

March 15, 2019

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Planning and Development
123 East Anapamu Street
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RE: Scoping for the Plains Replacement Pipeline Project

On behalf of the environmental, indigenous, public health, and environmental justice organizations signed below, we are writing to urge you to consider the many significant impacts and dangers of the Plains pipeline project in your Environmental Impact Report (EIR).

The project threatens our ocean and coastal environment with more oil spills; toxic air and water pollution; and harm to threatened and endangered species and their habitats. It would also exacerbate climate change by prolonging our dependence on dirty fossil fuels at a time when we must be rapidly transitioning to clean, sustainable energy.

Any reasonable environmental review will reveal that there is no way to adequately avoid the harm from the project and that the only safe course of action is to reject it.

First, the EIR must evaluate the Plains pipeline project's impacts against the present baseline environmental conditions. The County has proposed to consider the environmental baseline to be the average conditions from 2012 to 2014. Such conditions have not existed for more than four years, and they are not the present conditions against which to measure the proposed pipeline's environmental impacts.

Second, the EIR must analyze and consider a reasonable range of alternatives, including a no project alternative. The no project alternative should have no harmful environmental impacts if evaluated against present circumstances. It cannot assume that the old pipeline will be restarted. The no project alternative must also assume that there is no trucking of oil drilled from offshore platforms. The EIR should also explore alternatives that hasten decommissioning of offshore oil platforms and promote renewable energy.

Third, the EIR must fully disclose the risks and potential damage of oil spills. In 2015 Plains' pipeline ruptured near Refugio State Beach, releasing more than 120,000 gallons of oil into the environment. The spill killed hundreds of birds and marine mammals and blackened Santa Barbara area beaches for miles. As was evident by that disaster, oil spills cause devastating harms, including killing and harming marine life, public health, and coastal communities.

The EIR must fully evaluate the risks and damage from a pipeline spill. Transporting oil by pipeline is dangerous. Nationwide, there were nearly 8,000 significant incidents with U.S. pipelines, involving death, injury, and economic and environmental damage, between 1986 and 2013—more than 300 per year. Federal data show new pipelines carry a high risk of spills, mostly due to faulty design or construction. Federal data indicate there are more oil spills in the first two years of pipeline's life than in the next seven years combined.

Fourth, the EIR must analyze the significant adverse environmental impacts to the water, wildlife, plants and other natural and cultural resources in the project area. The proposed pipeline may threaten sacred lands and wildlife that sustain Chumash cultural practices. The County must disclose these impacts in its EIR, and it further has a responsibility for consultation with tribes.

Fifth, the EIR must consider that the applicant, Plains All American, has a bad track record of environmental compliance. Plains' poor track record of oil spills and other accidents in California and across the country only heighten the numerous risks in the project, which the County must take into account. For example, Plains was held criminally negligent for the 2015 oil spill described above, and a jury found Plains guilty of a felony for failing to properly maintain its pipeline in connection with the spill, and several misdemeanors, including failing to timely call emergency responders.

The company has been involved in many other incidents. According to federal data, Plains All American Pipeline has had 239 incidents (mostly oil spills) nationwide from 2006–2017, including 20 in California. The company has been responsible for nearly \$180 million in property damage from spilling more than 822,000 gallons of hazardous liquids from its pipelines.

Sixth, the EIR must evaluate the impacts of the proposed pipeline servicing aging and expanded offshore oil projects. The EIR must consider the numerous threats from restarting aging offshore oil platforms that have been shut down since 2015. These threats include increased risk of oil spills and ship strikes and increased water, air and noise pollution.

Additionally, the EIR must consider that the pipeline will facilitate oil and gas development in federal waters. The Trump administration's draft proposed program for offshore oil and gas leasing for 2019 to 2024 includes federal waters off California. The proposed pipeline will facilitate federal oil and gas leasing by potentially servicing new and expanded drilling projects. The EIR must evaluate the full suite of impacts from expanded offshore oil and gas development.

Finally, the EIR must disclose the climate change impacts from the proposed pipeline. The EIR must consider the greenhouse gas emissions from all aspects of the project. The County must consider and mitigate the emissions not only from construction and operation of the pipeline and associated pump stations, it must also consider and mitigate the emissions from drilling, processing, transporting, refining, and consuming the oil as well.

California is already experiencing the harmful impacts of climate change and is threatened by sea level rise. To reverse course and keep warming below 1.5 degrees, we must take swift action to keep fossil fuels in the ground. A recent study confirmed that every barrel of California oil left in the ground will result in a net decrease of about half a barrel of oil consumption globally. The EIR must consider how the project will impact climate change and local and state goals for greenhouse gas pollution reductions.

In sum, we urge the County to prepare a comprehensive EIR for the proposed Plains pipeline project. Until and unless the County can entirely mitigate and prevent the harmful impacts from this dangerous project (which it cannot), it must not approve the project.

Sincerely,

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350 Santa Barbara

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President and Executive Director
California Water Impact Network

Miyoko Sakashita
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