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April 20, 2022

Via Electronic Mail Only

Eric Gillies
Environmental Program Manager I
California State Lands Commission
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Re: PRC 421 Decommissioning Project FEIR Comments

Dear Mr. Gillies and Members of the State Lands Commission:

Shute, Mihaly & Weinberger submits this comment letter on behalf of the Santa Barbara Chapter of the Surfrider Foundation (“Surfrider”) regarding the State Lands Commission’s Final Environmental Impact Report (“FEIR”) for the PRC 421 Decommissioning Project (“Project”). Surfrider’s mission is the protection and enjoyment of ocean, waves, and beaches for all people through a powerful activist network. It has worked for decades to protect public resources in and around the City of Goleta (“City”), including access to the sandy beach, Goleta Beach Park, and recreational amenities.

Removing harmful legacy oil and gas infrastructure from the Goleta shoreline will protect critical environmental resources and significantly enhance public enjoyment of the coast. Surfrider appreciates the care with which the Commission has addressed issues related to public access and sea level rise in its Project design and review. In particular, Surfrider strongly supports removal of the PRC 421 revetment and seawall as a strong coastal management option in the face of sea level rise. As the Commission moves forward with decommissioning PRC 421 and related infrastructure, Surfrider urges the Commission and all responsible agencies to pursue additional, creative public access wherever possible.

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As Surfrider’s prior comments have documented, the area surrounding PRC 421 suffers from a dearth of public access. The City’s General Plan identifies only two locations where the public can access the beach from a public roadway, and there is not sufficient parking at those locations to meet demand. Surfrider July 9, 2021 Comments on the Notice of Preparation at 2. The vertical access road that provides access to PRC 421—but which is not included in the instant Project—could be a valuable tool for public access moving forward. As the State Lands Commission, the Coastal Commission, and the City of Goleta work to wind down and repurpose the Ellwood Onshore Facility (“EOF”) and other infrastructure surrounding and related to PRC 421, they should strongly consider how that infrastructure and the vertical access road could contribute to future public beach access. Creating new public access through the EOF and the PRC 421 site is consistent with the City’s longstanding land use plan and with the State’s obligations under the Coastal Act. *See* City of Goleta General Plan Policy OS 2.2; General Plan Fig. 3.1; Pub. Resources Code § 30212 (“[p]ublic access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects,” which include decommissioning activities).

Even if the Commission cannot pursue new public access as part of this Project, the approach the Commission takes to decommissioning PRC 421 will likely influence future decisions regarding EOF and surrounding infrastructure. Accordingly, as the Commission proceeds with the Project, Surfrider emphasizes that it must do so with future public access and sea level rise in mind. Surfrider would welcome the opportunity to collaborate with the Commission, the Coastal Commission, and the City regarding new public access at the Project site.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Andrew Miller

cc: **Via E-Mail**
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