will be discussed along with the reasons why the project is being proposed, notwithstanding their effect.

***Significant Irreversible Changes Which Would Be Involved in the Proposed Project Should it be Implemented (CEQA Guidelines §15126.2(c))*** – This section will discuss any irreversible commits of resources that may be associated with Project, primary and secondary impacts that could commit others to similar uses, and well as an irreversible damage that could result from environmental accidents associated with the Project.

***Growth-Inducing Impacts of the Proposed Project (CEQA Guidelines §15126.2(d))*** – This section will discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts can also be caused by removing obstacles to population growth such as an expansion of a wastewater treatment plant. Growth-inducing impacts can result from population increases that require the construction of new community services facilities.

In general terms, a project may induce spatial, economic, or population growth in a geographic area if it meets any of these four criteria:

- Removal of an impediment to growth (e.g., establishment of an essential public service or the provisions of new access to an area);
- Economic expansion or growth (e.g., changes in revenue base, employment expansion);
- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning or general plan amendment approval); or
- Development or encroachment in an isolated area or one adjacent to open space (being different from an “infill” type of project).

MRS Environmental will evaluate the proposed Project against the four criteria listed above.



**5.0 Cost Proposal**

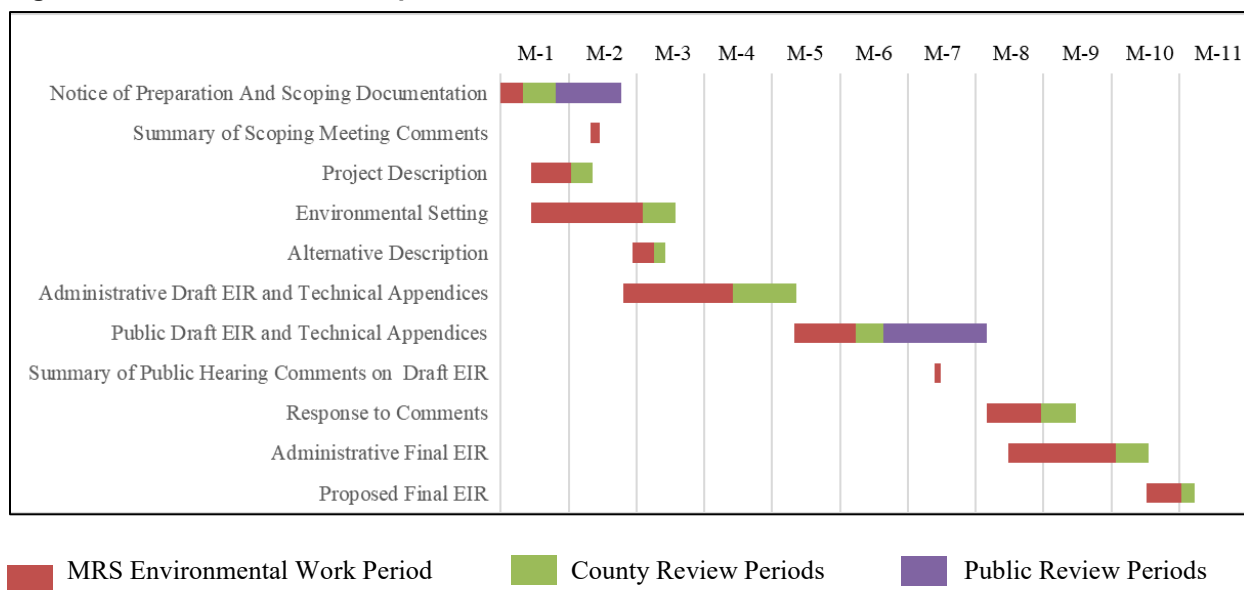
The cost proposal is presented separately from this technical proposal. See separate cost proposal.



### 6.0 Schedule

Figure 2 provides an estimated timeline for preparation of the SEIR that was developed using the working day requirements specified in the RFP, with the modifications discussed below. The timeline is broken out by the major tasks identified in the RFP. Appendix C to the technical proposal provides a detailed estimated schedule for preparation of the SEIR that was used to develop the timeline shown in Figure 2.

**Figure 2 Estimated SEIR Preparation Timeline**



In developing this schedule, assumptions had to be made about the County and public review period. The estimated schedule has assumed a 30-day NOP comment period and a 45-day Draft SEIR comment period. It has been assumed that the NOP workshop would occur approximately three weeks into the NOP comment period. The assumptions used for the various County review periods are provided in Table 3.

MRS Environmental is proposing to accelerate the deliverable dates for the project description and environmental setting. Based upon a review of the Applicant’s project description and the project description include with the RFP, MRS Environmental feels that this deliverable can be accelerated. This would assure that the project description can undergo adequate review by the County and Applicant prior to work beginning on the project impact assessment. While this would move delivery of the draft project description up to before the close of the NOP comment period, typically the scoping process does affect the project description in any significant manner.



<b>Table 3 Assumed County Review Periods</b>	
<b>Deliverable to County</b>	<b>Assume Review Period (working days)</b>
Draft NOP and Scoping Document	5
Draft SEIR Style Guide	5
Draft Project Description (two reviews)	11
Draft Cumulative Description	5
Draft Environmental Setting	15
Draft Alternative Descriptions	5
Administrative Draft SEIR	20
Draft SEIR	3
Response to Comments	10
Administrative Final SEIR	10
Proposed Final SEIR	3

MRS Environmental is also proposing to accelerate the environmental setting deliverable by about one week to assure that the project team has adequate time to conduct the impact assessment. A lot of the drafting of the environmental setting would occur during the NOP comment period.

Table 4 provides the product deliverables and deliverable schedule for the SEIR. The table shows the schedule requirements for deliverables as specified in the RFP, along with a set of proposed schedule deliverables. All deadlines will be strictly followed. Any deviations from this schedule will be coordinated in advance with the County.





<b>Table 4 List of Deliverables and Proposed Due Dates</b>			
<b>Deliverable</b>	<b>Quantity</b>	<b>RFP Due Date</b>	<b>Proposed Due Date</b>
Notice of Preparation and Scoping Document	One reproducible unbound copy and one electronic copy on compact disc.	10 Working days from County authorization to proceed on the contract.	10 Working days from County authorization to proceed on the contract.
Written Summary of Comments at the Scoping Meeting	One electronic copy on compact disc or via email, size permitting.	5 Working days after the Scoping Meeting.	5 Working days after the Scoping Meeting.
Project Description	One electronic copy on compact disc or via email, size permitting.	20 Working days after the Scoping Meeting.	23 Working days from County authorization to proceed on the contract.
Environmental Setting	One electronic copy on compact disc or via email, size permitting.	20 Working days after the Scoping Meeting.	14 Working days after the Scoping Meeting.
Description of Project Alternatives	One electronic copy on compact disc or via email, size permitting.	20 Working days after the Scoping Meeting.	20 Working days after the Scoping Meeting.
Administrative Draft SEIR and Technical Studies	One reproducible unbound copy, 3 bound copies, and one electronic copy on compact disc, with files divided into chapters.	45 Working days after the Scoping Meeting.	45 Working days after the Scoping Meeting.
Draft SEIR and Technical Appendices	One reproducible unbound copy, 5 bound copies, 20 electronic copies on compact discs with the files divided into chapters and in searchable pdf format.	20 Working days after receipt of the County’s final comments on the Administrative Draft SEIR.	20 Working days after receipt of the County’s final comments on the Administrative Draft SEIR.
Written Summary of Comments at the Public Hearing on the Draft SEIR	One reproducible unbound copy and one electronic copy on disc or via email, size permitting.	5 Working days after the public comment hearing.	5 Working days after the public comment hearing.
Responses to Comments on Draft SEIR	One reproducible unbound copy and one electronic copy on disc or via email, size permitting.	20 Working days after the close of the public comment period on the Draft SEIR.	20 Working days after the close of the public comment period on the Draft SEIR.
Administrative Final SEIR	One reproducible unbound copy, 3 bound copies, and 3 electronic copies on compact discs with the files divided into chapters.	15 Working days after receipt of the County’s final comments on the responses to comments on the Draft SEIR.	15 Working days after receipt of the County’s final comments on the responses to comments on the Draft SEIR.



**Table 4 List of Deliverables and Proposed Due Dates**

<b>Deliverable</b>	<b>Quantity</b>	<b>RFP Due Date</b>	<b>Proposed Due Date</b>
Proposed Final SEIR	One reproducible unbound copy, 5 bound copies, 20 electronic copies on compact discs, with the files divided into chapters.	10 Working days after receipt of the County’s final comments on the Administrative Final SEIR.	10 Working days after receipt of the County’s final comments on the Administrative Final SEIR.
Final SEIR	One reproducible unbound copy, 3 bound copies, 3 electronic copy on compact disc, with the files divided into chapters.	10 Working days after final decision-maker action.	10 Working days after final decision-maker action.



## 7.0 References

Below are former clients for which MRS Environmental has provided comparable services.

Ellen L. Carroll  
Planning Manager/Environmental Coordinator  
San Luis Obispo County  
Planning and Building Department  
976 Osos St.  
San Luis Obispo, CA 93402  
(805) 781-5028

Timothy Stapleton, AICP  
Land Use Regulations Division  
Department of Regional Planning  
County of Los Angeles  
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Los Angeles, CA 90012  
(213) 974-6453

Alison Dettmer  
Deputy Director  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105  
(415) 904-5205

Eric Gillies, Asst. Chief  
Div. of Environmental Planning and Management  
California State Lands Commission  
100 Howe Ave., Suite 100-South  
Sacramento, CA 95825  
(916) 574-1897

Steve Goggia  
Community Development Director  
City of Carpinteria  
5775 Carpinteria Avenue, Carpinteria, CA 93013  
(805) 755-4414

Susan Perrell  
Environmental Advisor  
Aera Energy LLC  
P.O. Box 5639 / Santa Maria, CA 93456-5639  
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John Martini  
Governmental Affairs  
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6011 Bollinger Canyon Road, Bldg G, Rm G1260  
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(925) 842-2550

David Rose  
Manager Environmental, Health and Safety  
FMOG  
201 S. Broadway  
Orcutt, CA 93455  
(805) 934-8220



## **Appendix A: Resumes of Key Staff**

This appendix contains more detailed resumes of the key staff



**List of Resumes**

John F. Peirson, Jr. .... A-1  
Luis F. Perez ..... A-4  
Steven Radis..... A-5  
Dean Dusette..... A-7  
Lauren M Brown..... A-9  
Brittney C. Hendricks ..... A-10  
Greg Chittick..... A-11  
Joe Fernandez..... A-14



## **JOHN F. PEIRSON, JR.**

**Project Role:** Project Manager, Technical Manager, Air Quality/Greenhouse Gases

**Education:** Advanced Studies in Chemical Engineering Columbia University, B.S. Mathematics, Hartwick College

**Expertise:** Management of CEQA/NEPA Projects, Air Quality, Risk of Upset, Permitting and Compliance - 35 years

Mr. Peirson is President of MRS Environmental. Before joining MRS Environmental, he was a principal with Marine Research Specialists for 16 years. Prior to that Mr. Peirson was a Director in Arthur D. Little's Environmental Health & Safety Practice and Director in their Santa Barbara and Ventura offices. For more than 30 years, Mr. Peirson has been extensively involved in preparing CEQA documents for various State and local agencies. The focus of Mr. Peirson's work has mainly been in oil and gas development, remediation, and industrial chemical. He has also worked with several companies, including PXP, Shell, Aera Energy, Chevron, and Air Products on permitting diverse types of projects in California.

Mr. Peirson has been involved CEQA permitting activities since 1983. He has participated in the preparation and CEQA permitting of more than 60 major projects within California. Most of these projects have been very controversial and involved considerable work in developing permitting strategy. None of the EIRs that Mr. Peirson has led have ever been overturned in Court.

Mr. Peirson has provided more than 600 hours of testimony to local and State decision makers, which have included Planning Commissions, Boards of Supervisors, the State Lands Commission and the California Coastal Commission. He also has extensive experience in working with local and State government staff in developing permit conditions and findings associated with development projects.

### PROFESSIONAL EXPERIENCE

Mr. Peirson's relevant assignments include the following:

- Mr. Peirson was the Project Manager for the Phillips 66 Rail Spur and Unloading Facility EIR. This was one of the largest and most controversial project on the Central Coast in the last few decades. Mr. Peirson managed a team out about 20 staff members who were responsible for the development of the EIR. The EIR analysis looked at the impacts of rail operations throughout the State of California. The EIR also addressed impacts of crude oil trucking as part of the alternatives analysis. Mr. Peirson was responsible for coordinating the development and analysis of mitigation measures across the various issue areas assessed in the EIR. Mr. Peirson also served as one of the principal investigators for air quality and risk of upset.
- Mr. Peirson was Project Manager for the Excelaron Exploration and Development EIR. This EIR assessed the environmental impacts of a proposed oil and gas development project in the Huasna Valley, in San Luis Obispo County. The key issue areas in the EIR were air quality, GHGs, risk of upset, traffic, and fire protection. Mr. Peirson served as one of the principal investigators on air quality and risk of upset. The Project included the trucking of crude oil from the production site to refinery destinations in the Los Angeles basin. MR. Peirson worked closely with San Luis Obispo

County Public Works on assessing the adequacy of private roads that were proposed for use as part of the Project.

- Mr. Peirson was Project Manager for the Chevron Tank Farm Remediation and Development EIR that was prepared for the City and County of San Luis Obispo. This EIR addressed the impacts of a remediation project, as well as two development scenarios. The development scenarios included both commercial and industrial development along with substantial amounts of new infrastructure such as road, power, sewer and water. Mr. Peirson was responsible for assuring that the EIR meet the needs of the two co-lead agencies, each of which had responsibility for approving and issuing permits for various aspects of the Project.
- Mr. Peirson is currently the Project Manager for the Guadalupe Oil Field Remediation Environmental Monitoring Project. He has been managing this ongoing project since 1998. Mr. Peirson oversees a team of biologists and engineers who have developed strong working relationships with the field personnel at the Guadalupe site, as well as with the regulatory staff who are responsible for overseeing the remediation and abandonment activities. Mr. Peirson stays in close contact with staff from the California Coastal Commission, Regional Water Quality Control Board, San Luis Obispo County Air Pollution Control District, California Department of Fish and Game, U.S. Fish and Wildlife Service, and U.S. Army Corps of Engineers.
- Mr. Peirson was Project Manager for the Guadalupe Oil Field Remediation and Abandonment EIR. This EIR evaluated environmental impacts associated with the remediation and abandonment of the Guadalupe Oil Field by Unocal. This highly environmentally sensitive site covers approximately 3,000 acres within the Guadalupe-Nipomo Dunes system. This highly complex project assessed several remediation technologies and their impacts and effectiveness on various spill locations with diverse characteristics. The project, which lasted more than two years, involved extensive field work both onshore and offshore. The project also included a six-month remedial investigation of the extent of the contamination. The site contains more than 90 petroleum plumes. The project involved over 100 staff members working in 18 different environmental issue areas.
- Mr. Peirson was the Project Manager of an EIR for the County of Los Angeles covering the development of a Community Standards District (CSD) for the Baldwin Hills Oil Field. The project involved the evaluation of a hypothetical development scenario to determine the level of impacts and associated mitigation measures. The mitigation measures were then used to develop a CSD, which would serve to regulate any future development within the Boundaries of the CSD. Mr. Peirson was responsible for managing the preparation of the EIR and for drafting the CSD provisions. This project required working closely with the landowners and concerned citizens in the preparation of the EIR and the CSD.
- Mr. Peirson managed the permitting of a hydrogen plant in Carson, California for Air Products and Chemicals. The project involved developing a set of technical reports to support the applications to the City of Carson and the South Coast Air Quality Management District. The key technical reports covered air emissions, risk of upset, noise, and traffic. The project was approved by the City of Carson, and air permits for construction and operation were issued by the South Coast Air Quality Management District.

- Mr. Peirson managed the permitting of the Rocky Point Development for Plains Exploration and Production (PXP). Mr. Peirson was responsible for developing the application materials for the Development and Production Plan (DPP) and for the land use permit from Santa Barbara County. Mr. Peirson also developed the materials for the California Coastal Commission consistency analysis. His work on the DPP included developing air emission estimates, description of facilities, as well as geological and reservoir information. The project was approved by the Federal government, Santa Barbara County, and the California Coastal Commission.
- Mr. Peirson was tasked with managing the permitting of a new gas plant in Seal Beach, California. The work involved preparing application documents covering air emissions, biological resources, risk of upset, aesthetics, and fire protection. The application process required working with the City of Seal Beach for a land use permit and with the California Coastal Commission (CCC) for a Coastal Development Permit.
- Mr. Peirson was Project Manager for the City of Carpinteria's Consolidation of Pitas Point and Carpinteria Gas Odorant Station EIR. This project would consolidate two existing facilities by dismantling and removing the odorant equipment at the Carpinteria Odorant Station, constructing a new natural gas pipeline, and installing new equipment at the Pitas Point Odorant Station. Although the project would result in reduced public health and safety impacts, reduced air emissions, and upgraded equipment, it generated significant public controversy due to the proximity of residential and public use areas.
- Mr. Peirson was the Project Manager for the Santa Ynez Unit Development SEIR prepared for the County of Santa Barbara. The SEIR addressed the environmental impacts of proposed changes from the SYU project that focused primarily on the facilities in Las Flores Canyon. This was a controversial project at the time and involved considerable interaction with the Applicant and the public. Mr. Peirson managed a team of about 25 professionals who worked on the SEIR impact assessment.
- Mr. Peirson was Project Manager for Santa Barbara County's Tranquillon Ridge Oil and Gas Development Project, LOGP Produced Water Treatment System Project, and Sisquoc Pipeline Bi-Directional Flow Project EIR. This complicated EIR assessed the environmental impacts associated with three different, but interrelated projects proposed by three applicants. The proposed Tranquillon Ridge Project would involve the development of oil and gas wells in a proposed State Tidelands Lease from Platform Irene, which is in Federal Waters and is currently used to develop and produce the Point Pedernales Field. This EIR involved a wide range of alternatives for oil development, pipeline replacement, processing facility location, and drill mud/cuttings disposal.
- Mr. Peirson was the Program Manager for the Chevron Point Arguello Field Q-6 Supplemental EIR, which addressed the transportation of oil by tanker from the Gaviota Interim Marine Terminal. As part of this Supplemental EIR, he helped develop an air quality impact analysis for various tanker routes as well as for most of the alternatives covered in the Gaviota Marine Terminal Supplemental EIR/EIS. Mr. Peirson was also responsible for the preparation of the alternatives description and screening analysis done as part of the Q-6 Supplemental EIR.

## **LUIS F. PEREZ**

**Project Role:** Land Use and Other Issue Areas

**Education:** M.A. Organizational Management Fielding Graduate University, B.A. Environmental Science and Public Relations, Northern Arizona University

**Expertise:** Land Use Analysis, Permitting and Compliance - 29 years

Mr. Perez is a Senior Project Manager and Land Use Issue Area Coordinator with MRS Environmental. Before joining MRS, Mr. Perez acquired extensive public agency experience working for Santa Barbara County, which included interpretation of land use and environmental policies and regulations for large development projects, recommendations to decision-makers and public presentations. He was an Energy Specialist with the Santa Barbara County Energy Division for 16 years, working on permitting and environmental review for onshore and offshore oil and gas projects. Mr. Perez is involved with the management and preparation of environmental studies, primarily focusing on the implementation of CEQA for oil and gas development projects in California. His major areas of expertise are in land use issues of major oil and gas development and transportation projects. Mr. Perez has extensive experience in the preparation of environmental documents, staff reports for decision-makers, presentations for decision-makers, public workshops and hearings.

### PROFESSIONAL EXPERIENCE

While working for MRS Environmental, Mr. Perez has worked on the preparation of the Hermosa Beach Oil Development Project EIR, the Whittier Main Oil Field EIR, Paredon EIR, the Baldwin Hills Community Standards District EIR, the Conoco-Phillips Santa Maria Refinery Expansion EIR, the Chevron El Segundo Marine Terminal Lease Extension EIR, the Guadalupe Oil Field Fencing Plan, and the preparation of the Venoco Full Field Development Project EIR.

- Mr. Perez was also the Project Manager for a number of decommissioning of oil and gas projects that had reached the end of their economic life. Those projects included the abandonment of the Texaco Pipeline through Hollister Ranch, the decommissioning of the Unocal Cojo Marine Terminal and the decommissioning of the Texaco Gaviota Gas Plant, among others. In addition, Mr. Perez led the team effort required to oversee compliance with mitigation required for the execution of the different projects.
- While working for the County, Mr. Perez was also tasked with the management and supervision of the contract to provide Oil and Gas permitting and compliance services to the City of Goleta by Santa Barbara County. The efforts included to manage and supervise teams, report writing, public hearings and presentations for the Venoco Full Field Development Project, Venoco State Lease 421 Repairs, and Venoco Line 96 SCADA system.
- Mr. Perez also managed the contract to provide oil and gas permitting and compliance services to the City of Carpinteria, which included application completeness review, policy considerations, and preparation of environmental documents.
- Mr. Perez has also acquired significant experience in the implementation and compliance of oil and gas and construction projects by overseeing the operation of the All American Pipeline Project, the Chevron Point Arguello Project, the Gaviota Marine Terminal Project, the Exxon Santa Ynez Unit Project, the Santa Maria Asphalt Refinery, among others.

## STEVEN RADIS

**Project Role:** Risk of Upset

**Education:** M.A. Climatology, B.A. Climatology, California State University, Northridge

**Expertise:** Air Quality, Risk Analysis, Modeling, HARP2, AERMOD, Meteorological Development - 30 years

Mr. Radis' expertise includes meteorological modeling and analysis, physical oceanographic modeling and analysis, consequence and risk analysis, fire and explosion dynamics, hazard evaluation, external events analysis, fault tree analysis, quantitative risk analysis and model development. Mr. Radis has worked on a wide variety of studies for oil and gas projects, utilities, commercial, and government clients involving meteorological modeling, quantitative risk assessments, health risk assessments, consequence analysis, risk management, air quality modeling (inert/photochemical pollutants, toxic air contaminants), and EIR/EIS.

### PROFESSIONAL EXPERIENCE

His experience includes the following:

- For the County of San Luis Obispo, Mr. Radis completed a safety and vulnerability analysis of the Diablo Canyon Power Plant (DCPP) Independent Spent Fuel Storage Installation (ISFSI). The EIR analysis evaluated a range of equipment and operational failure modes and quantitatively evaluated the associated radiological consequences of spent fuel pool and dry cask storage accidental releases. Failure modes, release mechanisms and consequences associated with terrorist attacks were also evaluated.
- Mr. Radis was the Project Manager and Public Safety coordinator for the Venoco Ellwood Marine Terminal Lease Renewal Project EIR. This is the last marine oil terminal in Santa Barbara County, and the continuing operation of the terminal is raising a lot of public outcry. Critical environmental issues include the increased risk of an accidental release of oil and its impact on marine and terrestrial water quality and biological resources, recreation, land use, and visual resources.
- Mr. Radis managed the preparation of an Environmental Impact Report for the Nacimiento Water Project. The EIR evaluated environmental impacts associated with construction and operation of a 65-mile water pipeline and associated facilities in San Luis Obispo County. The pipeline would draw water from Nacimiento Reservoir and deliver it to various purveyors in the County. The pipeline would cross numerous jurisdictions and would affect several landowners and agencies. The proposed project included two equal options: (1) Raw Water Option that entailed construction of the pipeline and facilities that would deliver raw water to the purveyors; and (2) Treated Water Option that also entailed construction of a water treatment plant; in this case, potable water would be delivered to the purveyors. This EIR contained more than 800 pages, not including the Executive Summary and technical appendices. Over 140 mitigation measures were developed to lessen impacts from the proposed project.
- Mr. Radis conducted system safety and reliability studies for several oil and gas projects for Santa Barbara County. These studies included hazard identification, external event and offsite consequence analyses. Facilities included oil and gas processing plants, offshore platforms,

onshore production facilities, as well as sour gas and crude oil pipelines. QRAs were prepared for several of the projects.

- As part of an EIR/EIS for the Unocal Avila Beach Cleanup Project, Mr. Radis served as the Project Manager for San Luis Obispo County, California Regional Water Quality Control Board, and the U.S. Army Corps of Engineers. The EIR/EIS included the evaluation of site contamination and a variety of cleanup strategies, including air sparging/bioventing, solidification/ stabilization, solvent flooding, steam stripping, excavation, and thermal desorption. Leaking Unocal Marine Terminal pipelines had resulted in approximately 400,000 gallons of petroleum hydrocarbon contamination beneath the town of Avila Beach and the adjacent beach and intertidal zone. San Luis Obispo County certified the EIR/EIS, and Mr. Radis assisted the Regional Water Quality Control Board in establishing cleanup levels for the site.
- Mr. Radis conducted oil spill modeling simulations for several oil and gas projects in California. These analyses included the simulation of multi-component land-based spills, spills to rivers and creeks, as well as ocean and harbor spills. Local oil spill modeling projects included simulations of spills in the Ventura River and existing and proposed pipelines along the Ventura coastline.
- For the Center for Chemical Process Safety of the American Institute of Chemical Engineers, Mr. Radis co-authored a book entitled *Guidelines for Postrelease Mitigation Technology in the Chemical Process Industry*. As part of this effort, Mr. Radis quantitatively evaluated the effectiveness of a variety of hazardous chemical mitigation technologies.
- Mr. Radis has been involved in the preparation of EIR/EISs for a wide variety of facilities including power generating facilities (coal, fuel oil, natural gas, geothermal, hazardous waste), hazardous waste disposal facilities (chemical and nuclear), crude oil and natural gas transmission pipelines and distribution networks, oil and gas development projects, and military development or conversion projects. Mr. Radis has managed many of these projects and was also responsible for the system safety, public health, and air quality issue areas.
- Mr. Radis has worked on the development of several models, including the development or revisions to several accidental release models, an oil spill model, a multi-component pool model, atmospheric diffusion models, an integrated human exposure and health risk assessment model, and several meteorological models.

Mr. Radis is a member of the American Meteorological Society and the Air and Waste Management Association. He has also periodically served as a guest lecturer at the University of California Santa Barbara in the areas of meteorology and atmospheric diffusion modeling.



## DEAN DUSETTE

**Project Role:** Land Use and Other Issues Areas

**Education:** B.A. Geography, University of California Santa Barbara

**Expertise:** Land Use, Permitting, Air Quality, Auditing, Mitigation Measure Development - 25 years

Mr. Dusette is a Senior Scientist with MRS. Mr. Dusette's public agency work included project management, permitting, environmental review, permit condition compliance, field inspections and environmental data analysis for oil and gas projects. Additional public agency experience included preparation and management of a variety of CEQA documents, staff reports, recommendations to decision makers and public presentations. Mr. Dusette has worked on oil and gas related projects in California for 25 years.

Mr. Dusette spent 15 years working as an environmental consultant on a variety of environmental analysis and environmental compliance projects in California, Texas and Alaska. His major areas of expertise include environmental permitting and permit compliance, data analysis, report preparation, and environmental impact assessment. Mr. Dusette has prepared and managed air quality permits for local, State and Federal agencies. Mr. Dusette worked as a contract technical expert to the Santa Barbara County Air Pollution Control District providing air quality and meteorological monitoring data quality assurance/quality control reviews and as field auditor of air and meteorological monitoring stations. Mr. Dusette also provided technical review and auditor services for air monitoring stations for the State of Texas. Mr. Dusette's environmental monitoring experience includes the preparation and implementation of Surface Water Quality Management Programs, Storm Water Pollution Prevention Plans and Ground Water Management Plans.

### PROFESSIONAL EXPERIENCE

Mr. Dusette was involved with a variety of permitting, environmental review, compliance, and monitoring projects at Santa Barbara County. Those projects included:

- The Venoco Line 96 Modification Project: installation of a new pipeline from an existing oil and gas processing facility to a pipeline tie-in on the Gaviota Coast. The project involved permitting and oversight from multiple local and state agencies including the City of Goleta, California State Lands Commission and California Coastal Commission. Santa Barbara County acted as lead CEQA agency and Mr. Dusette, as Project Manager/Planner, performed application review, preparation and review of the project EIR, preparation of recommendations to decision makers, and made public presentations.
- System Safety Reliability Review Committee: a County working group made up of representatives from Fire, Air Pollution Control District, Building & Safety, and Office of Emergency Management tasked with oversight of major oil and gas facility safety compliance. Mr. Dusette was Chair of the Committee and managed the annual safety audits of seven facilities in Santa Barbara County.
- Remediation Projects: Mr. Dusette was Project Manager/Planner for several remediation projects generated from past oil and gas development activities. Projects included the Shell/Aera PCB

Remediation Project on the Gaviota Coast, the Shell/Aera abandoned gravel road located in the Guadalupe Dunes, multiple hydrocarbon cleanup sites managed Chevron in Casmalia, and several oil and gas remediation sites in the Cat Canyon area. For the Shell/Aera PCB project, Mr. Dusette represented Santa Barbara County on the project Interagency Working Team consisting of staff from the State Department of Toxics Substances Control, the State Regional Water Quality Control Board, California Department of Fish & Wildlife, and County Fire.

- **Oil and Gas Permit Compliance:** Mr. Dusette was Project Manager/Planner overseeing compliance and new permitting for many of the larger oil and gas projects in Santa Barbara County. Project activities included permit condition effectiveness review, review of monitoring data and compliance reports, safety audits, and permitting for facility modifications and new equipment. Projects included ExxonMobil Santa Ynez Unit, FMO&G Pt. Arguello and Pt. Pedernales Projects, Phillips 66 Orcutt Pump Station/Santa Maria Tank Facility, Venoco Ellwood Onshore Facility, Venoco Ellwood Marine Terminal, and E&B Resources Cuyama Gas Plant.
- **Air Quality Impact Assessment and Permitting:** as an environmental consultant, Mr. Dusette prepared air quality impact assessments and associated permit applications for a variety of clients and jurisdictions in California. Projects included an air toxic air quality risk assessment for SCE's Mandalay Beach Power Plant, compliance permitting for the City of Burbank, Air Toxic Inventory and Plan reporting for Venoco's Ellwood Onshore Facility, and air quality permit compliance for ExxonMobil's Santa Ynez Unit. Mr. Dusette has coordinated air quality permitting projects with Santa Barbara County Air Pollution District, Ventura County Air Pollution District, South Coast Air Quality Management District, the California Air Resources Board and the EPA.

Mr. Dusette is a CalEPA Registered Environmental Assessor and has 40 Hour Hazwoper Certification.

## **LAUREN M. BROWN**

***Project Role:*** Biological and Water Resources

***Education:*** B.S. Ecology & Systematic Biology' Environmental Horticulture, California Polytechnic State University, San Luis Obispo

***Expertise:*** Biological Resources, Surveys, Restoration - 25 Years

Ms. Brown is a Senior Botanist with more than 25 years' experience conducting biological surveys, habitat/vegetation mapping, and monitoring for sensitive species protection and habitat recovery; coordinating and consulting with Federal, State and local regulatory agencies on scope and impact of projects; and preparing planning documents such as environmental impact reports, initial studies, and mitigated negative declarations. She has considerable expertise in delineation of wetlands throughout California using the USACE 1987 Wetland Delineation Manual, the 2008 Supplement for the Arid West Region, and the 2010 Supplement for Western Mountains, Valleys and Coast Region, and all State and local requirements. Additional resources include familiarity with different types of wetland functional assessments, and completion of the California Rapid Assessment Method (CRAM) training for Riverine, Estuarine, and Vernal Pool Modules.

Ms. Brown is an active member of the California Native Plant Society San Luis Obispo Chapter, previously served on the State Board of Directors and as San Luis Obispo Chapter President and received the Hoover Award from the San Luis Obispo Chapter in recognition for long-time volunteer service to the organization. As a volunteer, she provides information to local organizations on native and invasive plant issues, including docent led hikes and presentations at workshops and meetings. Ms. Brown also represents CNPS as a member of the Dune Restoration Task Force, a group of property managers, agency representatives, and local experts that come together to provide recommendations for restoration and long-term management of the Guadalupe-Nipomo Dunes.

Ms. Brown has her 40-hour HAZWOPER certification and is current with the required annual 8-hour refresher and Certificate of Completion for Adult First Aid/CPR/AQED from the American Red Cross.

## **BRITTNEY C. HENDRICKS**

***Project Role:*** Report Production, QA/QC, Graphics

***Education:*** B.S. Business Administration, Chapman University

***Expertise:*** Technical Editing and Administrative Support - 5 years

Mrs. Brittney Hendricks serves as Technical Editor and Office Manager at MRS. Her role as support staff is pertinent to company-wide adherence of office standards. As Technical Editor, her responsibilities include the oversight of consistency within style parameters for large multi-section documents including proposals, annual reports/periodic reviews, EISs and EIRs. She also organizes and responds to comments for each phase of these projects. She performs assignments relative to the organization and coordination of shared drives, editing and proofreading, word processing and formatting, and the modification and design of graphics. She controls all aspects of report production.

As Office Manager, Mrs. Hendricks assists with administrative, bookkeeping, marketing and human resources matters. She is proficient in multiple software programs within the Microsoft Office Suite and the Adobe Creative Suite. Mrs. Hendricks also attends meetings such as community workshops, certification hearings, and advisory panel meetings to provide administrative tasks.

More recently, Mrs. Hendricks has participated in the technical research and writing for EIRs and proposals, specifically under the issue areas of Energy and Mineral Resources and Public Services and Utilities. She has also contributed to writing introductory and cumulative projects chapters.

Mrs. Hendricks has contributed to the successful completion, production and delivery of numerous EIRs including the E&B Oil Drilling and Production Project EIR for the City of Hermosa Beach, the Chevron Tank Farm Remediation and Development Project EIR for the City and County of San Luis Obispo, the Phillips SMR Rail Project EIR for the County of San Luis Obispo, the Carpinteria Offshore Field Redevelopment Project DEIR/EIS and the Becker and Legacy Wells Abandonment and Remediation Project for the California State Lands Commission, the Alon Bakersfield Refinery Crude Flexibility Project EIR for Kern County, the Termo North Aliso Canyon Project EIR for the County of Los Angeles, and the Orcutt Hill Resource Enhancement Plan Project DEIR for the County of Santa Barbara. She has also contributed to research on additional projects for the City of Carson and County of Los Angeles.

## GREG CHITTICK

**Project Role:** Risk of Upset and Air Quality Support Staff

**Education:** M.S. Mechanical Engineering, B.S Mechanical Engineering, UC Berkeley

**Expertise:** Project Management, Air Quality, Risk Assessments, Technical Analysis - 30 years

Mr. Chittick is a Senior Scientist and Project Manager with MRS Environmental with more than 30 years of experience specializing in project management in combination with the technical analysis areas of safety, risk, air quality analysis, noise, aesthetics, visual, traffic and GIS systems. At MRS, he has been involved in preparing and managing air quality studies and environmental impact assessments, environmental technology studies, computer mapping analysis, modeling accidental releases of hazardous materials, and conducting risk analysis studies for small and large facilities. Mr. Chittick has worked with the County of Santa Barbara for over 20 years on an extensive range of projects. His combination of effective and efficient project management with extensive experience in technical analysis makes him an exceptionally well qualified project manager.

Mr. Chittick also worked for more than 10 years with Arthur D. Little, Inc., based in Boston, on risk, air quality and EIR analysis. Mr. Chittick previously worked at Lawrence Berkeley Laboratory on studies related to building energy efficiency. Mr. Chittick is a member of the American Society of Mechanical Engineers, Southern California Association of Risk Analysis, the Chlorine Institute, and the International Institute of Ammonia Refrigeration.

Mr. Chittick's areas of expertise include:

### ENVIRONMENTAL IMPACT ASSESSMENT

- Mr. Chittick has managed a number of environmental impact studies, including analysis on pipeline transportation of crude oil and oil and gas processing facilities. Specific to Santa Barbara County, recent projects include the PCEC EIR, Santa Maria Energy EIR and the Foxen Canyon Pipeline EIR. These projects were all related to CEQA.
- Mr. Chittick has performed technical impact analysis related to EIR and EIS projects in a number of different impact areas including risk and hazardous materials, air quality, traffic analyses, noise analysis, traffic analysis visual impacts, and environmental justice.
- Mr. Chittick has completed numerous air quality analyses for more than 30 CEQA documents over the past 20 years. Analyses have included assessment of criteria pollutants, including emissions from hydrocarbon impacted soil handling activities associate with the Guadalupe project; toxic pollutants, including AB2588 health risk assessments; CO hot spots analysis and greenhouse gas emissions analysis, including electrical grid assessments; and indirect emissions. Modeling conducted as part of these analyses included ISC, AERMOD, SLAB, ACE, HARP, HARP2, CALINE4, URBEMIS and CalEEMod, among numerous others.
- Mr. Chittick assessed the quantitative risk impacts using QRA techniques on oil and gas projects, hydrogen plants and pipelines, offshore drilling, and production units as well as pipelines and marine terminals. Risk analysis examines risks to public health as well as the quantitative analysis of oil spill probabilities and impacts to the environment. Recent local analysis includes the Venoco Ellwood Lease Line Adjustment Project (for the CSLC).

- Mr. Chittick has conducted quantitative risk analysis for a broad range of transportation related projects, including transportation of gas liquids and ammonia on highways and pipeline transportation of crude oils. His studies have included developing QRA models, FN curves and mitigation measures to reduce risk impacts. Recent local projects include review of the East Cat Canyon project QRA for Aera Energy.
- Mr. Chittick has conducted numerous chemical release and dispersion modeling analyses, including releases of hydrogen, ammonia, gas liquids, hydrocarbons, produced gas containing hydrogen sulfide, and vapor from spilled combustible liquids, including crude oil. Models include SuperChems, SLAB, AERMOD, Aloha, and multi-component models.
- His experience with noise analysis has included impacts of increased traffic, construction equipment operations, as well as in-field measurements of noise levels. Analysis included modeling of noise generated from a range of equipment, including assessing the attenuation of noise levels over barriers and terrain and assessing the effectiveness of a range of noise mitigation methods. The analysis included the development of location-specific models to assess potential noise impacts.
- Mr. Chittick has conducted over 20 in-field noise measurement and assessments studies, including noise associated with construction equipment, sheetpile installation, railway noise, truck noise, processing equipment noise, including pumps and compressors, and natural noise sources, including ocean waves and surf. Studies of noise mitigation have included the measurement of the effect of noise barriers, noise blankets and the effects of vegetation on noise attenuation. Assessments have included A weighted, linear, and octave band analysis.
- Mr. Chittick's traffic impact experience includes analysis of level of concern and intersection traffic flow changes due to project related increases in traffic volumes utilizing the Intersection Capacity Utilization approach and the Highway Capacity Manual software.
- His experience with visual impacts have been conducted with visual simulations of proposed projects, including oil and gas processing plant equipment removals and additions, grading and land contouring impacts on visual resources, drill rig impacts. Mr. Chittick conducted extensive visual analysis including viewpoint analysis, 3D flythrough assessment, and visual simulations. Viewpoint assessments involve the development of maps showing locations of areas where towers and drilling rigs are visible over complex terrain and manmade features. 3D simulations have included the assessment of terrorist risk on Diablo Canyon nuclear power plant and the location of storage casks to minimize view and target accessibility. Mr. Chittick has conducted numerous visual simulations of proposed development projects for CEQA documents, placing drilling rigs, tanks, storage areas, building, vegetation, roadways and other objects within visual simulations. His visual impacts analysis has utilized BLM VRM, USDA SMS, and US DOT VRM assessment techniques.
- Mr. Chittick has also conducted fire protection and emergency response analysis associated with many oil and gas project EIRs in Santa Barbara County. All included analysis of pertinent issues, including water supply and demand estimates and availability of emergency response and mutual aid assistance. He also examined and compared projects to applicable codes and guidelines, including IRI, ANSI, and NFPA.

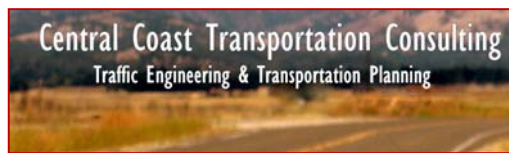


He has extensive experience with PC and Macintosh computers, including software and hardware expertise, networking, programming, installation, and optimization. Projects include customized macro/program development, database development, AutoCAD drawings and graphics, and computer GIS mapping analysis including demographic data analysis.

## PUBLICATIONS

*Risk Management Program Handbook, Accidental Release Prevention Under the 1990 Clean Air Act*, Contributing author, Thompson Publishing Group, Washington DC, August 1997.

*Chemical Incident Data Helps Facilities Manage RMP*, Contributing author, Thompson Publishing Group



**Joe Fernandez, PE, AICP**

**Summary**

Mr. Fernandez has worked as a transportation planner and traffic engineer in California since 2002. He has successfully managed dozens of complex studies including transportation impact analyses, travel demand forecasting studies, traffic operations studies, traffic engineering designs, and multimodal planning studies. As both a Certified Planner and Professional Engineer, he specializes in the development of solutions that are both technically sound and fitting with communities' planning principles.

**Career History**

- Principal, *Central Coast Transportation Consulting*** *2011-Present*

  - Founder and lead project manager.
  - Responsible for project scoping, budgeting, schedule adherence, and overall client satisfaction.
- Senior Engineer/Planner, *Febr & Peers Transportation Consultants*** *2004-2010*

  - Served as project manager for complex transportation projects. Responsible for project scoping, budgeting, schedule adherence.
  - Led companywide multi-modal level of service research effort.
  - Responsible for technical analysis and quality control for a wide variety of projects, including traffic operations, travel demand forecasting, multi-modal planning, and traffic engineering design.
- Transportation Planner, *San Luis Obispo Council of Governments (SLOCOG)*** *2003*

  - Assisted with Regional Transportation Plan, transit unmet needs analysis.
- Planning Intern, *City of Arroyo Grande*** *2002*

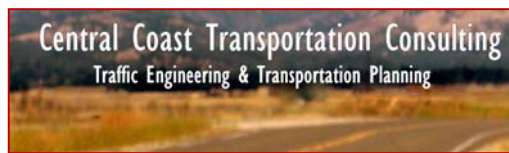
  - Prepared staff reports, assisted in bike plan update.

**Education**

- Master of Science, Civil Engineering** *2004*  
*California Polytechnic State University, San Luis Obispo, CA*
- Master of City and Regional Planning** *2004*  
*California Polytechnic State University, San Luis Obispo, CA*
- Bachelor of Science, Civil Engineering** *2002*  
*Vanderbilt University, Nashville, TN*  
 Graduated magna cum laude.

**Awards and Publications**

- Award of Excellence: Central Coast APA, City of Paso Robles Circulation Element
- Transportation Excellence Award, Transportation Agency of Monterey County, Seaside West Broadway Specific Plan
- Neighborhood Planning Award, NorCal APA, Seaside West Broadway Specific Plan
- *Network Planning: Developing a Multimodal Approach*, ITE Journal, September 2009 issue
- *Achieving Sustainable Results: Public-Private Efforts and Coordination*, California APA Annual Conference, 2008
- *Another Case Against Roadway Widening: This Time It's For Drivers*, ITE District 6 Annual Conference Paper, 2006



## **Selected Project Experience- Environmental Impact Reports**

### **Avila Ranch EIR**

CCTC prepared the Transportation Impact Study used in the EIR for this project, which consists of 720 residential units and 15,000 square feet of neighborhood commercial space in the City of San Luis Obispo. The TIS included a phasing analysis of the project, evaluated near term and cumulative conditions, and included extensive evaluation of multi-modal level of service.

### **Menlo Park El Camino Real/Downtown Specific Plan and EIR**

Mr. Fernandez managed the transportation component of the El Camino Real/Downtown Specific Plan, which addressed pedestrian and bicycle connectivity, links to transit, vehicular operations along a Caltrans facility, and parking concerns in the downtown. The project included extensive community outreach, where Mr. Fernandez lead breakout groups and responded to the community's questions related to transportation.

### **Rancho Canada EIR Carmel Valley**

CCTC prepared the Transportation Impact Study used in the EIR for this project, which consists of 281 residential units in Carmel Valley, in unincorporated Monterey County. Mr. Fernandez managed the project and assisted in preparing responses to comments on the DEIR on this controversial, heavily scrutinized project.

### **Laetitia Agricultural Cluster EIR**

Mr. Fernandez managed this project, which consisted of the development of an agricultural cluster development in San Luis Obispo County. The project included the evaluation of numerous sub-standard roadways and extensive coordination with Caltrans and Cal Fire.

### **Chevron Tank Farm EIR**

This project consists of the remediation and redevelopment of an oil storage facility along Tank Farm Road in San Luis Obispo County. CCTC conducted the technical analysis and prepared the transportation section of the EIR. The evaluation included estimates of truck traffic related to the transport of contaminated soils and the evaluation of the project's five-phased redevelopment.

### **City of San Luis Obispo Circulation Element Update and EIR**

CCTC provided extensive support services to assist the consultant team and City staff in delivering the updated Land Use and Circulation Elements within tight scheduling constraints. Tasks included travel demand modeling support, including alternatives testing and sensitivity analyses; mode split adjustments to the model; operational tests using the City's Synchro network; public meeting facilitation; and document review acting as an extension of City staff.

### **Carmel Canine Sports Center EIR**

CCTC prepared the transportation impact study and assisted with preparation of the EIR for this project in Monterey County. The project included development of non-standard trip generation rates to reflect the unique operating conditions on the site, and a detailed evaluation of special events during off-peak time periods. Mr. Fernandez managed this project.

### **San Luis Obispo Chinatown Mixed Use Project EIR**

This project consisted of the redevelopment of a city block in Downtown San Luis Obispo, to include a hotel, restaurant, residential units, retail and office space, and underground parking. Mr. Fernandez managed the project and attended the project's public hearings to address transportation issues.



## **Appendix B: MRS Environmental Relevant Projects**

This appendix provides detailed descriptions of each of the projects listed in Table 1 – List of MRS Environmental Relevant Projects.

## **EXCELARON OIL EXPLORATION AND PRODUCTION PROJECT EIR**

CLIENT: COUNTY OF SAN LUIS OBISPO

MRS Environmental was the lead consultant in preparing an EIR for the Excelaron Oil Exploration and Production Project for the County of San Luis Obispo. Excelaron leased more than one thousand net mineral acres in the Huasna Valley area, including the project site, and proposed exploring, testing, and possibly producing oil on the western edge of the Huasna Basin in an existing oilfield designated by the California Department of Oil, Gas and Geothermal Resources.

Although the project site was on private property, Excelaron obtained exclusive easements over the Mankins Ranch and Porter Ranch to access the area. Huasna Valley is a remote area with limited access via narrow winding roads.



The four-phased proposed project involved exploration and testing, production, cleanup and abandonment of oil facilities, and development. The project was for 13 wells producing up to 1,000 barrels per day of crude oil. The crude oil was to be trucked from the site to refinery destinations in Los Angeles Basin.

The major issue areas evaluated in the EIR included air quality, GHG emissions, visual impacts, traffic, risk of upset, biological and water resources, fire protection, and noise. This was a very controversial project that was strongly opposed by the residents in Huasna Valley. The areas of concern were visual impact from the construction of well pads on hills overlooking the valley, risk of upset from operations and trucking, noise from the drilling operations, and potential impacts to sensitive biological resources.

MRS Environmental staff conducted an extensive noise impact assessment that included baseline noise measurements and modeling of noise levels with and without the project. Mitigation measures were developed to reduce the overall noise levels from the project. Risk of upset was evaluated using a quantitative risk assessment for the trucking operations that addressed crude oil spills and resultant fires. The analysis also addressed the potential impact on biological and water resources from a spill of crude oil as part of the drilling, facility and trucking operations.

MRS Environmental staff performed a fire protection analysis for the drilling and operations. Equipment layout, firewater requirements and supply, and emergency response times to the site from various Cal Fire locations were evaluated as part of the analysis. Visual simulations of the drill rig and proposed pads were developed from different viewpoints of and within the Huasna Valley.

As part of this project, MRS Environmental staff conducted public outreach with the community to discuss the issues of concern. Small group meetings were held in the Valley with local residents.

## PHILLIPS 66 RAIL EXTENSION AND CRUDE UNLOADING PROJECT EIR

CLIENT: COUNTY OF SAN LUIS OBISPO

The County of San Luis Obispo called upon MRS Environmental staff to conduct an environmental review for the proposed Rail Spur and Crude Unloading Project. The project entailed the installation of a rail spur and crude oil unloading facility along with the importation of five 80-car unit trains per week of crude oil. This was one of the most controversial projects on the central coast in decades and generated interest from parties throughout California.



The analysis involved assessing the transportation risks of crude oil along railroads through numerous communities within California, including Los Angeles, the San Francisco Bay Area, the Central Valley, Sacramento and rural areas; performing a quantitative risk assessment, including assessing train derailment frequencies as a function of track class and tank car condition probabilities based on tank car design, including the currently proposed Option 1 tank car design; as well as examining populations in detail along the potential routes to examine consequences of a crude oil spill. The resulting risks were plotted on FN curves to determine significance. A similar analysis was also done for trucking crude as part of the alternatives analysis.

Response to Comments
<ul style="list-style-type: none"> <li>➤ Nearly 2,200 individual comments from 470 commenters were submitted in response to the Draft EIR for this project.</li> <li>➤ MRS authored a response to comments volume, which totaled to over 38,000 pages in length.</li> <li>➤ MRS authored an executive summary of the response to comments to provide information to the public on the organization of the response to comments volume of the Final EIR and on the responses to the key comments.</li> </ul>

The analysis also included examining air emissions, including GHG emissions, along the entire rail route. Toxic emissions were examined, including quantification of cancer, acute and chronic risks, using models.

Noise was assessed utilizing sophisticated noise models via SoundPlan, along with in-field noise monitoring conducted specifically for the project to calibrate FTA train models.

Many points were debated as the EIR was brought from draft form to its final phase, including the role of Canadian crude oil and climate change, as well as emergency response preparedness along rail routes and the potential for preemption of mitigation measures by the Federal government.



## **GUADALUPE TRUCKING PROJECT SEIR**

CLIENT: COUNTY OF SAN LUIS OBISPO AND CITY OF SAN LUIS OBISPO

MRS Environmental staff prepared a SEIR for trucking hydrocarbon impacted soils from the Guadalupe Restoration Project site to the City of Santa Maria Landfill. The Guadalupe Restoration Project occupies over 2,700 acres of the larger Nipomo Dunes Complex and is located on the Central California Coast. Most of the site is in San Luis Obispo County, with a small portion located in Santa Barbara County. The site is a very sensitive ecological area that is home to several Federal and State rare and endangered species such as the Snowy Plover, the California Red-Legged Frog, and La Graciosa Thistle.



The Guadalupe Restoration Project is a major clean up and restoration of a large oil field. Over 40 separate flumes have been excavated generating over one-million cubic yards of hydrocarbon impacted soil that has been trucked from the site to the Santa Maria Landfill.

The key issues covered in the SEIR were traffic, risk of upset, air quality, and noise. The SEIR assessed the impacts of moving up to 120 truck loads per day of hydrocarbon impacted soil. A detailed traffic and circulation assessment was conducted for various routes from the Guadalupe site to the Santa Maria Landfill. This included collecting baseline traffic data for some of the key roads and intersections and assessing level of service and intersection delay impacts.

The risk of upset analysis focused on the potential for truck accidents and spills of hydrocarbon impacted soils and the potential impacts to biological and water resources along the various truck routes. Peak day and annual air emission estimates were made for each of the truck routes.

## **CHEVRON TANK FARM PROJECT EIR**

CLIENT: COUNTY OF SAN LUIS OBISPO AND CITY OF SAN LUIS OBISPO

MRS Environmental staff prepared an EIR for a project to remediate and develop the San Luis Obispo Tank Farm, currently owned by Chevron. The 332-acre project site is now primarily vacant; it stored crude oil transported from the San Joaquin Valley via pipeline from 1910 until the early 1980s. Following two lightning strikes in 1926, explosions, releases, and fires created several surface occurrences (i.e., expressions) of highly weathered and burnt petroleum present on the ground today. Although some operations resumed, several reservoirs never returned to service.

The proposed project was to remediate the site to address contamination issues, restore and improve the habitat's ecological function, and develop portions of the site consistent with a proposed land use plan. Chevron's proposal included development for a business park, recreational use, and open space.

The site's inclusion in the San Luis Obispo City's Airport Area Specific Plan complicated the EIR because the Specific Plan anticipates annexing the site and the San Luis Obispo County Regional Airport with the City. Due to potential lengthy approval times for long-term development and phasing plans with City annexation, Chevron filed land division applications with both the City and the County. Chevron presented two distinct development options to provide alternatives if the annexation is not successful. The EIR had to evaluate the environmental impacts of the remediation project as well as both the San Luis Obispo City and County development options. Complicating the development of the EIR further was the fact that portions of the project site are within the runway safety protection zones for the San Luis Obispo Regional Airport.

MRS Environmental staff worked with the City, County, and the Applicant to develop detailed estimates of the types of land uses that would occur with the development. This included both specific types of commercial and industrial uses. This was a critical aspect of the project since it laid the foundation for estimating the impacts of the development project.



The key issue areas for the EIR were air quality and greenhouse gases, traffic and circulation, recreation, land use, public services, and biological resources. For this project, traffic models were used to estimate the impacts of traffic from the proposed development. Air emission estimates were made for the remediation and development phase of the project. This included both construction and operation of the development. The risk of upset section had to address potential impacts to and from aircraft using the regional airport.

The remediation portion of the project focused on capping and excavation of hydrocarbon impacted material. The excavated material was to be trucked to the City of Santa Maria Landfill. The traffic and safety impacts of these trucking operations were evaluated in the EIR. The EIR also addressed the impact of the remediation project on biological resources, including fairy shrimp.

## **AERA ENERGY EAST CAT CANON PROJECT EIR APPLICATION**

CLIENT: AERA ENERGY

MRS Environmental staff were hired by Aera Energy to assist with the development of technical reports to support the preparation of the East Cat Canyon Oil Field Development Project, located in Northern Santa Barbra County. Aera Energy had MRS Environmental prepare a quantitative risk assessment for a proposed natural gas pipeline that would be used to supply natural gas to the site. MRS Environmental conducted consequence modeling for SO<sub>2</sub> emissions from crude oil fires and prepared a technical paper on the modeling results. MRS Environmental staff also assisted Aera Energy in developing the crude oil and light oil trucking requirements for the project that

were used in the air quality impact assessment and the trucking quantitative risk assessment. MRS Environmental staff aided Aera Energy in responding to comments and questions for Santa Barbara County on various aspects of the project.

## **ORCUTT HILL RESOURCE ENHANCEMENT PLAN PROJECT EIR**

CLIENT: SANTA BARBARA COUNTY

In May 2016, MRS completed the final draft of the Orcutt Hill Resource Enhancement Plan Project EIR. Pacific Coast Energy Company (PCEC), the Applicant, was proposing to replace and expand its existing diatomite Oil Drilling and Production Plan. The project included eight new well pads (called pods), two new equipment pads, and drilling of up to 144 oil and gas wells. The Oil Drilling and Production Plan, approved in 2006, permits the operation of the existing 96 diatomite cyclic steamed wells on seven surface well pods.



This highly controversial project, was considered by the County of Santa Barbara shortly after oil drilling opponents had in 2014 placed on the November Ballot Measure P, which would have potentially banned all cyclic steaming, hydraulic fracturing and other high intensity completion methods in the County. The key issue areas for the project were air quality, GHG emissions, geological processes, and biological and water resources.

## **ERG OPERATING COMPANY FOXEN PETROLEUM PIPELINE PROJECT**

CLIENT: COUNTY OF SANTA BARBARA ENERGY DIVISION

MRS Environmental assisted the Santa Barbara County Energy Division in the preparation of the ERG Operating Company Foxen Pipeline Petroleum Project EIR including air quality, biological assessments, hazardous materials, cultural, water, transportation and alternatives analysis. Assistance included support at hearings and scoping and workshop meetings as well as the development of the detailed analysis and EIR sections. The pipeline would connect the Cantin Lease to the Sisquoc Pipeline system to transport crude oil from the Cat Canyon area to the Santa Maria Pump Station and the Santa Maria Refinery.





## **BECKER AND LEGACY WELLS ABANDONMENT AND REMEDIATION PROJECT SUMMERLAND EIR**

CLIENT: CALIFORNIA STATE LANDS COMMISSION

MRS Environmental developed a fast-track EIR for the California State Lands Commission (CSLC) project of abandoning a legacy well (the “Becker Well”) on the beach in Summerland, CA. To assist in the abandonment of the Becker well, which is located in the surf zone with sufficient depth 16 of water at high tide, CSLC proposed to use a offshore barge system.



The EIR addressed impacts related to hazardous materials and risk of upset, air quality and GHGs, aesthetics, biological resources, noise, recreation, and marine transportation.

MRS Environmental staff developed specific design data for the project and alternatives and performed a detailed air quality analysis on barge and tug transport to/from the Ports of Los Angeles/Long Beach and abandonment of wells located near-shore. MRS Environmental staff worked closely with Santa Barbara County Air Pollution Control District to implement mitigation measures to reduce air and odor emissions.

## **E&B OIL DRILLING AND PRODUCTION PROJECT EIR**

CLIENT: THE CITY OF HERMOSA BEACH

The City of Hermosa Beach called upon MRS Environmental staff to conduct an environmental review for the proposed E&B Oil Drilling and Production Project. The project was the result of a 2012 Settlement Agreement between the City of Hermosa Beach, E&B, and Macpherson Oil Co. to comply with the California Environmental Quality Act and place on the ballot a measure allowing the City of Hermosa Beach electorate to decide whether or not to approve the applicant’s project and a development agreement to vest the project so that, if approved, the project could not later be invalidated by a vote of the people.



Proposed was the development of 30 oil wells and four wells for water disposal/injection to access the oil and gas reserves in the tidelands. The project would be composed of two parts: the relocation of the City Maintenance Yard to make room for the project site and the development of the oil and gas facility. The existing lease would grant for a 35-year project lifespan. The project garnered

much attention in the community of Hermosa Beach because of the small 1.3-acre site on which the drilling was to take place, the absence of adequate setbacks to avoid impacts related to safety and hazards, and the high-level of population density in the City.

Many points were debated as the EIR was brought from draft form to its final phase. Issues areas addressed by MRS Environmental staff in the EIR included air quality, GHG emissions, risk of upset, odors, and traffic. Alternatives to the project suggested by MRS included utilizing a different site, developing oil with reduced wells, shortening the life of the Project, and the use of existing pipelines, all of which would meet or nearly meet the applicant's objectives with reduced impacts.

*"Thanks to MRS, we were not only able to complete our settlement commitment with integrity, but your work also helped us treat residents as full-fledged decision makers. Simply put, I could not be more pleased."*

**Michael DiVirgilio, Councilman, City of Hermosa Beach**

## **SANTA BARBARA COUNTY OIL AND GAS DEVELOPMENT EIRS AND ASSESSMENTS.**

CLIENT: COUNTY OF SANTA BARBARA

MRS Environmental staff has worked extensively with the County of Santa Barbara Energy and Minerals Division for almost 30 years reviewing oil and gas development projects, conducting risk assessments, air quality analysis and completing EIRs. MRS Environmental staff, contributed to the ERG Foxen Petroleum Pipeline Project EIR by completing the air quality and risk of upset sections, contributed to the Santa Maria Energy Project EIR by completing the air quality, GHG and risk of upset sections and has conducted numerous individual risk assessments for the County on projects by Amrich, Vaqueros, Petrorock, and Greka. MRS has provided technical expertise in developing the recently adopted GHG thresholds, conducted analysis related to the La Goleta project, and performed extensive analysis related to the Venoco Ellwood facilities risk assessments.

## **OIL AND GAS SUPPORT**

CLIENT: CITY OF CARSON

MRS recently worked closely with the City of Carson to construct an update to its current oil and gas drilling and extraction regulations. As the oil code had previously been written, the public and the environment were not well protected from any potential hazards or nuisances caused by any existing or future oil and gas drilling and extraction facilities and operations in the City. The draft Code Update remedied this lack of adequate protection and included a prohibition on the use of hydraulic fracturing and acid well stimulation.

This Project was very controversial since the City was trying to pass an oil code in response to having an antiquated oil code and in response to an application by Oxy for a Project to drill 200 wells in the city after many years of low to no activity. Opposition to the Oxy project by citizens had also created distrust and opposition to the development of the new oil code.

MRS currently assists the City with implementation of the oil code serving as the City's Petroleum Administrator. As Petroleum Administrator, MRS is responsible for coordinating the many technical and environmental issues that are raised by the oil and gas industry in the City. MRS developed a Procedures Manual that includes procedures, a series of checklists, and flowcharts to ensure that all code requirements are being implemented and complied with in a timely and effective manner, thereby minimizing any impacts to community health and safety.



## **GHG CEQA THRESHOLDS DEVELOPMENT**

CLIENT: SANTA BARBARA COUNTY APCD

MRS Environmental staff assisted the County of Santa Barbara and the Santa Barbara County Air Pollution Control District in the research, analysis, and development of significance thresholds for GHGs, leading to implementation of thresholds at both agencies. This involved researching Federal, State and local jurisdiction programs and thresholds and providing technical expertise and testimony at hearings.

## **AIR EMISSIONS ASSOCIATED WITH DECOMMISSIONING OPERATIONS FOR PACIFIC OUTER CONTINENTAL SHELF (OCS) OIL AND GAS PLATFORMS**

CLIENT: BUREAU OF OCEAN ENERGY MANAGEMENT

MRS Environmental was awarded a contract with the Bureau of Ocean Energy Management to develop a spreadsheet tool to estimate air emissions associated with the decommissioning of Pacific Outer Continental Shelf (OCS) platforms. The study also addresses the air permitting regulatory requirements that may be associated with the decommissioning activities. MRS Environmental staff are working with regulators and some of the platform operators to develop inputs for the spreadsheet tool that cover well plugging and abandonment, removal of conductors, topside removal, jacket removal, pipeline and power cable removal, etc.



Some of the major tasks of the project are the collection of data on the physical parameters of the platforms, estimating equipment needs and duration for each phase of decommissioning, and collecting data on engine sizes, fuel use and emission factors for major pieces of equipment.

The emission spreadsheet tool will allow regulators and the operators to estimate decommission emissions for each Pacific OCS platform by major task and to adjust various input parameters to reflect a specific decommissioning project.

## **BALDWIN HILLS COMMUNITY STANDARDS DISTRICT EIR**

CLIENT: LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING

MRS Environmental staff prepared an EIR for a proposed Community Standards District (CSD) for the Baldwin Hills Oil Field located in unincorporated portions of Los Angeles County. The purpose of the CSD was to develop regulations to control oil and gas development activities at an oil field near residential areas. MRS Environmental managed a team of over 30 professionals to develop the EIR. MRS Environmental staff worked with the oil field operator on the development scenario for the oil field that covered a 30-year period. The environmental impacts of this development scenario were then assessed. Based upon the impacts identified, a set of mitigation measures were developed to reduce the level of impacts to less than significant. MRS Environmental then used these mitigation measures to develop standards that were incorporated into the CSD.



Some of the most salient issues associated with the project were public health, noise, site cleanup and remediation, air quality, and geology. MRS Environmental staff worked closely with the County of Los Angeles, the landowners, and the affected public in developing the EIR and the CSD.

MRS Environmental staff organized more than 20 public meetings with the community as part of this project. MRS used small neighborhood meetings to work with the community on the EIR and the CSD.

MRS organized more than 20 public meetings with the community as part of this project. MRS used small neighborhood meeting to work with the community on the EIR and the CSD.

*"I can't say enough for the knowledge, skill and professionalism you all demonstrated on what was one of the most challenging projects in my career. We were very fortunate to have MRS assisting us. I don't think any other consultant could have accomplished as much as you all have in such a short period of time."*

**Russell J. Fricano, Ph.D., AICP, Section Head, Community Studies  
Los Angeles County Department of Regional Planning**

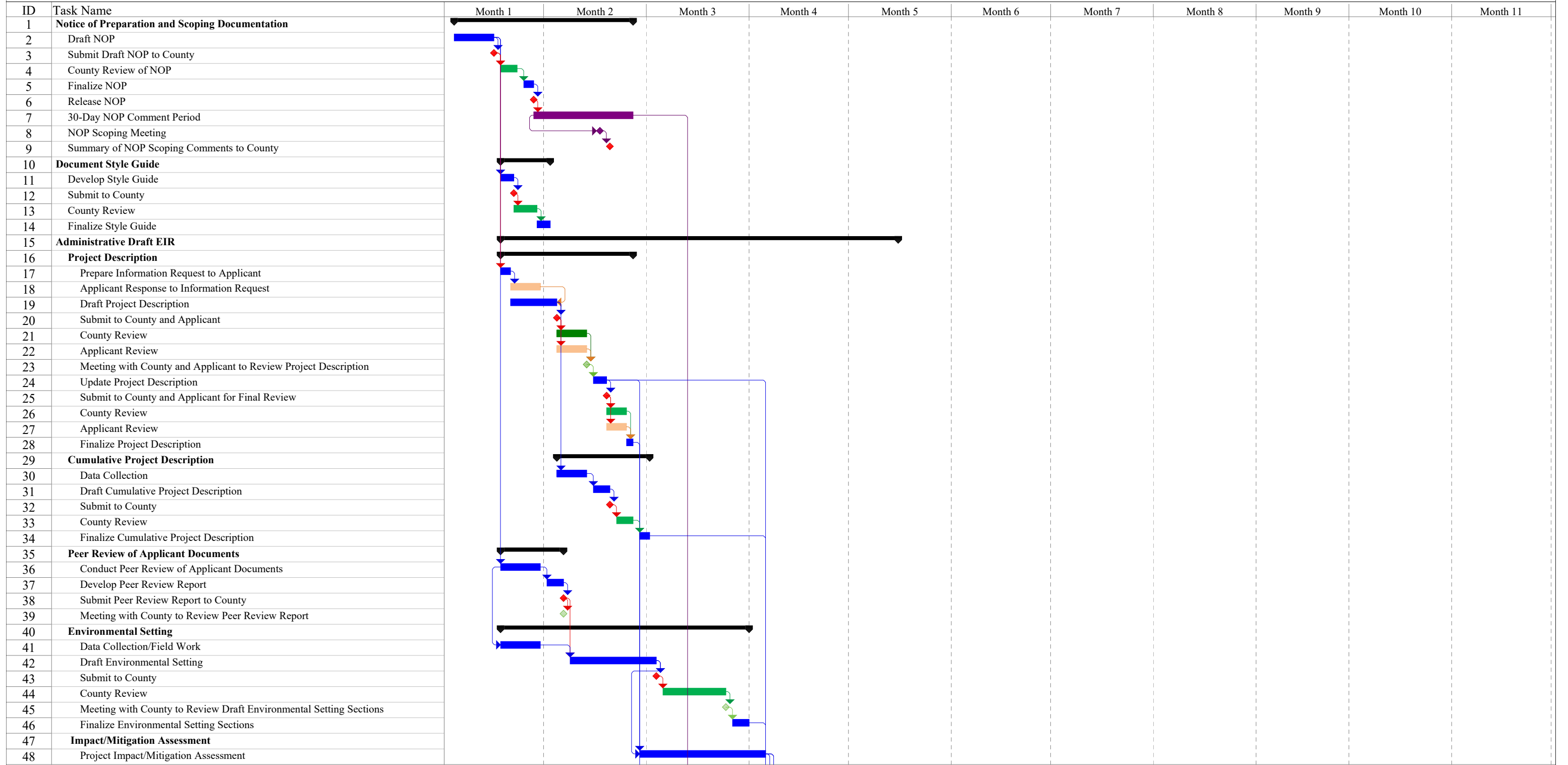




### **Appendix C: Detailed Estimated SEIR Schedule**

This appendix provides a detailed schedule for the SEIR project including elements such as comment periods, review periods, peer review and section submission timelines, and workshop and hearing dates. This pre-project planning and attention to detail is important to developing an efficient and timely SEIR process.

ExxonMobil Interim Trucking SYU Phased Restart Project Estimated SEIR Schedule



ExxonMobil Interim Trucking SYU Phased Restart Project SEIR

Summary  
Task



County Review



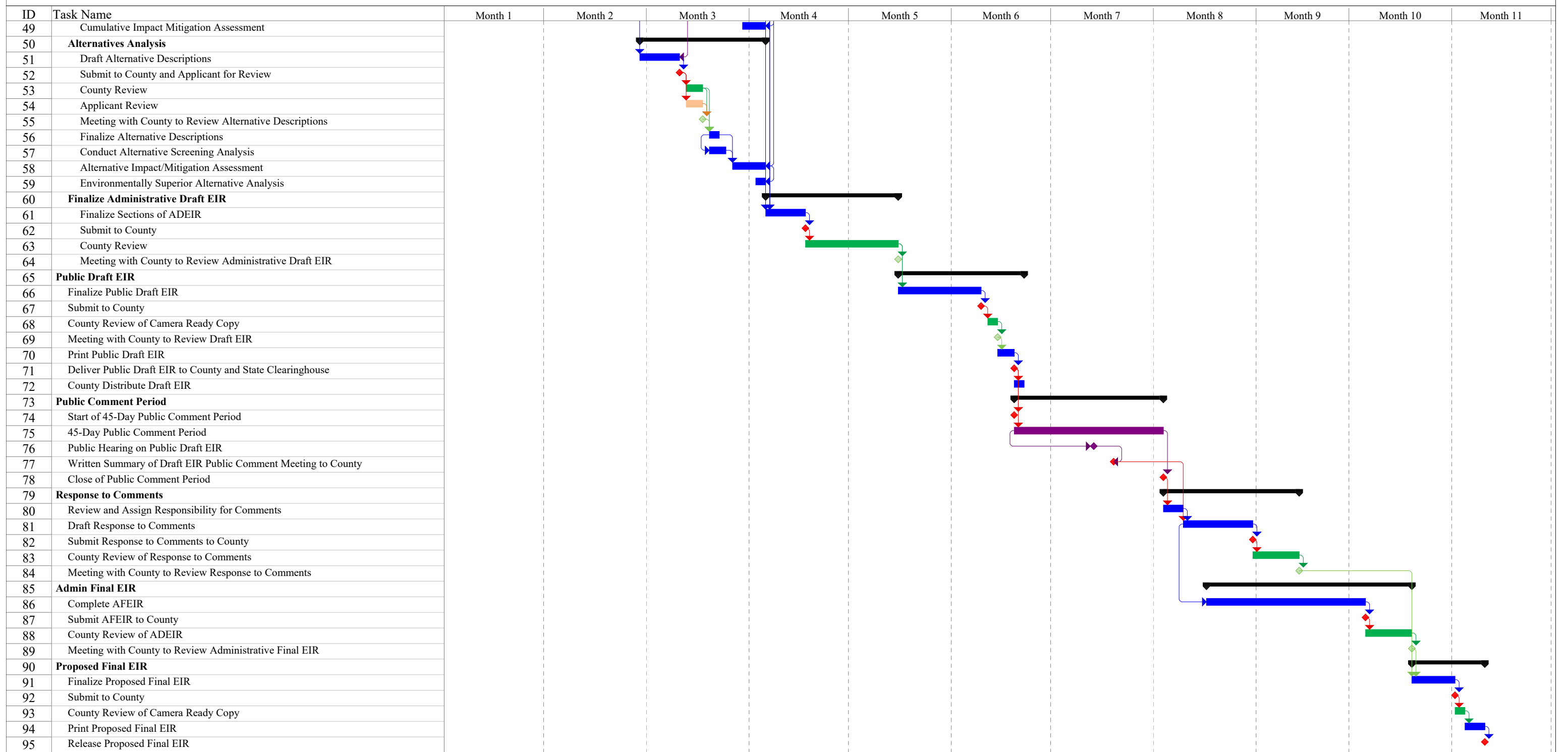
Applicant Review  
Public Workshop/Meeting



Milestone  
P&D/Consultant Meeting

All task durations are working days except for the NOP and DEIR Comment Periods, which are calendar days.

ExxonMobil Interim Trucking SYU Phased Restart Project Estimated SEIR Schedule



ExxonMobil Interim Trucking SYU Phased Restart Project SEIR

Summary  
Task



County Review  
Public Review Period

Applicant Review  
Public Workshop/Meeting

Milestone  
P&D/Consultant Meeting

Milestone  
P&D/Consultant Meeting

Milestone  
P&D/Consultant Meeting

Milestone  
P&D/Consultant Meeting

All task durations are working days except for the NOP and DEIR Comment Periods, which are calendar days.

**Attachment 1**  
**Appendix 2: MRS Cost Proposal for**  
**ExxonMobil Interim Trucking for Santa Ynez**  
**Unit (SYU) Restart Project**



***Cost Proposal-Revised***

ExxonMobil Interim Trucking SYU Phased  
Restart Project SEIR

Case Nos. 17RVP-00000-00081  
APN: 081-220-014

May 21, 2018



Prepared for:  
***County of Santa Barbara  
Planning & Development Dept.  
123 East Anapamu Street  
Santa Barbara, CA 93101***

**MRS Environmental Inc.  
1306 Santa Barbara Street  
Santa Barbara, CA 93101**

**Contact: John Peirson  
Phone: 805.289.3923**





Cost Proposal

MRS Environmental is pleased to submit this cost proposal to the County of Santa Barbara (County) to prepare a Supplemental Environmental Impact Report (SEIR) for the ExxonMobil Interim Trucking Santa Ynez Unit (SYU) Phased Restart Project. This cost proposal has been prepared to meet the requirements of the Request for Proposal (RFP), dated April 3, 2018.

MRS Environmental proposes to perform, on a best efforts basis, the work described in the separate technical proposal at a time and materials budget for professional services and expenses not to exceed \$163,511 plus a 15 percent contingency of \$24,527 for a total of \$188,038. The costs were developed based upon our work on similar trucking and transportation projects and our review of the Applicant-prepared technical reports.

Table 1 provides a summary of the total costs by issue area. Table 2 provides a summary of the total costs by task. Table 3, which is at the end of the cost proposal, provides a detailed cost breakdown by task for each issue area and includes staff hours and billing rates.

<b>Table 1 Cost Summary By Issue Area</b>			
<b>Issue Area</b>	<b>Hours</b>	<b>Costs</b>	<b>% of Total Labor Cost</b>
<b>Direct Labor</b>			
A. Project and Alternative Descriptions	46	\$9,480	5.9%
B. Air Quality & Greenhouse Gases	84	\$18,240	11.3%
C. Risk of Upset	177	\$33,000	20.4%
D. Traffic and Transportation	68	\$10,824	6.7%
E. Land Use/Consistency Analysis	104	\$20,280	12.6%
F. Issue Areas with Less than Significant Impacts	73	\$13,620	8.4%
G. Report Production	196	\$30,160	18.7%
H. Project Management	<u>118</u>	<u>\$25,960</u>	<u>16.1%</u>
<b>Total Direct Labor</b>	<b>866</b>	<b>\$161,564</b>	<b>100.0%</b>
<b>Other Direct Costs</b>		<b>\$1,947</b>	
<b>Total Costs</b>		<b>\$163,511</b>	
<b>Contingency</b>		<b>\$24,527</b>	
<b>Total Cost with Contingency</b>		<b>\$188,038</b>	





Category	Task 1 NOP and Comments	Task 2 Project and Alternative Descriptions	Task 3 Peer Review and Information Requests	Task 4 Admin Draft SEIR and Technical Appendices	Task 5 Public Draft SEIR and Technical Appendices	Task 6 Admin Final SEIR Response to Comments	Task 7 Final SEIR and Mitigation Monitoring Plan	Task 8 Meetings and Hearings	Total
Labor Costs	\$5,916	\$5,960	\$14,616	\$64,680	\$18,447	\$26,946	\$9,887	\$15,112	\$161,564
Other Direct Costs	\$0	\$0	\$165	\$297	\$550	\$660	\$275	\$0	\$1,947
<b>Total Costs</b>	<b>\$5,916</b>	<b>\$5,960</b>	<b>\$14,781</b>	<b>\$64,977</b>	<b>\$18,997</b>	<b>\$27,606</b>	<b>\$10,162</b>	<b>\$15,112</b>	<b>\$163,511</b>
% of Total Cost	3.6%	3.6%	9.0%	39.7%	11.6%	16.9%	6.2%	9.2%	100%
15% Contingency									\$24,527
<b>Total Cost with 15% Contingency</b>									<b>\$188,038</b>

As part of this project, MRS Environmental team members will be required to attend meetings with the County as well as attend workshops and public hearings. As stated in the RFP, these meetings, workshops and hearing have not been scheduled. The RFP requested that the cost proposal include an estimated number of meetings with Planning & Development, as well as attendance at one public comment hearing on the Draft SEIR and two public hearings with the County Planning Commission/Board of Supervisors. The RFP also requested that the Cost Proposal contain unit costs for attendance at meetings and workshops/hearings. Table 4 provides a breakdown of the meetings and workshops/hearings costs that have been included in the cost proposal as well as unit costs.

Project Team Member	Meetings with Planning & Development		Public Meetings and Hearings	
	# of Meetings Assumed in Costing <sup>1</sup>	Additional Meeting Unit Costs <sup>2</sup>	# of Public Meeting and Hearings Assumed in Costing <sup>3</sup>	Additional Hearing Attendance Unit Costs <sup>4</sup>
J. Peirson, Project Manager, Air Quality	11	220	3	\$880
S. Radis, Risk of Upset	2	200	2	\$800
L Perez, Land Use and Policy	4	180	3	\$720
J. Fernandez, Transportation and Circulation	2	198	0	\$857
L. Brown, Biological/Water Resources	0	140	0	560

1. All staff except J. Fernandez are in Santa Barbara so would attend meetings in person. J. Fernandez would be via conference call. Assumes the average length of the meeting would be two-hours.
2. Additional meeting unit costs assume 1-hour in person at the County except for J. Fernandez who is assumed to be via conference call.
3. Assumes attendance at one comment hearing on Draft SEIR and two public hearings for the Planning Commission/Board of Supervisors. All hearings are assumed to be in City of Santa Barbara. Hearing are assumed to be four-hour hearings and include any travel time and expenses.
4. Hearing attendance unit costs assume four-hour hearings and include any travel time and expenses. Assumes all hearing are in City of Santa Barbara.



### Costing Assumptions

The cost estimates include all activities associated with development of the SEIR as discussed in Section 4.0 of the Technical Proposal. The estimated costs for the project rely on the following major assumptions.

- Field work will be limited to what is described in Chapter 4.0 of the Technical Proposal.
- The Applicant-prepared technical studies will be complete enough to not require any substantial additional field work by the SEIR consultant beyond what is discussed in Chapter 4.0 of the Technical Proposal.
- The Applicant will provide final versions of all their technical studies submitted to the County in pdf format.
- The Applicant will respond to requests for information in a timely manner, and no substantial changes to the Applicant-prepared technical studies will be required. If substantial deficiencies are found in the Applicant prepared technical studies, then the estimated schedule may slip, and additional costs may be needed to conduct a second peer review.
- The County Planning and Development Department will provide one set of written or electronic comments on the Project Description, Alternative Description, Administrative Draft SEIR, Camera Ready Public Draft SEIR, Response to Comments, and Administrative Final SEIR.
- The Draft SEIR will not exceed 200 pages not including the Technical Appendices. The Technical Appendices will only be produced in electronic format.
- The Final SEIR will not exceed 250 pages not including the Technical Appendices and Response to Comments. The Technical Appendices and Response to Comments will only be produced in electronic format.
- 100 comments will be addressed as part of the Response to Comments, and no new analysis will be required as a result of the comments received on the Draft SEIR.
- County Planning and Development will be responsible for mailing all documents and notices for the project.
- County Planning and Development will be responsible for preparing staff reports for Planning Commission and Board of Supervisors hearings including CEQA Findings and any Statement of Overriding Considerations.
- Deliverables to the County will be limited to those specified in Chapter 6.0 of the Technical Proposal.

### Payment Schedule

The RFP states that payment will be a percentage of the contract based upon milestone deliverables. Reimbursement will be provided on a time and materials basis, with partial payment not-to-exceed amounts contingent upon specific delivery milestones. As requested in the RFP, Table 6 provides the suggested breakdown of milestones, and the cumulative not-to-exceed amount for each milestone.



<b>Milestone</b>	<b>% of Costs</b>	<b>Amount</b>
Administrative Draft SEIR	50%	\$81,756
Public Draft SEIR	70%	\$114,458
Proposed Final SEIR	90%	\$147,160
Final SEIR	100%	\$163,511

Amount does not include any of the contingency. If the County authorizes use of contingency funds, they would be added to the total not-to-exceed amounts based upon the percentages.

**Conflict of Interest**

Neither MRS Environmental, nor any of the members of the project team, has been hired by the Applicant to assist in the preparation of materials directly related to any component of the proposed project. No member of the contractor’s team has a financial gain or an interest in the outcome of the project. MRS Environmental hereby certifies that MRS Environmental and its subcontractors have the capacity to submit a neutral and unbiased environmental document.

MRS Environmental is a Certified Small Business (OSDS Ref #8017). All of MRS Environmental’s insurance and workers compensation documentation are currently on file with the County of Santa Barbara.



Table 3 Detailed Cost Breakdown

Key Staff	Labor Classification	Rate (\$/hr)	NOP and Comments		Project and Alternative Descriptions		Peer Review and Information Requests		Admin Draft EIR and Technical Appendices		Public Draft EIR and Technical Appendices		Admin Final EIR Response to Comments		Final EIR and Mitigation Monitoring Plan		Meetings and Hearings		Total	
			Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost
<b>Direct Labor</b>																				
<b>A. Project and Alternative Descriptions</b>																				
J. Peirson	Managing Engineer III	\$220	4	\$880	16	\$3,520	0	\$0	2	\$440	2	\$440	2	\$440	2	\$440	2	\$440	30	\$6,600
D. Dusette	Principal Planner III	\$180	<u>2</u>	<u>\$360</u>	<u>8</u>	<u>\$1,440</u>	<u>0</u>	<u>\$0</u>	<u>2</u>	<u>\$360</u>	<u>0</u>	<u>\$0</u>	<u>0</u>	<u>\$0</u>	<u>4</u>	<u>\$720</u>	<u>0</u>	<u>\$0</u>	<u>16</u>	<u>\$2,880</u>
<b>Total Project Description and Alternatives</b>			<b>6</b>	<b>\$1,240</b>	<b>24</b>	<b>\$4,960</b>	<b>0</b>	<b>\$0</b>	<b>4</b>	<b>\$800</b>	<b>2</b>	<b>\$440</b>	<b>2</b>	<b>\$440</b>	<b>6</b>	<b>\$1,160</b>	<b>2</b>	<b>\$440</b>	<b>46</b>	<b>\$9,480</b>
<b>B. Air Quality &amp; Greenhouse Gases</b>																				
J. Peirson	Managing Engineer III	\$220	2	\$440	0	\$0	16	\$3,520	32	\$7,040	4	\$880	16	\$3,520	4	\$880	2	\$440	76	\$16,720
G. Chittick	Principal Engineer II	\$190	<u>0</u>	<u>\$0</u>	<u>0</u>	<u>\$0</u>	<u>2</u>	<u>\$380</u>	<u>2</u>	<u>\$380</u>	<u>2</u>	<u>\$380</u>	<u>2</u>	<u>\$380</u>	<u>0</u>	<u>\$0</u>	<u>0</u>	<u>\$0</u>	<u>8</u>	<u>\$1,520</u>
<b>Total Air Quality and Greenhouse Gases</b>			<b>2</b>	<b>\$440</b>	<b>0</b>	<b>\$0</b>	<b>18</b>	<b>\$3,900</b>	<b>34</b>	<b>\$7,420</b>	<b>6</b>	<b>\$1,260</b>	<b>18</b>	<b>\$3,900</b>	<b>4</b>	<b>\$880</b>	<b>2</b>	<b>\$440</b>	<b>84</b>	<b>\$18,240</b>
<b>C. Risk of Upset</b>																				
S. Radis	Principal Scientist I	\$200	2	\$400	0	\$0	24	\$4,800	36	\$7,200	8	\$1,600	14	\$2,800	3	\$600	12	\$2,400	99	\$19,800
G. Chittick	Principal Engineer II	\$190	0	\$0	0	\$0	4	\$760	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	4	\$760
L. Brown	Biologist I	\$140	0	\$0	0	\$0	0	\$0	32	\$4,480	2	\$280	4	\$560	2	\$280	0	\$0	40	\$5,600
D. Dusette	Principal Planner III	\$180	0	\$0	0	\$0	0	\$0	16	\$2,880	0	\$0	0	\$0	0	\$0	0	\$0	16	\$2,880
J. Peirson	Managing Engineer III	\$220	0	\$0	0	\$0	0	\$0	8	\$1,760	2	\$440	6	\$1,320	2	\$440	0	\$0	18	\$3,960
<b>Total Risk of Upset</b>			<b>2</b>	<b>\$400</b>	<b>0</b>	<b>\$0</b>	<b>28</b>	<b>\$5,560</b>	<b>92</b>	<b>\$16,320</b>	<b>12</b>	<b>\$2,320</b>	<b>24</b>	<b>\$4,680</b>	<b>7</b>	<b>\$1,320</b>	<b>12</b>	<b>\$2,400</b>	<b>177</b>	<b>\$33,000</b>
<b>D. Traffic and Transportation</b>																				
J. Fernandez (CCTC)	Principal	\$198	2	\$396	0	\$0	6	\$1,188	12	\$2,376	2	\$396	8	\$1,584	2	\$396	4	\$792	36	\$7,128
T. Low (CCTC)	Transportation Engineer	\$116	<u>0</u>	<u>\$0</u>	<u>0</u>	<u>\$0</u>	<u>16</u>	<u>\$1,848</u>	<u>8</u>	<u>\$924</u>	<u>2</u>	<u>\$231</u>	<u>4</u>	<u>\$462</u>	<u>2</u>	<u>\$231</u>	<u>0</u>	<u>\$0</u>	<u>32</u>	<u>\$3,696</u>
<b>Total Traffic and Transportation</b>			<b>2</b>	<b>\$396</b>	<b>0</b>	<b>\$0</b>	<b>22</b>	<b>\$3,036</b>	<b>20</b>	<b>\$3,300</b>	<b>4</b>	<b>\$627</b>	<b>12</b>	<b>\$2,046</b>	<b>4</b>	<b>\$627</b>	<b>4</b>	<b>\$792</b>	<b>68</b>	<b>\$10,824</b>
<b>E. Land Use/Consistency Analysis</b>																				
L. Perez	Principal Planner I	\$200	2	\$400	0	\$0	0	\$0	32	\$6,400	8	\$1,600	12	\$2,400	4	\$800	20	\$4,000	78	\$15,600
D. Dusette	Principal Planner III	\$180	<u>0</u>	<u>\$0</u>	<u>0</u>	<u>\$0</u>	<u>0</u>	<u>\$0</u>	<u>12</u>	<u>\$2,160</u>	<u>4</u>	<u>\$720</u>	<u>8</u>	<u>\$1,440</u>	<u>2</u>	<u>\$360</u>	<u>0</u>	<u>\$0</u>	<u>26</u>	<u>\$4,680</u>
<b>Total Land Use/Consistency Analysis</b>			<b>2</b>	<b>\$400</b>	<b>0</b>	<b>\$0</b>	<b>0</b>	<b>\$0</b>	<b>44</b>	<b>\$8,560</b>	<b>12</b>	<b>\$2,320</b>	<b>20</b>	<b>\$3,840</b>	<b>6</b>	<b>\$1,160</b>	<b>20</b>	<b>\$4,000</b>	<b>104</b>	<b>\$20,280</b>



**Table 3 Detailed Cost Breakdown (cont.)**

Key Staff	Labor Classification	Rate (\$/hr)	NOP and Comments		Project and Alternative Descriptions		Peer Review and Information Requests		Admin Draft EIR and Technical Appendices		Public Draft EIR and Technical Appendices		Admin Final EIR Response to Comments		Final EIR and Mitigation Monitoring Plan		Meetings and Hearings		Total		
			Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	Hrs	Cost	
<b>F. Issue Areas with Less than Significant Impacts</b>																					
L. Perez	Principal Planner I	\$200	4	\$800	0	\$0	0	\$0	20	\$4,000	4	\$800	4	\$800	2	\$400	0	\$0	34	\$6,800	
J. Peirson	Managing Engineer III	\$220	0	\$0	0	\$0	0	\$0	4	\$880	0	\$0	0	\$0	0	\$0	0	\$0	4	\$880	
D. Dusette	Principal Planner III	\$180	0	\$0	0	\$0	0	\$0	16	\$2,880	4	\$720	4	\$720	2	\$360	0	\$0	26	\$4,680	
L. Brown	Biologist I	\$140	0	\$0	0	\$0	0	\$0	4	\$560	2	\$280	2	\$280	1	\$140	0	\$0	9	\$1,260	
<b>Total Less Than Significant Issue Areas</b>			<b>4</b>	<b>\$800</b>	<b>0</b>	<b>\$0</b>	<b>0</b>	<b>\$0</b>	<b>44</b>	<b>\$8,320</b>	<b>10</b>	<b>\$1,800</b>	<b>10</b>	<b>\$1,800</b>	<b>5</b>	<b>\$900</b>	<b>0</b>	<b>\$0</b>	<b>73</b>	<b>\$13,620</b>	
<b>G. Report Production</b>																					
B. Hendricks	Consultant II	\$100	6	\$600	6	\$600	4	\$400	38	\$3,800	20	\$2,000	16	\$1,600	8	\$800	0	\$0	98	\$9,800	
J. Peirson	Managing Engineer III	\$220	2	\$440	0	\$0	2	\$440	24	\$5,280	12	\$2,640	10	\$2,200	4	\$880	0	\$0	54	\$11,880	
L. Perez	Principal Planner I	\$200	2	\$400	2	\$400	2	\$400	12	\$2,400	4	\$800	4	\$800	2	\$400	0	\$0	28	\$5,600	
D. Dusette	Principal Planner III	\$180	2	\$360	0	\$0	0	\$0	8	\$1,440	4	\$720	2	\$360	0	\$0	0	\$0	16	\$2,880	
<b>Total Report Production</b>			<b>12</b>	<b>\$1,800</b>	<b>8</b>	<b>\$1,000</b>	<b>8</b>	<b>\$1,240</b>	<b>82</b>	<b>\$12,920</b>	<b>40</b>	<b>\$6,160</b>	<b>32</b>	<b>\$4,960</b>	<b>14</b>	<b>\$2,080</b>	<b>0</b>	<b>\$0</b>	<b>196</b>	<b>\$30,160</b>	
<b>H. Project Management</b>																					
J. Peirson	Managing Engineer III	\$220	2	\$440	0	\$0	4	\$880	32	\$7,040	16	\$3,520	24	\$5,280	8	\$1,760	32	\$7,040	118	\$25,960	
<b>Total Program Management</b>			<b>2</b>	<b>\$440</b>	<b>0</b>	<b>\$0</b>	<b>4</b>	<b>\$880</b>	<b>32</b>	<b>\$7,040</b>	<b>16</b>	<b>\$3,520</b>	<b>24</b>	<b>\$5,280</b>	<b>8</b>	<b>\$1,760</b>	<b>32</b>	<b>\$7,040</b>	<b>118</b>	<b>\$25,960</b>	
<b>Total Direct Labor</b>			<b>32</b>	<b>\$5,916</b>	<b>32</b>	<b>\$5,960</b>	<b>80</b>	<b>\$14,616</b>	<b>352</b>	<b>\$64,680</b>	<b>102</b>	<b>\$18,447</b>	<b>142</b>	<b>\$26,946</b>	<b>54</b>	<b>\$9,887</b>	<b>72</b>	<b>\$15,112</b>	<b>866</b>	<b>\$161,564</b>	
<b>Other Direct Costs</b>																					
Printing and Binding				\$0	\$0	\$0	\$0	\$120	\$450	\$550	\$200	\$0	\$1,320								
Miscellaneous				\$0	\$0	\$150	\$150	\$50	\$50	\$50	\$0	\$450									
G&A on Other Direct Costs				\$0	\$0	\$15	\$27	\$50	\$60	\$25	\$0	\$177									
<b>Total Other Direct Costs</b>				<b>\$0</b>	<b>\$0</b>	<b>\$165</b>	<b>\$297</b>	<b>\$550</b>	<b>\$660</b>	<b>\$275</b>	<b>\$0</b>	<b>\$1,947</b>									
<b>Total EIR Amount</b>				<b>\$5,916</b>	<b>\$5,960</b>	<b>\$14,781</b>	<b>\$64,977</b>	<b>\$18,997</b>	<b>\$27,606</b>	<b>\$10,162</b>	<b>\$15,112</b>	<b>\$163,511</b>									
<b>Contingency at 15%</b>												<b>\$24,527</b>									
<b>Total EIR with Contingency</b>												<b>\$188,038</b>									