

## Lenzi, Chelsea

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**From:** Steve Ferry <stephenjamesferry@gmail.com>  
**Sent:** Wednesday, October 05, 2016 3:47 PM  
**To:** SupervisorCarbajal; Wolf, Janet; Farr, Doreen; Lavagnino, Steve; sbcob  
**Subject:** Deny PCEC's appeal of Orcutt denial

Dear Honorable Supervisors,

Pacific Coast Energy Company (PCEC) is proposing to expand its cyclic steam operation - a highly polluting, water intensive method of oil extraction near Orcutt. I urge you to DENY PCEC's appeal, and support the Planning Commission's decision to protect our County from further damage from PCEC's oil seeps and spills.

1. The Planning Commission carefully considered this project and rejected it because of the significant impacts to air quality, endangered and sensitive species, critical habitat and water quality.
2. Cyclic Steam Injection oil extraction has a high well casing failure rate and there is a history of eruptive well failures at the site. The drilling would occur in an area that is already suffering extensive damage from over 100 accidental oil seeps and spills, destroying numerous federally listed endangered species and sensitive habitat.
3. The Project site is one of the most biologically rich locations in Santa Barbara County. The Project's oil seeps would potentially drown the endangered California Tiger Salamanders and destroy some of the rarest and most imperiled plant communities in the world.
4. The environmental review found significant and unavoidable risks to our water, with various creeks on the project site that flow to the San Antonio Lagoon and Pacific Ocean. The recent Refugio oil spill demonstrates the immense risk and costs of oil spills.
5. The Project does not provide any benefits that will outweigh the potential environmental harm from allowing PCEC to double its cyclic steam drilling operations on Orcutt Hill.

Sincerely,

Stephen Ferry

5557 Camino Galeana

Santa Barbara, CA 93111

**Lenzi, Chelsea**

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**From:** Carbajal, Salud  
**Sent:** Wednesday, October 05, 2016 11:40 AM  
**To:** sbcob  
**Subject:** Fwd: oil drilling

Sent from my iPhone

Begin forwarded message:

**From:** Lindsey Parks <lindsey@hrwmlaw.com>  
**Date:** October 5, 2016 at 11:37:38 AM PDT  
**To:** <SupervisorCarbajal@sbcbos1.org>  
**Subject:** oil drilling

*Dear Honorable Supervisors,  
I urge you to DENY PCEC's appeal, and support the Planning Commission's decision to protect our County from further damage from PCEC's oil seeps and spills.*

- 1. The Planning Commission carefully considered this project and rejected it because of the significant impacts to air quality, endangered and sensitive species, critical habitat and water quality.*
- 2. Cyclic Steam Injection oil extraction has a high well casing failure rate and there is a history of eruptive well failures at the site. The drilling would occur in an area that is already suffering extensive damage from over 100 accidental oil seeps and spills, destroying numerous federally listed endangered species and sensitive habitat.*
- 3. The Project site is one of the most biologically rich locations in Santa Barbara County. The Project's oil seeps would potentially drown the endangered California Tiger Salamanders and destroy some of the rarest and most imperiled plant communities in the world.*
- 4. The environmental review found significant and unavoidable risks to our water, with various creeks on the project site that flow to the San Antonio Lagoon and Pacific Ocean. The recent Refugio oil spill demonstrates the immense risk and costs of oil spills.*
- 5. The Project does not provide any benefits that will outweigh the potential environmental harm from allowing PCEC to double its cyclic steam drilling operations on Orcutt Hill.*

*Sincerely,*

*[Lindsey Parks*

*4648 Via Clarice Santa Barbara CA 93111*

Lindsey Parks  
Assistant to David W. Magnusson  
THE EGENOLF GROUP, LLP  
3700 State St., Suite 350  
Santa Barbara, CA 93105  
(805) 963-4488 Fax: (805) 682-7192

Chapala Office

1415 Chapala – 2nd Floor, Santa Barbara CA 93101  
Phone 805 963 8906 - Fax 805 962 8936

Riviera Office  
1590 Alameda Padre Serra, Santa Barbara CA 93103  
Phone 805 962 1625 - Fax 805 962 336

**Lenzi, Chelsea**

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**From:** Carbajal, Salud  
**Sent:** Wednesday, October 05, 2016 7:35 PM  
**To:** sbcob  
**Subject:** Fwd: Deny PCEC Appeal !

Sent from my iPhone

Begin forwarded message:

**From:** Melissa Bower <[m-bower@earthlink.net](mailto:m-bower@earthlink.net)>  
**Date:** October 5, 2016 at 4:58:47 PM PDT  
**To:** <[SupervisorCarbajal@sbcbos1.org](mailto:SupervisorCarbajal@sbcbos1.org)>  
**Subject:** Deny PCEC Appeal !

*Dear Honorable Supervisors,  
I urge you to DENY PCEC's appeal, and support the Planning Commission's decision to protect our County from further damage from PCEC's oil seeps and spills.*

- 1. The Planning Commission carefully considered this project and rejected it because of the significant impacts to air quality, endangered and sensitive species, critical habitat and water quality.*
- 2. Cyclic Steam Injection oil extraction has a high well casing failure rate and there is a history of eruptive well failures at the site. The drilling would occur in an area that is already suffering extensive damage from over 100 accidental oil seeps and spills, destroying numerous federally listed endangered species and sensitive habitat.*
- 3. The Project site is one of the most biologically rich locations in Santa Barbara County. The Project's oil seeps would potentially drown the endangered California Tiger Salamanders and destroy some of the rarest and most imperiled plant communities in the world.*
- 4. The environmental review found significant and unavoidable risks to our water, with various creeks on the project site that flow to the San Antonio Lagoon and Pacific Ocean. The recent Refugio oil spill demonstrates the immense risk and costs of oil spills.*
- 5. The Project does not provide any benefits that will outweigh the potential environmental harm from allowing PCEC to double its cyclic steam drilling operations on Orcutt Hill.*

*Sincerely,*

*Melissa Bower  
1095 Garcia Rd.  
SB, 93103*

## Daly, Julia Rutherford

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**From:** Carbajal, Salud  
**Sent:** Thursday, October 06, 2016 12:39 PM  
**To:** sbcob  
**Subject:** Fwd: PCEC Appeal  
**Attachments:** EDC ltr re PCEC Appeal to BOS\_2016\_10\_06\_FINAL.pdf; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

**From:** Linda Krop <[lkrop@environmentaldefensecenter.org](mailto:lkrop@environmentaldefensecenter.org)>  
**Date:** October 6, 2016 at 12:29:02 PM PDT  
**To:** "Carbajal, Salud ([scarbaja@co.santa-barbara.ca.us](mailto:scarbaja@co.santa-barbara.ca.us))" <[scarbaja@co.santa-barbara.ca.us](mailto:scarbaja@co.santa-barbara.ca.us)>, "jeremy tittle ([jtittle@sbcbos1.org](mailto:jtittle@sbcbos1.org))" <[jtittle@sbcbos1.org](mailto:jtittle@sbcbos1.org)>  
**Cc:** Alicia Roessler <[aroessler@environmentaldefensecenter.org](mailto:aroessler@environmentaldefensecenter.org)>, "Brian Trautwein" <[btrautwein@environmentaldefensecenter.org](mailto:btrautwein@environmentaldefensecenter.org)>, "ken@sbcac.org" <[ken@sbcac.org](mailto:ken@sbcac.org)>, Katie Davis <[kdavis2468@gmail.com](mailto:kdavis2468@gmail.com)>  
**Subject:** PCEC Appeal

Please see attached letter urging the Board to deny the PCEC appeal and project, and approve the Seep Can Only alternative.

Thank you for your consideration,  
LK

Linda Krop, Chief Counsel  
Environmental Defense Center  
906 Garden Street  
Santa Barbara, CA 93101  
Phone (805) 963-1622, x106  
Fax (805) 962-3152

[www.EnvironmentalDefenseCenter.org](http://www.EnvironmentalDefenseCenter.org)

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**environmental**  
DEFENSE CENTER

October 6, 2016

Board of Supervisors  
Santa Barbara County  
105 E. Anapamu Street  
Santa Barbara, CA 93101

**Re: Denial of PCEC Appeal of Orcutt Hills Resource Enhancement Plan and Approval of Seep Can Only Alternative**

Dear Honorable Supervisors:

The following comments are submitted by the Environmental Defense Center (“EDC”) on behalf of the Sierra Club Los Padres Chapter (“Sierra Club”) and Santa Barbara County Action Network (“SBCAN”), urging the Board of Supervisors (“BOS”) to (I) support the Planning Commission (“Commission”) decision, follow Staff’s recommended action, and deny Pacific Coast Energy Company’s (“PCEC”) appeal of the Commission’s denial of the Orcutt Hill Resource Enhancement Plan (“Project”), and (II) approve the Seep Can Only Project. With respect to the Seep Can Only Project, we urge the BOS to require public notice when permits for future seep cans are issued.

EDC is a non-profit, public interest law firm that protects and enhances the environment in Santa Barbara, Ventura, and San Luis Obispo Counties through education, advocacy and legal action. The Sierra Club, a national nonprofit organization with roughly 146,000 members in California, is dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth’s ecosystems and resources; to educating and encouraging humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. SBCAN is a countywide grassroots organization that works to promote social and economic justice, to preserve our environmental and agricultural resources, and to create sustainable communities. All of our clients have members who live, visit, work, and recreate in the area and would be affected by the Project.

At the June 29, 2016, Planning Commission hearing, EDC and our clients urged the Commission to consider PCEC’s significant history of oil seeps and spills from its existing cyclic

steam drilling operation and deny PCEC's proposal to drill an additional 144 wells. The Final Environmental Impact Report ("FEIR") concluded that allowing PCEC to double its damaging drilling operation would result in numerous Class I impacts to Air Quality, Biological Resources and Water Quality. (FEIR at ES-6) The FEIR also disclosed that PCEC's existing operation has resulted in over 100 seeps and surface expressions (FEIR at ES 1, 7) The 2006 Mitigated Negative Declaration ("MND") that supported the approval of the existing 96 wells failed to foretell the damaging oil seeps that led to the loss of 360 endangered Lompoc yerba santa and 6.09 acres of sensitive habit. To make matters worse, PCEC failed to implement the MND's required mitigation to replace Lompoc yerba santa at a 10:1 ratio, amounting to 3,600 plants, and failed to consult with or notify the United States Fish and Wildlife Service ("USFWS") to secure the necessary permits required for an incidental take of a federally listed endangered plant species. (FEIR at 4.3-48) PCEC's legacy of oil seeps and spills from well failures and risky steam drilling must not be rewarded. PCEC has proven on its own accord that using an intensive oil extraction technique such as cyclic steam injection cannot be conducted safely. In fact, the FEIR concluded that each of the project alternatives that involved drilling additional wells using cyclic steam injection technology would result in significant and unavoidable impacts from future oil seeps and surface expressions or oil spills. (FEIR at 5-7)

Given the overwhelming evidence of past and future oil seeps and spills, and the loud outcry of disapproval from our community, the Commission properly denied PCEC's project. The County now needs to address the cleanup and containment effort necessitated by PCEC's 100 seeps and spills and ancillary emergency permits.

**I. The Board Should Deny the PCEC Appeal and Project.**

**A. The Staff Report's Responses to PCEC Support Denial of the Appeal.**

EDC and our clients support the Staff Report's responses to PCEC's appeal. The following comments highlight additional facts and evidence in the record that rebut PCEC's appeal issues.

**Issue # 1: The rationale for denial of the Project is supported by substantial evidence.**

As the Staff Report points out, the findings for denial properly conclude, based on substantial evidence in the record, that the Project's uncertain and undocumented benefits do not outweigh its significant and unavoidable impacts. Contrary to PCEC's representations, there is overwhelming evidence in the record to support the Commission's decision to deny the Project, as identified in the Staff Report. As mentioned above, the Project's construction of pods, seeps, surface expressions, and potential pipeline spills all have the potential to cause significant and unavoidable impacts to biological resources and water resources. Importantly, these potential impacts are not uncertain or speculative, but have already been realized and documented in the record, such as significant habitat degradation and species loss from the last ten years of PCEC's steam drilling from just 96 wells on the Project site. The Staff Report accurately recites the long list of these impacts documented in the FEIR and by the USFWS. (Staff Report, p. 4-5)

The following points identify additional evidence in the record to counter PCEC's claims regarding impacts to Lompoc yerba santa and the California Tiger Salamander ("CTS").

***Impacts to Lompoc Yerba Santa:*** The evidence is undisputed that PCEC's operations to date have destroyed 360 federally endangered Yerba Santa as a result of over 100 oil seeps and surface expressions. Moreover, PCEC failed to mitigate these impacts as required, and failed to notify and consult with USFWS.<sup>1</sup> It is also undisputed that future oil seeps, surface expressions and potential pipeline spills will cause further impacts and loss of the Lompoc yerba santa, as the entire Project site is located within the Lompoc yerba santa Solomon Hills Critical Habitat Unit. (FEIR at 4.3-41) PCEC presented evidence of two surveys to prove that Yerba Santa is thriving on the site. (FEIR section 4.3.) However, the most recent study, conducted by PCEC, was of a larger survey area than the first study, and negates any false conclusion that the Lompoc yerba santa population has grown. Regardless, the applicant's contrived "evidence" fails to counter the fact that oil seeps and spills have and will cause a significant and unavoidable impact to a federally protected endangered species. The presence of Lompoc yerba santa on the site only proves how constrained this site is, and how risky any future drilling operations are at this location.

***Impacts to California Tiger Salamander:*** The entire Project site is designated upland refuge habitat for the endangered CTS, and evidence in the record shows that a Class I impact to CTS habitat will likely also result in a Class I impact to the CTS species.<sup>2</sup> (FEIR at 4.3-42-43) Thus, there is substantial evidence in the record that supports the Commission's findings that the Project's oil seeps, surface expressions or pipeline spills will result in a significant and unavoidable impact to the CTS.<sup>3</sup>

**Issue # 2: The Commission considered and denied the Careaga Exclusion Alternative because it still results in Class I impacts to both biological and water resources.**

As the Staff Report discloses, the Careaga Exclusion Alternative, which precludes drilling on the Careaga formation, does not eliminate potential impacts from seeps as falsely alleged in PCEC's appeal. (PCEC Appeal, Attachment A, p. 2; see Staff Report at pp. 3, 5) Several seeps have already occurred outside the Careaga formation from existing cyclic steam wells. (FEIR at 5-9) The FEIR's analysis of this alternative concluded that there is still potential for additional future seeps from drilling outside the Careaga formation and cited to seeps that occurred near the proposed Project outside the Careaga zone. (FEIR at 5-7)

Additionally, the potential for surface expressions is not eliminated or reduced by approving the Careaga Exclusion Alternative, as they originate from the Diatomite formation and

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<sup>1</sup> Letter from United States Dept. of Interior, Fish and Wildlife Service, Draft Orcutt Hills Resource Enhancement EIR comments (April 3, 2015).

<sup>2</sup> Letter from Biologist Lawrence E. Hunt, comments on DEIR and FEIR for Orcutt Hills Resource Enhancement Project Regarding Impacts to the California Tiger Salamander (June 24, 2016).

<sup>3</sup> Letter from United States Dept. of Interior, Fish and Wildlife Service, Draft Orcutt Hills Resource Enhancement EIR comments (April 3, 2015).



not the Careaga zone. (FEIR at 5-7) PCEC has already had two surface expressions from well casing failures that resulted in a surface fracture, steam release and oil spilling onto the surface. (FEIR, Appendix A, 1629)

Moreover, the same significant and unavoidable impacts to sensitive habitats and water resources from construction of pods and pipeline spills remain unchanged by this project alternative. (FEIR at 5-7) Notably, the Commission found that the Project's impacts to habitats and water resources are inconsistent with the Comprehensive Plan Land Use Element Hillside and Watershed Policy #2. The Careaga Exclusion Alternative, which results in the same impacts, would also be inconsistent with the County's General Plan policy and thus cannot be approved.

**Issue # 3: The evidence in the record reveals seeps increased significantly immediately following PCEC's cyclic steam drilling and still continue today.**

The Staff Report accurately identifies the evidence in the FEIR that shows while seeps may have historically occurred on the site, there was a significant increase after PCEC began steaming operations in 2007. (Staff Report, p. 6) The seeps did not start to decrease until DOGGR insisted on revising PCEC's production practices in 2009. However, the seeps still occur today and PCEC has not been able to prove it can conduct its steam drilling operation without eliminating damaging oil seeps.

**Issue # 4: There is no evidence in the record to prove this project will have a substantial economic benefit.**

There is no evidence in the record to substantiate PCEC's claim that the Project will have a substantial economic benefit to the community. PCEC failed to present any reliable, project specific evidence about the Project's projected tax contribution, and the County Assessor's office declined to speculate or provide an estimate. There is also no evidence in the record to justify any claims by PCEC that the Project would provide any meaningful jobs to the local economy, as the 35 -75 temporary jobs do not provide a significant long term benefit. When compared to PCEC's significant history of oil seeps and spills and the resulting species and habitat loss, the Commission was unable to support a Statement of Overriding Considerations based on the scarce evidence in the record.

**B. The Board Should Make Findings to Deny the Project.**

EDC and our clients wholly support the County's Findings for Project Denial. The comments that follow provide evidence relevant to support the findings that were omitted, or to clarify relevant facts.

## **Production Plan Findings #1**

### ***Lompoc yerba santa impacts***

This Finding should be revised to affirmatively conclude that the applicant's 2008 and 2016 surveys of the Lompoc yerba santa do not provide evidence that the species is thriving on the Project site. In addition to the difference in methodology disclosed in the Finding, the two surveys compared *different sized* areas on the project site. The 2008 survey was of a smaller area on just part of the Project site, while the 2016 survey included the entire Project site.<sup>4</sup> PCEC's "biologists mapped the Lompoc yerba santa within the entire designated critical habitat, including most of the Project Site, in 2008."<sup>5</sup> However, "The total area surveyed in 2016 includes all of the areas that were mapped with Lompoc yerba santa in 2008 and the entire Project Site."<sup>6</sup> Therefore, comparing the two surveys as PCEC does is like comparing apples to oranges; no conclusions can be reached. The applicant's conclusion that the Lompoc yerba santa have increased in abundance on the project site is not proven. Regardless, even if additional Lompoc yerba santa plants were identified on site, it does not counter the undisputed evidence that PCEC's operations have destroyed 360 plants to date and are likely to destroy more from future seeps and spills. Nor does the existence of naturally occurring yerba santa prove that impacts to the yerba santa have been successfully mitigated by the applicant.

The Finding notes that the Project has resulted in the loss of approximately 360 Lompoc yerba santa plants, a federally endangered species, but *omits the fact that the Project is located "entirely within" - and has and will continue to impact - critical habitat for Lompoc yerba santa.* (FEIR at 4.3-16; emphasis added) The Finding should be revised to include this omission.

### ***No evidence of project specific tax revenues***

The amount of annual tax revenue from all of PCEC's *current* drilling operations of \$2.7 – \$4.7 million cited in the Finding should not be included because it cannot be considered a benefit of the proposed Project and is not relevant for the BOS to consider. Only Project specific tax revenue information can be relied upon by the BOS, and there is no evidence in the record that provides this information. In fact, the County Assessor was asked and was unable to provide an accurate estimate of the Project's uncertain future tax revenues.

## **Production Plan Findings #2: Presence of additional watersheds**

The Finding does not mention that the site is unable to accommodate additional oil and gas development because it is located in two important watersheds which could be polluted by future seeps and/or spills: Orcutt Creek and San Antonio Creek, both of which support listed and sensitive species. (FEIR at 4.3-58)

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<sup>4</sup> Chambers Group letter to Phil Brown, PCEC. June 24, 2016. Page 1.

<sup>5</sup> Chambers Group letter to Phil Brown, PCEC. June 24, 2016. Page 1.

<sup>6</sup> Chambers Group letter to Phil Brown, PCEC. June 24, 2016. Page 1-2.

**Production Plan Findings #3: Neither the project, nor any alternatives that include drilling additional oil wells, are consistent with the Comprehensive Plan.**

This Finding concludes that the Project is not consistent with the county's Comprehensive Plan Land Use Element Hillside and Watershed Policy #2:

Hillside and Watershed Policy #2: All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

The Finding correctly asserts that the Project will result in significant and unmitigable impacts to the site's natural features and native vegetation. In addition to Southern Bishop pine stands and Lompoc yerba santa, the Finding omits the fact that La Purisima Manzanita, Mesa horkelia, Shag-bark Manzanita, and Black-flowered figwort – all sensitive plant species - would also not be preserved to the maximum extent feasible. (FEIR at 4.3-48 – 49) The Finding should also disclose that the Project's oil seeps and surface expressions are risky and unpredictable, resulting in Class I impacts to biological resources and water resources. This inconsistency exists for the Careaga Exclusion alternative as well, due to its similar Class I impacts from oil seeps and spills, and thus precludes approval.

**II. The Board Should Approve the Seep Can Only Alternative.**

EDC and our clients support the Seep Can Only Alternative as a feasible mechanism to contain oil seeps on site. We urge the BOS, however, to ensure that public notice will be provided when permits issue for future seep cans so that the public and decision-makers will be able to monitor future activities at the PCEC Project site.

The following comments relate to a couple necessary revisions to the CEQA Findings.

**1.0 CEQA Findings**

**1.1.6 Findings that identified project alternatives or mitigation measures are not feasible.**

*Careaga Exclusion Alternative*

The Findings should be revised to acknowledge the FEIR's conclusion that this Alternative would still result in Class I impacts to biological resources and water resources from oil seeps and surface expressions. (FEIR at 5-7) Therefore, the BOS should also find that this

alternative should not be adopted as it would not sufficiently lessen the Project's significant impacts and only partially meets the Project objectives.

*Careaga and CTS Exclusion*

The Findings fail to mention that the FEIR concluded that this Alternative would still result in Class I impacts to CTS and that operational impacts from oil seeps and surface expressions would also remain Class I. (FEIR at 5-17) Therefore, the BOS should also find that this alternative should not be adopted as it would not sufficiently lessen the Project's significant impacts and would only partially meet the Project objectives.

**Conclusion**

We urge the BOS to deny PCEC's appeal and support the Commission, the Staff and our community and protect our air, water and wildlife from further unnecessary harm. We also recommend that the Board move forward with the Seep Can Only proposal and require PCEC to immediately mitigate impacts from their existing oil wells and resulting seeps and spills.

Sincerely,



Alicia Roessler  
Staff Attorney



Brian Trautwein  
Environmental Analyst

cc: Sierra Club  
SBCAN

## Daly, Julia Rutherford

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**From:** Kovacs, Naomi  
**Sent:** Thursday, October 06, 2016 5:15 PM  
**To:** sbcob  
**Subject:** Ex Parte 10/11/16 Pacific Coast Energy Company - Orcutt Hill  
**Attachments:** 2016-10-06 Tess Blake.docx

Attached please find another letter received by Supervisor Wolf regarding the PCEC Orcutt Hill project, before the Board of Supervisors on 10/11/16:

Tess Blake

If you'd please confirm receipt of this attachment, I would greatly appreciate it.

Best,

-Naomi

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**Naomi Kovacs, MPA**

**Office of County Supervisor Janet Wolf**

105 E. Anapamu St.

Santa Barbara, CA 93101

(805) 568-2191

[nkovacs@countyofsb.org](mailto:nkovacs@countyofsb.org)

**From:** [tblakedbond@aol.com](mailto:tblakedbond@aol.com)

**Date:** October 6, 2016 at 1:09:53 PM PDT

**To:** [jwolf@sbcbos2.org](mailto:jwolf@sbcbos2.org)

**Subject:** Fwd: Deny appeal for PCEC's project to expand their drilling in the Orcutt Hill oilfield

Dear Supervisor Wolf,

As a resident of Orcutt, I'm very concerned about any expansion of oil drilling here, and I'm asking you to please deny the appeal by PCEC.

I attended all the Planning Commission meetings regarding PCEC's project over the past few months. This oil project was rejected by the Planning Commission due to unavoidable risk of spills. Existing operations there have already caused 100 seeps in surrounding natural areas, and endangered species habitats. The State predicts at least another 225 seeps in the next 25 years if the Project is approved.

Furthermore, it was rejected because of the significant, unmitigated Class I impacts to Air Quality. We do not even have an air quality monitor in or close to the Orcutt Hill oilfield.

Moreover, the environmental review found significant and unavoidable risk to our water. The Project site is on a hill that intersects Orcutt creek and others that flow to the San Antonio Lagoon and Pacific Ocean.

The County cannot justify overturning the Planning Commission's decision and Staff recommendations of denial. The Project does not offer any benefits that outweigh the potentially substantial and irreversible environmental harm from allowing PCEC to double its cyclic steam drilling (another way of saying fracking) on Orcutt Hill. Again, please deny PCEC's appeal.

Thank you for taking action to prevent more oil seeps and spills in Santa Barbara County.

Regards,

Tess Blake

**Daly, Julia Rutherford**

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**From:** Kovacs, Naomi  
**Sent:** Friday, October 07, 2016 3:57 PM  
**To:** sbcob  
**Subject:** Ex Parte 10/11/16 Pacific Coast Energy Company - Orcutt Hill  
**Attachments:** 2016-10-07 Vicky Blum and David Lebell.docx

Attached please find another letter received by Supervisor Wolf regarding the PCEC Orcutt Hill project, before the Board of Supervisors on 10/11/16:

Vicky Blum & David Lebell

If you'd please confirm receipt of this attachment, I would greatly appreciate it.

Best,

-Naomi

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**Naomi Kovacs, MPA**

**Office of County Supervisor Janet Wolf**

105 E. Anapamu St.  
Santa Barbara, CA 93101  
(805) 568-2191  
nkovacs@countyofsb.org

**From:** [blumvicky@gmail.com](mailto:blumvicky@gmail.com) [mailto:[blumvicky@gmail.com](mailto:blumvicky@gmail.com)]

**Sent:** Friday, October 07, 2016 10:18 AM

**To:** Wolf, Janet

**Cc:** David Lebell

**Subject:** Stop New Oil Wells

Hi Janet,

I hope you're doing well.

I wanted to send you an email regarding new oil development. I hope that you will DENY PCEC's appeal, and support the Planning Commission's decision to protect our SB County from further damage from PCEC's oil seeps and spills.

1. The Planning Commission carefully considered this project and rejected it because of the significant impacts to air quality, endangered and sensitive species, critical habitat and water quality.
2. Cyclic Steam Injection oil extraction has a high well casing failure rate and there is a history of eruptive well failures at the site. The drilling would occur in an area that is already suffering extensive damage from over 100 accidental oil seeps and spills, destroying numerous federally listed endangered species and sensitive habitat.
3. The Project site is one of the most biologically rich locations in Santa Barbara County. The Project's oil seeps would potentially drown the endangered California Tiger Salamanders and destroy some of the rarest and most imperiled plant communities in the world.
4. The environmental review found significant and unavoidable risks to our water, with various creeks on the project site that flow to the San Antonio Lagoon and Pacific Ocean. The recent Refugio oil spill demonstrates the immense risk and costs of oil spills.
5. The Project does not provide any benefits that will outweigh the potential environmental harm from allowing PCEC to double its cyclic steam drilling operations on Orcutt Hill.

Thanks,

Vicky Blum and David Lebell  
703 Litchfield Lane  
SB, CA 93109