Lenzi, Chelsea

Subject: FW: PCEC oil spills

From: Jessica Rose [mailto:jessicarosehypnosis@gmail.com]
Sent: Thursday, October 06, 2016 6:35 AM
To: County Executive Office
Subject: PCEC oil spills

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.*

Please, be part of the reason things stay healthy and beautiful. Please.
Sincerely,

Jessica Rose

Thousand Oaks, CA

Daly, Julia Rutherford

From: Carbajal, Salud
Sent: Thursday, October 06, 2016 12:10 PM
To: sbcob
Subject: Fwd: PCE Orcutt Hill Resources Enhancement Plan Project (Deny Appeal)
Attachments: Sierra Club PCE Oil Project Supervisors.pdf; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

> **From:** Katie Davis <kdavis2468@gmail.com>
> **Date:** October 6, 2016 at 11:58:33 AM PDT
> **To:** "Farr, Doreen" <dfarr@countyofsb.org>, SupervisorCarbajal@sbcbos1.org, Janet Wolf <jwolf@sbcbos2.org>, peter.adam@countyofsb.org, "Lavagnino, Steve" <steve.lavagnino@countyofsb.org>, mmiyasato@countyofsb.org
> **Cc:** "O'Gorman, Mary" <mogorman@countyofsb.org>, "Tittle, Jeremy" <jtittle@co.santa-barbara.ca.us>, "Henson, Chris" <chenson@countyofsb.org>, Jefferson Litten <jlitten@cecmail.org>, W Michael Hackett <sbcahackett@gmail.com>, James Hines <Jhcasitas@gmail.com>, allen@co.santa-barbara.ca.us, sbcob@co.santa-barbara.ca.us
> **Subject: PCE Orcutt Hill Resources Enhancement Plan Project (Deny Appeal)**
>
> Dear Santa Barbara County Supervisors,
>
> Please see attached letter regarding the PCE Orcutt Hill Resources Enhancement Plan Project.
>
> Regards,
>
> Katie Davis
> Chair, Santa Barbara Sierra Club
> 805-451-4574

PO Box 31241
Santa Barbara CA
93130-1241

SIERRA CLUB
Los Padres Chapter

October 6, 2016

Santa Barbara County Board of Supervisors
105 E. Anapamu St, Suite 407
Santa Barbara, CA 93101
Attn: Michael Allen, Clerk of the Board, allen@co.santa-barbara.ca.us and sbcob@co.santa-barbara.ca.us

Re: PCE Orcutt Hill Resources Enhancement Plan Project (Deny Appeal)

Dear Santa Barbara County Supervisors,

The Planning Commission decision to deny the PCE oil project is well supported and should be upheld.

Seeps and spills are unavoidable and unacceptable. The installation of the 100th "emergency" seep can in the existing operation, the EIR's finding of significant and unavoidable (Class 1) risks of spills and damage to water and biological resources, CA Fish & Wildlife's estimate of up to 225 additional seeps if this project were approved, the EIR's documentation of eruptive well failures at the site, and the fact that as the EIR explains, "casing failure rate is can be high in steam injection wells and especially in cyclic steam injection wells," all make it abundantly clear that seeps and spills are an on-going and inevitable feature of PCE's operation, and not the "hypothetical and remote" impacts that the company claims in its appeal. Hence PCE's appeal should be denied.

Contrary to PCE's claim, the Planning Commission extensively discussed the area's natural seeps. They noted the Careaga tar zone exclusion option still wouldn't prevent seeps which also occur outside that zone. It is precisely because of these natural fissures that steam injection operations, which liquefy and free oil to find any available path to the surface, are uniquely unsuited to the area and worsen the problem. The geotechnical investigation notes that, "surface cracks began forming after the cyclic steaming began."

Lastly, PCE's claim of "substantial economic benefits" is not supported by the facts. The project would provide zero permanent jobs. A modest increase in property taxes is not worth the risk of a major spill that might fall to taxpayers to clean up given PCE's precarious financial situation. (The Refugio spill cost will be well over $200 million.)

Uphold the considered decision of the Planning Commission and approve staff's recommended "seep can only alternative," but include public notice of new seeps.

Thank you very much for your consideration,

Jim Hines
Chair, Los Padres Chapter of the Sierra Club

Attachment: May 9, 2016 Sierra Club letter to the Planning Commission

SIERRA CLUB
Los Padres Chapter

PO Box 31241,
Santa Barbara CA
93130-1241

May 9, 2016

Santa Barbara County Planning Commission
105 E. Anapamu St
Santa Barbara, CA 93101
Attn: David Villalobos, Board Assistant Supervisor, dvillalo@co.santa-barbara.ca.us

Re: PCE Orcutt Hill Resources Enhancement Plan Project (Oppose)

Dear Santa Barbara County Planning Commission Members:

The Los Padres Chapter of the Sierra Club appreciates staff's recognition of the Class I (significant and unavoidable) impacts related to oil spills, seeps and impacts on biological resources and water resources, and their efforts to find a way to lessen these impacts. However, staff suggested mitigations are insufficient. The "Careaga Exclusion Alternative" doesn't solve the problems because seeps are happening outside of the Careaga tar zone as well as within it. And spills can happen anywhere. In fact, these Class I impacts cannot be avoided by definition. As such, this project should be denied.

The project does not meet DOGGR conditions. In their June 9, 2012 letter, DOGGR states, "the Division's approval is strictly limited to injection operations conducted in accordance with the conditions specified by the Division." The first of which is, "Oil, steam, and/or water are prevented from flowing to the surface as a result of cyclic steaming operations, either through new or existing seeps, fissures, or other conduits associated with improperly cased and/or cemented wells."

Simply put, DOGGR says that preventing seeps is s condition of expansion, and yet PCE has been unable to comply. While they have tried to modify operations to prevent seeps and surface expressions, these problems continue. Since DOGGR's letter there have been many emergency seep cans. The 100th seep can was recently employed. Clearly PCE has not found a way to comply with this condition and should not be permitted to expand operations until they can do so. DOGGR has had to shut down operations at certain pods due to problems with surface expressions (oil exploding out of the ground near drill sites). PCE's current steam operations in this field are dangerous and uncontrolled, and they should not be allowed to double their operations.

In addition, the staff report claims "compliance" with the County Plan when there are clear conflicts. For instance, "continued use of the access road to seep can location 88 has the potential to disrupt, alter, or destroy SBA-4069/H, a significant prehistoric and historic archaeological site." The Historical and Archaeological Sites Policy requires developments avoid impacts to cultural sites, but you can't stop accessing a seep can or responding to a new seep or spill. Therefore, you can't conclude the project is in compliance by requiring that, "the applicant stop work if cultural resources are encountered during project-related activities." You can't both require PCE to respond to seeps and at the same time require them to stop if an archaeological site is endangered.

The same applies to water. Protection of our water should be of primary importance in Santa Barbara County, and this project puts our water unavoidably at risk. The County Hillside and Watershed Policy prohibits, "Degradation of the water quality of groundwater basins, nearby streams, or wetlands" and discharge of pollutants into or near waterways. Our Streams and Creeks Policy also requires protection of stream corridors. The project is situated on a hill intersecting various creeks that flow to the San Antonio Lagoon and Pacific Ocean. The EIR concludes that oil seeps and surface expressions threaten water resources. According to the EIR and staff report, "seeps may occur within a stream corridor." It also concludes, "A rupture or leak from the PCEC oil production facilities and pipelines could substantially degrade surface or groundwater quality." The staff report claims that having a "Spill Prevention Control and Countermeasures (SPCC) Plan" puts the project in compliance with county policy to protect streams and groundwater. This is completely insufficient. Protecting water means preventing the risk in the first place.

In the event of a major spill, we are also deeply concerned that PCE will not live up to its clean-up obligations and that its precarious financial situation may lead it to cut corners that increase risks of spills. In February, Pacific Coast Oil Trust received notice from the NYSE that it was not in compliance with the continued listing standard. It also stopped paying cash distributions. If the trust is at risk as it is, what happens in the event of a major spill? The Plains Pipeline spill at Refugio last year has turned out to be far more costly than Plains ever anticipated. Unless PCE puts forward a very large bond, this project puts county taxpayers at significant and unacceptable risk.

The risks of this project outweigh the benefits. The project's "stated objectives" are incorrect. The project proposes to reduce the need for foreign oil, but will not do so. According to the EIA, we currently export 400,000 barrels of petroleum products every day from the west coast. That is over 100 times the 3,600 barrels a day that would be produced by this project. Clearly, this project will have zero measurable impact on the global oil trade. Any local economic gains of the project are outweighed by the larger economic damage caused by spills and the displacement of other, more locally beneficial economic activity.

We are only touching on the problems with this project which also include putting endangered species at risk, significant air pollution and huge greenhouse gas releases that are unlikely to be offset locally. Steam injection is the worst type of oil production in terms of emissions. Studies in Canada have found that it can use more energy than it produces. What is also known is that steam injection projects are dangerous. Casing failure rate can be high in steam injection wells and especially in cyclic steam injection wells. People have died. Waterways, such as in the Cold Lake field in Canada, have been permanently polluted.

Given that the project cannot comply with DOGGR conditions and County Policy, it should be denied.

Thank you very much for your consideration,

Jim Hines
Chair, Los Padres Chapter of the Sierra Club

Lenzi, Chelsea

From: Gail Osherenko <gail.osherenko@gmail.com>
Sent: Thursday, October 06, 2016 2:03 PM
To: sbcob; Carbajal, Salud
Subject: Please Deny Pacific Coast Energy Company's Project

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.

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. 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.

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.

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.

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. I urge you to deny the project.

Sincerely,

Gail Osherenko
835 Via Granada
Santa Barbara, CA 93103

Daly, Julia Rutherford

From: Masseybarb@aol.com
Sent: Thursday, October 06, 2016 2:44 PM
To: sbcob
Cc: masseybarb@aol.com
Subject: Please Deny PCEC's Project

October 6, 2016

Dear Supervisors,

Please 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.

Because of the significant impacts to air quality, endangered and sensitive species, critical habitat, and water quality, the Planning commission after careful consideration rejected it.

Significant and unavoidable risks to our water, with various creeks on the project site that flow to the San Antonio Lagoon and Pacific Ocean was found during the environmental review. The recent Refugio oil spill demonstrates the immense risk and costs of oil spills.

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.

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.

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.

Please deny this project.

Sincerely,

Barbara Massey
7912 Winchester Circle
Goleta, CA 93117
masseybarb@aol.com

Daly, Julia Rutherford

From: Rich Moser <rich@transcendentalastrology.com>
Sent: Thursday, October 06, 2016 5:07 PM
To: sbcob
Subject: Input on future oil production operations in SB County.

Hello,

1. No more expansion of existing oil facilities for at least ten years (and then only if they've improved their track records, which have been pretty dismal).

2. No fracking whatsoever. It destroys the groundwater and we can't clean it up yet.

3. No exploding oil transport trains or trucks.

Thank you, Rich Moser

659 Mayrum St.
SB, 93111
(805) 845.4805

Rich Moser
rich@transcendentalastrology.com

Daly, Julia Rutherford

From: John Michal <john.michal@gte.net>
Sent: Thursday, October 06, 2016 5:10 PM
To: sbcob
Subject: PCEC Drilling Project

Dear Honorable Carbajal,

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.

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.

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.

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.

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.

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,

John A. Michal, III, M.D.
1455 Monte Vista Road
Montecito, CA 93108
(805) 969-4951
john.michal@gte.net

Daly, Julia Rutherford

From: Greg LeRoy <sbgregleroy@gmail.com>
Sent: Thursday, October 06, 2016 5:12 PM
To: sbcob
Subject: No new Wells!

No new steam injection wells in Orcutt or anywhere in Santa Barbara county!!

Greg LeRoy
Santa Barbara, CA 93110

Daly, Julia Rutherford

From: Maribel Aguilera <maribel@mhernandezlaw.com>
Sent: Thursday, October 06, 2016 5:20 PM
To: sbcob
Subject: PCEC Project on agenda for October 11, 2016
Attachments: Correspondece to Board of Supervisors in support of PCEC project 10-7-2016.pdf

Dear Clerk of the Board:

Attached please find a letter in support of the Pacific Coast Energy Company project that is on the agenda for October 11, 2016.

I have placed the letter in the mail but I want to be sure you receive the letter before the October 7, 2016 deadline.

Maribel Aguilera
Attorney at Law

Maribel Aguilera-Hernandez
Attorney at Law
937 E. Main Street #206
Santa Maria, CA 93454
(805) 598-9358 or (805) 603-
Maribel@mhernandezlaw.com

October 6, 2016

Clerk of the Board
105 East Anapamu St.
Santa Barbara, CA 93101

Dear Mr. Chairman and commissioners.

My name is Maribel Aguilera. I was raised on the central coast and am a true local. I practice law in Santa Maria, CA. I had the privilege to work as a Landman with ERG in Cat Canyon for 3 years and worked in the Petroleum industry for 5 years. Having had this experience, I am familiar with oil projects and oil operations and am pleased to make some comments in support of PCEC's Orcutt Hill Resource Enhancement Project, or OHREP.

This project is well thought out, designed and probably one of the new oil projects with the least impacts you will likely see. In fact, it sounds like the few "significant" impacts from the EIR for the project are actually based on hypothetical impacts rather than concrete ones. I understand the County need to be conservative in its analysis and conclusions, which I believe has been fully addressed in planning staff's environmentally superior Careaga Alternative.

As you know from your staff report and staff presentation, the project will utilize existing infrastructure, including existing steam generators, roads, offices and pipeline corridors. The new wells will be on existing pads so there won't be a lot of new ground disturbance, and the overall footprint is diminutive.

The benefits of the project for the County are real, and the project will provide employment, tax revenues, and an ongoing need for services that will support local businesses and workers. Not to mention that the project will enable continued local production of an energy resource we all utilize on a daily basis.

I have worked with PCEC in the past and know they are a capable and experienced operator with a strong commitment to safety, the environment, and the community. They are invested and contribute to the local community. They have a very good, well-thought out project with a large economic benefit, and I ask that you approve this project.

Maribel Aguilera-Hernandez
Attorney at Law

Daly, Julia Rutherford

From: Carbajal, Salud
Sent: Thursday, October 06, 2016 7:10 PM
To: sbcob
Subject: Fwd: Your Vote on PCEC's Appeal
Attachments: Letter to Supervisors re PCEC's Appeal, 10-6-16.docx; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: Renee ONeill <chasingstar2701@yahoo.com>
Date: October 6, 2016 at 4:39:59 PM PDT
To: The Honorable Supervisors <steve.lavagnino@countyofsb.org>, Steve Lavagnino <steve.lavagnino@countyofsb.org>, Janet Wolf <jwolf@sbcbos2.org>, Doreen Farr <dfarr@countyofsb.org>, Salud Carbajal <SupervisorCarbajal@sbcbos1.org>, Peter Adam <peter.adam@countyofsb.org>
Subject: RE: Your Vote on PCEC's Appeal
Reply-To: Renee ONeill <chasingstar2701@yahoo.com>

Dear Honorable Members of the Board,

Attached, please find my letter regarding concerns I have about your final vote on the PCE Appeal.

I plan to attend the October 11th Hearing, in Santa Maria.

Respectfully Yours,

Renée O'Neill

"In the middle of every difficulty**´¨)
¸.·´ ¸.·*´¨) ¸.·*¨)
(¸.·´ (¸.·´ * lies opportunity." – Albert Einstein

Dear Honorable Members of the Board: October 6, 2016

I am gravely concerned about the final decision you are making, re PCEC's appeal to drill, up to 144 cyclic steam injection oil wells in the Orcutt Hills. I have been informed that this oil project was already rejected by the Planning Commission, due to unavoidable risk of spills. **Before making a decision, please bear the following in mind:**

1. **Your Mission Statement:** ***"Provide quality public services to the people of Santa Barbara County in response to their need for a healthy, safe, and prosperous environment; and to establish and maintain a workforce which reflects the diversity of the community."***

2. Toxic Fracking Chemicals have been proven detrimental to the environment, contaminating ground water, causing earthquakes, cancer, birth defects and other health-related issues. **Not Healthy! Not Safe! Not Prosperous!**
3. One million gallons of water are needed to execute one, single Frack!
4. Where is this water coming from, especially in times of drought? **This is Not Healthy, Safe or Prosperous for SB Community or our Environment!**
5. The waste water from fracking is permanently polluted with toxic chemicals and/or naturally occurring toxins, hydrogen sulfide, radioactive compounds, arsenic, lead and other contaminants. To dispose of this polluted water they re-inject it underground, a process that has been proven to trigger earthquakes. The US Geological survey has found, definitively that there is more than a 4-fold increase in large earthquakes in the central and eastern US, which "coincides with the injection of wastewater from oil and gas production." **SB County is riddled with fault lines!! The likelihood of earthquakes will increase exponentially, here! Not Safe!**
6. If you research other places in our nation/world, where this type of industry has been allowed to develop, the people who voted for it have been devastated by the results and sorely regretted their misconception that this was a 'Good Thing.' The oil industries' reputation, 'Slam-Bam-Thank-You-Ma'am...we're-out-of-here,' approach, has permanently destroyed untold areas of our planet. **Not Prosperous for SBC!**

Ben Franklin and Albert Einstein were fond of repeating an ancient Chinese proverb, "The definition of insanity is doing the same thing in the same way, over and over again and expecting different results."
Throughout Industrial History, we hear horrific stories about mountain-top removal, strip-mining, nuclear disasters and oil spills; all of which have long-term, devastating effects on the inhabitants of our planet. We continue to 'do the same thing, over and over again,' by using very destructive methods of extracting fuels and other resources, to feed our nation's insatiable appetite. This has proven detrimental to the sustainability of our small, precious planet.
As stewards of the land, we have a moral responsibility to future generations and an obligation to continually develop and strive for the use of cleaner, greener resources! Our great nation has the ability and responsibility to lead our world, in this effort!

God has provided the clean resources for us to accomplish this! It is up to YOU and the PEOPLE of our Green Planet, to attain it! Please help us, by setting a good example in Santa Barbara County!

Appreciatively Yours,

Renée O'Neill

Daly, Julia Rutherford

From: Rasnow, Brian K. <brian.rasnow@csuci.edu>
Sent: Thursday, October 06, 2016 7:36 PM
To: sbcob
Subject: DENY PCEC's 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.

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. 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. 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.

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. 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. Instead please support efforts towards sustainable, renewable, distributed energy generation.

Respectfully,

Brian Rasnow, Ph.D.
Dept. of Physics
California State University Channel Islands
One University Drive
Camarillo, CA 93012
brian.rasnow@csuci.edu
www.rasnowpeak.com/brian

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All we have is our powerlessness, and that is our strength - Václav Havel
"Unless we change direction, we are likely to end up where we are going" - *Chinese proverb*

Daly, Julia Rutherford

From: Carbajal, Salud
Sent: Thursday, October 06, 2016 9:08 PM
To: sbcob
Subject: Fwd: PEC Letter of support
Attachments: Orcutt Hill project.pdf; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: Martin Rodriguez <martin433@icloud.com>
Date: October 6, 2016 at 9:05:21 PM PDT
To: supervisorcarbajal@sbcbos1.org
Cc: <jwolf@sbcbos2.org>, <dfarr@countyofsb.org>, <steve.lavagnino@countyofsb.org>, <peter.adam@countyofsb.org>
Subject: PEC Letter of support

Ironworkers Local 433

International Association Of Bridge, Structural & Ornamental Iron Workers A.F.L.- C.I.O.

17495 HURLEY STREET EAST CITY OF INDUSTRY, CALIFORNIA 91744

PHONE: (626) 964-2500
FAX: (626) 964-1919
mike@ironworkers433.org

MICHAEL SILVEY
Financial Secretary-Treasurer
Business Manager

September 21, 2016

Supervisor Salud Carbajal
Supervisor Janet Wolf
Supervisor Doreen Farr
Supervisor Peter Adam
Supervisor Steve Lavagnino
Santa Barbara County Board of Supervisors
105 E. Anapamu Street, Room 407
Santa Barbara CA, 93101

Re: Case No. APL-00000-00020

Dear Supervisors,

I am writing on behalf of the **Ironworkers Local #433**, the structural ironworkers who work throughout the Central Coast and Southern California. We are contacting you to urge support of the Orcutt Hill Project proposed by Pacific Coast Energy.

We support this project for several reasons, the first being that the support of the oil and gas industry is important to the region and the State as a whole. The industry produces thousands of jobs and millions of dollars of tax revenue regionally in the Central Coast, including jobs for my members and other Building Trades members. I also urge you to support Orcutt Hill as it is a good example of a project getting revised based upon the planning process. Because of the feedback at the planning hearing, this project has been significantly changed to incorporate the concerns that were voiced. And, because of these changes and more importantly, the spirit in which they were made, we feel that the project has earned approval.

Please consider supporting this important project.

Thank you.

Martin Rodriguez

Cc: Robbie Hunter, President, SBCTC

Daly, Julia Rutherford

From: janejo49@yahoo.com
Sent: Friday, October 07, 2016 6:24 AM
To: sbcob
Subject: PCEC Appeal

Honorable Supervisors,

Please deny PCECs appeal to build more cyclic steam wells in Orcutt. We strongly believe that the risks outweigh any benefits.

Jane Warner
Howard Rothman
1534 Marquard Terrace
Santa Barbara 93101

Sent from my iPhone

Daly, Julia Rutherford

From: a practising light child <urielsong@yahoo.com>
Sent: Friday, October 07, 2016 8:44 AM
To: sbcob
Subject: 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.
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.
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.
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.
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.
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,
Sarah Finley
7661 Santos rd
Lompoc, CA
93436

Daly, Julia Rutherford

From: Marguerite Borchers <margieborchers@gmail.com>
Sent: Friday, October 07, 2016 9:07 AM
To: sbcob
Subject: No PCEC!

"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.
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.
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.
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.
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.
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.
Most Sincerely,
Margie Borchers
Santa Barbara

Daly, Julia Rutherford

From: Heather Shields <Heather.Shields@patagonia.com>
Sent: Friday, October 07, 2016 9:16 AM
To: SupervisorCarbajal; Wolf, Janet; Farr, Doreen; Adam, Peter; Lavagnino, Steve; sbcob
Subject: PCEC cyclic steam operation expansion

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,
Heather Shields

Heather Shields
Testing and Standards Engineer, Technical Knits
Patagonia, Inc.
259 W. Santa Clara St., Ventura, CA 93001 USA
Phone: (805) 667-4867

Daly, Julia Rutherford

From: Tina Boradiansky <swancloud55@gmail.com>
Sent: Friday, October 07, 2016 9:57 AM
To: sbcob
Subject: PCEC Hearing Oct 11, 2016

Good Morning

I am writing to urge the County Board of Supervisors to DENY the PCEC appeal of their proposed oil drilling project to be heard on the October 11, 2016 Agenda.

I believe the Planning Commission carefully weighed the benefits and risks of this project of expanded drilling for the county of Santa Barbara, and correctly concluded the risks are too substantial to go forward. If the County of Santa Barbara is going to act consistent with both California and Global (Paris Climate Accord), it is imperative to stop approving increased air emissions from oil drilling. Continual expansion will place Santa Barbara County at odds with the increasingly protective carbon dioxide and methane emission cut backs.

The specific site of this proposal is also way too fragile to risk the kind of continual negligent oil spills and seepage that we experienced recently at Refugio Beach and spreading down the coast.

Please DENY this appeal. I am not able to attend the hearing in Santa Maria, but I strongly believe the planning commission's denial is both consistent with California standards and goals plus the new Paris Accord.

Thank you,

Tina Boradiansky

Daly, Julia Rutherford

From:	John Douglas <jed805@gmail.com>
Sent:	Friday, October 07, 2016 10:06 AM
To:	sbcob; SupervisorCarbajal; Wolf, Janet; farr@countyofsb.org; Adam, Peter; Lavagnino, Steve
Subject:	PCEC appeal of Planning Commission decision

October 7, 2016

re: Pacific Coast Energy Company appeal

Santa Barbara Count Board of Supervisors

Honorable Supervisors:

I urge you to DENY Pacific Coast Energy Company's ("PCEC") appeal, and support the Planning Commission's decision to protect our County from further damage from PCEC's oil seeps and spills.
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.
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.
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.
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.
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 for considering my views.

John E. Douglas
7465 Hollister Ave. #234
Goleta, CA 93117
(805) 284-2082
jed805@gmail.com

Daly, Julia Rutherford

From: Sarah Kass <sarskass@gmail.com>
Sent: Friday, October 07, 2016 10:31 AM
To: sbcob
Subject: PEC appeal

Dear Board Members,
I urge you to deny PEC's appeal. Please do not let further degradation to our precious environment occur.

Sincerely
Sarah Kass, Santa Barbara

Gregory Gandrud

1180 Eugenia Place, Suite 220
Carpinteria, CA 93013-2000

October 6th, 2016

Clerk of the Board
105 East Anapamu Street
Santa Barbara, CA 93101

Re: Pacific Coast Energy OHREP Project – October 11th

Dear Sir:

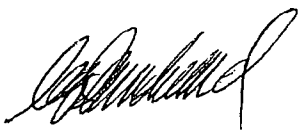
I have always been a supporter of oil production at Orcutt Hill. I am a firm believer in the importance of domestic energy production. Not only does local oil development reduce our dependence on foreign companies, but producing oil in the U.S. means that we have total control over the environmental impacts of these projects.

The current oil production procedures in place at Orcutt Hill reflect current best practices, and meet all applicable environmental rules and regulations. In most other countries in the world where drilling takes place, this kind of safe oil production and oversight is difficult, if not impossible, to ensure.

That is why I was dismayed at the recent Planning Commission's decision to deny this project. I do not believe you could find a better new oil project that has taken in to consideration so many safety and environmental considerations to insure minimal impacts.

I believe the OHREP is the gold standard of environmentally conscious oil production, and strongly encourage the Board of Supervisors to approve this project on Oct. 11th.

Respectfully,



Gregory Gandrud, Former Councilmember
City of Carpinteria

Clerk of the Board
105 East Anapamu Street
Santa Barbara, CA 93101

October 5, 2016

Re: Pacific Coast Energy Company OHREP Project – October 11

To the Board of Supervisors :

On the 11th of October, the Board of Supervisors will hold a hearing on the subject of the PCEC's appeal to approve the Orcutt Hill Resource Enhancement Project (OHREP). As a Petroleum Engineer with over 30 years and now working up at the Orcutt Hill Field, I would like the Board of Supervisors to approve this Project based on the following:

- This OHREP project is a continuation of the Diatomite development that has substantially increased this field's oil and gas production, which helps us reduce our dependence on foreign oil. This project has a very small foot print. There are no oil pipelines into California and if California does not produce what it consumes, then the deficiency has to be brought in by rail car or ship.
- There are no Underground Sources of Drinking Water (USDW) on Orcutt Hill that can be adversely impacted. The steam used to move this heavy oil comes from the field's cleaned up produced water (seawater brine laid down with the oil millions of years ago).
- Oilfield Standards: We engineers go to great lengths to protect the environment by strictly adhering to industry standard practices in the design, building and production of our natural resources: SPE, API, NACE, ASME, etc.
- Economic Impacts:
  Jobs – almost all of us earn higher than average salaries and many of our young operators have the ability to buy homes for their new families
  Increased tax revenues for schools
  Support of Non-profits like the PCPA
  Standard of Living – energy is the key reason why all of us enjoy such a high standard of living. Energy of all kinds is what we need.
- It's the right thing to do for our community.

As a registered voter, I'm strongly requesting that all of you approve this very well designed project.

Respectfully submitted,

Frank W. Smith

Frank W. Smith – Consulting Petroleum Engineer

Jim Bray

From: John Collier
Sent: Wednesday, October 05, 2016 2:11 PM
To: Jim Bray
Subject: Letter To Board

Clerk of the Board
105 East Anapamu Street
Santa Barbara, CA. 93101

October 5, 2016

RE: Pacific Coast Energy OHPER Project – October 11

Dear Board

I take care of all Electrical and Instrumentation for PCEC on Orcutt Hill, and have over 35 years in the Oil Industry. PCEC is the best I've worked with. The Crew " both Young and Old" are TOP NOTCH, all of us take our jobs personally and strive to be the best,
I can vouch that we use the most "state of the art" and best quality controls and safety devices out there, and spare no cost.
I urge you to vote yes on this project because I know we can produce it in an environmentally safe and productive way, that will only lead to a positive impact to the community and our country.

Take care

John Collier
Pacific Coast Energy Company
Orcutt Hill, I/E Foreman
1555 Orcutt Hill Road
Orcutt, Ca. 93455
Office 805-937-2576
Cell. 805-431-1407
jcollier@pceclp.com

October 5, 2016

2016 OCT -7 AM 11:20

COUNTY OF SANTA BARBARA
CLERK OF THE
BOARD OF SUPERVISORS

Clerk of the Board
105 East Anapamu St.
Santa Barbara, CA 93101

Re: Pacific Coast Energy Company OHREP Project

Dear Sir:

My family has been ranching on Orcutt Hill for over fifty years with a lease to graze our cattle on PCEC property.

PCEC has proven to be a very good neighbor as well as oil field operator. I consider them to be one of the best operators in the County. They are good about keeping me informed on their operations, have been pro-active to help with issues I as a rancher may have, and work closely with me regarding access to their property. They were pro-active a couple of years ago to invest in fencing to keep unwanted trespassers off the property, which can certainly affect my cattle and ranching operations.

I have been around oil fields all my life and never has there once been an issue for me regarding the safety, cleanliness and environmental stewardship of Orcutt Hill.

I can also tell you they have been active in the community, supported numerous local non-profit and charitable causes, and readily make their company picnic grounds available for public use. They are an excellent operator, good lessor, economic contributor to the community, and I fully support, hope you will approve, their proposed 96-cyclic steaming diatomite well project.

Regards,

Paul T. Righetti
Paul Righetti Ranch Company
Righetti Ranch Properties

Daly, Julia Rutherford

From: CamilleGilbert@aol.com
Sent: Friday, October 07, 2016 11:57 AM
To: sbcob
Subject: DENY PCEC Drilling Project

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.
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.

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.

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.

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.

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,

Camille Gilbert
Santa Barbara, CA 93101

Daly, Julia Rutherford

From: Stephen Thomas <steve@stevet.net>
Sent: Friday, October 07, 2016 12:54 PM
To: sbcob
Subject: Letter to Santa Barbara Board of Supervisors
Attachments: 2016_10_07_12_51_35 Eric Eisenhammer - 10-7-16.pdf; ATT00001.txt

October 6, 2016

Clerk of the Board
105 E Anapamu Street
Santa Barbara, CA 93101

Re: Pacific Coast Energy Company OHREP Project – Oct. 11th

Dear Sir:

I am a longtime resident of Santa Barbara County and a proud supporter of PCEC's Orcutt Hill Resource Enhancement Plan (OHREP) that is the subject of an appeal before the Board of Supervisors on October 11th. This plan is a shining example of how energy production projects should be conducted. OHREP will utilize all of its existing infrastructure and resources to increase oil production on its land. They won't need to add any new steam generators, and they'll use recycled brine water to create the steam for injection.

OHREP will create construction jobs and bring in more tax money for Santa Barbara County – all while taking extreme care to preserve the environment. The proposed project will create opportunity and strengthen our economy.

PCEC has done a great deal of work to address issues raised in the initial Planning Commission hearings. I can't think of a single reason *not* to support this project, and I urge the Board of Supervisors to move forward quickly in approving the project.

Sincerely,

Stephen Thomas
1346 Estrella Drive
Santa Barbara, CA 93110

Daly, Julia Rutherford

From: colin <watermillvillage@gmail.com>
Sent: Friday, October 07, 2016 2:06 PM
To: sbcob
Subject: Injection wells

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.
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.

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.
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.

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.

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,
Colin Loustalot
17 W. Pueblo St.
Santa Barbara, CA. 93105

Daly, Julia Rutherford

From: John Broberg <jtbroberg@gmail.com>
Sent: Friday, October 07, 2016 2:38 PM
To: sbcob
Subject: 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.
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.
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.
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.
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.
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,
John Broberg
545 Conejo Rd
Santa Barbara, Ca 93103
--
"You never change things by fighting the existing reality.
To change something, build a new model that makes the existing model obsolete."

- Buckminster Fuller

Daly, Julia Rutherford

From: Shivaun.Cooney@lw.com
Sent: Friday, October 07, 2016 3:20 PM
To: sbcob
Cc: Cantle, Peter; Briggs, Errin; rb@pceclp.com; philip.brown@pceclp.com; GEORGE.MIHLSTEN@lw.com
Subject: Submission to Board of Supervisors: October 11, 2016 Agenda, Case No. 16APL-00000-00020
Attachments: Submission to Board.pdf

Please find attached a submission to the Board of Supervisors on behalf of Pacific Coast Energy Company in connection with the Orcutt Hill Resource Enhancement Plan project (item 1 on the Board's agenda for October 11).

Thanks very much,
Shivaun

Shivaun A. Cooney

LATHAM & WATKINS LLP
355 South Grand Avenue
Los Angeles, CA 90071-1560
Direct Dial: +1.213.891.7606
Fax: +1.213.891.8763
Email: shivaun.cooney@lw.com
http://www.lw.com

Direct Dial: (213) 891-7606
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355 South Grand Avenue
Los Angeles, California 90071-1560
Tel: +1.213.485.1234 Fax: +1.213.891.8763
www.lw.com

LATHAM & WATKINS LLP

October 7, 2016

VIA EMAIL

Santa Barbara County Board of Supervisors
c/o Clerk of the Board
105 East Anapamu Street, Suite 407
Santa Barbara, CA 93101

Re: Pacific Coast Energy Company Orcutt Hill Resource Enhancement Plan Project (Board of Supervisors Agenda, October 11, 2016, Case No. 16APL-00000-00020)

Dear Honorable Supervisors:

We represent Pacific Coast Energy Company ("PCEC"), the applicant for the Orcutt Hill Resource Enhancement Plan (the "Project"). We appreciate your review of the Project, and respectfully request that the Board grant PCEC's appeal of the Planning Commission's decision and approve the Project with the Careaga Exclusion Alternative (as recommended by County Planning staff and identified as the Environmentally Superior Alternative in the County's EIR for the Project).

Since the Planning Commission's action, PCEC has taken a hard look at the Project and carefully considered the Planning Commission's findings and Planning staff's recommendations. As a result of these efforts, PCEC supports the Careaga Exclusion Alternative and has made substantial enhancements to the overall benefits of the Project and focused on mitigation measures related to key issues. These enhancements are outlined below, and we believe they warrant your consideration and approval:

- Careaga Exclusion Alternative/Reduction of Seeps. PCEC supports the Careaga Exclusion Alternative as recommended by Planning staff. The Careaga Exclusion Alternative eliminates Project drilling through and under the Careaga tar zone, which as explained in the County's EIR, is the zone from which seeps originate. Seeps from the Careaga are a function of the local geology and have naturally occurred for thousands of years, and likely will continue to occur occasionally regardless of the land use on Orcutt Hill. However, as determined by Planning staff, the Careaga Exclusion Alternative mitigates potential naturally occurring seep impacts to the maximum extent feasible and will eliminate seeps from the Careaga associated with the new Project wells.

- Project Labor Agreement. Since the Planning Commission action, PCEC has signed a binding commitment with the California Building Trades that the Project will be covered by a Project Labor Agreement, ensuring high-paying, high quality union jobs for local families. This is a substantial additional benefit of the Project, combined with the $1.8-$2.6 million in additional annual property tax revenue to the County (on top of the $3.7 million PCEC already pays to the County each year) and the Project's significant contribution to the County economy during construction and ongoing operations.

- Net Benefit to California Tiger Salamander ("CTS"). PCEC has continued to work with the U.S. Fish and Wildlife Service ("USFWS") and has submitted a Habitat Conservation Plan that furthers the USFWS recovery goals for CTS in the County. PCEC proposes to mitigate CTS impacts by permanently conserving acreage located in an approximately 21-acre area of CTS breeding habitat on Orcutt Hill that includes a known breeding pond and a potential breeding pond, which will provide a net benefit to the species. As confirmed by the USFWS in the attached letter to Planning (Attachment A), the proposed conservation area "encompasses habitat that is of greater value than that which is being impacted and would aide in the recovery of the species."

- Proliferation of Lompoc Yerba Santa ("LYS") On-Site. As confirmed by Chambers Group biologists in their June 24, 2016 report previously submitted to the County, LYS is thriving on Orcutt Hill, and its growth is not impeded by oil field operations, having increased in total acreage to nearly 300% of the amount mapped by Chambers Group in 2008. The proliferation of LYS from 2008 to 2016 has occurred as PCEC implemented the existing County-approved project of 96 diatomite wells, engaged in ongoing oil field operations, and managed seeps. In fact, a number of new areas of LYS are along pipelines and around seep cans. PCEC is actively working with the biologists to build on the success of the species on-site to date and meet the Project's mitigation requirements.

- Funding for Important LYS Research. To further benefit LYS, PCEC has volunteered the following additional mitigation measure, which has been submitted to the USFWS:

  > "The Habitat Restoration Plan shall include funding in the amount of $25,000/year for a period of five (5) years to support research to determine whether and to what extent individual Lompoc yerba santa plants may be propagated to establish a new population in the wild. Any research project receiving such funding shall first be reviewed and approved by the Service."

- Mitigation of Greenhouse Gas Emissions to Zero. PCEC has committed to mitigate all greenhouse gas emissions to zero, not only offsetting all allowances earned under AB 32 but also offsetting below the County's threshold. PCEC has successfully partnered with the non-profit Community Action Commission of Santa Barbara County on a pilot program to reduce GHG emissions locally and assist low-income residents. This successful project provided County families with free energy upgrades for their homes and new energy-efficient refrigerators, reducing greenhouse gas emissions in the County.

In conclusion, the Project has been carefully designed with a minimal (approximately 3 acre) footprint using existing infrastructure and previously disturbed areas within the 10,000-acre State-designated oil field, where oil production operations have occurred for over 100 years. The additional benefits and mitigation measures described herein and in the attached presentation (Attachment B) offer further support for your approval. We respectfully request that the Board grant PCEC's appeal, approve the Careaga Exclusion Alternative recommended by County Planning staff in their report dated April 20, 2016, with the associated conditions of approval and findings, and certify the EIR.

We appreciate your consideration of these comments.

Very truly yours,

Shivaun Cooney
of LATHAM & WATKINS LLP

Attachments

cc: Peter Cantle, County of Santa Barbara Planning and Development
Errin Briggs, County of Santa Barbara Planning and Development
Randall Breitenbach, Pacific Coast Energy Company
Phil Brown, Pacific Coast Energy Company
George Mihlsten, Latham & Watkins LLP

ATTACHMENT A

USFWS LETTER TO COUNTY

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

IN REPLY REFER TO:
08EVEN-2017-CPA-0004

October 5, 2016

Errin Briggs
County of Santa Barbara
123 East Anapamu Street
Santa Barbara, California 93101

Subject: Receipt of the Draft Habitat Conservation Plan for the Orcutt Hill Resource Enhancement Plan Project, Santa Barbara County, California

Dear Mr. Briggs:

On October 5, 2016, the Ventura Fish and Wildlife Office received a complete permit application for the Orcutt Hill Resource Enhancement Plan Project from the Pacific Coast Energy Company (PCEC). Along with the application, PCEC included a draft Habitat Conservation Plan and $100.00 check for the application fee.

Included in the draft plan is PCEC's proposal to minimize impacts to the California tiger salamander and to mitigate for unavoidable impacts. PCEC is proposing to provide mitigation through the conservation of on-site California tiger salamander known breeding ponds and associated upland habitat located adjacent to the proposed project location. On February 23, 2016, staff from the Ventura Fish and Wildlife Office attended a site visit with PCEC staff to see the proposed project site and mitigation site. The proposed area mitigation encompasses habitat that is of greater value than that which is being impacted and would aide in the recovery of the species. In general, mitigation for impacts to California tiger salamander and their habitats should occur at a location within the affected California tiger salamander metapopulation. The Ventura Fish and Wildlife Office views the proposed mitigation lands as an appropriate location for mitigation and favorable for recovery of the California tiger salamander in the metapopulation.

The Ventura Fish and Wildlife Office and PCEC have been corresponding and working through negotiations since the time of the site visit. Negotiations strive to achieve a net conservation benefit for natural resources and the California tiger salamander. PCEC continues to be good partner and work with the Ventura Fish and Wildlife Office to come to a mutually agreed upon mitigation proposal that will benefit the recovery of the California tiger salamander.

If you have any questions, please contact Rachel Henry of my staff at (805) 644-1766, extension 333, or by electronic mail at rachel_henry@fws.gov.

Sincerely,

Collette M. Thogerson, Ph.D.
Assistant Field Supervisor

ATTACHMENT B

PRESENTATION

HONORABLE MEMBERS
OF
THE SANTA BARBARA COUNTY BOARD OF SUPERVISORS

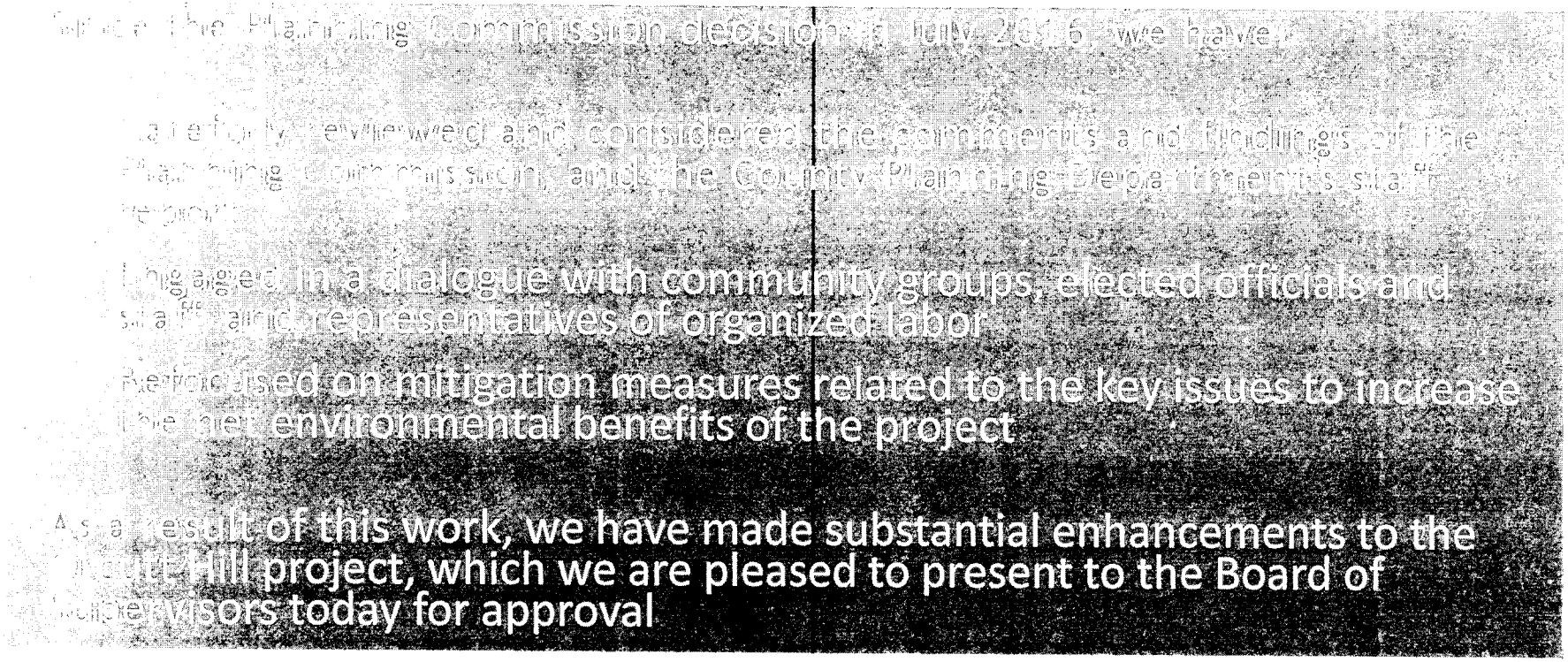
THE ORCUTT HILL RESOURCE ENHANCEMENT PLAN PROJECT

BY

PACIFIC COAST ENERGY COMPANY

October 11, 2016

THE ENHANCED ORCUTT HILL PROJECT

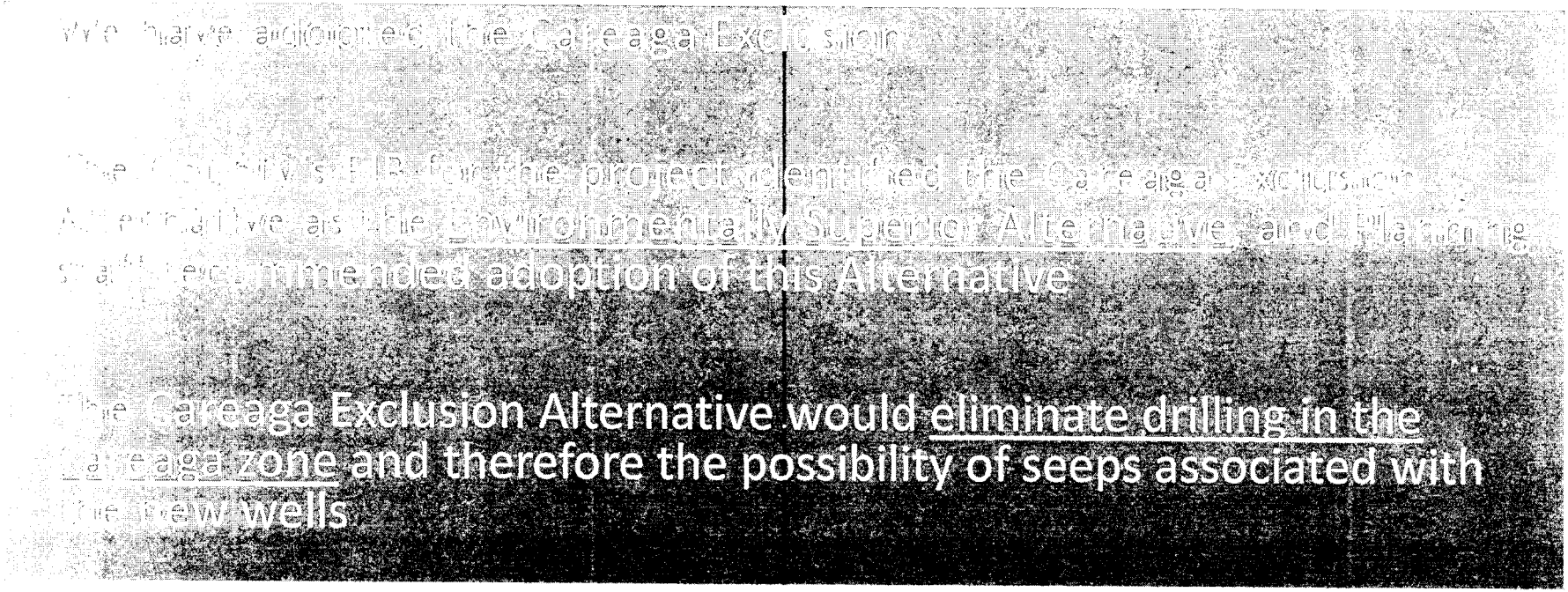


Since the Planning Commission decision in July 2016, we have:

- Carefully reviewed and considered the comments and findings of the Planning Commission, and the County Planning Department's staff report;
- Engaged in a dialogue with community groups, elected officials and staff, and representatives of organized labor;
- Refocused on mitigation measures related to the key issues to increase the project environmental benefits of the project.

As a result of this work, we have made substantial enhancements to the Orcutt Hill project, which we are pleased to present to the Board of Supervisors today for approval.

WHAT'S NEW:
ADOPTION OF THE CAREAGA EXCLUSION

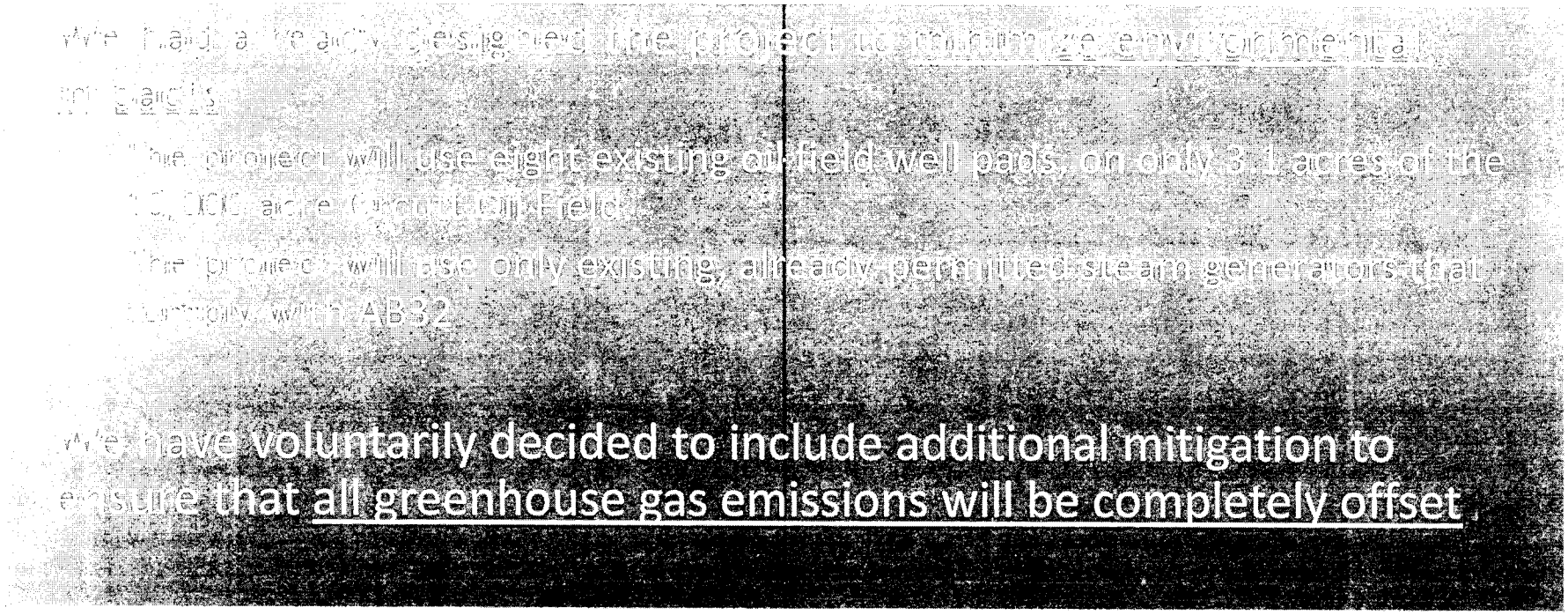


We have adopted the Careaga Exclusion

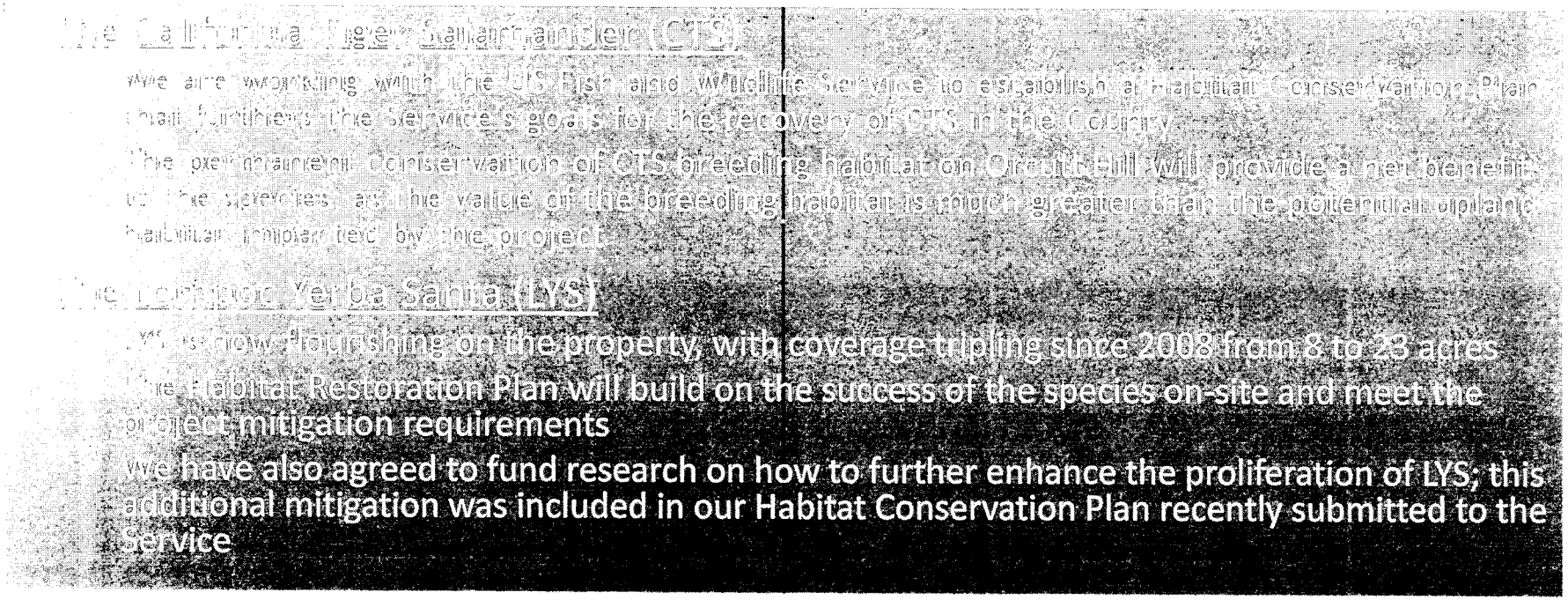
The Preferred Alternative in the proposed plan included the Careaga Exclusion Alternative as the Environmentally Superior Alternative and Preferred Alternative. The staff recommended adoption of this Alternative.

The Careaga Exclusion Alternative would eliminate drilling in the Careaga zone and therefore the possibility of seeps associated with the new wells.

WHAT'S NEW:
100 % OFFSET FOR ALL GREENHOUSE GASES



WHAT'S NEW:
CTS HABITAT CONSERVATION AND LYS RESEARCH



The California Tiger Salamander (CTS)

We are working with the CTS Fish and Wildlife Service to establish a Habitat Conservation Plan that furthers the Service's goals for the recovery of CTS in the County.

The permanent conservation of CTS breeding habitat on Orcutt Hill will provide a net benefit to the species as the value of the breeding habitat is much greater than the potential impacts habitat impacted by the project.

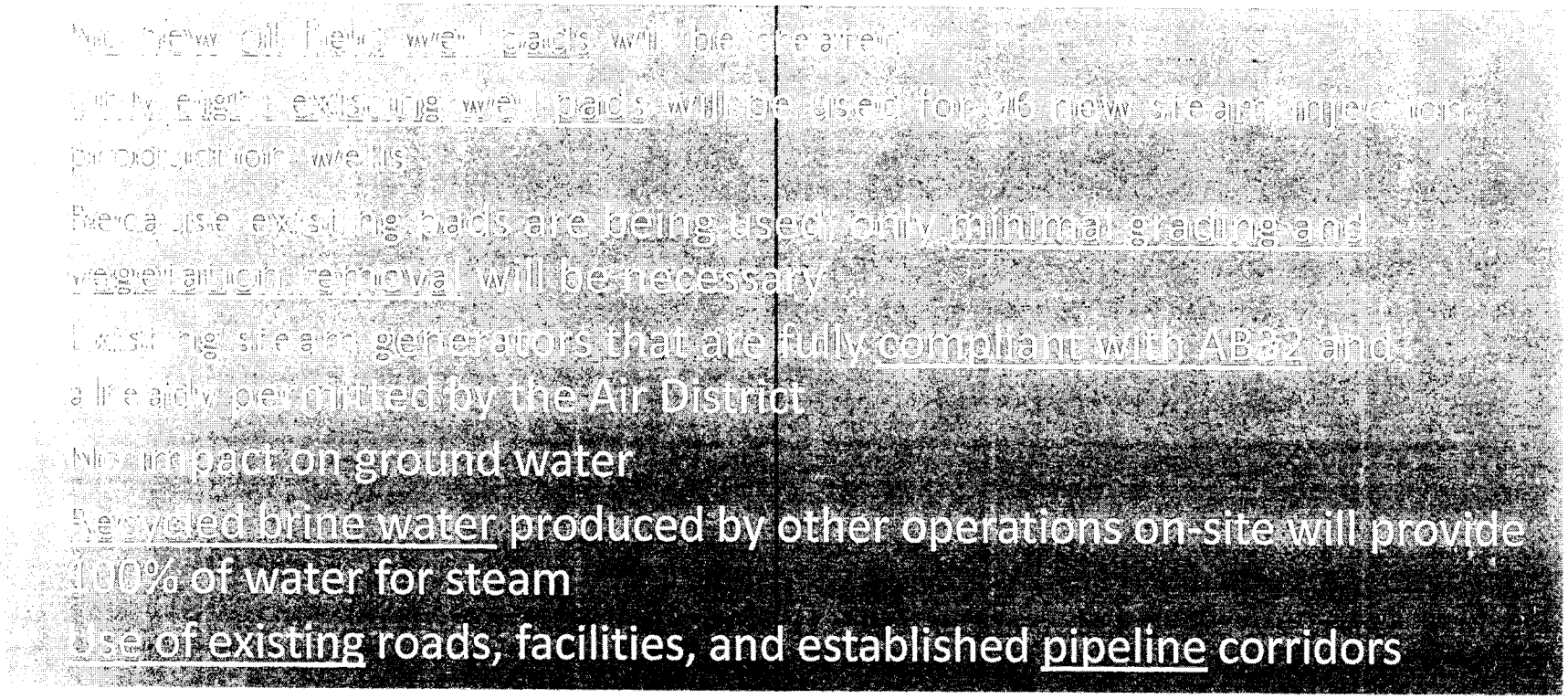
The Lompoc Yerba Santa (LYS)

LYS is now flourishing on the property, with coverage tripling since 2008 from 8 to 23 acres

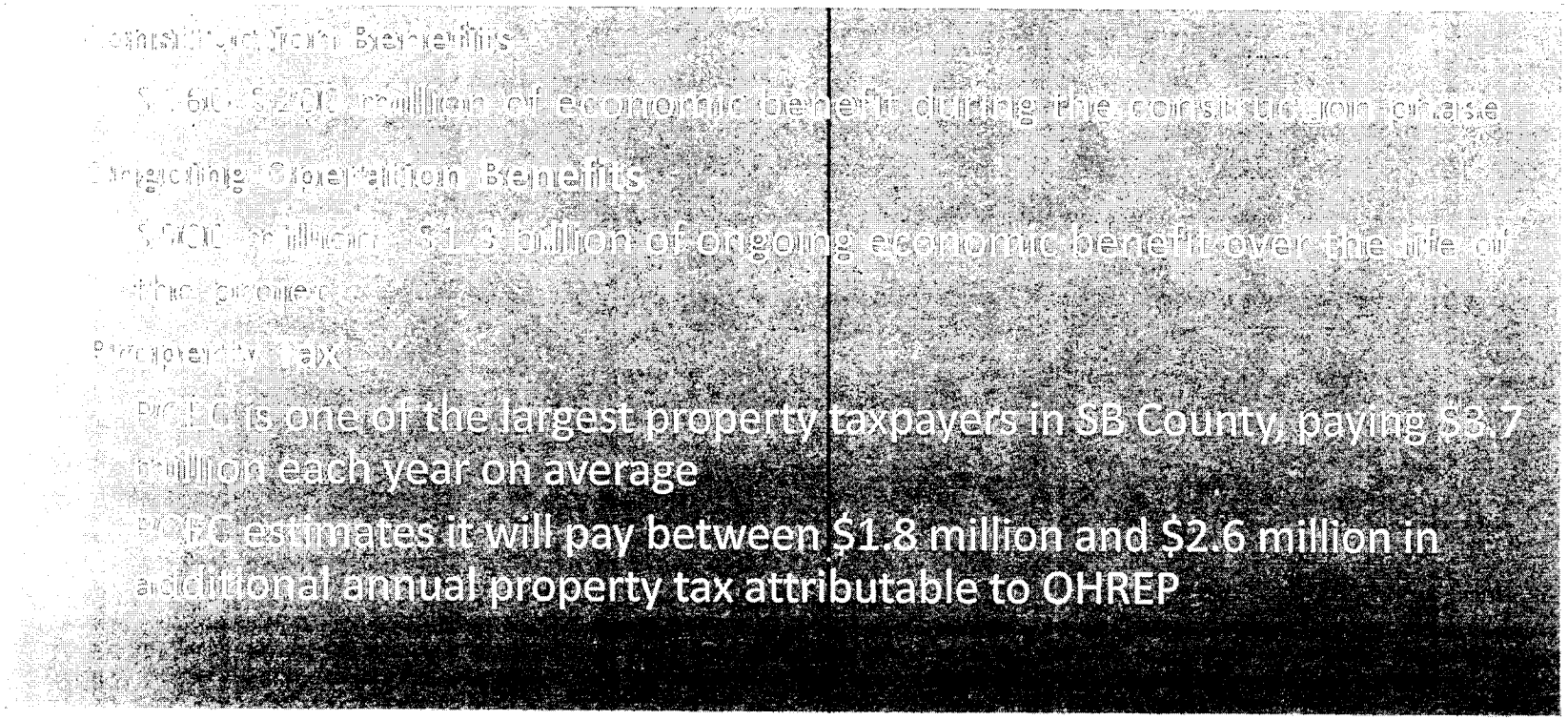
The Habitat Restoration Plan will build on the success of the species on-site and meet the project mitigation requirements

We have also agreed to fund research on how to further enhance the proliferation of LYS; this additional mitigation was included in our Habitat Conservation Plan recently submitted to the Service

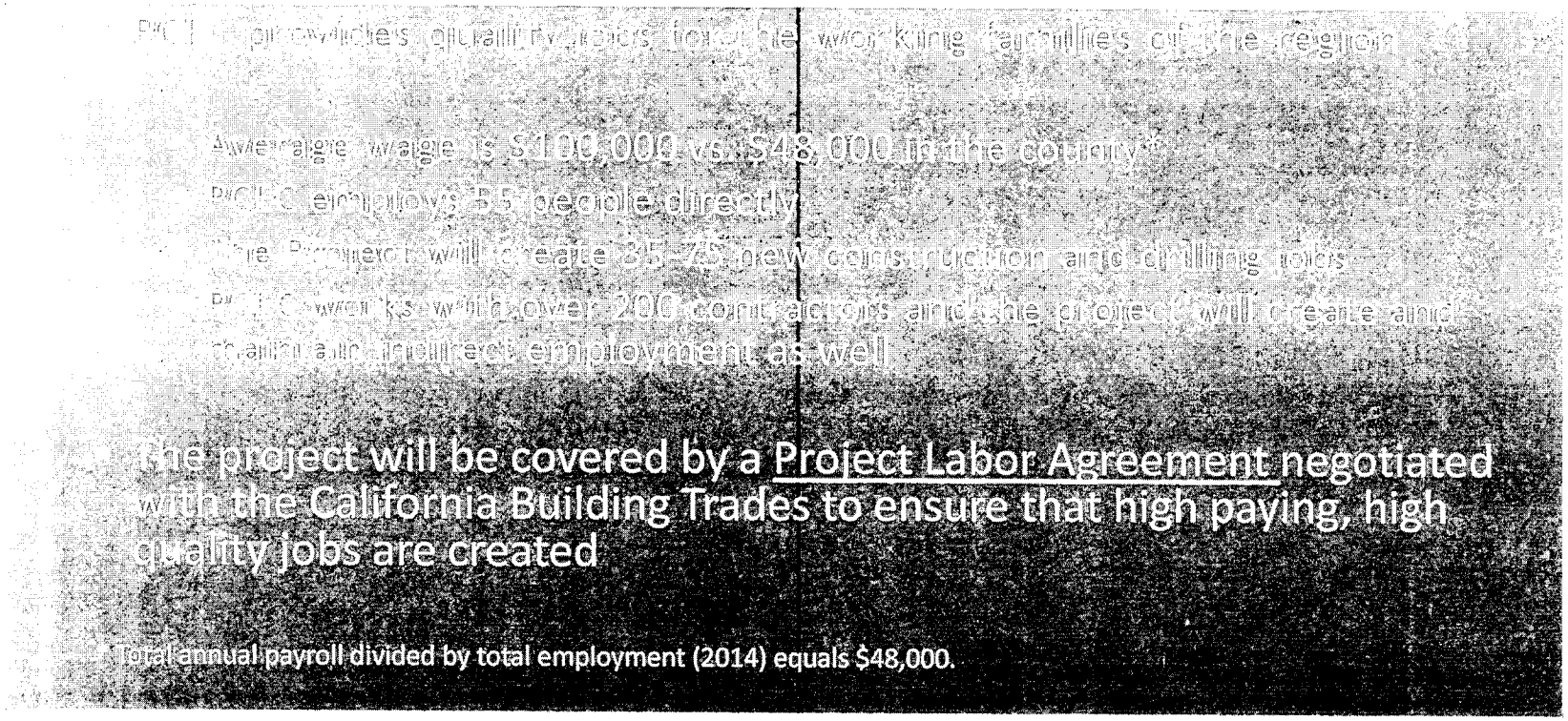
OUR FINAL PROJECT: CAREFULLY DESIGNED TO MINIMIZE ENVIRONMENTAL IMPACTS



ECONOMIC BENEFITS TO SANTA BARBARA COUNTY



ECONOMIC BENEFITS TO SANTA BARBARA COUNTY



CONCLUSION:
WHAT PROJECT APPROVAL WOULD MEAN

- Net benefit to California Tiger Salamander by conserving valuable on-site breeding habitat, advances CTS recovery goals
- Significant proliferation of locally native Yerba Santa on-site and funding for beneficial research on LYS propagation
- Greenhouse gas emissions mitigated to zero
- Well-paying jobs for local families, guaranteed by a Project Labor Agreement with the Building Trades
- $1.8 - $2.6 million of additional property taxes each year
- $900 million - $1.3 billion in economic benefit to Santa Barbara County
- No increase in seeps associated with new wells


PCEC respectfully requests that you grant the
appeal and approve our project

Daly, Julia Rutherford

From:	Rebecca August <rebeccaaugust@mac.com>
Sent:	Friday, October 07, 2016 4:01 PM
To:	sbcob; Farr, Doreen
Cc:	Rebecca August
Subject:	PLEASE DENY THE PCEC APPEAL

Dear Honorable Supervisors,

I urge you to support the Planning Commission's decision to protect our county from further damage from PCEC's oil seeps and spills by voting to **uphold their denial of the project**.

• After careful consideration, the Planning Commission rejected this project because of the significant impacts to air quality, endangered and sensitive species, critical habitat and water quality.

• Cyclic Steam Injection oil extraction has a high well casing failure rate. Most seeps occur underground where we cannot see them. At this site, however, there is a well documented history of eruptive well failures at the surface and over 100 accidental oil seeps and spills have occurred, almost all of which have been caused by oil operations.

• The Project site is one of the most biologically rich locations in Santa Barbara County, and doubling the number of oil wells will further imperil the endangered California Tiger Salamanders and some of the rarest and most imperiled plant communities in the world.

• 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.

• The Project does not provide any benefits that will outweigh the potential environmental harm that the project will cause. The project EIR found NO SIGNIFICANT ECONOMIC IMPACT.

Sincerely,

Rebecca August
rebeccaaugust@mac.com
705 Bobcat Springs Rd.
Buellton, CA 93427