



A-34

de la Guerra, Sheila

From: Thomas Becker <lesdeplorable7@gmail.com>
Sent: Saturday, March 16, 2019 6:48 AM
To: sbcob
Subject: Agenda item A-34 public comment, Board meeting 3/19/19.
Attachments: Plains Pipeline Environmental Impact Report.docx

Categories: Public Comment

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Please see attached file, Public comment for A-34.

3/10/19

Public comment, Plains All- American Pipeline replacement project EIR scope, due by 3/15/19

The County of Santa Barbara Planning and Development department is the lead agency preparing the EIR for the Plains 901/903 pipeline replacement project. P&D is responsible for responses to public comments, and P&D's responses will be the official County of Santa Barbara position on the comments received.

In the past, County of Santa Barbara government has refused to properly respond to comments received as part of EIR's and other environmental documents. The State of California government has also refused to properly respond to comments.

Under CEQA, County P&D must respond truthfully and completely to comments that are relevant to material issues arising from the Plains pipeline project.

When state and county governments fail to respond fully and truthfully to comments received as part of environmental documents, the public is denied the opportunity to engage on the issues at hand. This causes issues raised by the proposed project to be inadequately addressed during the environmental review process. This leads to unnecessary lawsuits. The environmental review process is the proper time and place to settle disputes, not afterwards in a court of law.

Each relevant comment and question from the public, NGOs and government entities should be fully and truthfully answered. A response like "comment noted", or responding by referring to another response, is not adequate. Each response to every relevant comment should be detailed in its own right, with questions answered in detail. The responses to questions should contain the details of the answers, so all a person has to do to understand the answer is read the detailed response made directly to the comment.

The Plains pipeline replacement is directly connected to the issue of oil and gas development in federal waters located in the Outer Continental Shelf (OCS). The two issues are inseparable and MUST be considered together. Currently, the federal Bureau of Ocean Energy Management (BOEM) is in the process of approving a new 5-year OCS leasing plan. The Plains 901/903 pipeline transported/will transport oil produced from current OCS leases, mostly ExxonMobil leases. The Plains pipeline may be used to transport oil produced from new leases. The State of California and Santa Barbara County governments have threatened to sue the BOEM over any new leases or changes in existing leases arising from the new OCS 5-year leasing plan. It is for this reason that County of Santa Barbara P&D fully and

truthfully answer questions and comments submitted as part of the Plains pipeline replacement. This will force County government to put its official position on technical, scientific and economic issues on the record. It will also allow the public to fully engage on the issues. The State of California government, through the California Coastal Commission and State Lands Commission, will also be given the opportunity to act in good faith and fully and truthfully answer questions, putting the state government's official positions on the issues on the record. All disputes arising from oil and gas development in the OCS can be resolved during the Plains pipeline EIR process IF state and local governments act in good faith and fully and truthfully respond to comments and answer questions submitted by the public and NGOs, as well as federal, state and local governments. If state and local governments act in bad faith and do not fully and truthfully respond to comments and questions during the Plains EIR process, they should have no credibility in any court, regardless if they are a plaintiff, defendant or witness.

Concerning the scope of the Plains EIR, below is a list of subjects that should be covered:

- 1) A complete review of offshore oil development and production in the OCS. This would include past, present and potential future exploration and production.
- 2) A complete review of the new BOEM 5-year OCS leasing plan.
- 3) A complete review of all public comments concerning offshore oil development made by county government and state government elected officials.
- 4) A complete review of the economic impacts to the county and state from offshore oil development in federal waters.
- 5) A complete review of gasoline and diesel fuel consumption trends in Santa Barbara County and the State of California over the past 10 years and 20 years from now.
- 6) A complete review of the decision- making process of the Venoco pipeline project, which was allowed to hook up to the Plains 901 pipeline by state and local governments.
- 7) A complete review of the history of the safety and condition of the current Plains 903 pipeline, which was/is under state and local jurisdiction.

Questions that should be fully and truthfully answered by the county government:

- 1) How many BPD can the existing pipelines between the ExxonMobil platforms and Los Flores handle?
- 2) Can the existing pipelines between the ExxonMobil platforms and Los Flores Canyon handle processed oil?
- 3) Can ExxonMobil transfer oil processing to their platforms and close Los Flores?
- 4) Can ExxonMobil ship its oil via offshore marine oil terminals, eliminating the need for the 901/903 pipeline?
- 5) Has ExxonMobil or Plains contacted BOEM about the proposed reduction of the pipeline?
- 6) Does BOEM know about the proposed reduction of the pipeline? Who told them?
- 7) Can future new offshore oil production connect to the 901/903 pipeline?
- 8) Is the State of California's ban on new pipelines through state waters lawful?
- 9) Can the State of California ban oil tankers from crossing through state waters?

- 10) Can new oil production from federal waters use existing ExxonMobil pipelines and processing facilities? Does the shared use of oil facilities conform with the county requirement that oil facilities be shared to the greatest extent possible?
- 11) Has ExxonMobil or Plains discussed the reduction of the pipeline with any NGO or elected government official? Who, and when?
- 12) Has ExxonMobil or Plains entered into ANY agreement with ANY NGO or elected government official concerning the reduction of the pipeline? Who? What are the details of the agreement?
- 13) Has ExxonMobil or Plains paid ANY person or entity money or ANY thing of value in exchange for ANY favorable consideration concerning the project? Who, and how much?
- 14) Has ExxonMobil or Plains discussed maintaining the current diameter of the pipeline with the BOEM so the pipeline can transport new oil production from future new federal leases?
- 15) How much would it cost to repair the current pipeline and return it to service?
- 16) How much will the new pipeline project cost?
- 17) How many gallons of gasoline and diesel fuel per day were consumed in the County of Santa Barbara and the State of California in 2018? How many gallons in 2008?
- 18) How many megawatts of electricity can be generated by natural gas fired powerplants fueled by natural gas deposits located in federal waters off of Santa Barbara County?
- 19) How many people have been killed in the State of California over the past 10 years by fires started by faulty electrical transmission equipment that traverse forested/ brush covered publicly owned lands?
- 20) Can the load on electrical equipment that traverse forested/brush covered public lands be reduced by generating electricity locally, within 10 miles of the point of consumption?
- 21) How many vehicles powered solely by batteries are registered in the State of California?
- 22) How many new vehicles powered solely by batteries were sold in the State of California in the first 3 months of 2019?
- 23) How many vehicles powered solely by batteries will be registered in the State of California in 2039? Please cite sources to back up your estimate.
- 24) Was County P&D aware that Plains Pipeline 901 did not have an automatic shutoff valve system when county government permitted the Venoco Pipeline project, which connected to Line 901?
- 25) Did State and County inspectors have access to the calibration and testing reports of the equipment that was used to inspect the wall thickness of Line 901 in the years and months before the rupture?
- 26) Was the equipment used to inspect the wall thickness of Line 901 properly calibrated and functional?

If County P&D has any questions for me they can contact me at the email address below.

Tom Becker

Buellton, CA

Lesdeplorable7@gmail.com

