

I am here to comment on item #8 the Excelaron/Mankins conditional use permit. This application for a Conditional Use Permit lists only two parcels of land, one of which is under Williamson Act contract. However, both of these parcels are land-locked and do not touch a public road.

Excelaron's project description has vehicle traffic for their facility transiting over seven miles of dirt roads on 14 separate parcels of land prior to reaching Highway 166. 13 of these parcels are in Williamson Act contracts with the state, and the use of these parcels for project vehicle traffic must also be considered by this committee.

Excelaron's project description estimates construction traffic of up to 40 average daily round trips and on-going traffic of up to 20 average daily round trips. These vehicles will travel on seven miles of dirt roads, crossing three parcels on the Mankins ranch and eleven parcels on the Porter ranch, two ranches involved in active agriculture with cattle, hay crops, row crops, and vineyards.

Excelaron plans to bring in 70 truck-loads of gravel and apply soil binders to the seven miles of dirt road in order to control dust. These plans have not been evaluated to determine the potential effectiveness of their dust control strategy. The issues of dust and the use of soil binders on these roads could significantly affect agriculture on these and neighboring contracted lands.

Table 2 does not cover income generating easements across contracted lands for vehicle traffic servicing an industrial facility. Such easements apply along the entire seven mile haul route and affect 13 parcels of contracted land on both the Mankins and Porter ranches.

It may appear that petroleum extraction on contracted lands can be a compatible use subject to your review and recommendations. However, the definition of petroleum extraction in table 2.2 only allows onsite processing to conform to pipeline requirements. There is no mention of vehicle-based shipping.

Excelaron's oil production facility includes a terminal for loading trucks to haul oil to an offsite refinery. Such activity meets the definition of a vehicle and freight terminal, an activity that is not allowed on contracted land according to table 2.