



April 11, 2019

Mr. Steve Lavagnino, Chair  
Board of Supervisors  
County of Santa Barbara  
105 East Anapamu Street  
Santa Barbara, CA 93101

**Re: Santa Barbara County Budget – Oil Spill Planning and Response**

Dear Chair Lavagnino and Supervisors:

Thank you for your recent adoption of the Santa Barbara County Operational Area Oil Spill Contingency Plan (“OSCP”). As discussed during the April 9, 2019, hearing on the OSCP, two issues remain to support the County’s role as first responder and to ensure effective oil spill response. On behalf of the Environmental Defense Center (“EDC”), I urge the Board to include adequate funding in the budget to replace the County’s Oil Spill Response Planner/Coordinator, and to secure the training and resources necessary to respond to an oil spill. EDC is a public interest law firm that protects and enhances the local environment through education, advocacy, and legal action. EDC, along with other community groups and stakeholders, was involved in the response and follow-up to the Plains All American pipeline oil spill. We participated in a State “hot wash” as well as a multi-agency Subcommittee process established by the U.S. Coast Guard that developed recommendations for improved oil spill response and changes to the local, State, and Federal oil spill contingency plans. One of the key recommendations, which we supported, was for the County Fire Department to act as a first responder in the event of an oil spill. Other recommendations are also relevant to the County’s role in the Unified Command and in coordinating with other agencies and stakeholders.

First, the County should include funding to provide adequate oil spill response planning and coordination. This position<sup>1</sup> is necessary to oversee and implement:

- Oil spill response planning, including timely updates to the County’s OSCP<sup>2</sup>

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<sup>1</sup> It may make the most sense to accommodate this position within the Fire Department, especially now that the Fire Department is designated as an initial Incident Commander and first responder.

<sup>2</sup> The County’s recent update to the OSCP missed the statutory deadline and was delayed by a year, in part due to the lack of a dedicated oil spill response planner. Other County staff were busy with other issues, including follow-up to the Thomas Fire and debris flows.

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- Participation in federal and state oil spill response planning
- Coordinating with other agencies, including the U.S. Coast Guard, U.S. Environmental Protection Agency, California Department of Fish and Wildlife-Office of Spill Prevention and Response (“OSPR”), National Oceanic and Atmospheric Administration, U.S. Fish and Wildlife Service, Channel Islands National Marine Sanctuary, Channel Islands National Park, California Coastal Commission, California Department of Fish and Wildlife, California Parks and Recreation, County Public Health, County Air Pollution Control District, County Planning and Development
- Coordinating with Oil Spill Response Organizations (“OSROs”)
- Ensuring adequate training for County personnel
- Planning and executing exercises and drills
- Reviewing facility oil spill prevention and response plans
- Conducting facility inspections
- Participating in meetings of the Area Committee, OSPR
- Attending conferences, workshops, and other events to learn the latest practices in oil spill response and to maintain relationships with partner response agencies and entities
- Assisting with pre-incident volunteer trainings
- Responding to public inquiries

Under the updated OSCP, the County will also need to be trained and prepared to serve as initial Incident Commander and first responder. To do so, the County will need to determine the personnel, training, and resources necessary to fulfill these duties; obtain and maintain any necessary equipment and resources; train personnel; and coordinate with the Unified Command agencies regarding these efforts.

Second, the County should include funding to secure the equipment and resources necessary to effectuate an effective first response to an oil spill. Early containment must occur immediately, even before the first OSROs arrive. The County should develop an inventory of equipment, vehicles, and infrastructure that will enable the Fire Department to deploy necessary assets immediately in the event of a spill.

Thank you very much for your consideration of these requests. Please do not hesitate to contact me if you have any questions.

Sincerely,



Linda Krop  
Chief Counsel

cc: Robert Lewin, Santa Barbara County Office of Emergency Management  
Mark Hartwig and Rob Hazard, Santa Barbara County Fire Department  
Mona Miyasato, Teri Maus-Nisich, and Matthew Pontes, Santa Barbara County Chief  
Executive Office