Ramirez, Angelica

Rubic Comment

From:

Ana Citrin < Ana@lomcsb.com>

Sent:

Friday, March 4, 2022 10:09 AM

To:

sbcob

Subject:

GCC comments on Exxon Trucking, 3/8/22 Agenda Item No. 3

Attachments:

GCC Exxon Trucking_Comments to BOS_3-4-22_FINAL.pdf



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Dear Clerk, attached please find a comment letter for the Supervisors, submitted by this office on behalf of the Gaviota Coast Conservancy (GCC), urging their denial of the ExxonMobil Interim Trucking for Santa Ynez Unit Phased Restart Project (Case No. 17RVP-00000-00081)

Best regards,

Ana Citrin

Law Office of Marc Chytilo, APC P.O. Box 92233 Santa Barbara, CA 93190 Phone: (805) 570-4190

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LAW OFFICE OF MARC CHYTILO, APC

ENVIRONMENTAL LAW

March 4, 2022

Santa Barbara County Board of Supervisors 105 E. Anapamu Street Santa Barbara, CA 93101 By email to sbcob@co.santa-barbara.ca.us

RE: ExxonMobil Interim Trucking for Santa Ynez Unit Phased Restart Project (Case No. 17RVP-00000-00081); Departmental Agenda Item No. 3

Chair Hartmann and Supervisors:

These comments are submitted on behalf of the Gaviota Coast Conservancy (GCC), a California public benefit non-profit corporation dedicated to enhancing the rural character and ecological integrity of the Gaviota Coast for the benefit and enjoyment of present and future generations. GCC urges the Board to **deny** the ExxonMobil Interim Trucking Project consistent with the Planning Commission's recommendation, due to its significant and unavoidable impacts to the environment generally, and to the Gaviota Coast in particular.

ExxonMobil proposes to truck crude oil along the rural Gaviota Coast, at a rate of 70 trucks per day, where the risk for accidents and spills is significant. The Gaviota Coast contains Southern California's healthiest remaining coastal ecosystem and supports a wide variety of rare and endangered habitats and species.ⁱ The Gaviota Coast is also "a coastal recreation destination of local and statewide importance due in part to the unspoiled beauty of the Gaviota coast and miles of relatively undeveloped coastline." Jeopardizing these invaluable shared resources in order to restart fossil fuel extraction that endangers our planet more broadly is simply not acceptable.

Our letter to the Planning Commission (dated 9/24/21) and comments on the Draft Environmental Impact Report (EIR) (dated June 4, 2019) explain why the proposed Project and its EIR fail to comply with County policy and ordinance requirements and with the California Environmental Quality Act (CEQA). The issues raised in these letters (incorporated herein by reference) were not resolved in responses to comment, revisions to the EIR, or in Planning Commission staff reports and remain legal impediments to approval.

GCC concurs with the many other environmental organizations and concerned residents that urge denial of this Project because of its climate change and spill risk impacts. Moreover, as proposed, oil trucks would access the Los Flores Canyon (LFC) facility from Calle Real and Refugio Road, in an area that is heavily used by the public for recreation including pedestrian and bicycle access between Refugio and El Capitan State Beaches, as well as El Capitan Canyon Campground and Ocean Mesa RV Campground, and is an identified route for the California Coastal Trailⁱⁱⁱ. Additionally, children walk to and from school bus stops along Calle Real on the same

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stretch of Calle Real. The safety of this important public access area must not be compromised by allowing this Project to proceed.

We respectfully request that the Board follow the Planning Commission's recommendation and deny ExxonMobil's environmentally damaging project.

Sincerely,

LAW OFFICE OF MARC CHYTILO, APC

Ana Citrin

For Gaviota Coast Conservancy

ⁱGaviota Coast Plan (GCP), p. 2-1; GCP EIR 4.6-1; both available at https://www.countyofsb.org/plndev/policy/communityplans/gaviota.sbc

ii GCP p. 4-1. iii See GCP Figure 4-7.