

Katherine Douglas

Public Comment

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From: Ana Citrin <Ana@lomcsb.com>
Sent: Friday, August 18, 2023 11:58 AM
To: sbcob
Cc: Doug Kern
Subject: Letters for Supervisors - Item 2 - Valve Upgrade
Attachments: LOMC to BOS_Valve Upgrade_8-18-23_FINAL.pdf; GCC Sign-On Letter to BOS_Valve Upgrade Project_8-18-23_FINAL2.pdf

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Dear Clerk, attached please find two letters, one submitted by GCC and 17 other organizations, and another submitted by this office on GCC's behalf.

Thank you!

Ana

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Ana Citrin

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LAW OFFICE OF MARC CHYTILO, APC

ENVIRONMENTAL LAW

August 18, 2023

Santa Barbara County Board of Supervisors
105 E. Anapamu Street
Santa Barbara, CA 93101

By email

RE: Applicant Appeal of the Planning Commission Denial of the Existing Oil Lines 901/903 Valve Upgrade Project, Case Nos. 23APL-00022

Dear Chair Williams and Honorable Supervisors,

This office represents the Gaviota Coast Conservancy (GCC), a California public benefit organization dedicated to protecting the rural character and environmental integrity of the Gaviota Coast for present and future generations. Along with rural character and environmental integrity, public access and recreational opportunities is the “third pillar” that together fulfills GCC’s mission.

GCC submitted a letter together with 17 other organizations asking that you uphold the Planning Commission’s denial of the Line 901-903 Valve Upgrade Project (Project) deny Exxon Mobil subsidiary Pacific Pipeline Corporation (PPC)’s appeal, and deny the Project. That letter (also dated 8/18/23) describes how the Project would add valves to the existing compromised Line 901-903 to enable its resumed use, and why use of the existing line would jeopardize sensitive coastal resources. This letter addresses several of the specific allegations contained in the appeal and analyzed in the Board Letter.

Generally, PPC’s appeal levels unjustified attacks on the County’s jurisdiction without acknowledging the County’s clear land use authority over the County permits sought for the Valve Upgrade Project. As explained by your staff in the Board Letter “A County permit is required for the proposed development and certain findings are required to be made in order to approve that permit.” (Board Letter p. 8 (emphasis added)). Moreover, the Board’s review of the Valve Upgrade Project is discretionary. “The proposed project is before your Board under *de novo* review, which affords your Board the discretion to determine whether the findings for approval or denial can be made, based on the evidence in the record.” (Id. pp. 4, 5, 6.)

Discussed in the sign-on letter and further below, the Planning Commission’s denial is consistent with State law and substantial evidence supports the denial findings. We urge the Board to exercise its discretion in a manner that protects coastal resources, and deny the Valve Upgrade Project.

1. A Denial Protects Sensitive Coastal Resources Consistent with the Purposes of AB 864

PPC’s Appeal asserts the Planning Commission’s finding that the Valve Upgrade Project “would be detrimental to the health, safety, comfort, convenience, and general welfare of the neighborhood and environment” is contrary to AB 864. (PPC Appeal, p. 3). To support this assertion the Appeal makes several allegations that are inaccurate and misleading.

First, the Appeal alleges that the Environmental Impact Report (EIR) already addressed the risks and impacts associated with accidental releases of oil from the pipelines (Board Letter, p. 3.) In fact, the EIR did not address the risks and impacts associated with accidental releases when Corrosion Under Insulation (CUI) has thinned the pipeline wall and rendered cathodic protection ineffective at preventing additional external corrosion.¹ The 1985 EIR's description of the Celeron/All American pipeline that was used to determine the pipeline's environmental impact assumes an effective liner and cathodic protection system to protect the pipeline from corrosion. Specifically the EIR states:

Protection of a pipeline from corrosion is of critical importance to the environment as well as the pipeline operator. Pitting of the pipeline can occur due to chemical reaction between the soil and the carbon steel pipe if it is not adequately protected. This pitting would eventually reduce the strength of the pipe sufficiently to cause a break and allow an oil leak. Therefore, Getty and Celeron/All American intend to wrap the pipelines in accordance with applicable regulations. Additionally, cathodic protection would be installed as required within 12 months of the pipeline installation dependent upon soil and chemical conditions. Corrosion control test stations would be installed with which to test the integrity of the corrosion protection. This is all in accordance with 49CFR-195.

(DEIR p. 4-106 (emphasis added)). Additionally the EIR provides “[t]he entire pipeline would be protected from corrosion with cathodic protection systems consisting of groundbeds and rectifiers.” (DEIR p. 2-5 (emphasis added).) Installing safety valves on an oil pipeline without a functioning liner and cathodic protection system is substantially different from installing safety valves on the pipeline analyzed in the 1985 EIR. This change in circumstances substantially increases the risk of rupture and release of oil into the environment in a manner that the 1985 EIR did not anticipate or mitigate for.

The Appeal further relies on the assertion that the OFSM approved hazards report concluded installation of the proposed Best Available Technology (BAT) elements will reduce the baseline worst case spill volume of 3,622.20 bbls to 1,871.40 bbls, a 48% reduction from existing conditions. (Board Letter, p. 3.) First, **PPC has not provided the risk analysis to the County or the public.** The OSFM “Approval of Risk Analysis” attached to the Planning Commission’s Staff Report dated July 6, 2021 is merely a cover letter and does not clarify whether it applies to the existing pipeline or the replacement pipeline. (See 2/2/23 PC Staff Report Attachment O.) Moreover, the 48% reduction referenced is not *from existing conditions*. Following the Refugio Oil Spill in 2015 Line 901/903 was emptied, purged, and idled, and is currently nonoperational with no oil contained within it.

¹ PHMSA Report, p. 14 (“**Corrosion under insulation (CUI) cannot be prevented on insulated lines where the coating system has been compromised.**”), Appendix M (Mechanical and Metallurgical Testing), p. 16.

In its current non-operational state, the volume of a potential release is zero and there is no risk to sensitive coastal resources from an oil release. OSFM has confirmed that AB 864 does not apply to non-operational pipelines such as Lines 901 and 903 because there is no risk of an oil spill.² By contrast, use of the existing compromised pipeline as the Project proposes would pose a very real risk of future spills, because valves do not remedy external corrosion or prevent additional ruptures from occurring. Specifically, approval of the Valve Upgrade Project would lead to increased potential spill risk above the existing conditions baseline of a non-operational pipeline, and increased spill *frequency* compared to the originally approved pipeline project. Denial of the Valve Upgrade Project functions to protect sensitive coastal resources in a manner that is fully consistent with AB 864.

2. Denial Findings Are Supported By Substantial Evidence

PPC asserts substantial evidence does not support the Planning Commission's findings for denial. Substantial evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached" and includes "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." (14 CCR §15384.) The record before the Board in this case includes robust evidence supporting the Planning Commission's denial findings.

a. Detriment to the Health, Safety, and Welfare

As explained at length in the PHMSA Report, the failures in the insulation/coating system and ineffectiveness of cathodic protection has compromised the pipeline to the extent that it is proposed for wholesale replacement. Expert reports including the PHMSA Report, Celeron/All American Pipeline EIR, and Final Damage Assessment provide substantial evidence detailing the pipeline's vulnerability to external corrosion and future ruptures, and the environmental damage that occurs when external corrosion is unchecked. By contrast there is no substantial evidence showing that the pipeline is safe to use with the proposed valves in place. The County has not been provided with the risk analysis (that the Appeal repeatedly refers to but does not include), and has no information regarding what additional safety measures, if any, the OSFM will require it connection with the waiver for the limited effectiveness of cathodic protection. Under these circumstances, substantial evidence supports a finding that the Valve Upgrade Project would be detrimental to the health, safety, comfort, convenience, and general welfare of the neighborhood and environment.

² Personal communication (Jim Hosler, Assistant Deputy Director, Pipeline Safety and CUPA for OSFM to Linda Krop, June 1, 2023).

b. Visual Incompatibility

PPC's Appeal also attacks the sufficiency of the Planning Commission's finding that above-ground infrastructure that the Valve Upgrade Project would install along Highway 101 on the Gaviota Coast will be incompatible with the established physical scale and surrounding rural landscape because permanent above-ground equipment would be visible from public viewsheds. The evaluation of visual compatibility is necessarily subjective, and the visual resources that the Project would affect are uniquely valuable and subject to a host of protections that guard against visual intrusion. With County approval of the Valve Upgrade Project, PPC could proceed with excavation, construction, and installation of permanent above ground infrastructure within the Gaviota Coast's protected viewshed. The visual impacts of this development would be entirely unnecessary and unjustified if OSFM ultimately rejects PPC's request to restart the line. Under these circumstances, the finding for denial on visual grounds is appropriate.

The State of California officially designated the 21.4 mile stretch of Highway 101 from near the City of Goleta's western boundary to Route 1 at Las Cruces as the Gaviota Coast State Scenic Highway on December 13, 2016.³ "This stretch of highway through the Gaviota Coast is the last best example of rural, coastal, Southern California, and is the largest remaining rural coastline within the southern region. Highway travelers are presented with spectacular views of grassy rolling hills and mountains, expansive views of the Pacific Ocean, and impressive rock formations of the Santa Ynez Mountains."⁴ As recognized in the County's application for State Scenic Highway Designation, "the County of Santa Barbara has valued the outstanding and unique scenic qualities of the Gaviota coast for decades, and has the intent to protect and promote this special resource for future generations."

The Project includes development within the Gaviota Coast State Scenic Highway corridor, including excavation and the installation of permanent above-ground infrastructure. Fenced utility areas between approximately 1,150 and 1,800 square feet are proposed to enclose each MOV station and to store electrical panels, conduits, communications equipment and solar panel equipment or the above / below ground connection to the nearby power line. (Addendum, p. 6.) Visual simulations prepared for the Applicant in response to this appeal show that four of the MOV stations are visible from Highway 101, adversely impacting nearfield views.

The Gaviota Coast Plan establishes a whole new category of protection for near-field views from Highway 101, defined in the Plan as the Critical Viewshed Corridor (CVC) Overlay. The Overlay policies includes the following:

³ <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

⁴ Gaviota Coast Scenic Highway Proposal, available at: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/f0002772-2016-12-gaviota-state-scenic-hwy-va-and-cpp-ally.pdf>

Policy VIS-12: Critical Viewshed Corridor. Protection of the ocean and mountain views of the Gaviota Coast from Highway 101 is critically important. Therefore, a Critical Viewshed Corridor Overlay, providing more protective viewshed policies for development permits within the overlay, is designated for the Gaviota Coast.

Policy VIS-13: Development Visibility. Development within the Critical Viewshed Corridor shall be screened to the maximum extent feasible as seen from Highway 101. Screening shall be achieved through adherence to the Site Design Hierarchy and Design Guidelines.

(GCP p. 6-11.) The Site Design Hierarchy includes, among other things:

Visibility - Eliminate or reduce the visibility of proposed development.

Site selection is the primary tool for minimizing the visibility of development. Development shall be subordinate to the setting, visually compatible with and complementary to the environment, and an integral part of the existing landscape.

To the maximum extent feasible, eliminate or reduce the visibility of development on the skyline as well as lesser or subordinate public viewshed ridgelines, as required by Policy VIS- 2 and Policy VIS-3 and existing Santa Barbara County policies.

Resource Sensitivity.

To the extent feasible, development should avoid environmentally sensitive habitat (ESH) areas including riparian and wildlife corridors but where unavoidable, impacts shall be minimized consistent with existing County policy.

(GCP p. 6-6.)

Moreover, Gaviota Coast Plan Visual Resource Policies that apply throughout the Plan area apply, including:

Policy VIS-1: Visual Compatibility. The height, scale, and design of structures shall be compatible with the character of the surrounding natural and agricultural environment.

Policy VIS-1a: Visual Resource Protection. (COASTAL) Development shall be sited and designed to avoid and minimize impacts to the rural, natural, and agricultural environment as seen from public viewing places. If there is no feasible building site location on the project site where development would not be visible, then the development shall be sited and designed to minimize impacts to visual resources through measures that may include, but not be limited to, siting development in the least visible portion of the site, breaking up the mass of new structures, designing structures to blend into the natural setting, restricting the

building maximum size, reducing maximum height, clustering development, minimizing grading, incorporating screening elements such as landscaping or artificial berms. Landscape screening and artificial berms shall not substitute for siting and design alternatives that avoid impacts to public views of the ocean and other scenic areas and minimize alteration of natural land forms.

Policy VIS-2: Visually Subordinate Development. Development shall be visually subordinate to the natural and agricultural environment as seen from public viewing places. Visual subordination shall be achieved through adherence to the Site Design Hierarchy and Design Guidelines. "Visually subordinate" is defined as development that is partially visible but not dominant or disruptive in relation to the surrounding landscape as viewed from a public viewing place.

Policy VIS-3: Skyline Intrusion. Where feasible, development shall be sited so as not to intrude into the skyline as seen from public viewing places. (but see Comprehensive Plan LUE VR Policy 2, below)

Policy VIS-4: Ridgeline Development. Development shall be prohibited from locating on ridgelines to the maximum extent feasible, as implemented by the Ridgeline and Hillside Development Guidelines.

In addition, Comprehensive Plan Land Use Element, Visual Resource Policy 2 provides:

In areas designated as rural on the land use plan maps, the height, scale and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms, shall be designed to follow the natural contours of the landscape, and shall be sited so as not to intrude into the skyline as seen from public viewing places.

Finally, GCP Policy LU-10 provides "*Development shall be sited to the maximum extent possible to . . . avoid visually prominent areas*".

The visual simulations provided by the Applicant show that the Project would impact public views from Highway 101 - a well-traveled transportation corridor and recently-designated State scenic highway. The Pleinaire Group Visual Study shows that MOV1-210P is located on a prominent ridgeline between El Capitan and Refugio State Beaches (Figure 12), and that MOV1-990P (Figure 2) MOV1-890P (Figure 4) and MOV1-790P (Figure 7) intrude into nearfield views from Highway 101. Photos of an existing Plains Pipeline Valve (Figure 16) and an existing SoCalGas valve (Figure 17) more clearly demonstrate the visual impact of these structures than the visual simulations which appear to downplay the visibility of Project structures. This development is not compatible with or visually subordinate to the natural and agricultural environment as seen

from public viewing places, and accordingly is inconsistent with GCP VIS-1, VIS-1a, and VIS-2. Further there is no evidence provided showing that the MOV structures are screened to the maximum extent feasible as required by CVCO Policy VIS-13 and the Site Design Hierarchy.

These conflicts with County policies protecting visual resources, and the Gaviota Coast viewshed from Highway 101 in particular, add to the evidence supporting the Planning Commission's visual incompatibility finding and are also grounds for denial on policy inconsistency grounds (CZO § 35-169.5).

3. Conclusion

For the foregoing reasons, as further explained in the sign-on letter, we respectfully request that the Board uphold the Planning Commission's denial and reject the Valve Upgrade Project.

Sincerely,

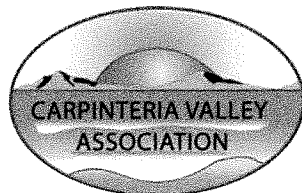
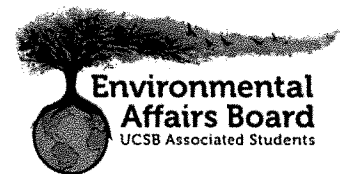
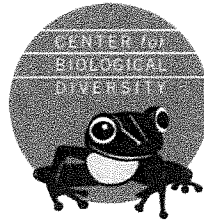
LAW OFFICE OF MARC CHYTILO



Ana Citrin
For the Gaviota Coast Conservancy



**SANTA BARBARA
STANDING ROCK
COALITION**



August 18, 2023

Santa Barbara County Board of Supervisors
105 E. Anapamu Street
Santa Barbara, CA 93101

By email

RE: Opposition to Applicant Appeal of the Planning Commission Denial of the Existing Oil Lines 901/903 Valve Upgrade Project, Case Nos. 23APL-00022

Chair Williams and Honorable Supervisors:

The undersigned organizations are committed to safeguarding the Gaviota Coast and the environment more broadly from the destructive impacts of oil and gas development. Together we ask that you uphold the Planning Commission's denial of the Line 901-903 Valve Upgrade Project, deny

Exxon Mobil subsidiary Pacific Pipeline Corporation (PPC)'s appeal, and deny the Valve Upgrade Project.

The Line 901-903 Valve Upgrade Project proposes to install 16 valves and related industrial infrastructure on the same pipeline that ruptured and caused the Refugio Oil Spill in 2015. Lines 901 and 903 are presently purged, emptied, and non-operational. Exxon/PPC acquired the pipeline from Plains, and an additional transfer to Sable Offshore Corp is pending. In its appeal, PPC claims a vested right to restart the existing Lines 901 and 903 at any time without discretionary approval from a County decisionmaker.ⁱ Sable has stated its intention to resume transporting crude oil through the existing pipeline once the safety valves are in place, with a target for bringing the shut-in assets back online during the first quarter of 2024ⁱⁱ.

The rupture in Line 901 that caused the Refugio Oil Spill resulted from progressive external corrosion of the pipeline.ⁱⁱⁱ Specifically, the Pipeline and Hazardous Materials Safety Administration (PHMSA) Failure Investigation Report determined that 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.^{iv} Once the coating system of a buried insulated pipeline is compromised, external corrosion cannot be prevented with cathodic protection or otherwise.^v 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^{vi}.

The Valve Upgrade Project proposes an entirely different approach to the replacement pipeline, whereby *16 valves would be installed on the existing compromised pipeline to enable its resumed use*, risking another spill with potentially disastrous consequences to the Gaviota Coast's marine and terrestrial ecosystems, cultural resources, and public recreational areas. As made clear at the Planning Commission hearings, the County would have no formal role in the Office of the State Fire Marshall (OSFM)'s approval process for the restart, and no ability to conduct environmental review before the restart could proceed.

After hearing Applicant and public testimony, and considering the evidence in the record, the County Planning Commission correctly found that the Valve Upgrade Project would be detrimental to the health, safety, comfort, convenience, and general welfare of the neighborhood and environment (among other denial findings). Specifically, the Commission found^{vii}:

while the severity of a potential future oil spill could be minimized through installation of the proposed sixteen new valves, the frequency of a potential future spill may be increased because of the degradation to the pipeline's integrity that has occurred since its commissioning in 1994. Oil spill related impacts may still occur even after successful implementation of mitigation measures imposed as part of the original project approval, as well as the proposed valve installations, due to several factors that have acted in combination to cause degradation of the line including inadequate inspection intervals, a lack of adequate anomaly repairs, internal corrosion, and corrosion under insulation (external corrosion). The risks of an oil spill are elevated above what was previously approved and the project would be detrimental to the

health, safety, comfort, convenience, and general welfare of the neighborhood and environment.

This finding, and the Planning Commission's other findings for denial, are squarely within the County's discretionary land use permitting authority, and are supported by substantial evidence in the record including the PHMSA Report.

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.^{viii} 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".^{ix} 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.^x 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.^{xi} 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".^{xii}

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). The construction and operation of Line 901-903 is permitted under a Final Development Plan (FDP) and Conditional Use Permit (CUP) that the County approved in 1986 (and revised in 1988 and 2003). On May 19, 2015, Line 901 ruptured, spilling an estimated 451,500 gallons of heavy crude oil into the Pacific Ocean near Refugio State Beach.^{xiii} 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.^{xiv} 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.^{xv}

2. The Valve Upgrade Project Jeopardizes Sensitive Coastal Resources

The Valve Upgrade Project includes 16 valves (CHK and MOV) and related infrastructure along the existing lines 901 and 903, ostensibly proposed to comply with Assembly Bill 864. That legislation, introduced by then-Assembly member Das Williams in response to the Refugio Oil Spill, requires pipeline operators to install Best Available Technology (BAT) on existing pipelines in the Coastal Zone to reduce the volume of a potential release and protect sensitive coastal resources.

In its current non-operational state, the volume of a potential release is zero and there is no risk to sensitive coastal resources from an oil release. OSFM has confirmed that AB 864 does not apply to non-operational pipelines such as Lines 901 and 903 because there is no risk of an oil spill.^{xvi} By

contrast, use of the existing compromised pipeline as the Project proposes would pose a very real risk of future spills, because valves do not remedy external corrosion or prevent additional ruptures from occurring. Specifically, approval of the Valve Upgrade Project would lead to increased potential spill risk above the existing conditions baseline of a non-operational pipeline, and increased spill *frequency* compared to the originally approved pipeline project.

The extensive corrosion and coating/insulation failures documented by PHMSA have thinned the pipeline wall and compromised the integrity of the existing Line 901-903.^{xvii} The pipeline is buried in corrosive soils^{xviii}, and PPC's proposed approach would resume oil transport through this line without effective protection from additional external corrosion^{xix}. The County's 1985 EIR for the pipeline clearly states "***Protection of a pipeline from corrosion is of critical importance to the environment***".^{xx} These facts are not disputed. PPC has refused to provide the results of safety audits to the County to review, and vigorously opposed conducting environmental review in conjunction with the Valve Upgrade Project (although the current condition of the pipeline represents a substantial change in circumstances that would necessitate subsequent or supplemental environmental review under CEQA^{xxi}). Approving the Valve Upgrade Project without documentation showing Line 901-903 is safe to use would jeopardize the health and safety of County residents, the welfare of County businesses, and the integrity of marine and terrestrial habitats in the County and beyond.

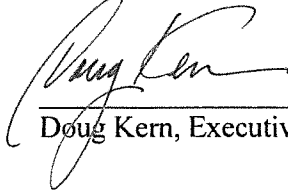
Even when viewed narrowly as only valve installation, the Valve Upgrade Project will still harm the Gaviota Coast's environment. Specifically, proposed above-ground infrastructure including electrical panels, conduits, communications equipment, solar panel equipment, and 1,150 to 1,800 sf fenced utility areas will permanently damage the Gaviota Coast viewshed along a State-designated scenic highway corridor^{xxii}, and create inconsistencies with a host of Gaviota Coast Plan policies and development standards that protect and enhance the rural, scenic, and visual qualities of the Gaviota Coast^{xxiii}. Construction of the Valve Project also causes impacts to biological resources, and potential impacts to cultural resources, that must be avoided where feasible^{xxiv}. If OSFM rejects PPC's request to restart, there is nothing to justify excavation and construction in the Gaviota Coast viewshed.

3. Conclusion

For the reasons discussed above, the Planning Commission correctly found that approval of the Valve Upgrade Project is detrimental to the health, safety, and general welfare because the valves would operate on the existing compromised pipeline. If no oil ever flows through the existing pipeline, the Valve Upgrade Project would unnecessarily damage the Gaviota Coast viewshed and sensitive coastal resources. Importantly, the Valve Upgrade Project is *not* required for PPC to comply with AB 864, because there is no risk of a spill from this non-operational pipeline. The denial of PPC's FDP/CUP Amendment is squarely within the County's discretionary land use permitting authority, and substantial evidence supports the findings for denial. Accordingly, undersigned organizations respectfully request that the Board reject PPC's appeal, and deny the Project.

Respectfully Submitted,

GAVIOTA COAST CONSERVANCY



Doug Kern, Executive Director

ENVIRONMENTAL DEFENSE CENTER



Linda Krop, Chief Counsel

LOS PADRES FORESTWATCH



Carla Mena, Director of Policy & Legislative Affairs

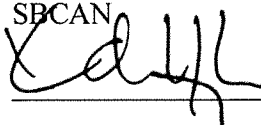
SANTA BARBARA STANDING ROCK COALITION

Rachel Altman Emiliano Campobello

Rachel Altman, Administrator

Emiliano Campobello, Co-Chair

SBCAN



Ken Hough, Executive Director

CLIMATE FIRST: REPLACING OIL & GAS (CFROG)



Haley Ehlers, Director

SOCIETY OF FEARLESS GRANDMOTHERS – SANTA BARBARA

Irene C. Cooke

Irene Cooke, Founding Member

SIERRA CLUB, SANTA LUCIA CHAPTER

Carole Mintzer

Carole Mintzer, Chair

GET OIL OUT

Michael Lyons

Michael Lyons, President

COASTAL RANCHES CONSERVANCY

Doug Campbell

Doug Campbell, Executive Director

SURFRIDER FOUNDATION

Stephanie Robertson

Stephanie Robertson, Treasurer, Santa Barbara Chapter

SANTA BARBARA AUDUBON SOCIETY

Katherine Emery

Katherine Emery, Ph.D., Executive Director

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Anna Eisenberg

Anna Eisenberg, Advocacy Chair

CENTER FOR BIOLOGICAL DIVERSITY



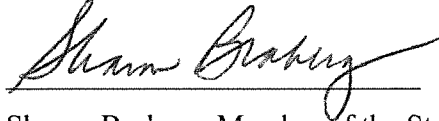
Brady Bradshaw, Senior Oceans Campaigner

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Jonathan Ullman, Director

350 SANTA BARBARA



Sharon Broberg, Member of the Steering Committee

CARPENTERIA VALLEY ASSOCIATION

Mike Wondolowski

Mike Wondolowski, President

COASTAL BAND OF THE CHUMASH NATION



Mariza M. Sullivan, Vice Chair

ⁱ PPC Appeal Application, 5/8/23 Appeal Letter, pp. 7-8.

ⁱⁱ <https://www.sec.gov/Archives/edgar/data/1831481/000119312522282811/d377586dprem14a.htm> (Flame's Preliminary Proxy Statement filed with the SEC describes the intended restart of Line 901 on p. 49; 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>)).

See also, Sable Offshore Corp's Investor Presentation, GCC Letter to PC 2/27/23, Exhibit B, available at <https://cosantabarbara.app.box.com/s/q97rv82305oyfnbdjhcyxrrdhu3dgkqy/file/1151364434820>

ⁱⁱⁱ 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, p. 14.

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

^v PHMSA Report, p. 14 (“**Corrosion under insulation (CUI) cannot be prevented on insulated lines where the coating system has been compromised.**”)

^{vi} 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/kMgGnx0tOrl6ZTEvxK9MMeqNrLQO9Zgzm79wtnPIiz9ypKehMDgvTH0hm3te5DOx4NMf_ebkpJow0wNe0

^{vii} Planning Commission Action Letter, May 3, 2023, Conditional Use Permit Findings pp. 4-5.

^{viii} About the Gaviota Coast (Gaviota Coast Conservancy)
<https://storymaps.arcgis.com/stories/2ace08fd24b04e36a3f0956c385f4b1e>

^{ix} Gaviota Coast Conservancy Vision Document, p. 7, available at: 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>

^x NPS Gaviota Coast Feasibility Study, p. 27.

^{xi} 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>

^{xii} Gaviota Coast Plan, p. 4-1, available at: <https://cosantabarbara.app.box.com/s/67cui9hpdphz64ajtmbdndqwwq1x8tr5h>

^{xiii} US Dist. Court, Central District of CA, Case No. 2:15-cv-04113-PSG-JEM, Expert Report of Igor Mezic, Ph.D., 3/29/19, pp. 16-17 (note, 10,750 barrels = 451,500 gallons).

^{xiv} Refugio Beach Oil Spill, Final Damage Assessment (June 2021), p. 22, available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=193144&inline>

^{xv} Final Damage Assessment, pp. 8, 22.

^{xvi} Personal communication (Jim Hosler, Assistant Deputy Director, Pipeline Safety and CUPA for OSFM to Linda Krop, June 1, 2023).

^{xvii} PHMSA Report, p. 14.

^{xviii} PHMSA Report, Appendix M (Mechanical and Metallurgical Testing), p. 16.

^{xix} PHMSA Report, p. 14.

^{xx} 1984 Draft EIR for the Celeron/All American and Getty Pipeline Projects, p. 4-106, available at <https://cosantabarbara.app.box.com/s/q97rv82305oyfnbdjhcyxrrdhu3dggkqy/folder/212643610300>; full document available at [https://commons.wikimedia.org/wiki/File:Draft_environmental_impact_report-environmental_impact_statement_for_the_Celeron-All_American_and_Getty_pipeline_projects_\(IA_draftenvironment09envi\).pdf](https://commons.wikimedia.org/wiki/File:Draft_environmental_impact_report-environmental_impact_statement_for_the_Celeron-All_American_and_Getty_pipeline_projects_(IA_draftenvironment09envi).pdf)

^{xxi} See CEQA Guidelines § 15162; GCC Letter to PC, 2/27/23, pp. 8-10.

^{xxii} 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>

^{xxiii} Gaviota Coast Plan, pp. 6-10 – 6-12 (Policies VIS-1 – VIS-3, VIS-10, VIS-13)

^{xxiv} Gaviota Coast Plan, pp. 2-15 – 2-31 (Natural and Cultural Resources Stewardship)