



March 11, 2019

Santa Barbara County Planning Commission  
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**Re: ERG Operating Company, LLC West Cat Canyon Revitalization Plan Project - OPPOSE**

Dear Honorable Commissioners,

The undersigned community organizations urge you to deny ERG Operating Company, LLC’s (“ERG”) West Cat Canyon Revitalization Plan Project (“Project”) to drill 233 new thermally enhanced production wells in the environmentally sensitive Cat Canyon. Our organizations represent thousands of your constituents, and we speak with a unified voice. Our community groups oppose the Project, including scaled-back alternatives, for the following reasons:

1. **The Project’s Final Environmental Impact Report (“FEIR”) is Inadequate and Cannot be Certified** – The FEIR fails to meet the most basic requirements of the California Environmental Quality Act (“CEQA”) and cannot be certified. Pub. Res. Code § 21000, *et seq.* The FEIR fails to serve its purpose because: (1) the Project Description fails to inform the public as to the true scope and magnitude of the Project; (2) necessary information is excluded from the environmental setting; (3) the impact analysis fails to identify a plethora of significant impacts that remain unknown and unmitigated; and (4) the alternatives analysis is improperly constrained and fails to comply with CEQA.
2. **Spills of Oil and Wastewater Increase Risks to Water Quality** – Contamination of surface and groundwater resources from the Project’s spills or leaks is a significant and unavoidable Class I impact. Spills of oil, produced wastewater, and other hazardous materials from the Project’s new oil wells, trucks, pipelines, and oil production facilities threaten surface and groundwater quality. Spills of toxic chemicals or oil into surface waters also threaten to destroy sensitive California Tiger Salamander and California Red Legged Frog breeding habitat.
3. **Significant Threats to Human Health and the Environment from Air Pollution** – The Project employs a highly energy-intensive method of oil extraction that will result in significant increases in air emissions and contribute to global climate change. The continuous injection of steam deep underground in order to extract the heavy crude oil requires the constant use of seven dirty steam generators, which emit high levels of greenhouse gases (“GHGs”) and other air pollutants hazardous to health.
4. **Millions of Gallons of Local Freshwater are Required for Drilling, Construction, and Operations** – The Project will require substantial quantities of local freshwater during the decades of construction, drilling, and operations. The Santa Maria Groundwater Basin, which is already experiencing a decline in freshwater levels, provides fresh groundwater to local communities for drinking water and to agricultural operations.
5. **Hundreds of Tanker Trucks Will Use Local Roads Each Day** – The Project will add hundreds of oil tanker trucks and other heavy-duty trucks each day to local roadways, including, but not limited to, Foxen Canyon Road, Dominion Road, Palmer Road, and Cat Canyon Road. The Project proposes to truck light crude oil from Kern County on U.S. Highway 101 and State Route 166, and then truck the produced blended crude oil out for refining for a daily total of 156 one-way tanker truck trips. These oil tanker trucks pose a serious safety risk to the public, increase the risk of accidents to other drivers, pedestrians, and cyclists, and significantly degrade local roadways.
6. **Injection of Toxic Wastewater Threatens Underground Aquifers** – Over a forty-year period, the Project will inject over *thirty-billion gallons of toxic wastewater into underground aquifers*, increasing the potential for fluid migration and contamination of underground sources of drinking water, and resulting in increased seeps, spills, earthquakes, and subsidence.
7. **Substantial Loss of Biodiversity** – The Project site is one of the most biologically rich locations in Santa Barbara County. The Project will significantly impact the endangered California Tiger Salamander—one of ninety-nine protected species that occur onsite—as well as wetlands, oak woodlands, grasslands, and coastal sage habitats which support threatened and endangered species. Threats to the impaired San Antonio Creek place the endangered unarmored three-spine stickleback at risk, which is a fish that occurs in only a handful of streams around the world.

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Finally, the Project's economic benefit is very limited. The property tax revenue from oil and gas amounts to less than 1% of the County's overall property tax revenue. Adverse economic impacts, such as increased health care costs related to air pollution, impacts to water supplies, and potential oil spills will harm our community if the Project is approved, especially given that the applicant is bankrupt. Any limited benefits that this Project would bring to Santa Barbara County do not outweigh the Project's significant impacts due to an irreversible loss of biodiversity, degradation of surface and groundwater quality, substantial air and GHG emissions, and 24/7 noise impacts from well construction and drilling.

**We urge the Planning Commission to deny the proposed ERG West Cat Canyon Revitalization Plan Project and safeguard a renewable energy future for Santa Barbara County. Thank you for your consideration of our concerns and our community.**

Sincerely,

Linda Krop, Chief Counsel  
Environmental Defense Center

Katie Davis, Chair  
Sierra Club Los Padres Chapter

Pat McElroy  
Former Santa Barbara City Fire Chief

Ken Hough, Executive Director  
Santa Barbara County Action Network (SBCAN)

Rebecca August, Chair  
Safe Energy Now North County

Clare Lakewood, Senior Attorney  
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Ana Rosa Rizo-Centino, Santa Barbara County Senior Organizer  
Food & Water Watch

Mike Lyons, President  
Get Oil Out!

Louis Andaloro, Vice-President,  
Santa Barbara Urban Creeks Council

Nick Jensen, PhD, Southern California Conservation Analyst  
California Native Plant Society

Ken Owens, Executive Director  
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Community Environmental Council

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Central Coast Alliance United for A Sustainable Economy (CAUSE)

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League of Women Voters, Santa Barbara

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League of Women Voters, Santa Maria Valley

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SYV Community Action Alliance

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Clean Coalition

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SB Standing Rock Coalition

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UCSB Environmental Affairs Board (EAB)

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Citizens Planning Association of Santa Barbara County (CPA)

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