



**SANTA BARBARA  
STANDING ROCK  
COALITION**



**SIERRA CLUB**  
SANTA LUCIA



February 23, 2023

Santa Barbara County Planning Commission  
126 E. Anapamu Street  
Santa Barbara, CA 93101

*By email*

**RE: Plains Line 901-903 Valve Upgrade Project Appeal**

*Dear Chair Parke and Honorable Planning Commissioners:*

We submit these comments on behalf of the undersigned organizations, supporting Gaviota Coast Conservancy’s appeal of the Plains Line 901-903 Valve Upgrade Project. Together we are committed to safeguarding the Gaviota Coast and the environment more broadly from the destructive impacts of oil and gas development.

The Plains Line 901-903 Valve Upgrade Project proposes to install 16 valves and related industrial infrastructure along the same pipeline that ruptured and caused the Refugio Oil Spill in 2015. Lines 901 and 903 are now owned by Exxon (along with the Santa Ynez Unit offshore platforms and related assets), with pending transfer to Sable Offshore Corp. The Valve Upgrade Project would enable Exxon/Sable to resume transporting oil through this compromised pipeline, risking another spill with potentially disastrous consequences to the Gaviota Coast’s marine and terrestrial ecosystems, cultural resources, and public recreational areas. Proposed above ground infrastructure including 1,150 to 1,800 sf fenced utility areas will permanently damage the Gaviota Coast viewshed along a State-designated scenic highway corridor.

The County Zoning Administrator approved permits for the Valve Upgrade Project without a full picture of the Project’s purpose and environmental impact, and without considering mitigation measures to reduce the Project’s visual impact and achieve consistency with Gaviota Coast Plan view protection policies. Gaviota Coast landowners whose lands are directly affected by the Project also appealed the Zoning Administrator’s approval, echoing these concerns and objecting to the use of their land for the Valve Upgrade Project on various grounds. We respectfully request that the Planning

Commission uphold the appeals, and either deny the Valve Upgrade Project or direct additional environmental and policy review.

## 1. Overview of the Gaviota Coast and Refugio Oil Spill

The Gaviota Coast encompasses globally significant natural, cultural, historical, and recreational resources within one of the last remaining stretches of unprotected and undeveloped coastline in Southern California.<sup>i</sup> The National Park Service (NPS) characterized the Gaviota Coast as “a globally rare biome” having “a high concentration of globally significant, diverse, rare species and habitat”.<sup>ii</sup> Cultural resources illustrate over 10,000 years of human inhabitation of the Gaviota Coast, including numerous well preserved Chumash village sites that show the rich and cultural complexity of the Chumash in this area.<sup>iii</sup> The Gaviota Coast offers “some of the last remaining views of the undisturbed, undeveloped and natural Southern California rural coastline”, with spectacular views of coastal terraces, rolling hills, and the Santa Ynez Mountains, Pacific Ocean and Channel Islands.<sup>iv</sup> The Gaviota Coast is a coastal recreation destination of “local and statewide importance due in part to the unspoiled beauty of the Gaviota coast and miles of relatively undeveloped coastline”.<sup>v</sup>

Plains’ Line 901 is a twenty-four (24) inch diameter pipeline constructed in 1988 to transport crude oil produced from the Santa Ynez Unit (SYU) off-shore platforms westward to the Gaviota Pump Station; Line 903 extends from the Gaviota Pump Station north east to the Pentland Station in San Luis Obispo. On May 19, 2015, Line 901 ruptured, spilling approximately 2,934 barrels of heavy crude oil into the environment, at least 500 barrels of which entered the Pacific Ocean near Refugio State Beach.<sup>vi</sup> The spill impacted approximately 1,500 acres of shoreline habitat and 2,200 acres of subtidal and fish habitat, killing and injuring marine plants and wildlife, including seagrasses, kelp, invertebrates, fish, birds, and mammals.<sup>vii</sup> The spill moreover forced the closure of beaches and fisheries, causing losses for local businesses and lost opportunities for the public to visit and enjoy the shore and offshore areas estimated at 140,000 lost recreational user days.<sup>viii</sup>

The rupture in Line 901 resulted from progressive external corrosion of the pipeline.<sup>ix</sup> The condition of the pipeline’s coating and insulation system fostered an environment that led to the external corrosion, and the pipeline’s cathodic protection system was not effective in preventing corrosion from occurring beneath the pipeline’s coating/insulation system.<sup>x</sup> Line 901 is now emptied, purged, and idled. Given the nature and extent of the pipeline’s condition, Plains proposed replacing the entire 123.4-mile Line 901 and Line 903 pipeline system. This replacement pipeline project is undergoing environmental review at the County<sup>xi</sup>.

## 2. Plains/Exxon/Sable Valve Upgrade Project

The Valve Upgrade Project proposes to install 16 valves (CHK and MOV<sup>xii</sup>) and related infrastructure along the existing lines 901 and 903, ostensibly to comply with Assembly Bill 864 (2015) which requires pipeline operators to install Best Available Technology (BAT) on existing pipelines in the Coastal Zone to reduce the volume of a potential release. Plains obfuscated any intention to restart operations using the existing pipeline at the Zoning Administrator hearings on the Valve Upgrade Project, but Exxon/Sable has since stated its intention to resume transporting crude oil through the existing pipeline once the safety valves are in place<sup>xiii</sup>. These valves do not remedy

external corrosion or prevent additional ruptures from occurring. The extensive corrosion and coating/insulation failures were unknown and unaccounted for in the 1986 Environmental Impact Report (EIR)<sup>xiv</sup>, and require a full environmental analysis and mitigation before the Valve Upgrade Project can be considered.

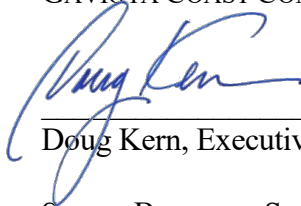
The Valve Upgrade Project will harm the Gaviota Coast environment even if no oil ever flows through the existing damaged pipeline. The proposed construction and installation of new industrial infrastructure results in impacts to the viewshed, impacts to biological resources, and potential impacts to cultural resources from excavation and construction. Proposed above-ground infrastructure including electrical panels, conduits, communications equipment, solar panel equipment, and chain-link fencing will permanently degrade public views of the rural and scenic Gaviota Coast from Highway 101, including near Refugio and El Capitan state beaches and popular recreational facilities. The Gaviota Coast Plan includes a host of policies and development standards designed to protect and enhance the rural, scenic, and visual qualities of the Gaviota Coast<sup>xv</sup>, that were largely ignored in the County's approval process. Importantly, the County failed to require changes to minimize the Valve Upgrade Project's visual impacts and achieve consistency with the Gaviota Coast Plan, which is required for Project approval.

### 3. Conclusion

The undersigned organizations respectfully request that the Planning Commission uphold the appeals, and either deny the Project, or at the very minimum direct subsequent environmental review of the Project's environmental impacts that takes into account the current degraded condition of Line 901 and the Gaviota Coast Plan's visual resource protection policies.

Respectfully Submitted,

GAVIOTA COAST CONSERVANCY



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<sup>i</sup> About the Gaviota Coast (Gaviota Coast Conservancy)

<https://storymaps.arcgis.com/stories/2ace08fd24b04e36a3f0956c385f4b1e>

<sup>ii</sup> Gaviota Coast Conservancy Vision Document, p. 7, available at:

[https://www.gaviotacoastconservancy.org/vision\\_document/](https://www.gaviotacoastconservancy.org/vision_document/); NPS Gaviota Coast Feasibility Study & Environmental Assessment (2004), p. 19, available at:

<https://parkplanning.nps.gov/document.cfm?parkID=422&projectID=72730&documentID=80018>

<sup>iii</sup> NPS Gaviota Coast Feasibility Study, p. 27.

<sup>iv</sup> Gaviota Coast Scenic Highway Proposal Visual Assessment, pp. 2-3, available at:

<https://dot.ca.gov/-/media/dot-media/programs/design/documents/f0002772-2016-12-gaviota-state-scenic-hwy-va-and-cpp-a11y.pdf>

<sup>v</sup> Gaviota Coast Plan, p. 4-1, available at:

<https://cosantabarbara.app.box.com/s/67cui9hpdphz64ajtmbdndqwq1x8tr5h>

<sup>vi</sup> U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration Failure Investigation Report, Plains Pipeline, LP, Line 901 Crude Oil Release, May 19, 2015 (May 2016) (“PHMSA Report”), p. 3. Available at:

[https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/PHMSA\\_Failure\\_Investigation\\_Report\\_Plains\\_Pipeline\\_LP\\_Line\\_901\\_Public.pdf](https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/PHMSA_Failure_Investigation_Report_Plains_Pipeline_LP_Line_901_Public.pdf)

<sup>vii</sup> Refugio Beach Oil Spill, Final Damage Assessment (June 2021), p. 22, available at:

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=193144&inline>

<sup>viii</sup> Final Damage Assessment, pp. 8, 22.

<sup>ix</sup> PHMSA Report, p. 14.

<sup>x</sup> PHMSA Report, p. 3; *see* <https://www.independent.com/2015/06/05/huge-discrepancy-pipeline-corrosion-measurements/>

<sup>xi</sup> Revised Notice of Preparation, Plains Replacement Pipeline Project, available at:

<https://cosantabarbara.app.box.com/s/o9fp2865sykaqn98s0702plaa96xj7t5/folder/74197252061> and <https://files.ceqanet.opr.ca.gov/170616->

[2/attachment/kMgGnx0tQr16ZTEvxK9MMeqNrLQO9Zgzm79wtnPIiz9ypKehMDgvTH0hm3te5DOx4NMf\\_ebkpJow0wNe0](https://files.ceqanet.opr.ca.gov/170616-2/attachment/kMgGnx0tQr16ZTEvxK9MMeqNrLQO9Zgzm79wtnPIiz9ypKehMDgvTH0hm3te5DOx4NMf_ebkpJow0wNe0)

<sup>xii</sup> The Project includes 11 motor operated valves (MOV) and 5 check valves (CHK). A full description of the Valve Replacement Project materials considered by the Zoning Administrator including Plains’ responses to public concerns is available at:

<https://cosantabarbara.app.box.com/s/cxomnkxzlp8wgay13pk46zv8pygaks8/folder/169801547762>

<sup>xiii</sup> Flame Acquisition Corp, a special purpose acquisition entity, announced an agreement to combine with Sable Offshore Corp which has separately agreed to acquire oil and gas assets as part of the merger (<https://www.businesswire.com/news/home/20221102005845/en/Flame-Acquisition-Corp.-Announces-Business-Combination-Transaction>). Flame’s Preliminary Proxy Statement filed with the SEC and available at

<https://www.sec.gov/Archives/edgar/data/1831481/000119312523030359/d434962dprer14a.htm>,

describes the intended restart of Line 901 on p. 49.

See also, Sable Offshore Corp’s Investor Presentation, available at

[https://d1io3yog0oux5.cloudfront.net/\\_df2b6e25eaff7d769fcf851164dad4d5/flameacq/db/1084/9527/pdf/Sable+-+Investor+Presentation+%2811-03-2022%29\\_v1+%28002%29.pdf](https://d1io3yog0oux5.cloudfront.net/_df2b6e25eaff7d769fcf851164dad4d5/flameacq/db/1084/9527/pdf/Sable+-+Investor+Presentation+%2811-03-2022%29_v1+%28002%29.pdf).

<sup>xiv</sup> 1986 Environmental Impact Report for the Celeron/All American/Getty Pipeline Projects, available at: <https://cosantabarbara.app.box.com/s/lkl9oo9xdsaangevdp6pasfo0cmimvlt>

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<sup>xv</sup> Gaviota Coast Plan, pp. 6-10 – 6-12 (Policies VIS-1 – VIS-3, VIS-10, VIS-13)