

December 4, 2008

Chairman Salud Carbajal
Board of Supervisors
County of Santa Barbara
105 E. Anapamu St.
Santa Barbara, CA 93101

RE: Rezone of Opportunity Sites & Key Site 30

Dear Chairman Carbajal:

We would like to express our deep concern for the rather sudden and seemingly arbitrary change of the sites being considered for re-zone as part of the housing element update.

For the last three years we have actively worked with County Planning staff and for the last year we have worked with Long Range Planning staff through the re-zone process, at their request, to develop a multi-family proposal that would fit the County's needs for high density housing. Some of the highlights of our process:

- 11/1/2005 General Plan Amendment and Re-zone filed.
- 3/7/2006 Planning Commission - Request for Initiation – First hearing
Initial proposal included 7 acres of commercial zoning and active recreation in the form of 12 soccer fields. This project was not supported by the immediate neighbors and the Planning Commission requested additional information.
- 5/10/2006 Planning Commission - Request for Initiation – Second hearing
Commission requested the commercial component and active recreation be removed from the proposal and replaced by to accommodate single and multi-family components and propose land uses more compatible with the surrounding neighborhood.
- 8/23/2006 Planning Commission approved Initiation of the General Plan Amendment and Rezone application based on the revised proposal which included 10 acres with 20/units per acre designation (at the request of Comprehensive Planning) with the understanding that the project would be part of the housing element re-zone program.
- 11/28/2007 Tentative Tract Map and Development Plan Applications submitted
- 11/7/2008 Applications Determined Complete (GPA, RZN, TTM, DVP)

Noteworthy is the fact that between May and August of 2006, while our project was being considered for initiation by the Planning Commission, Long Range Planning staff (Comprehensive Planning at that time) approached us with a proposal to increase the density of our project and be included as one of the opportunity sites being considered for re-zone as part of the housing

element update. At that time, one of the components of our proposal was to re-zone approximately 10.1 acres to 12.3 units per acre for senior housing. Based on the request from Long Range Planning, we agreed to amend our project proposal to reflect a density of 20 units per acre on the 10.1 acre senior portion of the site.

Through the ensuing months, after the initiation of our project was approved, our team made substantial progress on the project preparing preliminary grading, tentative map and development plans. We worked closely with County staff to answer all of their questions and provide additional information as requested through an arduous and lengthy iterative process, as highlighted above, of approximately two years. The project underwent a number of revisions in order to address issues of height, visual corridors, impact to sensitive areas, circulation, public access, grading, drainage, traffic and noise to name a few. On July 29 of this year, once again, we received a specific request from Long Range Planning to modify the re-zone acreage to meet specific numbers, and we further modified the re-zone acreage to 10.6 acres in order to meet the County's needs.

At the end of the three years, since our first application was submitted, planning staff determined all of our applications to be complete as we proceeded to the hearing stage of the re-zoning effort as one of the opportunity sites.

On November 12, 2008, the Planning Commission opted to replace Key Site 30 with Key Site 16 from the re-zone efforts. The main concern repeatedly expressed by Commissioner Blough was his perception that by granting the "by-right" multi-family zoning, as the MR designation proposed, the commissioners had no assurances that the project would be built as currently approved because once the re-zone was approved, the project would be reviewed at the staff level only. Commissioner Blough failed to realize that we have proposed all along that all parcels proposed for MR Zoning would be deed-restricted as senior housing units. Furthermore, what is of serious concern is that this lack of assurance became the criteria by which Key Site 30 was excluded from the re-zone, and yet, although Key Site 3 could not provide the same guarantees, it was allowed to stay in the process. Furthermore, the same assurances cannot be provided by Key Site 16. This was a rather arbitrary and capricious decision by the Commission which can seriously jeopardize the entire re-zone process.

Surprisingly, two days prior to that hearing, it came to our knowledge that Supervisor Grey had taken the initiative to recommend Key Site 16 as the site of choice for re-zoning, instead of Key Site 30, thus, exerting undue influence on the Commission. Prior to the Planning Commission hearing of November 12, our client, had a discussion with Supervisor Grey, and the reason provided for her recommendation was her desire to pursue an active recreation designation on the passive open space of Key Site 30. Our client shared this conversation with the Planning Commission as part of her testimony at the November 12 hearing. What is troublesome to us is the fact that the Planning Commission specifically gave us direction on August of 2006 to follow the Orcutt Community Plan (OCP) goals for Key Site 30, and the OCP clearly requires the Passive Open Space designation on the no-build zone of Key Site 30. In addition, the re-zoning of the 10.6 acres designated as high density residential would have neither impact nor influence on the zoning designation in the open space as currently proposed in Key Site 30.

Although Key Site 16 was one of the alternatives considered in the EIR, it has not been analyzed to the same extent as Key Site 3 or Key Site 30. The environmental review completed on this site is substantially less than adequate which undoubtedly leaves the County and the entire process open for legal challenge. Some of the key areas where the analysis is less than adequate are as follows:

Land Use

The parcel immediately southwest of the Key Site 16 is a pumping station for the Conoco-Phillips pipeline that directly feeds into the refinery in the Nipomo Mesa.

High Density residential adjacent to active ongoing oil operations where equipment runs 24 hours a day would be a highly incompatible use proposed for Key Site 16.

Parks and Recreation

Key Site 16 does not propose any open space and none would be set aside as part of the re-zone. In sheer contrast, Key Site 30 proposes 45 acres of open space as part of the proposed project currently under review.

Traffic and Circulation

The rezone would add 2,300 Average Daily trips to Clark Avenue. If the site is to use the access point on Clark as proposed by the Orcutt Community Plan, this access point is located in a blind curve area where approaching vehicles go out of sight because of the steep terrain along Clark Avenue.

Key Site 30 proposes a traffic signal at the intersection of Village Drive and Bradley Road. Two traffic signals have come into full operation since our application was submitted in 2006. The intersections of Patterson and Bradley Road, as well as the intersection of Rice Ranch and Bradley Road are signalized and have already improved the traffic flow along Bradley Road.

Biological Resources

No biological survey has been completed on Key Site 16. Furthermore, Graciosa Creek runs along the entire western boundary of the property which would impose a minimum of 50 ft setback from the top of the creek bank, thus further reducing the effective buildable area on this site.

In contrast, we have conducted a full survey on Key Site 30, the project has been designed to minimize the impact on certain sensitive areas of the site, and we have advocated re-locating of trails in order to strengthen the viability of others. 45 acres of the site are being proposed for passive open space as required by the Orcutt Community Plan. The large majority of the sensitive areas are located in this open space.

High Fire Hazard Area

Key Site 16 is located in a County-designated High Fire Hazard area. In addition, there are high pressure oil and gas pipelines running through the property as indicated by the various warning markers and signs which would create a significant health and safety hazard in the event of a wildfire.

Key site 30, on the other hand, as an infill site, is readily served by local fire stations with no hazardous materials nearby that could pose a serious risk to life.

Air Quality

Although Air Quality impacts are typically those considered generated by earth movement and construction activities as well as daily trips already evaluated under traffic, the development of Key Site 16 would also be required to observe certain setback distances from storage tanks. What the analysis fails to consider is the impact of emissions from the oil operations on the future residents of Key Site 16. Although certain emissions are allowed by current regulations, the complaints from future residents could, in essence, become a nuisance to the existing oil operations.

This is not the case with Key Site 30. As an infill site, Key Site 30 is surrounded by compatible land uses and residential development.

Noise

Noise impacts generated by development of Key Site 16 would require the same type of mitigation measures as with any of the other sites. However, the analysis fails to consider the impact to the ongoing oil operations by the development if operations or maintenance activities would be restricted to certain hours of the day in order to limit noise impacts on the residents of Key Site 16.

Grading and construction noise would be the only impacts Key Site 30 would generate. Once Key Site 30 is at full build-out, there would be no noise impacts on the project or generated by the project.

Seismic, Soil and Landslide Hazards

There have been no soils nor slope analysis completed for Key Site 16. We generated a slope analysis based on topographic data provided by Flood Control maps. You can clearly see that almost 30% of the site has a 15% slope or greater. Furthermore the amount of grading that could be done on Key Site 16 may be curtailed by the presence of buried high pressure gas lines and fiber optic lines.

This is, certainly, not the case on Key Site 30. There are no impediments or potential hazards that could be generated by any of the proposed grading on Key Site 30.

Utilities

The sewer connection closest to Key Site 16 runs 200 feet west parallel to Graciosa Creek. There is no readily available sewer connection for this site.

Key Site 30 is an infill project with all infrastructure in place, and all sewer and drainage facilities and easements already planned for and secured.

Hydrology and Water Quality

With the reduced area for building envelopes, it will be difficult to provide on-site drainage facilities on Key Site 16.

Key Site 30 has worked closely with Flood Control to preserve the historical flows and provide the appropriate facilities on site to handle the flow generated by the proposed development.

Hazards and Hazardous Materials

The EIR states "*However, similar to the proposed project, both sites under this alternative contain evidence of potential contamination or a recognized environmental concern. As with the proposed project, further environmental analysis including soil sampling, and groundwater sampling and remediation may be required to reduce potential impacts to a less than significant level.*" This is the assessment area of most concern. There are three oil sumps clearly identified on Key Site 16 by the Orcutt Community Plan, whereas there are none on Key Site 30.

We have provided the County with documentation that all past oil operations on Key Site 30 were surveyed, identified, remediated and closed to the County's satisfaction. So, currently, there is absolutely -no- evidence of potential contamination or a recognized environmental concern on Key Site 30. Furthermore, although the EIR identifies Key Site 3 and Key Site 30 as the proposed project, there is no further analysis such as soil or groundwater sampling that would be required on Key Site 30, as there is no potential contamination remaining on the site.

Visual and Aesthetic Resources

In order to meet the density requirements on a reduced area because of setbacks, creek bank protection, utility easements and slope, the development of Key Site 16 would most likely require three story structures in the section closest to Old Town Orcutt. This could, in effect, block the scenic views of the Orcutt Hills for the western end of Old Town Orcutt.

Key Site 30, on the other hand, has been designed to take full advantage of the topography of the site so as to minimize blocking views, as well as protect the visual corridors as required by the Orcutt Community Plan.

Health, Safety and Environmental Challenges

Finally, there is the larger issue of Health and Safety. Why the Planning Commission deem it necessary to locate a high density project in an area where future residents could be exposed to hazardous materials and cancer causing agents? If the Board agrees with the Commission's recommendation, then the County could potentially assume that liability.

Although Key Site 16 presents a great opportunity to encourage redevelopment of a contaminated and underutilized site, its adjacency to the Conoco-Phillips pumping station would present a challenge to place multi-family units that would not be adversely affected by noise, smells and potentially hazardous materials emitted by the ongoing oil operations. If the intended product to be built on Key Site 16 is low-income housing, the decision to re-zone could be legally challenged as a violation of civil rights on the basis of a low income population unfairly being exposed to environmental pollution. And, this could be an open invitation for any number of environmental groups to pursue litigation in an effort to ensure that poor and minority communities do not bear greater exposure to environmental pollution than other communities.

Key Site 30, by design, proposes high density housing to be deed restricted for senior citizens. Our project has proposed all along high density housing for a specific target audience that typically requires less parking, less traffic and less demands on recreational facilities than a standard multi-family housing project would require. Furthermore, it does not have any of the health and safety issues and concerns that affect Key Site 16.

Because of all the reasons stated above, we hereby request that Key Site 30 be re-instated as one of the opportunity sites in the re-zone program as part of the Housing Element Certification. We hope that you can agree with us, that Key Site 30 is a much better choice for the County and the Community.

Thank you in advance for your time and consideration on this matter. For your convenience, I have enclosed a copy of the slide presentation of Key Site 16 we prepared for the Planning Commission.

Respectfully,



Laurie Tamura, AICP
Principal Planner

Hazards and Hazardous Materials. Overall, impacts related to hazards and hazardous materials would be less than the proposed project under this alternative. Neither of these sites is in the vicinity of a major highway, therefore freeway-related hazards would also be less than significant. However, similar to the proposed project, both sites under this alternative contain evidence of potential contamination or a recognized environmental concern. As with the proposed project, further environmental analysis may be required, including soil sampling, and groundwater sampling and remediation, if required would reduce potential impacts to a less than significant level.

Cultural Resources. Potential impacts to known historic or archaeological impacts would be less under this alternative, because no sensitive cultural resources were identified on either of these sites. However, potential impacts to unknown cultural resources would be similar to the proposed project because grading and construction activities on the undeveloped site would have some potential to uncover unknown artifacts or remains. As with the proposed project, mitigation requiring work cessation in the event that archaeological resources are encountered during land modification activities would reduce potential impacts to a less than significant level.

Visual and Aesthetic Resources. Overall, visual and aesthetic impacts would be reduced under this alternative, in comparison to the proposed project sites. Development of high density multifamily residential at Key Site 23 would result in less than significant visual character impacts and would not affect scenic views. On the other hand, development of Key Site 15 would impact both the visual character of the surrounding area and potentially alter scenic views. However, mitigation measures including architectural guidelines and landscape requirements would reduce potential impacts to a less than significant level. As with the proposed project, potential light and glare impacts on both of these sites would also require mitigation.

Agricultural Resources. Impacts related to conversion of agricultural lands or agricultural/urban land use conflicts would be similar to the proposed project under this alternative. Development at either of these sites would result in less than significant impacts to agricultural resources.

6.2.3 Alternative 3: The Key Sites 3 and 16 Alternative

Setting

Key Site 3 is described in Sections 3.0, *Environmental Setting*, and Section 4.0, *Environmental Impact Analysis*, of this EIR.

Key Site 16 encompasses about 11.8 acres along Clark Avenue and Marcum Street in Orcutt. The proposed rezone portion would be 10.5 acres. Full buildout of the Orcutt Key Site 16 rezone site could accommodate up to 210 dwelling units. The property is currently vacant and the property was used in the past for oil production. Surrounding use consists of Clark Avenue, Mobile Home Park on the north; vacant (residential) on the south; light Industrial use on the east; and vacant industrial use on the west.



Impact Analysis

Land Use. Overall, potential land use conflicts would be slightly less than the proposed project under Alternative 3. As with the proposed project, development of these two alternative sites would not create additional temporary land use compatibility impacts beyond those addressed and mitigated in the *Air Quality* and *Noise* sections discussed below. Unlike the proposed project, neither of these sites are within an airport's safety zone; therefore airport hazards would be less than significant. One of these alternative sites (Key Site 16) would require mitigation similar to that required for Key Site 30, including architectural guidelines and design review by the Board of Architectural Review (BAR) to reduce potential land use compatibility conflicts to a less than significant level.

Parks and Recreation. This alternative would have similar impacts to parks and recreational facilities as with the proposed project. Approximately the same number of residential units would be developed (370), generating a similar population (1,014 residents), which would create a similar demand for park acreage (4.77 acres). As with the proposed project, payment of required fees would offset the incremental increase in demand associated with buildout of this alternative. Resultant impacts to existing parks would similarly be Class III, *less than significant*.

Public Services. Under this alternative, impacts to the public school system would result from the addition of future students generated by the proposed development into school districts that are already exceeding capacities. The increase in population resulting from the development of Alternative 3 would also cause the police officer and firefighter to population ratios to be further exceeded, increasing demand on existing resources. As with the proposed project, payment of required fees would offset the incremental increase in demand associated with buildout of this alternative. Resultant impacts to public schools, police and fire protection services would similarly be Class III, *less than significant*.

Traffic and Circulation. Development of these alternative sites would result in traffic impacts that are similar to the proposed project. Unlike the proposed project sites, Key Site 16 would not result in potentially significant impacts to the local circulation system. However, under this alternative, both of these sites would result in a potentially significant contribution to cumulative traffic impacts. As with the proposed project, development under this alternative would contribute to a cumulative impact at the Highway 101 southbound onramp at Clark Avenue. Similar mitigation as required for the proposed project would be applied to ensure that impacts to this intersection would be less than significant. Impacts to public transportation would be less than significant for these alternative sites, as with the proposed project.

Biological Resources. This alternative's impacts to biological resources would be similar to that of the proposed project. Although different special status species and habitat types would be impacted on Key Site 16 than would be on Key Site 30, the overall effect of development on either of these sites would be potentially significant. As with the proposed project, these impacts could be reduced to a less than significant level with incorporation of mitigation measures such as special-status species surveys, habitat avoidance and/or restoration, setbacks, and oak tree replacement. Development of Alternative 3 would, however, have a greater impact on wildlife movement corridors than the proposed project. Unlike Key Site 30, Key Site 16 is adjacent to areas containing valuable habitats, and currently provides a



natural corridor for wildlife movement. Impacts would be less than significant with incorporation of mitigation measures that require setbacks, wildlife linkages, and reduced road widths.

Fire Hazards. Under this alternative, the exposure of residents to wildland fire hazards would be greater than under the proposed project. Both Key Sites 3 and 16 are located in County-designated High Fire Hazard areas, whereas under the proposed project, only Key Site 3 presented wildland fire hazards. Impacts on either of these alternative rezone sites would be potentially significant. However, mitigation similar to that required under the proposed project for Key Site 3, such as development of a fire/vegetation management plan, fire prevention construction techniques, and access road requirements would reduce potential impacts from this alternative to a less than significant level.

Air Quality. Air quality impacts under Alternative 3 would be identical to those of the proposed project. Development of 370 residential units under this alternative would generate the same number of daily vehicle trips as the proposed project and onsite energy consumption would be the same as well. As with the proposed project, combined operational emissions from buildout of both of these sites would exceed established thresholds, but be mitigable. Temporary air pollutant emissions during grading and construction would also be similar. Development under this alternative would also generate similar levels of greenhouse gases, potentially contributing to global climate change. Overall, these air quality impacts would require implementation of standard dust control and diesel particulate matter mitigation measures, transportation control measures, and energy efficiency standards, as required for the proposed project to reduce construction related air quality impacts, operational emission impacts, and global climate change impacts to less than significant levels. As with the proposed project, cumulative air quality impacts would be Class I, *significant and unavoidable*.

Noise. Development of this combination of sites would result in similar noise-related impacts in comparison to the proposed project. Noise impacts related to Key Site 3 are discussed in Section 4.0. Construction noise at Key Site 16 would require mitigation similar to the proposed project. As with the proposed project, the increased traffic noise resulting from development under this alternative would be less than significant. Similar to the proposed project, Development at Key Site 16 would require similar noise attenuation mitigation to reduce impacts to a less than significant level.

Seismic, Soil and Landslide Hazards. As with the proposed project, almost all impacts related to exposure to geological hazards would be less than significant under this alternative. As discussed in the project analysis for Key Site 3, the onsite soils present erosion-related hazards. In addition, the soils on Key Site 16 present both expansion and erosion hazards for future development. Mitigation required for the proposed project sites, including a geotechnical study and soil erosion analysis, would similarly be required for Key Site 16 under this alternative to reduce potential impacts to a less than significant level.

Utilities. This alternative would have identical impacts on public utilities and service systems as the proposed project because these sites would be served by the same water and wastewater service providers. Water supply and wastewater impacts would be less than significant, as with the proposed project. Solid waste generation would also be the same, and would exceed the County's threshold, resulting in Class I, *significant and unavoidable* impacts.



Hydrology and Water Quality. Both temporary and long-term water quality impacts would be similar to the proposed project under this alternative. As with the proposed project, implementation of standard NPDES permit requirements would reduce construction-related water quality impacts to a less than significant level, and the required SWQMP would ensure that long-term water quality impacts would also be less than significant. Long-term hydrological impacts under this alternative would also be similar to the proposed project, and would exceed allowed surface runoff standards as a result of new impervious surfaces. As with the proposed project, mitigation including further drainage analysis, runoff conveyance and construction of detention basins would reduce impacts to a less than significant level. None of the alternative sites under consideration are within a flood hazard area; therefore flooding-related impacts would be less than significant.

Hazards and Hazardous Materials. Overall, impacts related to hazards and hazardous materials would be less than the proposed project under this alternative. Freeway-related hazards would also be less than significant for both sites under this alternative. However, similar to the proposed project, both sites under this alternative contain evidence of potential contamination or a recognized environmental concern. As with the proposed project, further environmental analysis including soil sampling, and groundwater sampling and remediation may be required to reduce potential impacts to a less than significant level.

Cultural Resources. Potential impacts to known historic or archaeological impacts would be similar to the proposed project under this alternative, because no sensitive cultural resources were identified on either Key Site 16 or 30. Potential impacts to unknown cultural resources would be similar to the proposed project because grading and construction activities on any undeveloped site have some potential to uncover unknown artifacts or remains. As with the proposed project, mitigation requiring work cessation in the event that archaeological resources are encountered during land modification activities would reduce potential impacts to a less than significant level.

Visual and Aesthetic Resources. Overall, visual and aesthetic impacts would be slightly reduced under this alternative, in comparison to the proposed project. Visual impacts related to the development of the Key Site 3 rezoning site would occur in this alternative. Development of high density multifamily residential at Key Site 16 would impact both the visual character of the surrounding area and potentially alter scenic views. However, mitigation measures including architectural guidelines and landscape requirements would reduce potential impacts to a less than significant level. As with the proposed project, potential light and glare impacts on both of these sites would also require mitigation.

Agricultural Resources. Impacts related to conversion of agricultural lands or agricultural/urban land use conflicts would be similar to the proposed project under this alternative. Development at either of these sites would result in less than significant impacts to agricultural resources.





CONCEPTUAL LAND USE
Key Site 30

May 2006
www.keysite30.com



2.0 Project Description

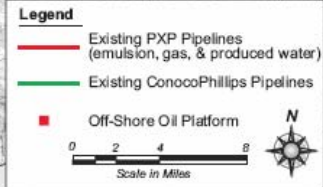
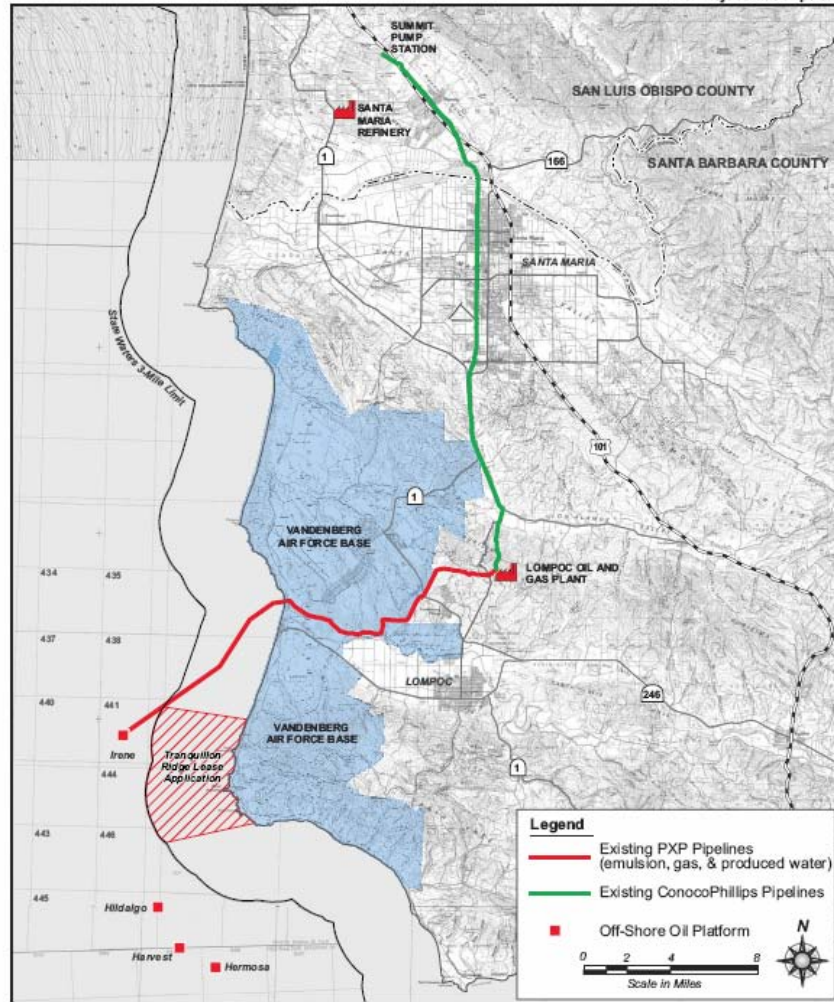


Figure 2-1
Proposed Project Location

PREPARED BY
Aspen
Environmental Group

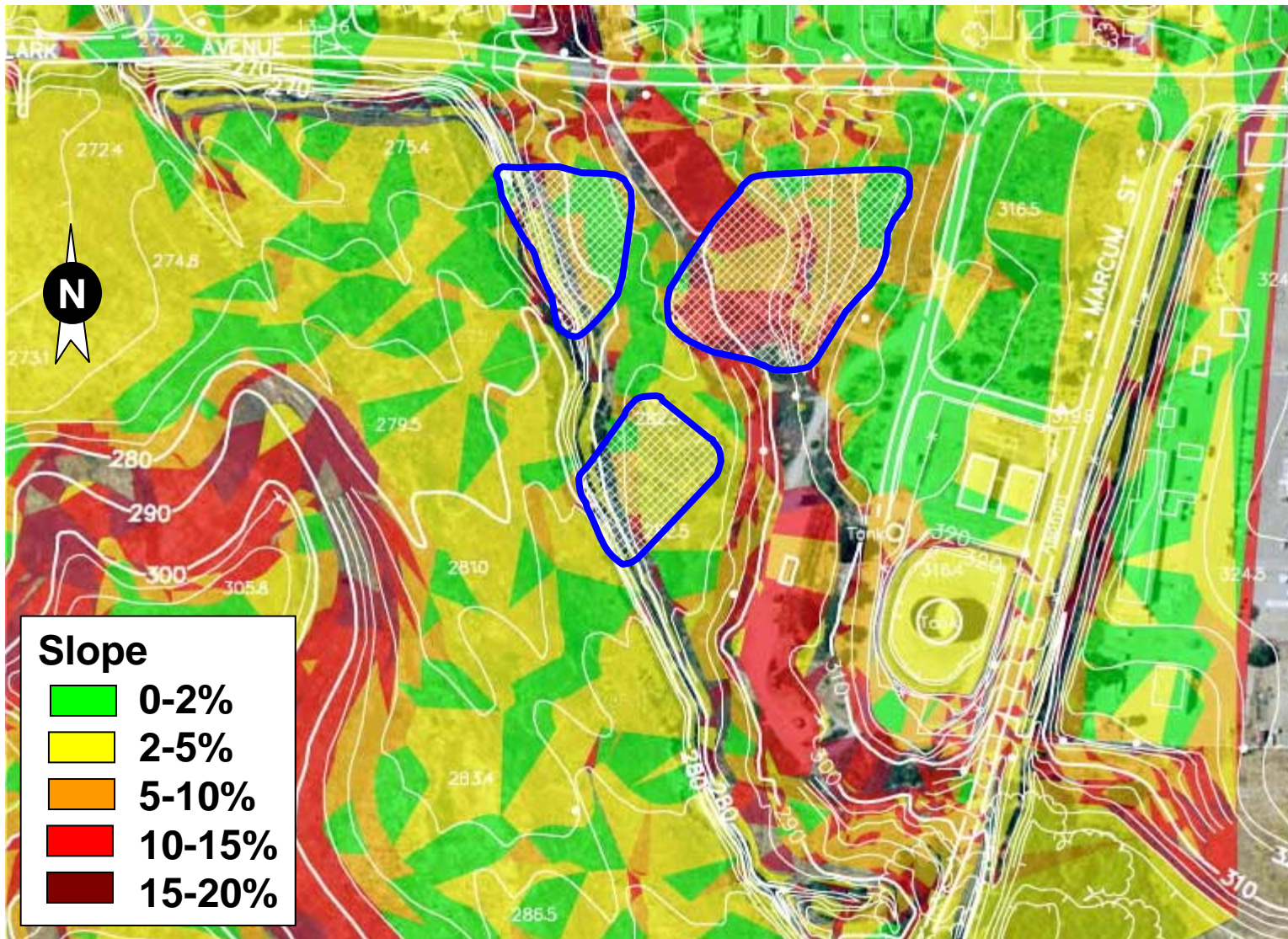
Source:
Tranquillon
Ridge EIR
3/27/08



**Location of Existing Oil Sumps
per Orcutt Community Plan**

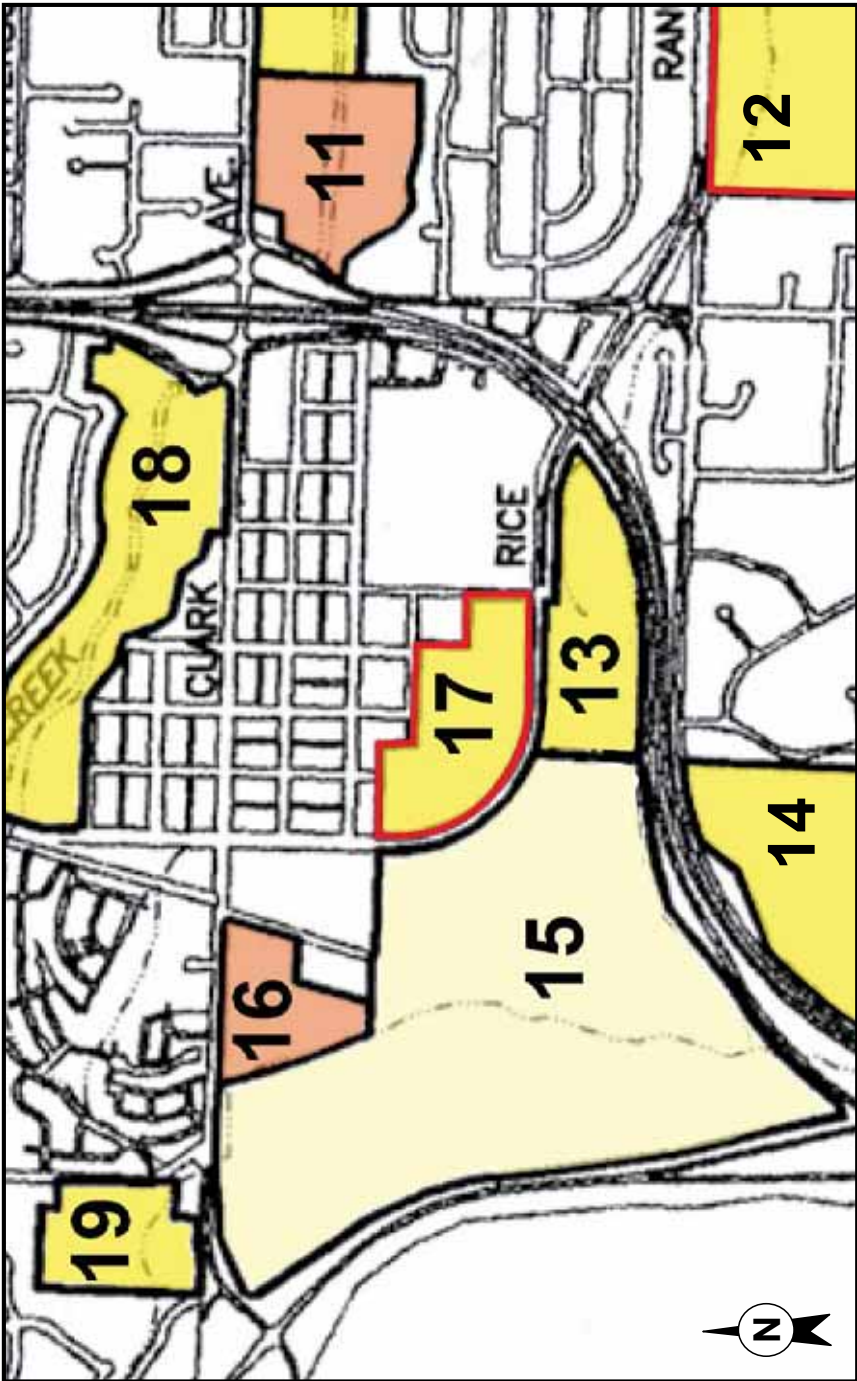


**Conoco-Phillips facility.
Looking Southeast from the gate**



KEY SITE 16

November 12, 2008





Clark Ave

Old Town

Orcutt

KS 16

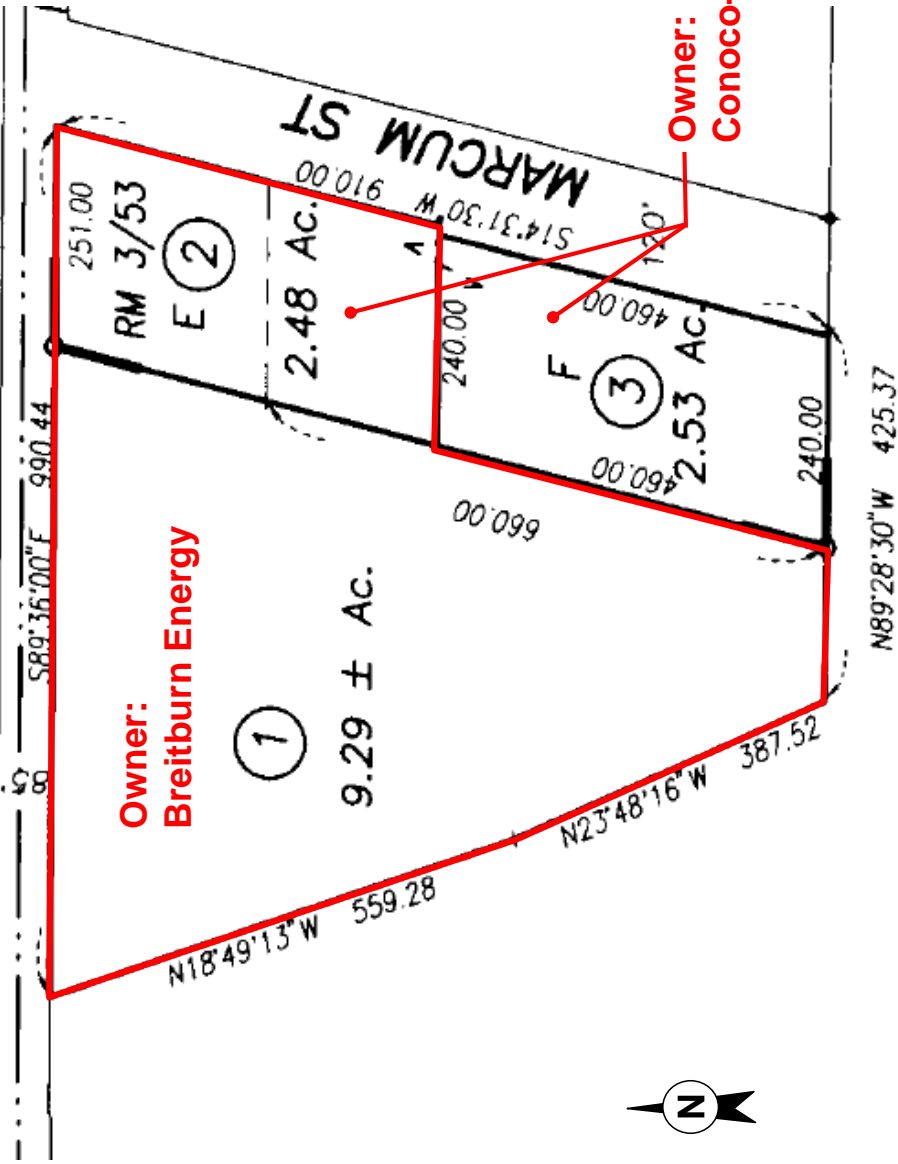
HWY 1

HWY 135





CLARK AVE





Source: Orcutt Community Plan



**OIL
SUMPS**

SITE #16
 Union Oil
 Clark/California

- [Symbol] > 30% SLOPE
- [Symbol] RIPARIAN HABITAT
- [Symbol] OPEN SPACE AREA
- [Symbol] OIL SUMP
- [Symbol] PROPOSED TRAIL
- [Symbol] PREDICTED FUTURE BULLDOZER NOISE CONTOUR

KS16-4

Figure KS16-1



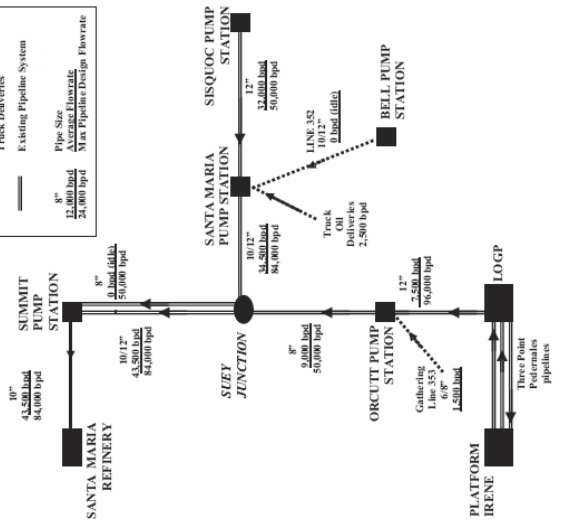
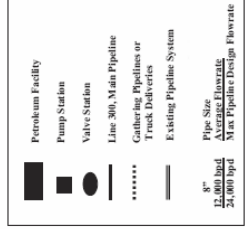


**Location of Existing Oil Sumps
per Orcutt Community Plan**



**Topo Map Source:
SB County Flood Control**

2.0 Project Description



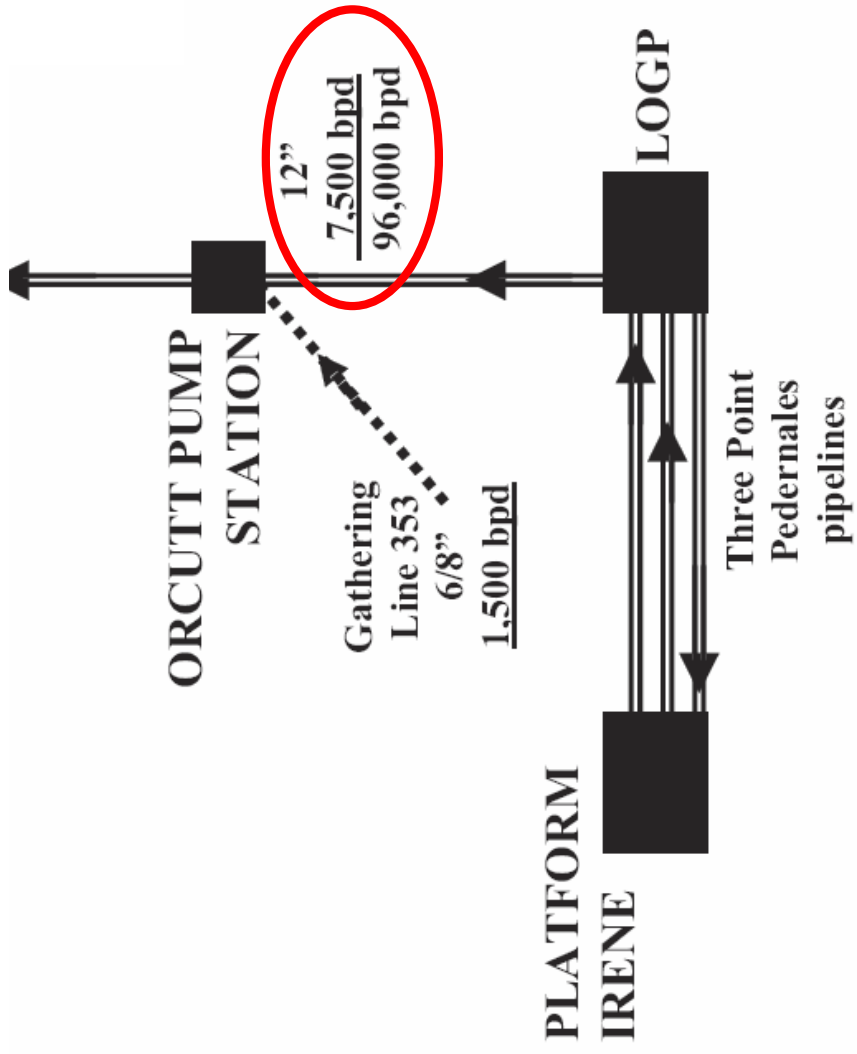
Source: PGP, 2006.

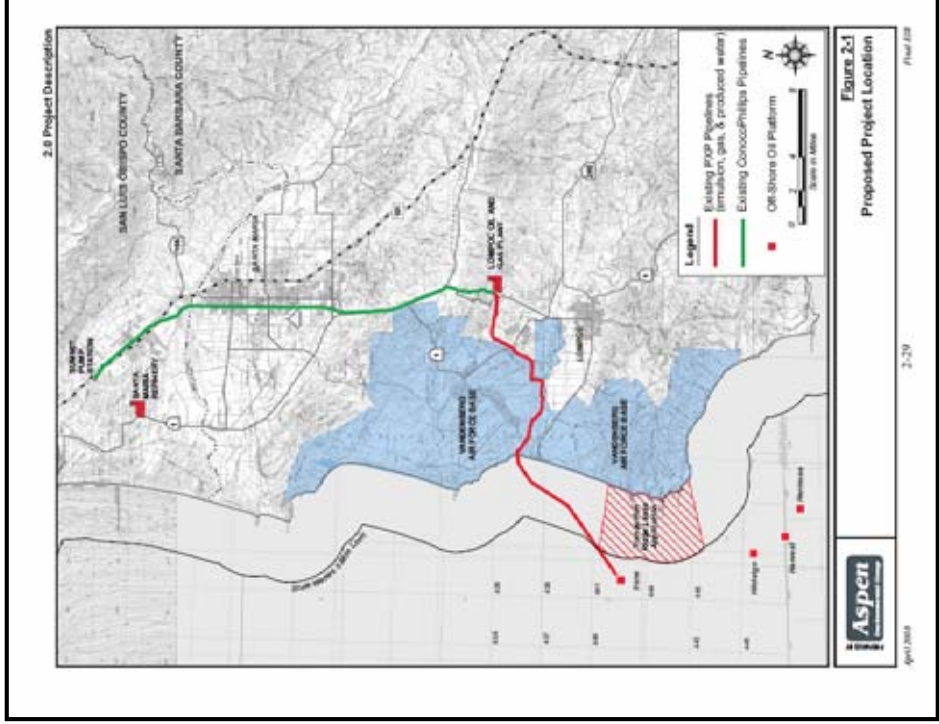


Figure 2-4
ConocoPhillips Pipeline System

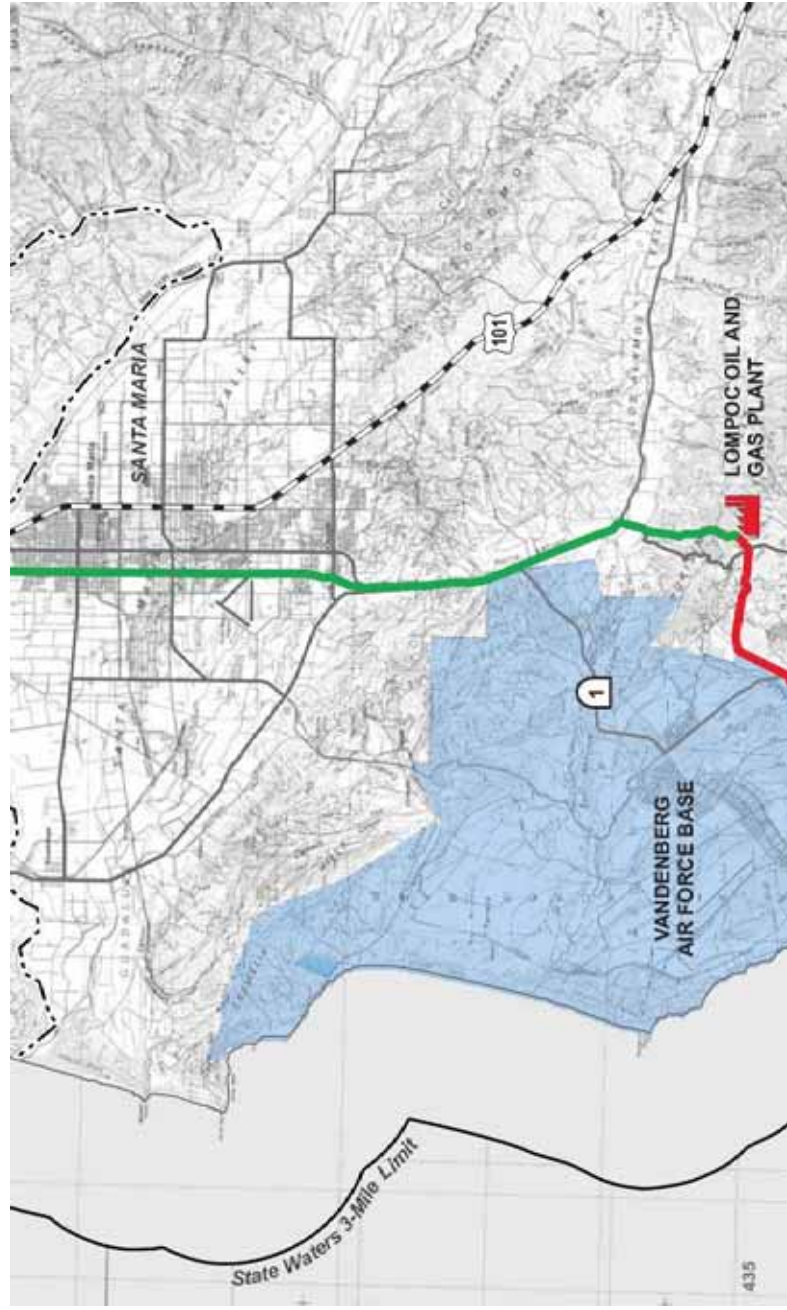
Final EIR

Source:
Tranquillon
Ridge EIR
3/27/08





Source:
Tranquillon
Ridge EIR
3/27/08



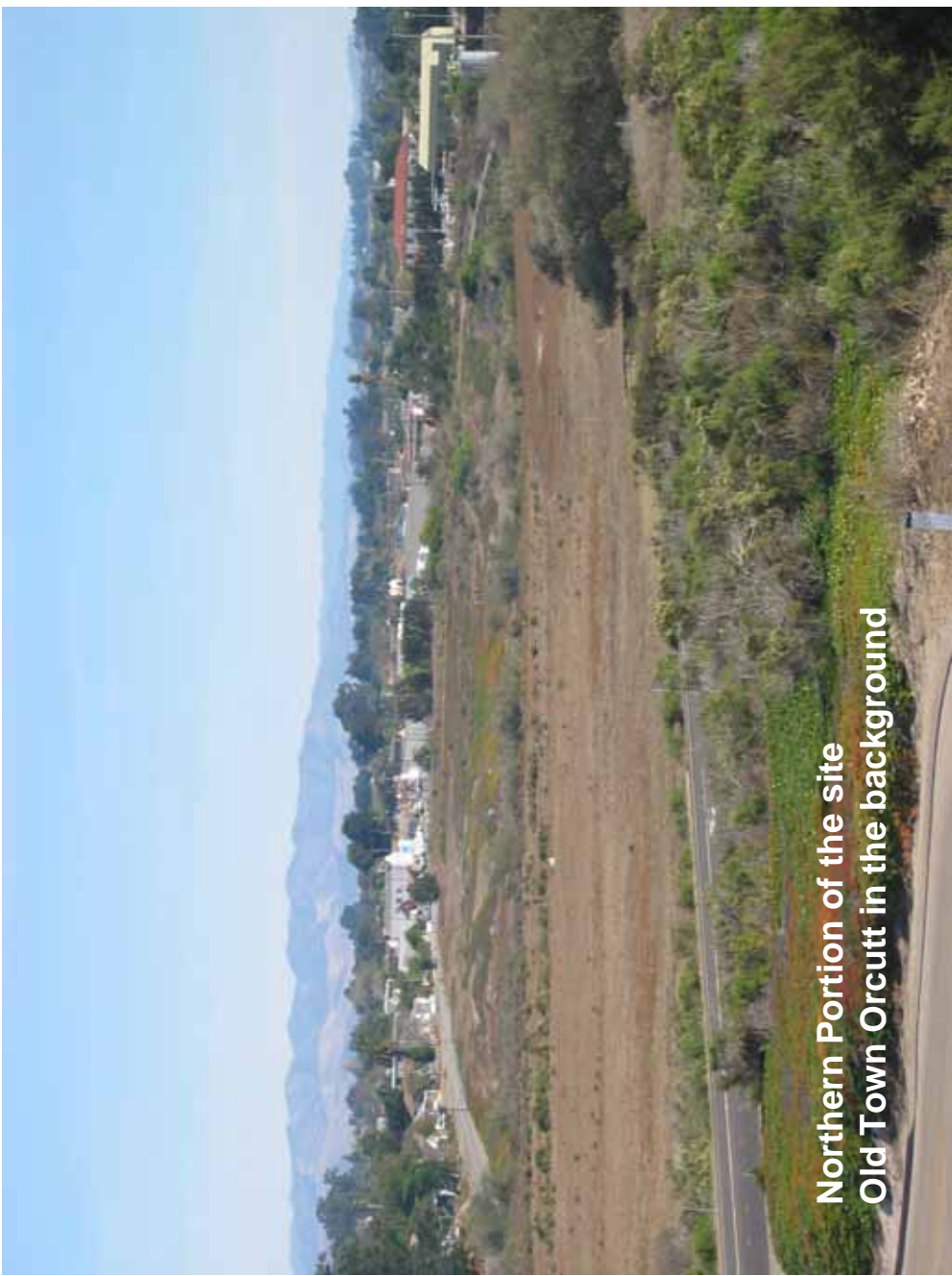
Source: Tranquillon Ridge EIR (3/27/08)



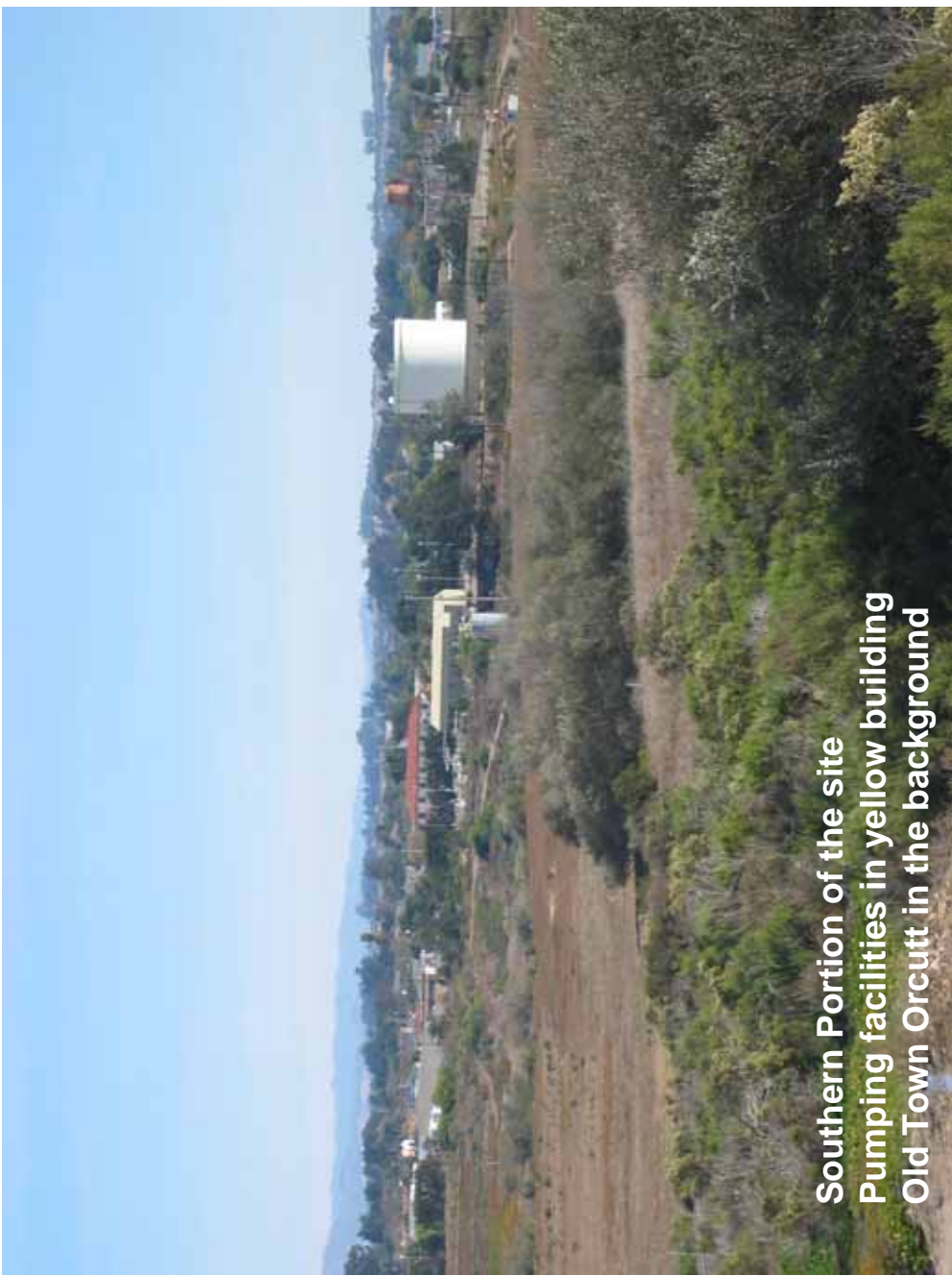
Conoco-Phillips Pipeline through Orcutt Pumping Station



Approximate location of property boundaries



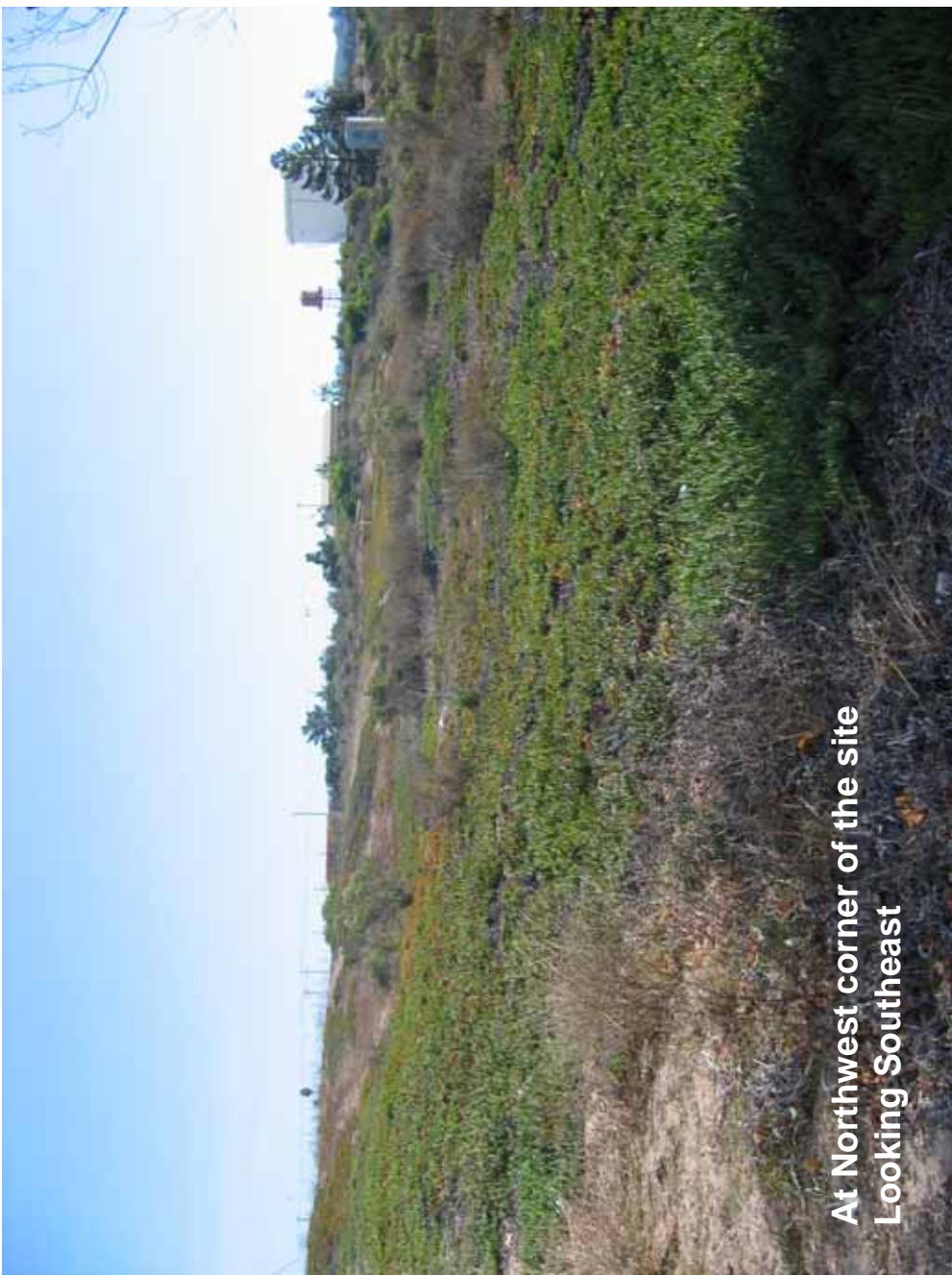
**Northern Portion of the site
Old Town Orcutt in the background**



**Southern Portion of the site
Pumping facilities in yellow building
Old Town Orcutt in the background**



Approach from the Northwest
Corner of the site
Looking directly east



**At Northwest corner of the site
Looking Southeast**



**At the lowest portion of the site
Looking in a Southeast direction**



Looking South along the access road



**Eastbound
Vehicle**

**Vehicle approach
at northwest corner of site
Traveling eastbound on Clark**



**Eastbound
Vehicle out of
clear view**

**Vehicle approach
at northwest corner of site
Traveling eastbound on Clark**

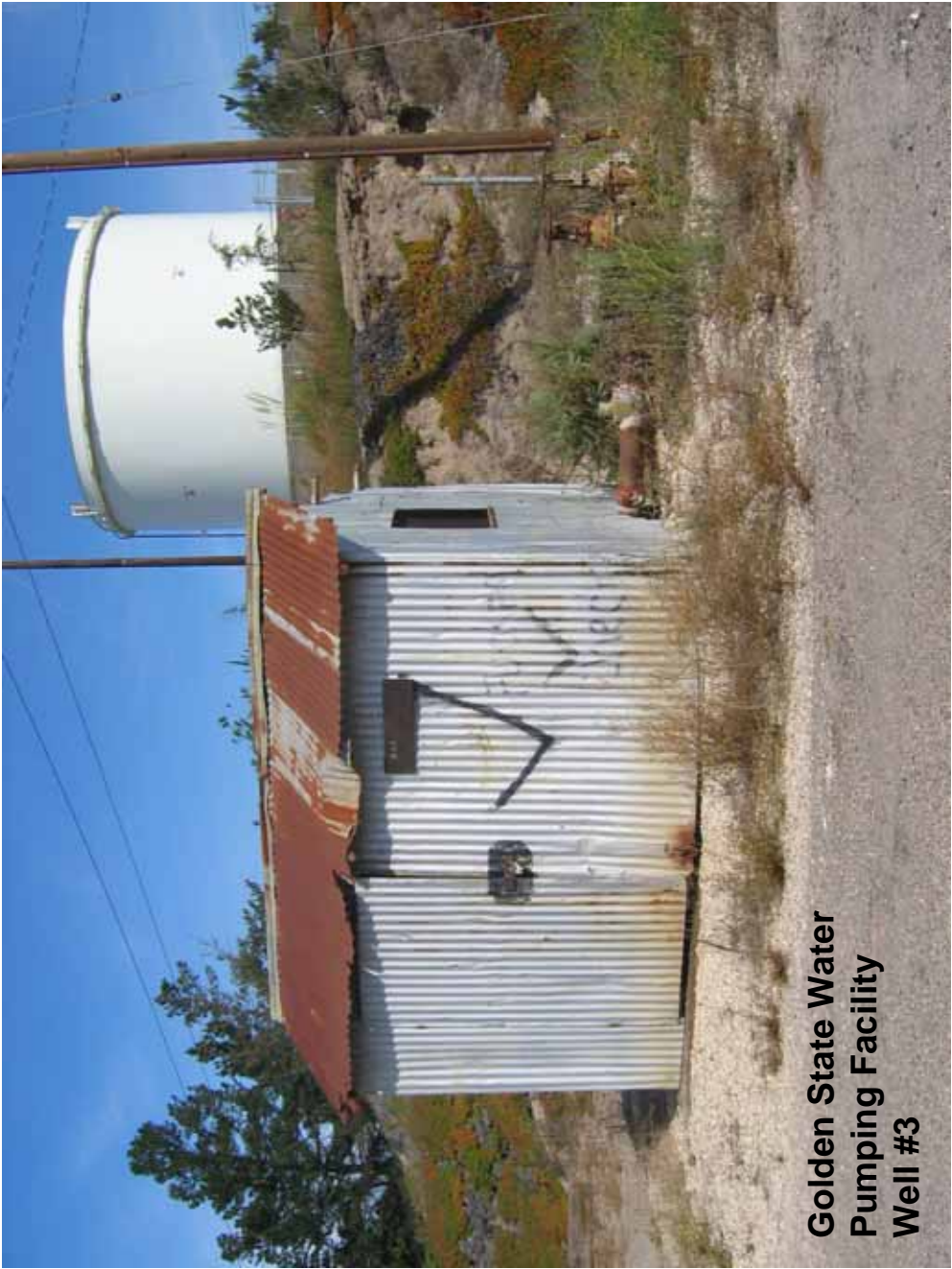


**Eastbound
Vehicle within
view**

**Vehicle approach
at northwest corner of site
Traveling eastbound on Clark**



**Existing pumping facilities
Operating on site**



**Golden State Water
Pumping Facility
Well #3**



Visible remnants of oil operation infrastructure on the site



**Conoco-Phillips facility.
Looking NNE from the gate**



**Conoco-Phillips facility.
Looking NE from the gate**



**Conoco-Phillips facility.
Looking NEE from the gate**



**Conoco-Phillips facility.
Looking East from the gate**

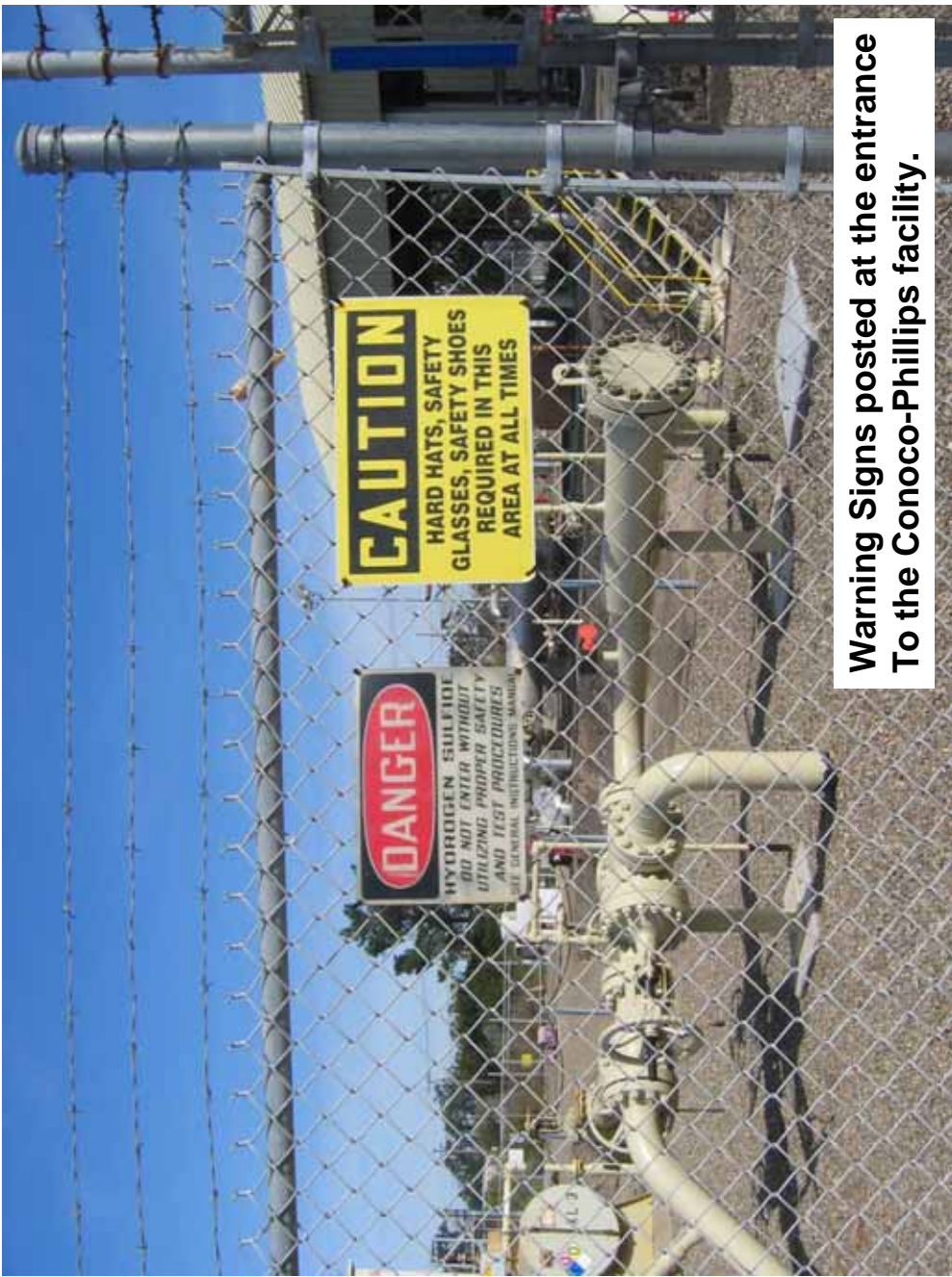


**Conoco-Phillips facility.
Looking Southeast from the gate**





Warning Signs posted at the entrance To the Conoco-Phillips facility.



Warning Signs posted at the entrance To the Conoco-Phillips facility.



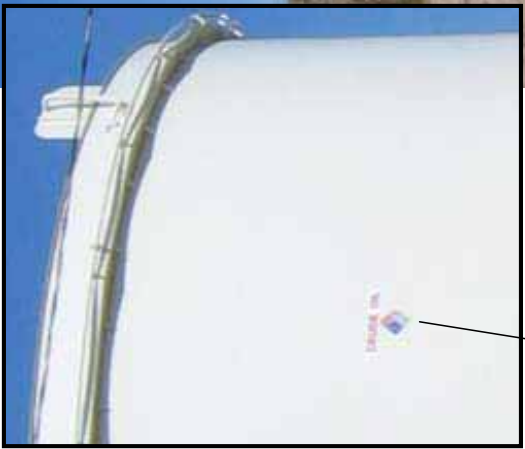
Warning markers posted throughout vicinity of site.



Warning markers posted throughout vicinity of site.

Marker near NE corner of
Clark – Marcum intersection:
DANGER
Cable Route
Buried Fiber Optic Cable
GTE





CRUDE
OIL



KEY SITE 16