SLO Department of Planning and Building
John McKenzie, Project Manager
976 Osos Street, Room 200
San Luis Obispo, CA 93408

Re: Excelaron (Mankins) EIR

To Whom It May Concern:

The draft EIR for the Excelaron (Mankins) conditional use permit does not adequately evaluate the feasibility and impacts of the proposed haul route that goes through the Porter Ranches.

First of all, the exact haul route for the tanker trucks still seems to be undefined. The recorded easement with the county does not specifically state which of the many ranch roads that the trucks will be using. The length of the haul route and therefore the exact impact that it will have on the environment in terms of habitat damage, dust control, oak tree removal, runoff, erosion, and many other impacts cannot be properly assessed until it is determined, in writing, exactly which ranch roads will be used. None of the roads on the Porter Ranch can accommodate an oil tanker in their current state. They would need to be widened, graded, re-surfaced, and have considerable vegetation removed in order to safely hold a tanker rig. Why aren't these impacts considered in the EIR?

One point that is certain on the haul route is the tiny, rickety bridge over the Huasna River. The applicant states that "Surface Improvements" will be made to the bridge. What does this mean? Are they going to replace a few deck boards? Full size farm equipment cannot cross this bridge due to width and weight restrictions, so how are tanker trucks going to manage? Aside from the bridge itself, tanker trucks will not even be able to get to the bridge due to the tight turn on the approach. The applicant stated at one point that instead of removing the enormous hills that are situated in front of the bridge, they have considered using a crane to help the trucks make the turn. If there isn't enough space for a truck to turn in the first place, then where is a crane that is large enough to move a tanker going to sit? This would mean that they would still have to remove the hills in order to make a larger approach. This will destroy the natural riparian habitat that surrounds the bridge, cause erosion, and ultimately damage the stability of the soils surrounding the bridge. This is too dangerous, both for humans and for the animals and plants that live around the Huasna River. A spill is imminent.

Routing the tanker trucks through the Porter Ranches will be a huge problem when we get our first big rains. The applicant states that they will shut down operations when the Twitchell Reservoir reaches a certain level, but even after a small amount of rain, our soils in this area liquefy and turn to quicksand. A few inches of gravel will not do anything to prevent a heavy truck from sinking or from sliding off the road. The un-paved ranch roads have several hills that border the river and lake beds. A half inch of rain or less might be all that is required to make conditions impassable for tanker trucks. What happens when a tanker starts to slide and can't stop? When the wheels finally sink into the earth and the momentum causes a rollover, it will be too late to mitigate this disaster. Hundreds of gallons of black tar will seep into the ground destroying our ground water and many more hundreds of gallons of pollutants will be washed

into the river and on into the Twitchell Reservoir, which provides groundwater recharge for the Santa Maria Valley. Perhaps Excelaron should cease operations for the season when the Huasna Valley receives more than a quarter of an inch of rainfall?

It is difficult to believe that such a marginal project can survive when it faces six month shutdowns due to haul route failure. What happens to the employees in those 6 months? What happens to the infrastructure of the wells and tanks when the sticky, tar-like oil congeals? It seems nearly impossible to get the facility cleaned out to begin operations again. It only seems logicial that the tankers would keep rolling and use the original haul route of Huasna Townsite to Huasna Road and through the Village of Arroyo Grande. These are all public roads, so how can the county legally forbid this project's trucks from using them? If one of the conditions of the permit is that tankers are not allowed on these public roads, what is the law that they are breaking? How can this be enforced? What is the punishment for violating this condition?

The Huasna Valley is one of the most pristine areas in San Luis Obispo County. We boast a healthy habitat for many animals and plants that works hand in hand with local agriculture. The residents here work hard to maintain a healthy environment to pass on to our families. I believe in private property rights, but no one owner or leaseholder should be allowed to damage and pollute the land beyond repair. There are too many Class I Impacts, too many unanswered questions, and too many discrepancies to be ignored. Why throw away something that we can never get back?

Respectfully Submitted,

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