

I am also here to comment on the Excelaron/Mankins conditional use permit.

It is premature for this project to be in front of you today because the project description for this permit is still incomplete. The EIR for this project is just in the scoping stage and the project description has yet to be analyzed. Local community members have brought up many scoping issues that may affect the ultimate project description and change the potential impacts to agriculture on these contracted lands. Among many others, these issues include:

- 1) The necessity for the project description to include all 14 parcels used for vehicle traffic, 13 of which are under Williamson Act contracts.
- 2) This oil production facility will process and dispose of over 60,000 gallons of water per day in a single injection well located on contracted land. We believe Excelaron has substantially underestimated the amount of produced water they will need to dispose of and that their project description needs a better disposal plan. **Is the disposal of wastewater even an allowed use on contracted land?** It is not listed in Table 2.
- 3) The number of holes the applicant may have to drill to find twelve producing wells has not been specified in the project description. Historically oil has only been found in 12% of the holes drilled. The drilling operations specified in the project description could be substantially more involved than currently specified, with subsequently larger impacts.
- 5) Excelaron plans to operate their industrial oil production facility, with an expected project life of twenty years, using a portable toilet for their employees. We feel this adds unnecessary service vehicle traffic to Huasna Road and that Excelaron should construct a permanent toilet facility and septic system. But this brings up another question for you: Is the development of a septic system allowed on Williamson Act contracted land if it services an industrial facility and is not in support of the agricultural use of the contracted land? **Does such a development represent yet another potential breach of contract with the State under AB 1492?**

This committee should make recommendations on this project only after a completed EIR and based on a complete, technically feasible, fully transparent project description so that the potential impacts to agriculture on contracted lands can be thoroughly analyzed.