

Haul Route

The condition that the applicant will shut down operations whenever the haul route road is deemed "impassible" should be subject to economic analysis in the EIR, since the oil storage stock tanks and pipelines must be heated in order to keep the thick oil flowing. The economic pressures of shutting down and then re-starting the facility might give rise to poor decision-making regarding road conditions, resulting in accidents and/or oil spills. In addition the EIR should conduct an analysis of the risk associated with quickly shutting down wells that are producing oil, water and gas under the pressure of thermal stimulation.

The "passibility" of the haul route road from Huasna Townsite Road to Highway 166 should be defined by the condition of the road surface and not just the Twitchell Reservoir 599-foot contour water elevation. Otherwise the entire haul route road should be an all-weather surface. The haul route crosses the Huasna River and crosses soils subject to liquefaction during the rainy season. It has several culverts and points of potential slope failure into the Huasna River, which the EIR must evaluate. These conditions can't be properly evaluated without a plan and profile of the entire haul route road.

The bridge over the Huasna River needs further evaluation in the EIR. Although Excelaron's engineering report states that the bridge is in fair condition, Cal Trans reports a deteriorating abutment, loose rails and posts, and sloughing approach fill. Excelaron's proposal to add a new deck with additional stringers does not address these problems

In terms of transportation of oil from the project site, our community would of course prefer the alternative of a pipeline to minimize impacts. The next best thing is transportation along the haul route from Huasna Townsite Road to Highway 166. We just ask that such transportation not affect the local agriculture, pollute the soils, water, and air, or jeopardize the liability of our neighbors with vaguely defined conditions for passage along a road and bridge which are in need of structural upgrading. There is no reason why an oil company shouldn't be able to do a proper job of upgrading, maintaining and safely using this road.