



Aug 21, 2023

Dear Chair Williams and Santa Barbara County Board of Supervisors

On behalf of the League of Women Voters of Santa Barbara (LWVSB) we thank you for this opportunity to provide input on the review of the Pacific Pipeline Company's ("PPC") appeal of the Planning Commission's denial of the Development Plan/Conditional Use Permit Amendment and Coastal Development Permit Pertaining to Line 901-903 Upgrade Project.

We urge you to uphold the Planning Commission's denial of the valve upgrade project.

The 901/903 pipelines have been shut down since the May 19, 2015 oil spill on the Gaviota Coast. The spill was caused by extensive external corrosion on the line. Oil from the spill spread over 150 miles of coastline causing closure of fisheries, state parks, beaches, and campgrounds, and the death of hundreds of marine mammals and seabirds. To date, the pipeline companies--Plains All-American and now Pacific Pipeline Company (PPC)--have taken no action to fix the damaged pipelines. Moreover, PPC has expressed an interest in restarting the pipelines. Installing these valves could facilitate Exxon's restart of the damaged pipelines.

State law (AB 864) requires that coastal pipeline operators install safety features to reduce the volume of a potential spill to protect sensitive resources. Because the pipelines are currently nonoperational, there is no risk of a spill at this time. Hence, our understanding is that the valves are not required by state law for this pipeline since it is non-operational. As such, there is no good reason to approve installation of valves before addressing the corrosion that makes the pipelines unsafe to operate.

The public has received inadequate information about the level of additional corrosion and weakening of the pipeline walls beyond that which led to the 2015 spill. The applicant has admitted that there are a number of "anomalies" but not disclosed the extent of the corrosion due to failure of the corrosion prevention system that obviously failed to prevent the massive 2015 oil spill. Granting a permit to add safety valves to a corroded pipeline strikes us as a way to get around public review by the County of measures to actually make the pipeline safe.

The risk of restarting these pipelines is far too great and poses a significant threat to the well-being of this community. We strongly urge the Board to uphold the denial to install valves.

Thank you for the opportunity to comment on this application. We look forward to hearing the Board of Supervisor's deliberations and decision on this topic.

Respectfully yours,

Laura Haston on behalf of the
LWVSB Sustainable Communities Committee

Vicki Allen, VP Communications on behalf of the
LWVSB Leadership Team