I am concerned about the liquefaction of soils in the Huasna Valley and the ability of dirt or poorly graveled road surfaces to support project vehicle traffic during the wet months.

An excellent example of the problems with dirt or graveled roads has recently been demonstrated by the Division of Oil, Gas, and Geothermal Resource's attempts to abandon the existing wells at the project site, which, incidentally, are part of an existing code violation on the project site from the previous attempt to extract oil in the 1980's.

On February 17, 2010 the DOGGR contractors hired to plug the existing wells attempted to reach the project site 8 days after the last rainfall. It has been a more-or-less average rainfall year in Huasna, with 22.6 inches of rain to date. The contractors thought the road was too wet and were forced to cross a neighboring parcel in order to enter the project site, but were unable to proceed.

It was only last Tuesday that the contractors were finally able to get in to the project site, 27 days after the last significant rainfall and 33 days after their first attempts to reach the site. That day they got their drill rig stuck in mud along the Huasna Townsite Road shoulder as they tried to turn the rig into the Mankins' driveway.

It is not uncommon for residents of the Huasna Valley to stick vehicles and farm equipment in wet soils. One resident reports a full concrete truck sinking through 14 inches of compacted gravel. That section of road is now passable with the addition of geotextile fabric under the gravel, but this season a seep developed in the hillside immediately above the geotextile fabric and the road now requires additional repair.

Excelaron's plan to put 70 truck-loads of gravel onto 7 miles of dirt roads needs to be properly evaluated by the EIR. These roads will service an industrial facility and should be designed and engineered for all-weather industrial traffic use. They no longer qualify under the AG grading requirements and should be designed and engineered from a complete plan and profile of the existing AG roads.

If the project applicant will not build a pipeline to transport oil from the site, then truck transportation along ranch roads to reach highway 166 is preferable to trucking oil along the hazardous Huasna Road and Huasna Road grade. These ranch roads, in order to be safe, must be properly designed and built.