



916 Anacapa Street,
Santa Barbara, CA 93101
March 4, 2022

To: SB Board of Supervisors

Re: ExxonMobil Interim Trucking for SYU Phased Restart hearing

Citizens Planning Association strongly urges the Board of Supervisors to *deny* the findings necessary to approve the revised development plan and Exxon Mobil's request to transport crude oil via diesel-driven tanker trucks from Las Flores Canyon facility to terminals in Santa Maria [SMPS] and Plains Pentland in Kern County.

We believe the necessary findings for approval cannot be made.

Specifically, the Statement of Overriding Considerations necessary to overcome the Class I Impact of Hazardous Materials Risk of Upset and the associated damages done to sensitive resources, including biological, water and cultural resources, cannot be made.

Several findings recommended by staff during the Planning Commission review discuss the financial benefits of the project. CPA finds fault with such findings, and concurs with the Planning Commission denial. The risk to human life presented by the oil spills and fires associated with the trucking of oil cannot be overcome by the financial components itemized in the SOC. Staff's original proposed Statement of Overriding Considerations includes "Increased property taxes" of approximately \$1.2 million annually.

While any amount of general fund is certainly commendable, it is important to put this amount in context. On page C-32 of the County Budget for 2021 the "estimated actual" amount of 2020-21 revenue from taxes was \$363,863 million dollars and total operating revenue was \$1.3 billion. Thus, the addition of the miniscule fraction (less than .09%) noted in the proposed SOC simply does not outweigh the multiple cited environmental impacts and risk.

It is also concerning that county staff altered their position on the risk posed by tanker truck travel on Highway 166. In August 2020 staff recommended prohibiting tanker trucks on 166 yet they now recommend approval of this dangerous route. Staff's proposed mitigation measures, restricting truck trips only during AM and PM "peak hours," is insufficient to address the risk to motorists 24 hours per day on both of those routes.

Finally, Exxon Mobil's plans to restart its offshore platforms and onshore processing facility will also generate unacceptable levels of greenhouse gas emissions and further contribute to climate change, undermining state and national climate targets and goals set by the county's Energy and Climate Action Plan adopted in May 2015. It is estimated that more than a million megatons of CO2 will be emitted by this project yearly – at a time when the urgency to reduce greenhouse gases has never been more critical.

CPA reviewed the *County of Santa Barbara Draft Climate Change Vulnerability Assessment*¹. This document is the result of three years research by the County. Santa Barbara County decided to invest in such a study, currently in the comment period, so the County can pro-actively address the negative impacts of climate change in areas of concern. This study will become the basis for the County in applying for grants to protect us from the negative impacts of climate change.

CPA urges both the Commissioners Board members and the public to read this report. The study delineates the areas where the most vulnerable of the County residents live and thoroughly discusses the negative impacts of climate change on our neighbors, to include drought, floods, debris flows, sea level rise, and wildfires. It would be illogical and inconsistent to approve the ExxonMobil **Interim Trucking for Santa Ynez Unit Phased Restart**, with its noted increases in GHG emissions when this recent County Climate Change Vulnerability study proves that climate change impacts will endanger the lives of our current and future residents.

Dating back to the Board of Supervisors' 2009 adoption of Climate Change Guiding Principles and 2015 Climate Action Plan, County decision makers have repeatedly acknowledged that climate change is here, and land use decisions must recognize that fact². Our county should not be supporting a project which will *add* to GHG emissions and while simultaneously placing county residents, visitors, and environmental resources at risk from Class I impacts of oil spills and fires. CPA believes many of the Findings you are offered by staff are inconsistent with existing County policies. We request that the Board follow the advice of your Planning Commission and deny this project.

Sincerely,

Marell Brooks

Citizens Planning Association President

¹ <https://www.countyofsb.org/plndev/projects/safetylelementupdate.sbc>

² <https://santabarbara.legistar.com/LegislationDetail.aspx?ID=2274337&GUID=E2575D87-FC34-4F18-8249-C41488F2F126&Options=&Search=>