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May 6, 2024

Susan Strachan
Decommissioning Manager
San Luis Obispo County
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408

RE: Comments on the Draft EIR for the Santa Maria Refinery Demolition and Remediation Project

Dear Ms. Strachan:

The Nature Conservancy (TNC) is writing to provide comments on the draft Environmental Impact Report (EIR) for the Santa Maria Refinery's Demolition and Remediation Project (Project). We recognize the significant time and effort that went into preparation of the draft EIR and appreciate the opportunity to provide comment.

TNC is a science-based organization that works worldwide to deliver conservation solutions that benefit both people and nature. Our mission is to conserve the lands and waters upon which all life depends, and TNC has applied deep technical expertise, tools, and resources in conservation science expressly to conserve biodiversity and increase climate resilience. We have protected over 1.5 million acres of rivers, forests, and lands in California to preserve habitats that are essential to nature and people. For decades, TNC has been working in San Luis Obispo County, and along the Central Coast more broadly, to achieve landscape-scale conservation to protect the area's biodiversity and avoid conversion of natural lands.

We appreciate the thorough analysis included in the draft EIR and the effort that went into preparing the document. While the draft EIR includes a detailed list of impacts related to the demolition and remediation of the project site, it lacks mitigation requirements that would provide long-term benefits for the community and the unique and fragile dune environment that surrounds the project site. We recommend that the final EIR for the Project include permanent land conservation for a "Buffer Area" of approximately 630 acres located within the Phillips 66 Santa Maria Refinery parcels. The recommended Buffer Area is located west of the Union Pacific Railroad and east of the Oso Flaco Lake

Natural Area. Protection of this Buffer Area will support conservation of the Guadalupe-Nipomo Dunes and the unique plant and animal species in this region.

In the late 1980s, TNC and the State Coastal Conservancy established the Guadalupe-Nipomo Dunes Preserve, which is comprised of several properties that were historically owned and managed by TNC. The Guadalupe-Nipomo Dunes are one of the last, largely undisturbed dune ecosystems along the west coast of North America. This dune system includes freshwater lagoons and pristine beaches that create a variety of habitats for endangered species, such as snowy plovers and northern elephant seals, and contains a rich diversity of plant species, many of which are endemic to this region.

For decades, TNC has been advocating for the long-term conservation of the lands in the Buffer Area. In the Guadalupe-Nipomo Dunes Preserve Management Program that TNC produced in 1999 in collaboration with the State Coastal Conservancy, we called for the in-perpetuity conservation of these lands and suggested adding the Buffer Area to the larger Guadalupe-Nipomo Dunes Preserve at a future time. This Buffer Area serves an important role in supporting, protecting, and conserving the coastal dune and wetland habitats in the Guadalupe-Nipomo Dunes Preserve.

Thank you for the opportunity to provide comment on the draft EIR for the Santa Maria Refinery's Demolition and Remediation project. We appreciate the thoughtful work involved in preparing the draft EIR for this project. The Guadalupe-Nipomo Dunes Complex contains unique and fragile ecosystems and habitat areas that require protection. We urge you to use this opportunity to conserve this ecologically significant, 630-acre Buffer Area to help protect this landscape for the benefit of people and nature both now and in the future.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Bell". The signature is fluid and cursive, with the first name "Michael" and last name "Bell" clearly distinguishable.

Michael Bell
Director of Protection
The Nature Conservancy