- support the Orcutt Hill Resource Enhancement Project (OHREP) because: Address:

15 years, Offshore and on. This project to my livelyhoodalong with my support the Orcutt Hill Resource Enhancement Project (OHREP) because: I'Ve Worked in the Oil fields for Address: 124 W. Chesta Ut St. Signature:

•

October 5, 2016

2016 OCT -6 AM 9: 43

COUNTY OF SANTA BAPEARA.

Re: Pacific Coast Energy Company OHREP Project – October 11 CLERK OF THE

Dear Sir:

As a practicing Engineer for nearly 20 years, I've taken part in designing and building oil and gas production facilities in all corners of the world. Good workmanship and safety in design in the protection of the environmental and personnel well-being has always been a big emphasis on my drive, which has given me pride in all the years as a professional. I've also taken pride in my part to contribute to the society as a citizen of the United States and provider for my family.

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My continued desire to provide all my years of experience to contribute to the safe design of the OHREP Project is at hand, ready and waiting. My emphasis on the environment and personnel well-being is not only driven by my responsibility to the local environment and society but my relationship to the countless local professionals eager to provide their contribution. Over my three years as a contractor with PCEC, I've worked will great talents and hardworking people, both contractor and employee alike.

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As a proud father of two young elementary children, we've been exposed to great education and extra-curricular sports activities that can be offered to them. I feel that the local school system and after school activities far exceeds other societies' offer to the development of our children. My other main focus is to develop my children as a great contributor and supporter of our great society, and this is the optimum place to raise them.

Respectfully,

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Respectfully,

From:

Brian Trautwein brian Trautwein@environmentaldefensecenter.org

Sent:

Wednesday, October 05, 2016 1:09 PM

To:

sbcob

Cc:

Alicia Roessler

Subject:

Comment letter for Oct. 11 Board hearing on PCEC Appeal

Attachments:

Group letter to PC re PCEC_2016_06_27_FINAL.pdf

Dear Clerk of the Board,

Please find the attached community group sign-on letter re the PCEC Project and distribute the letter to the Board of Supervisors in advance of its 10-11-16 hearing on PCEC's appeal.

While the June 27, 2016 letter is addressed to the County Planning Commission, we want to make sure the Board is also separately provided with this letter.

Please let us know if you have any questions.

Thank you,

Brian Trautwein

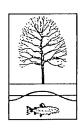
Environmental Analyst / Watershed Program Coordinator nvironmental Defense Center 906 Garden Street Santa Barbara, CA 93101 (805)963-1622 ext. 108 BTrautwein@EnvironmentalDefenseCenter.org www.EnvironmentalDefenseCenter.Org































June 27, 2016





Santa Barbara County Planning Commission 123 E. Anapamu Street Santa Barbara, CA 93101 EMAIL: dvillalo@co.santa-barbara.ca.us

Re: Pacific Coast Energy Company Orcutt Hill Oil Drilling and Seeps Project - OPPOSE

Dear Honorable Commissioners,

The undersigned community organizations urge you to deny the Pacific Coast Energy Company ("PCEC") Project to drill 96 new and up to 48 replacement wells in the environmentally sensitive Orcutt Hills. Our organizations represent thousands of your constituents and we speak with a unified voice. Our community groups oppose the project, including scaled-back alternatives, for the following reasons:

Crude Oil Seeps - The drilling would occur in an area that is already suffering extensive damage
from over 100 accidental oil seeps to date. California Department of Fish and Wildlife
predicts another 225 seeps in the next 25 years if the Project is approved. Seeps can emerge
in densely vegetated areas and steep canyons, and are not always discovered right away if at all.
The crude oil is carried downstream by rain events into Orcutt and San Antonio Creeks,
threatening Santa Barbara's County's precious water resources.

June 27, 2016 SBC Planning Commission re PCEC Orcutt Hill Oil Drilling and Seeps Project - OPPOSE Page 2

- 2. <u>Significant Threats to Human Health and the Environment from Air Pollution</u> The project will result in significant increases in air emissions and contribute to global climate change. The proposed mitigation measures for greenhouse gas emissions are vague, uncertain and unenforceable.
- 3. <u>Inconsistencies with County Comprehensive Plan</u> The project would violate numerous County Comprehensive Plan policies, including Orcutt Community Plan and Conservation Element policies that protect biological resources.
- 4. <u>Substantial Loss of Biodiversity</u> The project site is one of the most biologically rich locations in Santa Barbara County. The project will significantly impact the endangered California Tiger Salamander, including inundating their burrows and drowning them in the crude oil seeps; the Southern Bishop Pine Forest, which is one of the rarest and most imperiled plant communities in the world; the Burton Mesa Chaparral, another globally significant plant community found only in our area; and the Lompoc Yerba Santa, a rare Santa Barbara County plant species which is found in only 6 locations in the world including the subject property which is the most important location for this species in the world.

The County Planning Commission must deny the project because the County cannot make a Statement of Overriding Considerations pursuant to CEQA. The project's economic benefit, such as temporary jobs, is very limited. The potential property tax revenue from the project would be less than 1% of the County's overall property tax revenue. Adverse economic impacts (e.g., health care costs related to air pollution; impacts to water supplies; and potential oil spills) will harm our community if the project is approved. Any limited benefits do not outweigh the significant loss of biodiversity, air pollution and climate change this project would bring to Santa Barbara County and its residents. Therefore, because there is no substantial evidence demonstrating that project benefits outweigh impacts, the County cannot make the Findings of Overriding Considerations and must deny the project. Moreover, the County cannot make findings to approve the project because it is inconsistent with the Comprehensive Plan.

Therefore, we urge the Commission to deny the proposed Orcutt Hill oil drilling and seeps project. Thank you for your consideration to our concerns.

Sincerely,

Linda Krop, Chief Counsel
Environmental Defense Center

Jim Hines, Chair Sierra Club – Los Padres Chapter

Ken Hough, Executive Director SBCAN

Mike Lyons, President Get Oil Out!

Rick Frickmann, President, Santa Barbara Urban Creeks Council June 27, 2016 SBC Planning Commission re PCEC Orcutt Hill Oil Drilling and Seeps Project - OPPOSE Page 3

Cherie Topper, Executive Director Santa Barbara Audubon

Richard Halsey, Executive Director California Chaparral institute

Andrea Adams-Morden California Native Plant Society

Ken Owens, Executive Director Channel Islands Restoration

Kaia Stachel-Zambryski, Executive Director Save the Mermaids

Mark Morey, Chair Santa Barbara Surfrider

Rebecca Claassen, Santa Barbara County Organizer Food & Water Watch

Rebecca August, Chair Safe Energy Now

Board of Directors UCSB Coastal Fund

Clare Lakewood, Staff Attorney Center for Biological Diversity

Julia De'Sieno, Executive Director Animal Rescue Team

Matt Renner, Executive Director World Business Academy

From:

D. Dollar <dddollar@yahoo.com>

Sent:

Wednesday, October 05, 2016 1:31 PM

To:

sbcob

Subject:

Please Deny PCEC'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.

- 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.

6.

From:

Sandra S Mezzio <sandymv@me.com>

Sent:

Wednesday, October 05, 2016 3:32 PM

To:

sbcob

Subject:

Please Deny PCEC's Project

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Sincerely,

Sandra Mezzio 198 Tiburon Bay Ln.

Santa Barbara CA 93108

From:

Delton Johnson < corpsmanhm1@gmail.com>

Sent:

Wednesday, October 05, 2016 4:40 PM

To:

sbcob

Cc:

Delton Lee Johnson

Subject:

Please Deny PCEC's Project

This industry is a national disgrace.

Delton Johnson

CorpsmanHm1@gmail.com

From:

Melissa Bower <m-bower@earthlink.net>

Sent:

Wednesday, October 05, 2016 5:00 PM

To:

sbcob

Subject:

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Sincerely,

Melissa Bower 1095 Garcia Rd. SB, 93103

From:

Hoffman, Tom <Tom.Hoffman@flir.com>

Sent:

Wednesday, October 05, 2016 5:27 PM

To:

sbcob; Wolf, Janet

Subject:

Please Deny PCEC's Project

Dear Honorable Supervisors,

I support the EDC's efforts to prevent PCEC from further damaging the environment with this Cyclic Steam Injection oil extraction project.

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Sincerely, Tom Hoffman 5404 Agana Drive SB, CA 93111

Notice to recipient: This email is meant for only the intended recipient of the transmission, and may be a communication privileged by law, subject to export control restrictions or that otherwise contains proprietary information. If you receive this email by mistake, please notify us immediately by replying to this message and then destroy it and do not review, disclose, copy or distribute it. Thank you in advance for your cooperation.

From:

ANA MARTINEZ <anaimartinez@led-ls.com>

Sent:

Thursday, October 06, 2016 7:48 AM

To:

sbcob

Cc:

ANA I MARTINEZ

Subject:

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Sincerely,

ANA I MARTINEZ 401 Chapala St. Unit 206 Santa Barbara. CA 93101

Sent:

Thursday, October 06, 2016 8:47 AM

To:

sbcob

please DENY the appeal for the following reasons:

- 1. The Planning Commission carefully considered this project and rejected it because of the significant, unmitigated Class I impacts to Air Quality, Endangered and Sensitive Species, Critical Habitat and Water Quality. County Staff also recommends rejecting the appeal and only approving the emergency seep cans that are necessary to address the ongoing seep problem from existing operations.
- 2.Cyclic Steam Injection method 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 100 accidental oil seeps to date. The State predicts at least another 225 seeps in the next 25 years if the Project is approved.
- 3. The Project site is one of the most biologically rich locations in Santa Barbara County. The Project's oil seeps would otentially drown the endangered California Tiger Salamanders and destroy some of the rarest and most imperiled plant communities in the world, such as the Southern Bishop Pine forest and the Burton Mesa Chaparral. It will also have an irreversible impact on endangered Lompoc Yerba Santa plants, found in only 6 locations in the world.
- 4. The environmental review found significant and unavoidable risks to our water. The Project site is on a hill that intersects Orcutt creek and others that flow to the San Antonio Lagoon and Pacific Ocean. The recent Refugio oil spill demonstrates the immense risk and costs of oil spills.
- 5. The County cannot justify overturning the Planning Commission 's decision and Staff recommendation of denial. The Project does not supply any benefits that will outweigh the potentially substantial and irreversible environmental harm from allowing PCEC to double its cyclic steam drilling operations on Orcutt Hill. Thus, the County cannot legally justify approving the Project with a Statement of Overriding Considerations.

From:

Katie Davis <kdavis2468@gmail.com>

Sent:

Thursday, October 06, 2016 11:59 AM

To:

Farr, Doreen; SupervisorCarbajal; Wolf, Janet; Adam, Peter; Lavagnino, Steve; Miyasato,

Mona

Cc:

O'Gorman, Mary; Tittle, Jeremy; Henson, Chris; Jefferson Litten; W Michael Hackett;

James Hines; Allen, Michael (COB); sbcob

Subject:

PCE Orcutt Hill Resources Enhancement Plan Project (Deny Appeal)

Attachments:

Sierra Club PCE Oil Project Supervisors.pdf

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

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 ongoing 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

Chair Iim Hines

Vice-Chair Katie Davis

Secretary Gerry Ching

Treasurer Richard Hunt

At Large Michael Stubblefield

At Large

David Gold

At Large
Nina Danza

At Large Alex Pujo

Arguello Group Rep Rebecca August

SB Group Rep Katie Davis

Conejo Group Rep Hugh Warren

Ventura Network Rep Elizabeth Lamar



Los Padres Chapter

Chair Jim Hines

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Conejo Group Rep Hugh Warren

Ventura Network Rep Elizabeth Lamar

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

Jim Hen

Chair, Los Padres Chapter of the Sierra Club

From:

Linda Krop < lkrop@environmentaldefensecenter.org >

Sent:

Thursday, October 06, 2016 12:28 PM

To:

sbcob

Cc:

Alicia Roessler; Brian Trautwein; ken@sbcan.org; Katie Davis

Subject:

EDC letter re PCEC Appeal

Attachments:

EDC ltr re PCEC Appeal to BOS_2016_10_06_FINAL.pdf

Please distribute to the Board of Supervisors for the hearing next Tuesday. Thank you,

LK

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

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October 6, 2016

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

Re: <u>Denial of PCEC Appeal of Orcutt Hills Resource Enhancement Plan and</u>
Approval of Seep Can Only Alternative

Dear Honorable Supervisors:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Production Plan Findings #1

Lompoc yerba santa impacts

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

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

No evidence of project specific tax revenues

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

Production Plan Findings #2: Presence of additional watersheds

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

⁴ Chambers Group letter to Phil Brown, PCEC. June 24, 2016. Page 1.

⁵ Chambers Group letter to Phil Brown, PCEC. June 24, 2016. Page 1.

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

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

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

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

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

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

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

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

1.0 CEQA Findings

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

Careaga Exclusion Alternative

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

October 6, 2016 PCEC Appeal of Orcutt Hills Enhancement Project Page 7 of 7

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

Careaga and CTS Exclusion

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

Conclusion

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

Sincerely,

Alicia Roessler Staff Attorney

Brian Trautwein Environmental Analyst

cc: Sierra Club SBCAN

From:

Gregory Gandrud < Greg@gandrudfinancial.com>

Sent:

Thursday, October 06, 2016 1:09 PM

To:

sbcob

Subject:

Pacific Coast Energy OHREP Project October 11th

Attachments:

2016_10_06_13_06_04.pdf

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

(805) 566-1475 x114

www.Gandrud.org

www.GandrudFinancial.com

(805) 566-1475

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

F	r	o	n	n	•
•	•	•	•••		•

Kovacs, Naomi

Sent:

Wednesday, October 05, 2016 3:43 PM

To:

sbcob

Subject:

Ex Parte 10/11/16 Pacific Coast Energy Company - Orcutt Hill

Attachments:

2016-10-03 Michael Lopez - UA Plumbers and Pipefitters Local Union 114.pdf; 2016-10-05 Hod Gray.docx; 2016-10-05 Lindsey Parks.docx; 2016-10-05 Nancy

Parker.docx; 2016-10-05 Shirley Johnson.docx

Follow Up Flag:

Follow up

Flag Status:

Flagged

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

Michael Lopez, UA Plumbers and Pipefitters Local Union 114 Hod Gray Lindsey Parks

Nancy Parker Shirley Johnson

If you'd please confirm receipt of these attachments, I would greatly appreciate it.

Best,

-Naomi

Naomi Kovacs, MPA

Office of County Supervisor Janet Wolf

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

1



UNITED ASSOCIATION

of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada William P. Hite General President

Mark McManus General Secretary-Treasurer

Stephen F. Kelly
Assistant General President

Founded 1889

Letters should be confined to one subject UA Local Union: UA Plumbers and Pipefitters Local Union 114

Subject: Re: Case No. APL-00000-00020

October 3rd, 2016

Supervisor Janet Wolf Santa Barbara County Board of Supervisors 105 E. Anapamu Street, Room 407 Santa Barbara CA, 93101

Dear Supervisor,

I am writing to you on behalf of the United Association Union of Plumbers, Fitters, Welders and Service Techs Local #114. Next month you will be considering an appeal filed by Pacific Coast Energy for an oil extraction project. This project was met with concern at the Planning Commission. In response, Pacific Coast Energy has appealed Planning's decision and significantly amended their project.

This oil and gas industry is important to the Central Coast and important to the entire state of California. Extraction taxes produce millions of dollars for essential services here in Santa Barbara County and around the state. The oil and gas industry also produces jobs-thousands right here in the Central Coast. If this project moves forward, it will mean jobs for my membership. Specifically, my members will build-out the pipeline associated with Pacific Coast Energy's expansion.

On behalf of my members who are looking forward to building this pipeline, and their families, please consider moving this important project forward.

Very truly yours,

Michael Lopez

Cc: Robbie Hunter, President, SBCTC

PECKNEL OCT OS 2016

93 Thomas Road Buellton, CA 93427 Office: (805) 688-1470 Fax: (805) 688-7714 Ualocal114@gmail.com From: Lindsey Parks [mailto:lindsey@hrwmlaw.com]
Sent: Wednesday, October 05, 2016 11:39 AM

To: Wolf, Janet **Subject:** oil drilling

Dear Honorable Supervisors,

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

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

Sincerely, [Lindsey Parks 4648 Via Clarice Santa Barbara, CA 93111 From: Shirley Johnson [mailto:thusone@aol.com]
Sent: Wednesday, October 05, 2016 9:45 AM

To: SupervisorCarbajal; Wolf, Janet; Farr, Doreen; Adam, Peter; Lavagnino, Steve

Subject: NO for PCED Cyclic Steam Injection

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.
- 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.
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- 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.

WORST WASTE OF WATER EVER AND WORST THREAT TO OUR WATER EVER! BAD IDEA.

Sincerely, Shirley Johnson 5625 Calle Pacific Carpinteria, CA 93013 From: Hod [mailto:hgray@specialneedsproject.com]
Sent: Wednesday, October 05, 2016 8:53 AM

To: Wolf, Janet

Subject: Appeal of Pacific Coast Energy Company / Orcutt Project

Dear Supervisor Wolf,

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, Hod Gray 521 Arroyo Avenue Santa Barbara, CA 93109 From: Nancy Parker [mailto:nparker@jordanos.com]
Sent: Wednesday, October 05, 2016 9:10 AM

To: Wolf, Janet

Subject: DENY PCEC's appeal

Dear Janet Wolf,

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.
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- 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.

Nancy Parker

1512 Robbins St Santa Barbara, CA 93101

Email: <u>nparker@jordanos.com</u>

From:

Kovacs, Naomi

Sent:

Wednesday, October 05, 2016 4:45 PM

To:

sbcob

Subject:

Ex Parte 10/11/16 Pacific Coast Energy Company - Orcutt Hill

Attachments:

2016-10-05 Steve Ferry.docx

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

Steve Ferry

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

Best,

-Naomi

Naomi Kovacs, MPA

Office of County Supervisor Janet Wolf

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

nkovacs@countyofsb.org

September 19, 2016

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

Re: PCEC's Orcutt Hill Project

Dear Honorable Supervisors:

I have owned Property adjacent to Pacific Coast Energy Company's (PCEC) operations on Orcutt Hill for approximately thirty-eight years.

As I am sure you have probably heard from other neighbors, PCEC has proven to be a very good operator as well as neighbor. They keep me informed on their operations, and the lines of communication are always open. They have cooperatively worked with me regarding access across their property to reach my property. In addition, they have proactively worked to help reduce the trespassers on both our properties. In 2013, they spent a great deal of time and effort to install a fence along their property line that has I believe, certainly helped the trespassing issue

I would also like to add that they operate a clean and safe oil field. Not once has there been an issue of concert to me as a neighboring property owner.

Based on their past operations, their proactive communications with me as their neighbor, as well as their support for so many local nonprofit organizations in the community, I strongly encourage you to approve their proposed cycle steaming project.

Sincerely,

Kathleen Brodie

Kathleen Brodie

Property owner: 1420 Stubblefield Road Santa Maria, A

COUNTY OF SANIA BAPEARA

RE: Pacific Coast Energy Company 96-Cyclic Steaming Well Project

My name is Randy Kurz I have been working for the oil industry for over 25yrs.

During this time, I have a house four young men that Are all successful.

All the dreams a hard working person could ask for.

Times have changed, In 2015-2016 I have hit a low in my life,

To day I deal with paying my mortgage even after refinancing my house to lower

My payment. My credit is demolished, at 55yrs old it feels terrifying to think that

I might lose every thing. Please put me and other like me to work THANK YOU.

2016 OCT -6 PM 3 58

COUNTY OF SANTA BARBARA CLERK OF THE BOARD OF SUPERVISORS Anna Dato 259 Tulane Av Ventura, CA 93003 October 4, 16

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

RE: Pacific Coast Energy Company 96-Cyclic Steaming Well Project

To Whom It May Concern:

I am writing this letter to share with you the impact on our family of oil production in Santa Barbara County. My husband and I have lived and worked in Ventura and Santa Barbara Counties for the past 40 and 20 years respectively. Although I work and contribute financially to our family, for the last 11+ years my husband has primarily provided for our family by working solid 40+ hours work weeks in oil-field construction including PCEC Orcutt Hill.

The slow-down caused by pending permit approval and the oil-industry downturn in general has left our family struggling financially. His income has dropped about 40% over the last two years and to make ends meet we've cut back significantly on spending, charitable donations, and have even delayed medical and dental treatment. From day-to-day I worry if there will be enough work to sustain a full 40-hour week and the impact that will have on our ability to pay our bills, prepare for our future, and maintain our health. Health insurance depends on maintaining full-time status. Our mortgage requires his full-time income, as do all the other bills of daily living. I am looking forward to the Board of Supervisors allowing PCEC's expansion permit on Orcutt Hill so that we can once again be assured the opportunity to give an honest day's work for an honest day's pay and continue to be contributing members of the community now and well into our senior years.

Sincerely,

Anna Dato

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