



August 3, 2020

350 Santa Barbara Comment to Planning Commission re: Foxen Petroleum Pipeline

Dear Santa Barbara County Planning Commission,

We are writing to you regarding TerraCore Operating Company LLC's ("TerraCore") request for extension of the permit to build the Foxen Petroleum Pipeline. We advocate for you to reject the request.

Significant and highly relevant factors have changed since the original EIR was completed in 2013 and the original permit was granted in 2015. The original EIR was based on assumptions about links between fossil fuel production and climate change that are sorely out-of-date. In 2020, we are in a vastly different context. In 2018, the Intergovernmental Panel on Climate Change (IPCC) released a report which presented the updated scientific consensus that to keep global average temperatures to below 1.5 degrees Celsius – the universally accepted 'safe' target – we have to cut global emissions in half by 2030. Later that year, the International Energy Agency (IEA) released a report which found that all current fossil fuel infrastructure would eat up that carbon budget – in other words, to stay below 1.5 degrees Celsius, *we cannot build any new fossil fuel infrastructure*. Additionally, Santa Barbara County's own Climate Action Plan (CAP) listed the goal of reducing greenhouse gas emissions in the county by 50% of 2007 levels by 2030 (updated December 11, 2018). Therefore, based on the updated international scientific consensus and the County's own CAP, we cannot allow for any new oil exploration and development.

While this vote is about the extension of a permit to build a pipeline, its implications are beyond that of just a pipeline. We recognize that the County maintains a policy in which pipelines are preferable to trucks as a method of oil transportation, both in terms of reducing both accidents and greenhouse gas emissions. Yet we have to consider the Foxen pipeline alongside its implications. Will the approval of a pipeline allow for new, future development, thereby amounting in an overall increase in emissions?

When the Foxen pipeline permit was pursued in 2015, there were three companies applying for permits to drill in the Cat Canyon oil field; the pipeline was rated at capacity to transport crude oil to match both the existing and full total of proposed production. While two of those companies – AERA and PetroRock – have rescinded their applications, TerraCore is currently pursuing a permit to drill [233](#) new oil wells. The EIR for this project – the West Cat Canyon Revitalization Plan – states that the construction of the Foxen pipeline is dependent on the approval of the aforementioned Cat Canyon project. We therefore advocate that this extension be considered alongside TerraCore's proposed Cat Canyon project. We must consider the cumulative impacts implicated by these projects that are undeniably intertwined.

In closing, we advocate for a 'No' vote because, first and foremost, much has changed since the EIR and original permitting conditions that affect the viability of the pipeline, and second, because this vote is by implication not just about a pipeline but rather about further development of the Cat Canyon oil field.

We recognize you are required to make your decisions as the Planning Commission based on the merits and contents of both EIRs and applications. In addition to the reasons listed above, however, we encourage you to consider the following: oil pipelines are being denied nation-wide; do we, as Santa Barbara County, want to be recognized as the place that approves new pipelines at a pivotal moment when investing in new oil infrastructure would commit both current and future generations to an unsafe climate?

Sincerely,

350 Santa Barbara Steering Committee
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