City of Goleta

PRC 421 Access Road Maintenance and Repair Project

Final Mitigated Negative Declaration

February 2016

rincon

Environmental Scientists Planners Engineers

PRC 421 Access Road Maintenance and Repair Project

Final
Initial Study – Mitigated Negative Declaration

Prepared by:
City of Goleta
130 Cremona Drive
Goleta, California 93117
Contact: Anne Wells, Advance Planning Manager
(805) 961-7500

With Assistance From:
Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003
(805) 644-4455

February 2016

This report is printed on 50% recycled paper with 10% post-consumer content and chlorine-free virgin pulp.

TABLE OF CONTENTS

Page

Initial Study

1. Project Title 1
2. Lead Agency Name and Address 1
3. Contact Person and Phone Number 1
4. Applicant 1
5. Project Location 1
6. Project Description 3
7. Background Information 10
8. Approval Required by Other Public Agencies 10
9. Site Information 11
10. Environmental Setting 11
11. Environmental Factors Potentially Affected 13
12. Determination 14
13. Evaluation of Environmental Impacts 15
14. Issue Areas 16

Discussion:

I. Aesthetics 16
II. Agricultural and Forest Resources 22
III. Air Quality 24
IV. Biological Resources 31
V. Cultural Resources 37
VI. Geology and Soils 39
VII. Greenhouse Gas Emissions 42
VIII. Hazards and Hazardous Materials 45
IX. Hydrology and Water Quality 48
X. Land Use and Planning 51
XI. Mineral Resources 52
XII. Noise 54
XIII. Population and Housing 57
XIV. Public Services 59
XV. Recreation 60
XVI. Transportation/Traffic 62
XVII. Utilities and Service Systems 64
XVIII. Mandatory Findings of Significance 65

15. References 67

Mitigation, Monitoring and Reporting Program 68

Responses to Comments on the Draft IS-MND

Page

List of Figures

Figure 1 Project Location....2
Figure 2a Road Survey....7
Figure 2b Road Survey....8
Figure 3a Site Photographs....18
Figure 3b Site Photographs....19
Figure 3c Site Photographs....20
Figure 4 Environmentally Sensitive Habitat Areas....33

List of Tables

Table 1 Santa Barbara County Attainment Status....28

CITY OF GOLETA
FINAL INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

1. PROJECT TITLE:
PRC 421 Access Road Maintenance and Repair
Case No. 15-004-DP and 15-003-CDP

2. LEAD AGENCY NAME AND ADDRESS:
City of Goleta
Planning and Environmental Review Department
130 Cremona Drive, Suite B
Goleta, CA 93117

3. CONTACT PERSON AND PHONE NUMBER:
Jerry Hittleman, Contract Planner, (805) 961-7546

4. APPLICANT:
Venoco, Inc.
6267 Carpinteria Ave, Suite 100
Carpinteria, CA 93013

5. PROJECT LOCATION:

Venoco Inc., 7979 Hollister Avenue, Goleta, CA 93117
A.P.Ns.: 079-210-059 (Sandpiper) and 079-210-042 (Elwood Onshore Facility)

The project site is located on the State Oil and Gas Lease No. PRC 421 (PRC 421) access road which is on APN 079-210-059. The parcel is owned by Sandpiper Golf Course. Venoco has a forty foot wide easement for use and maintenance of the PRC 421 access road, originating at the northwest corner of the Ellwood Onshore Facility (EOF). The easement runs along the western perimeter of the EOF, through a portion of the Sandpiper Golf Course, and then southwest along the coastal bluff for approximately 1,600 feet. The easement terminates at the PRC 421-1 and 421-2 piers. The PRC 421 access road is twelve feet wide for the majority of the coastal bluff segment, with the eastern terminus being slightly wider to allow for equipment access to PRC 421-2. Figure 1 depicts the project location.

Imagery provided by Google and its licensors © 2015.

Project Location

Figure 1

6. PROJECT DESCRIPTION:

The proposed project consists of periodic maintenance and repairs to the PRC 421 access road for five years. Additionally, the project includes activities completed to repair and maintain the PRC 421 access road in the past. Below is a description of past activities as well as the proposed future repair and maintenance activities.

Past Repair and Maintenance Activities

Since 2001, repair and maintenance work on PRC 421 has occurred regularly. Activity has included erosion control, wall repairs, removal of loose material, and filling of holes. Repair and maintenance work completed between 2001 and 2014 is summarized below:

- 2001-2002: Erosion control measures were performed, including the use of plywood, relocation of displaced rip rap rocks to previous locations, and addition of new rip rap rocks to replace lost rock. All work was performed from the road and no equipment was placed on the beach.
- 2004: Road repairs were performed as part of the permitted 421-1 Caisson Wall Repair Project.
- 2005-2008: Minor road repair and maintenance was performed in each year from 2005 to 2008. Records indicate that the work included removing loose material and applying road base to fill holes and ruts.
- 2010: Road repairs were performed as part of the permitted 421-2 Caisson Wall Repair Project.
- 2012-2013: Minor road repairs and maintenance were performed.
- 2014: The road was repaired as a result of a major winter storm. This repair included the placement of plywood for erosion control in gaps of the wooden retaining wall and the placement of rock on the seaward side of the road at five locations behind the seawall. All work was performed from the road and no equipment was placed on the beach.

Of the maintenance work that has been performed on the PRC 421 access road, the major components were the addition of rock and plywood. Rock was placed on the seaward side of the road at specific locations, behind the seawall. The purpose of the rock is to stabilize the road fill. Plywood was used to control erosion resulting from road backfill. While the plywood is not structural, the plywood fills in gaps in the wood sheet piles (retaining wall) to prevent the backfill from migrating to the beach. Additional maintenance has included the removal of muddy materials that slough off the inland bluff and are deposited on the surface of the roadway, installation of 2-3” of road base to replace the removed material, and restoration of an all-weather surface.

Proposed Future Repair and Maintenance Activities

Future activities on the road would include standard maintenance and repair of the PRC 421 access road in order to allow continued safe and passable access to Venoco's 421-1 and 421-2 piers. The following specific activities would be covered by the permit:

- Perform routine and typical storm maintenance involving the removal of any muddy materials that slough off of the inland bluff and are deposited on the surface of the roadway and install 2-3" of road base to restore an all-weather surface.
- Repair pot holes in the roadway created by runoff. The potholes would be repaired by excavating to a sufficient depth and then filling with angular large rock (4"-12" size rock), crushed rock (approximately 2" size) and finally road base until a drivable surface is restored.
- Repair and/or replace rip rap lining the access road. Displaced rip rap will be relocated using heavy equipment. Operation of the heavy equipment will occur on the access road and not from the beach or from any other adjacent sensitive habitat areas. The equipment used for each maintenance or repair event would vary depending on the necessary level of work.

Equipment proposed for use during the above-described maintenance activities includes:

- Front end loader - A front end loader would be used to scrape mud from the road surface and load it into a dump truck. The front end loader would be delivered to the site on a trailer or semi-truck low-boy.
- Rubber tired or tracked excavator - An excavator would be used to excavate eroded areas or pot holes to solid material. After the excavated areas are filled, the excavator would be used to compact the backfill.
- Dump truck - A dump truck would be used to deliver road materials including rocks, crushed rocks, and road base, and to haul away mud and excavated road materials from the site.

Repair would typically consist of using the front end loader and laborers to scrape up any mud that has accumulated on the road surface, while removing as little road base as practical, and loading this material into a dump truck. A dump truck would then transport the recovered mud to a quarry for recycling as earth fill if practical or the mud would be disposed of in a proper manner. Dump trucks would also transport road base to the site for immediate spreading on the roadway. The front end loader would be used to spread and compact the new base.

If necessary, after cleaning the roadway surface of debris, a rubber tired or tracked excavator would be utilized to excavate any large eroded areas or large pot holes to a sufficient depth. Excavated material that could not be utilized for backfill would be recycled or disposed of using a dump truck to a facility that is certified to accept excavated materials. Angular large rock, crushed rock, and road base would be carefully

placed in the excavated areas until they are restored to pre-damage conditions. The excavator would be used as necessary to carefully compact the backfill in stages, as the pot holes are filled.

Consistent with past repairs, if necessitated by a storm event rock may be placed in the road and on the seaward side of the road behind the seawall to stabilize the road fill. This work would be accomplished from the PRC 421 access road. No equipment would be placed on the beach.

In the event that rip rap rocks need to be relocated or replaced, a large excavator located on the PRC 421 access road would be utilized to move and place rocks. Additional large rock, if needed, would be delivered to the lay down area on the existing road west of the EOF or work area by dump trucks, see Figure 2, Road Survey. Rocks delivered to the lay down area would be transported as required from the lay down area to the work area by a large front end loader. All rock placements would be performed with the excavator operating from the PRC 421 access road. No equipment would be placed on the beach.

The front end loader, excavator, dump truck, and any other equipment would be removed at the end of each work day. Any silt fencing or construction fencing would be removed upon completion of the repair work. All surplus material would be returned to the quarry or recycling yard for recycling by the contractor.

In the event that any roadway material may have migrated to the beach, it would be removed as much as practical by hand (bucket and shovel) and appropriately disposed of with other excavated materials. No motorized equipment would be used on the beach.

If any road repair materials could potentially fall to the beach during repair efforts, tarps, plywood, or similar methods would be utilized to contain any repair materials and these materials would be recycled or disposed of as described above. If road repair materials could potentially migrate to the beach through open areas in the existing wood seawall, plywood may be used (e.g., placed between the seaward edge of the road and the gaps in the existing seawall piles) to prevent the repair materials from migrating to the beach area. Placement of plywood or other suitable material in this manner would only be used as an erosion control measure, and would not function as a structural improvement to the seawall.

Any plywood used to prevent road material migration to the beach would be inserted from the access road by hand or by utilizing a small truck mounted crane or the bucket of a backhoe to help place the plywood. Hand tools and screws would be used to secure the plywood in place before backfill materials are placed. Any work on the beach would be limited to helping direct or hand position the plywood and clean-up by hand of any materials that may have migrated to the beach. The road survey is provided in Figures 2a and 2b.

During maintenance and repair work, access to the PRC 421 access road would be provided from the existing road west of the Ellwood Onshore Facility (EOF). Equipment and materials would be staged and stored on the existing access road west of the EOF. Some materials may be stored adjacent to the PRC 421 access road gate, shown in Figure 2a, in order to minimize or improve timing of trips across the golf course. This material would be stored pursuant to the terms of a formal agreement between Venoco and Sandpiper Golf Course.

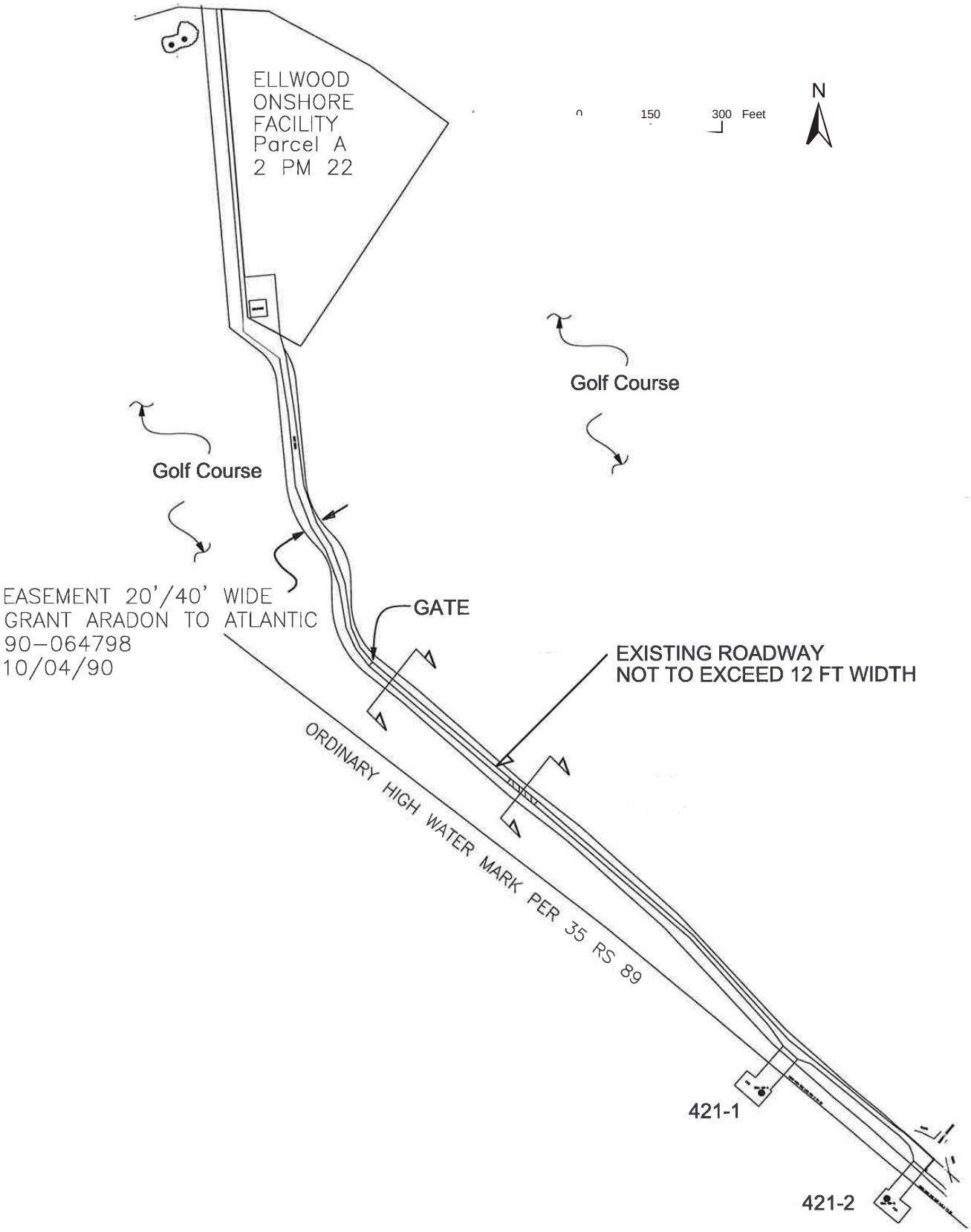
During work, approximately six contractors and Venoco personnel would be on-site. Workers would park their personal vehicles at the EOF or at a temporary laydown area immediately to the west of the EOF. To minimize traffic across the Sandpiper Golf Course, workers not involved with moving equipment, materials, or tools would walk across the Sandpiper Golf Course to the project site.

Work hours would vary, but work would ordinarily occur during daylight hours, between 7:00 AM and 7:00 PM, Monday through Friday. Should an emergency situation present itself, extended work hours and days may be requested from the City of Goleta. Venoco would coordinate with Sandpiper Golf Course management personnel to minimize any interference with golf course operations. This may necessitate storing of small quantities of clean materials near the road access gate and scheduling of equipment and material deliveries to and from the site, outside of normal work hours (i.e., pre-staging of materials before or after normal golfing hours).

Mobile equipment would be removed from the PRC 421 access road and returned to the staging area at the end of each workday. The tracked excavator may be left on the PRC 421 access road should relocation be problematic. Refueling of equipment would typically be done prior to the equipment being brought to the site. Should refueling be required during the project, it would be done on the access road west of the EOF. No refueling would be allowed on the PRC 421 access road adjacent to the beach or golf course. Appropriate drip mats would be placed under any stored equipment and for any necessary refueling.

The City of Goleta and the California Coastal Commission would be given notice a minimum of five working days before work begins. Should an emergency situation dictate faster response, the City of Goleta and the California Coastal Commission would be notified prior to the commencement of emergency work.

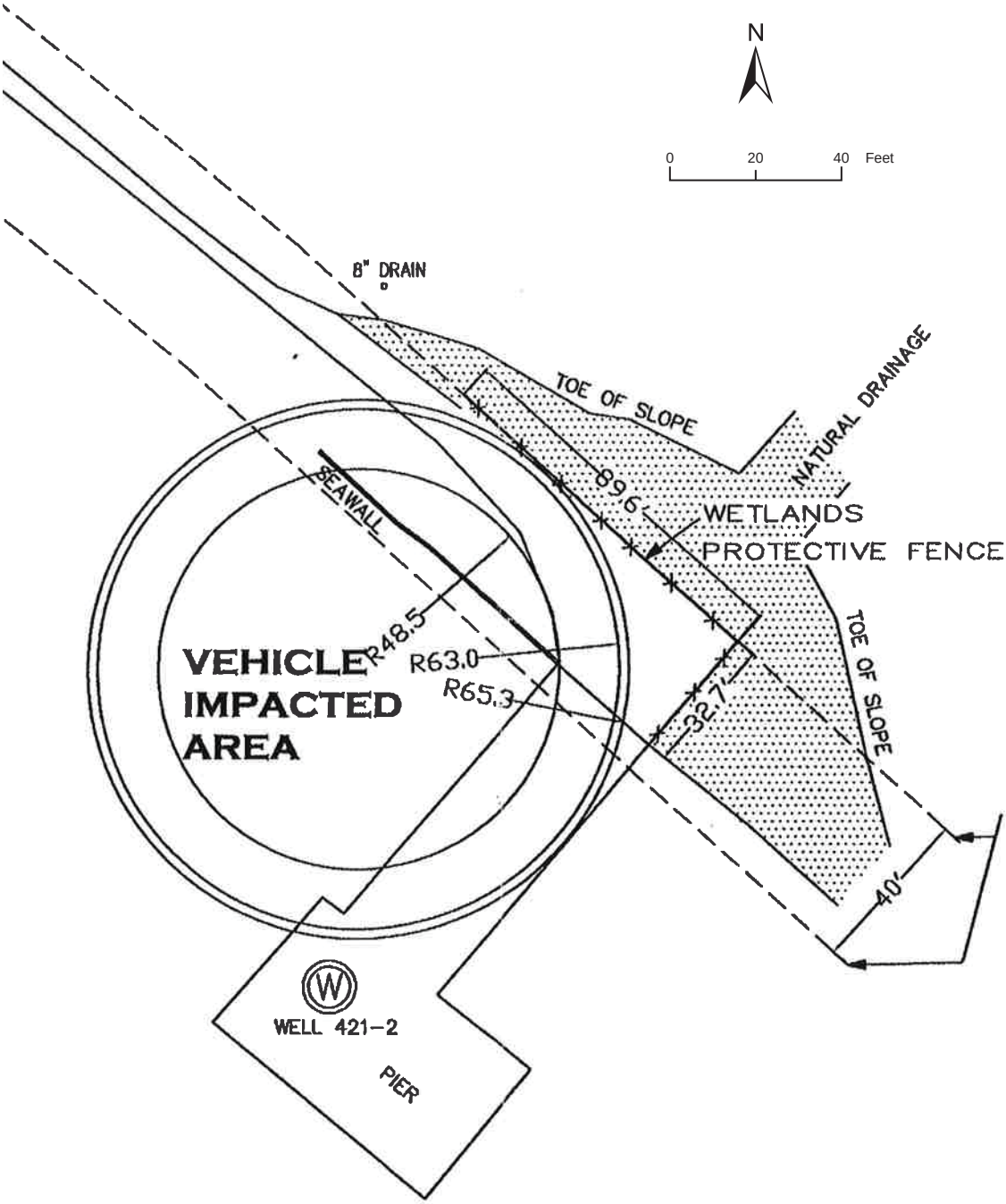
For all maintenance activities, pre- and post-construction site conditions would be documented in a project summary report, summarizing construction activities and measures taken to avoid and minimize impacts.
Natural resource protection measures would be installed prior to commencement of work and maintained throughout work, or implemented throughout work activities. Wetland sites would be protected with silt fencing and/or construction fencing. Tarps, plywood, or a similar material would be used to contain any repair material that could fall onto the beach during work activities. Other mitigation may be necessary depending on the



Source: Venoco, Inc., 2002

Road Survey

Figure 2a



Source: Venoco, Inc., 2002

Road Survey

Figure 2b

proposed work and site conditions. These additional measures may include the following:

- An on-site, pre-job meeting would be held with all on site contract personnel to provide site specific environmental training and explanations of the sensitive nature of the work area and any necessary protective measures or mitigation. Agency staff would be invited to attend the pre-job meeting and the City of Goleta approved environmental monitor would be present and available to provide additional information.
- No activities would take place on the beach. This would avoid potential impacts to shore birds, western snowy plovers, and grunion.
- Sensitive areas, including the wetland area near the PRC 421-2 pier, would be marked with temporary construction fencing, as necessary, and avoided by personnel and equipment. The environmental monitor would direct sensitive areas to be marked or fenced.
- Continuous silt fencing would be used to protect the area south of the roadway, as necessary where repairs are and equipment is working.
- Reflective stakes would be placed approximately every five meters on the northern, bluff side of the road during repair activities.
- Periodic site inspections would be performed by the environmental monitor to ensure that the project is in compliance.
- Heavy equipment would not be used near the PRC 421-1 or 421-2 well heads.
- Venoco's existing Ellwood Oil Spill Contingency Plan (OSCP) and Emergency Response Plan (ERP) would be implemented for the project. The plan addresses the PRC 421 wells, associated pipelines, and other facilities associated with the Ellwood operation. Additionally, Venoco has trained personnel and equipment in place and available to respond, in case a spill or other emergency were to occur.
- On-site refueling would be limited to the extent feasible. No refueling would occur on the PRC 421 access road. All necessary refueling would occur at suitable locations west of Ellwood Onshore Facility. Preventative procedures would be followed prior to refueling, including the use of spill prevention devices such as tarps and drip pans.
- All equipment would be clean prior to arriving at the project site and would be maintained throughout work activities. All equipment would be inspected daily, prior to commencement of work, for fuel or fluid leaks.
- No equipment would be washed down or maintained on-site.
- Spill response equipment would be stored in the emergency response trailers, staged at the EOF.
- All material collected from the roadway would be properly disposed of, offsite.
- The chance of worksite debris entering the ocean would be minimized through the enforcement of good housekeeping practices.
- As much as possible, work would be performed when there is little chance of rain that could cause offsite erosion.
- Interference with any golf course operations would be minimized through coordination with golf course management. This includes equipment and

materials delivery during times the golf course is not in use and the stockpiling of materials during these periods of inactivity. Temporary signs would be erected and maintained around the construction area. Additionally, Venoco would provide the golf course management with construction status updates and a list of upcoming activities for planning purposes.

- As necessary, a flag person would be stationed near the 11th hold and 12th tee during equipment transit across the golf course to assist with safe passage. Project related traffic would yield to golfers and golf course personnel.
- A water truck would be available and used as needed through project activities to control dust along the PRC 421 access road.
- The specific work plan would be approved by an approved environmental monitor in advance of project activities. The environmental monitor would provide necessary monitoring throughout repair work and should conditions change, review and approve any minor scope or mitigation modifications.

7. BACKGROUND INFORMATION

The PRC 421 access road surface is comprised of compact dirt and gravel. Three inches of base gravel overly compact fill material. The elevation of the road varies from 15 to 30 feet above sea level along the bluff. Coastal bluff and supporting rip rap extends 10 to 20 feet seaward of the access road. On the inland side, a coastal bluff slope varies in height from 20 to 50 feet.

The access road was originally constructed in the 1920's and has been maintained and repaired since then, as necessary. A major road repair was performed by Venoco in 2001, under Emergency Permit E-01-027-G, issued by the County of Santa Barbara.

The access road leads to two idled wells on State Lease 421, a water injection well on pier 421-1, and an oil production well on pier 421-2. The piers extend offshore immediately east of Sandpiper Golf Course. Each well has been idle since 1994, when a pipeline extending from the lease area leaked, spilling approximately 170 bbls onto the Sandpiper Golf Course. The wells were owned by Mobil Exploration and Producing, Inc. (Mobil) at the time and were sold to Venoco in mid-1997. Issues arose with the wells in November, 2000, requiring emergency road access in order to prevent an uncontrolled oil release from the wells.

8. APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES:

Coastal Development Permit (CDP), California Coastal Commission

9. SITE INFORMATION:

Existing General Plan Land Use Designation	Recreation
Zoning Ordinance, Zone District	Recreation District, Article II: Coastal Ordinance, *Environmentally Sensitive Habitat*
Site Size	68.48 acres
Present Use and Development	SL 421 is the site of two piers, 421-1 and 421-2, which contain a water injection well and an oil production well, respectively. There is an access road that runs from the Ellwood Onshore Facility (EOF), through Sandpiper Golf Course and out to both piers.
Surrounding Uses/Zoning	North: Sandpiper Golf Course South: Ellwood Beach/Pacific Ocean East: Sandpiper Golf Course West: Bell Creek, Bacara Resort
Access	Existing: Through the EOF or by the fire access road on the west side of the facility. The EOF can be accessed via Winchester Canyon Exit to Hollister Avenue and the plant access road. Proposed: Same.
Utilities and Public Services	Water Supply: Dust Control accomplished by water trucks Sewage: N/A Power: N/A Natural Gas: N/A Cable: N/A Telephone: N/A Fire: Santa Barbara Fire Department, Station #11 School Districts: N/A

10. ENVIRONMENTAL SETTING

Topography and Soils

The PRC 421 access road runs alongside the toe of a bluff, extending to the lease boundary. The bluff is stable and has intermittent vegetation. The access road has a flat grade and a drainage basin at the terminus of the road diverts water from the neighboring golf course. A sandy beach lies adjacent to the access road. The road itself is comprised of dirt and gravel.

Fauna, Flora and Surface Water Bodies

The vegetation immediately adjacent to the access road is dominated by saltbrush scrub and southern coastal bluff scrub, extending from the boundary of the sandy beach to the bluff crest. These habitats are identified as Environmentally Sensitive Habitat Areas (ESHAs) by the Conservation Element of the Goleta General Plan. Beyond the bluff crest is the developed Sandpiper Golf Course.

Three wetland sites supported by seeps have previously been identified along the access road. Two wetlands (Wetland 1 and Wetland 2) are in the western portion of the access road bluff segment and one wetland (Wetland 3) is at the eastern terminus of the access road. Each of the wetlands is dominated by saltgrass (*Distichlis spicata).* Wetland 3 also supports cattail (*Typha domingensis*), rabbitsfoot grass (*Polypogon marina*), African brassbuttons (*Cotula coronopifolia*), and saltmarsh sandspurry (*Spergularia marina*). The surface waters of Wetland 3 are sufficient enough to provide habitat for breeding populations of Pacific tree frogs (*Pseudacris regilla*) and western toads (*Anaxyrus boreas)*. Habitat is also provided for avian species such as yellowthroat, song sparrow, and the black phoebe. The wetlands are generally located landward of existing roadbed; however, some wet, un-vegetated soil has been identified within the roadbed (AMEC, 2014).

Additionally, striped skunk and raccoon are known to inhabit the area around the access road, with tracks being observed on several occasions. The 421 pier is commonly used for roosting by bird species, mainly Brandt's cormorant and brown pelicans. Brown pelicans are listed as endangered both federally and in the state of California. Other species of birds also migrate through or reside in the area. Offshore, kelp beds are common and provide habitat for marine species including whales, dolphins, porpoises, seals, and sea lions.

Cultural Resources

The Ellwood area of Goleta is known to contain valuable cultural resources; however, there are no known archaeological sites within the project site or in the immediate vicinity.

Surrounding Land Uses

Sandpiper Golf Course, located to the east and north of PRC 421, is a popular public golf resort noted for its scenic ocean views. The Ellwood beach area is a public beach that is a popular site for beach activities such as walking, surfing, swimming and nature observation.

11. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist and analysis on the following pages.

☐ Aesthetics
☐ Agriculture and Forestry Resources
☐ Air Quality
■ Biological Resources
☐ Cultural Resources
☐ Geology/Soils
☐ Greenhouse Gas Emissions
☐ Hazards and Hazardous Materials
☐ Hydrology/Water Quality
☐ Land Use/Planning
☐ Mineral Resources
☐ Noise
☐ Population/Housing
☐ Public Services
☐ Recreation
☐ Transportation/Traffic
☐ Utilities/Service Systems
☐ Mandatory Findings of Significance

12. DETERMINATION

On the basis of this environmental checklist/initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier environmental impact report or mitigated negative declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier environmental document, including revisions or mitigation measures that are imposed upon the proposed project and that a subsequent document containing updated and/or site specific information should be prepared pursuant to CEQA Sections 15162/15163/15164.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier environmental impact report or mitigated negative declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier environmental document, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Anne Wells — 2-11-16

Anne Wells Advance Planning Manager — Date

13. EVALUATION OF ENVIRONMENTAL IMPACTS:

(a) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

(b) All answers must take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

(c) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

(d) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (e) below, may be cross-referenced).

(e) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

1) Earlier Analysis Used. Identify and state where they are available for review.
2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
3) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated, "describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

(f) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). References to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

(g) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

(h) Lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected. The explanation of each issue should identify:

1) The significance criteria or threshold, if any, used to evaluate each question; and
2) The mitigation measure identified, if any, to reduce the impact to a less than significant level.

14. ISSUE AREAS:

AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Have a substantial adverse effect on a scenic vista?			X		
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X		
c. Substantially degrade the existing visual character or quality of the site and its surroundings?			X		
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X		

Existing Setting

The project site is an approximately 40 foot wide easement, containing an access road that runs along the western edge of the EOF and through a portion of the Sandpiper Golf Course. The easement runs approximately 1,600 feet southeast along the coastal bluffs, leading to PRC 421-1 and 421-2 piers. The road is 12 feet wide for the majority of its length, and is a little wider at the terminus, to allow for equipment to access Pier PRC 421-2. A water injection well and an oil production well are located on Piers PRC 421-1 and 421-2, respectively. Both wells have been idle since 1994. The access road allows

Venoco to maintain the two wells and inspect the wells for leaks in order to prevent spills.

Vegetation surrounding the access road is comprised of saltbrush scrub and southern coastal bluff scrub, which extends from the boundary of the sandy beach to the bluff crest. Both saltbrush scrub and southern coastal bluff are considered Environmentally Sensitive Habitat Areas (ESHA) by the City of Goleta. The road is on a flat grade, with slopes on each side. To the south of the access road is the beach and to the north and east is the Sandpiper Golf Course. To the west is Bell Creek and the Bacara Resort.

The site is bounded on the south by the beach and Pacific Ocean. Along the coast, Bell Canyon and Tecolote Canyon surround the Bacara Resort to the northwest. Santa Barbara Shores County Park, Devereux Lagoon, Coal Oil Point, and Coal Oil Point Reserve are along the coast to the southeast. To the east, inland from the coast, is residential development. North of the site, across US 101, are the Los Padres National Forest and the Santa Ynez Mountains. The PRC 421 access road is not visible from the nearby public road, Hollister Avenue, however is visible from the adjacent beach. From the PRC 421 access road, the Pacific Ocean can be seen to the south. To the north, the Santa Ynez Mountains are not visible, due to the steep bluffs adjacent to the roadway. See Figures 3a, 3b, and 3c for site photographs that show the current setting.

<u>Thresholds of Significance</u>

A significant aesthetic/visual resources impact would occur if the project resulted in any of the impacts noted in the above checklist (a – d). In addition, pursuant to the City's adopted (Resolution 08-40) Environmental Thresholds and Guidelines Manual (Thresholds Manual), affirmative answers to the following questions also indicate potentially significant impacts on aesthetic/visual resources:

e) Does the project site have significant visual resources by virtue of surface waters, vegetation, elevation, slope or other natural or man-made features which are publicly visible? If so, does the project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?

f) Does the project have the potential to impact visual resources of the Coastal Zone or other visually important area (i.e., mountainous area, public park, urban fringe, or scenic travel corridor)? If so, does the project have the potential to conflict with the policies set forth in the Local Coastal Plan, the Comprehensive Plan or any applicable community plan to protect the identified views?

g) Does the project have the potential to create a significantly adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

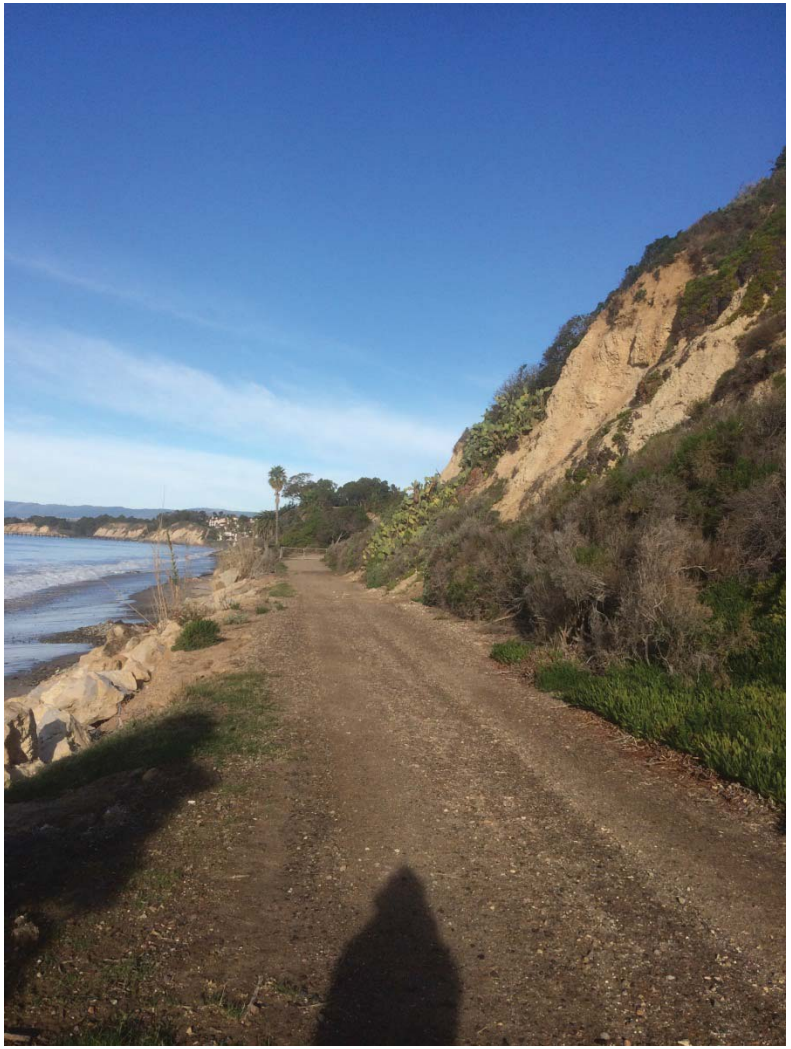


Photo 1. Western portion of access road, looking west toward road entrance gate.

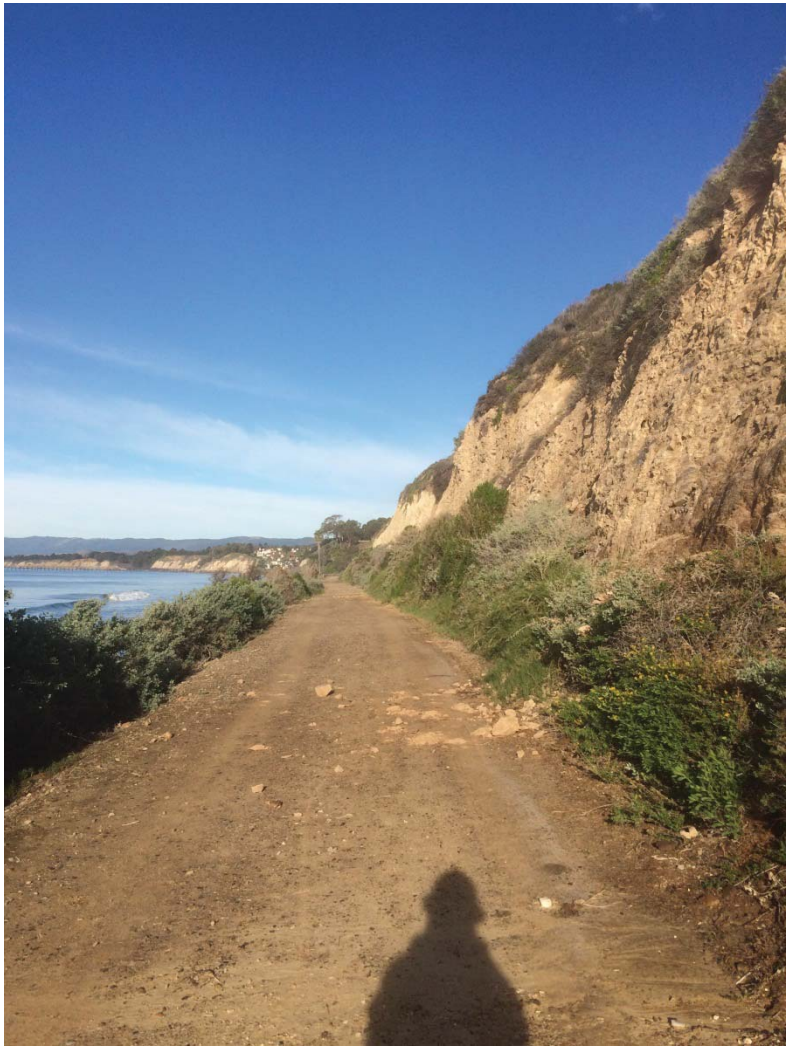


Photo 2. Western portion of access road, looking west. Note debris on road from bluff erosion.

Site Photographs

Figure 3a

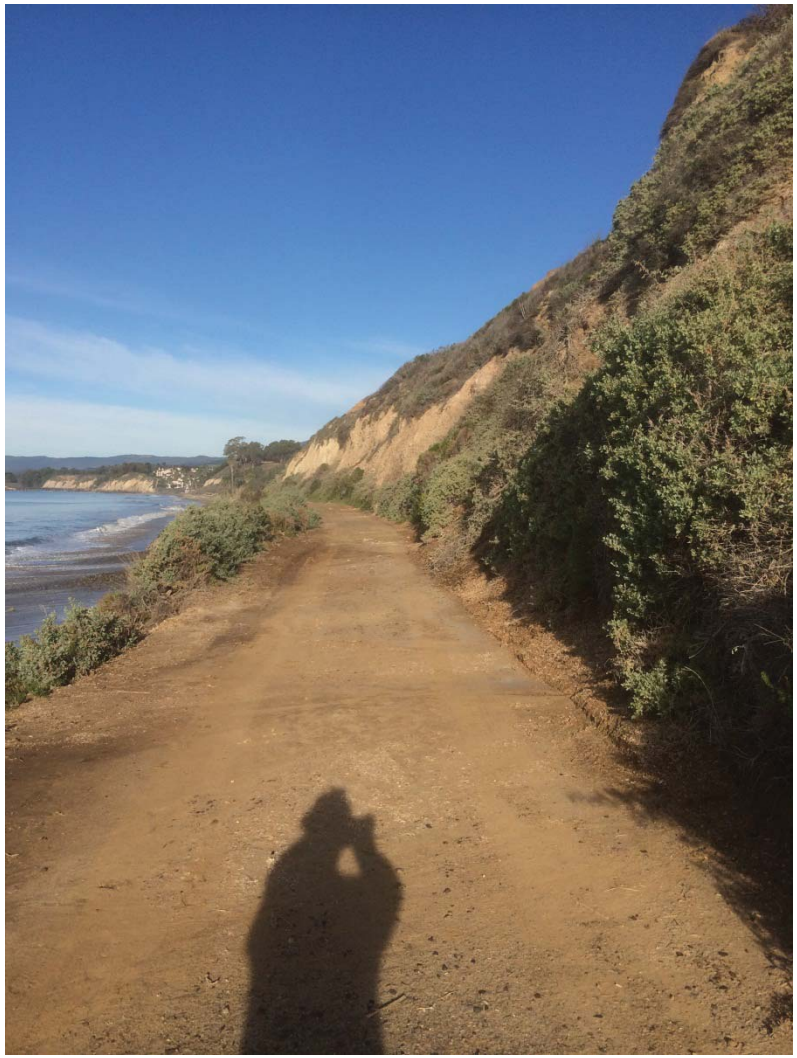


Photo 3. Central portion of access road, looking west, near entrance to PRC 421-1.

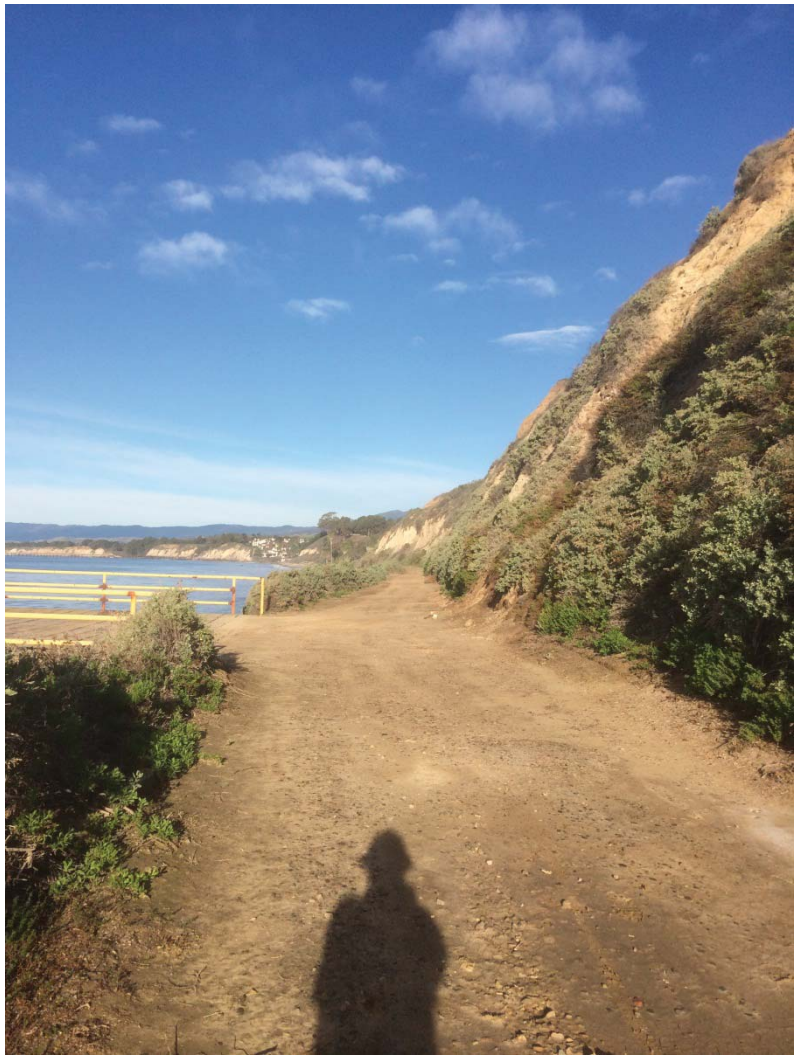


Photo 4. Access road, looking west, between entrances to PRC 421-1 and PRC 421-2.

Site Photographs

Figure 3b

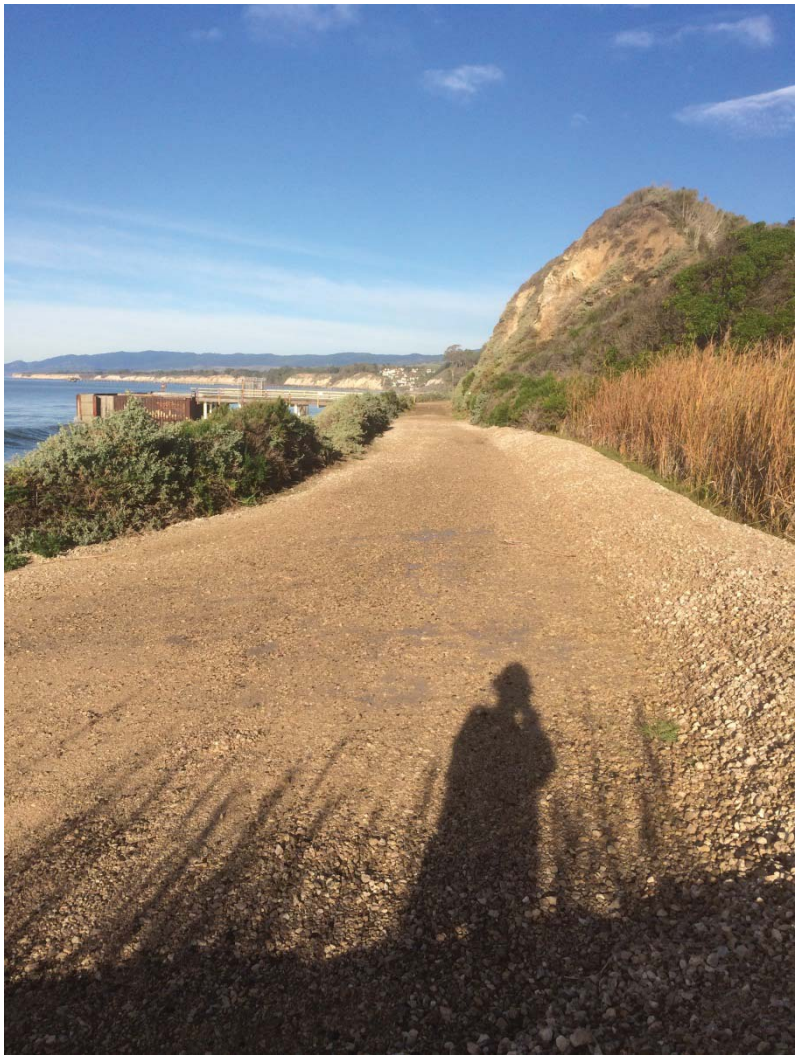


Photo 5. Eastern end of access road, looking west from entrance to PRC 421-2. Note gravel berm separating road from wetland feature.

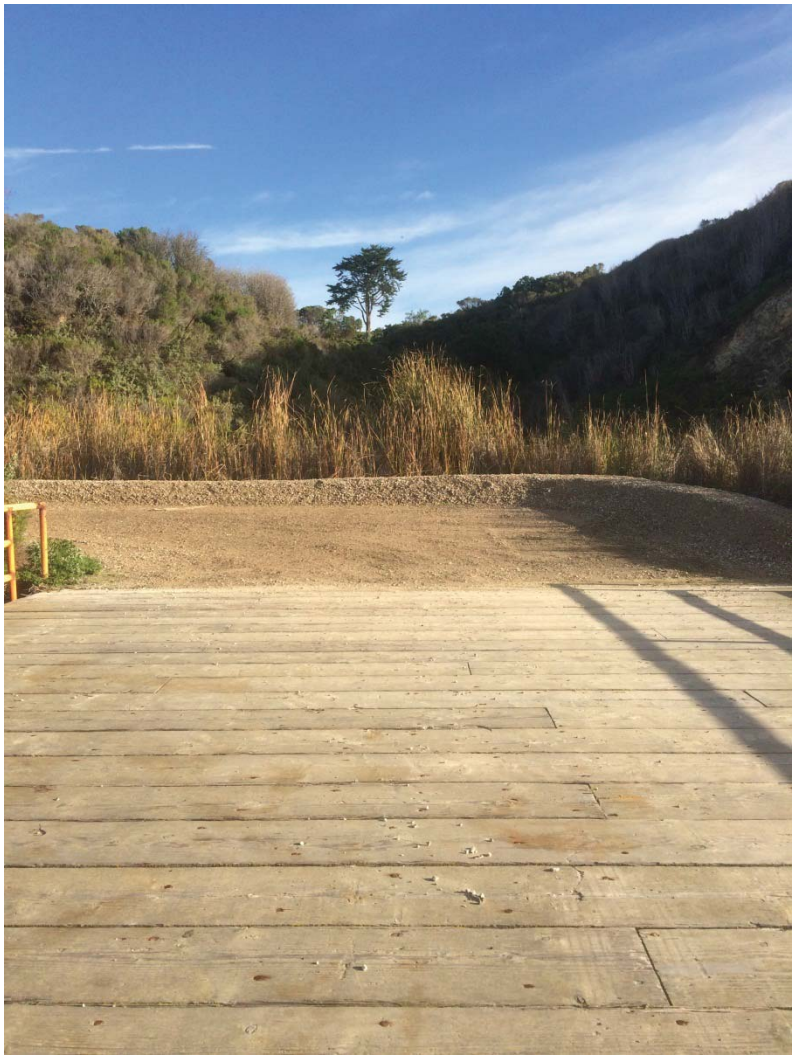


Photo 6. Eastern end of access road, looking north from PRC 421-2. Note gravel berm separating road from wetland feature.

Site Photographs

Figure 3c

Project Specific Impacts

a, c) Temporary visual impacts would result due to staging and operation of repair equipment on the access road, partially obstructing views of the bluff and wetlands areas from the beach and the golf course. However, the impacts would be temporary and limited to portions of the access requiring maintenance and/or repair. While the project site is directly adjacent to a public beach, no equipment would be staged on the beach and all construction activity would take place on the PRC 421 access road. Some native vegetation may be temporarily removed as a result of road repairs; however, the extent of removal would be limited and the vegetation would be restored will not change the visual character of the area. Further, Venoco is required to restore affected areas adjacent to the road and staging areas via an approved revegetation plan upon completion of work. (See Biological Resources for a detailed discussion of the required restoration activities). Impacts would be less than significant.

b) The project site is neither located along nor visible from a state scenic highway. The majority of the project site is not visible from Hollister Avenue, the nearest public road. Bluffs extend upwards along the northern side of the PRC 421 access road. During repair work, the width of PRC 421 access road would be staked to prevent potential encroachment into the bluffs and the bluffs would not be altered. No trees are present on the project site. Impacts to trees, rocks, and scenic resources within a state scenic highway would be less than significant.

d) Roadway repair work is anticipated to occur within daytime hours, and therefore night lighting would not be required. If work during nighttime hours would be necessary to minimize conflicts with golf course operations or to address an emergency situation, the use of night lighting would have minimal impacts, due to the relatively remote location of the project site and due to the City's standard conditions of approval, which require the use of directionally focused light fixtures. Typically, Venoco provides night lighting through 4000 watt light towers that extend 30 feet high and have a 360 degree turning capability. This would allow for Venoco to focus and limit the light to specific work areas. The selected light towers are characterized by "quiet operation" status, generating a sound as low as 62 dBA at 21 feet. Venoco would only use night lighting when necessary to prevent accidents more likely to occur during nighttime hours. Lighting would be minimized to the greatest extent possible so as not to disturb wildlife and the neighboring Bacara Hotel. The existing facilities do not produce any light and no new lighting would be added on a permanent basis. Impacts from glare or light on daytime and nighttime views would be less than significant.

Cumulative Impacts

The proposed project would not contribute to any permanent adverse cumulative impacts to views or scenic resources in the area. Any project impacts would be

temporary during periods of repair and maintenance. No permanent structures would be added to the project site.

Required/Recommended Mitigation Measures

No mitigation measures are necessary.

Residual Impact

Residual impacts (either project-specific or cumulative) on Aesthetics would remain less than significant as a result of project implementation.

AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Doc-ument**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X	
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?				X	
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X	
d. Result in the loss of forest land or conversion of forest land to non-forest use?				X	

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Doc-ument**
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?				X	

Existing Setting

The project site is currently developed as an access road, along the southwestern portion of the developed Sandpiper Golf Course. To the south of the road is a public beach and the Pacific Ocean. The PRC 421 access road originates at the EOF, at the northern end. The EOF is approximately 2,200 feet from the eastern terminus at PRC 421-2. No agricultural activities take place on the project site within the project's vicinity.

Thresholds of Significance

A significant impact to Agricultural and Forest Resources would occur in the proposed project resulted in any of the impacts noted in the above checklist. Additionally, the City of Goleta's Environmental Thresholds and Guidelines Manual states that a project would normally have a significant effect on the environment if it would:

f) Conflict with adopted environmental plans and goals of the community where it is located; or
g) Convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land.

Project Specific Impacts

a) The proposed project would provide maintenance and repair to an existing access road. The surrounding land is operated as a developed golf course and public beach.

The PRC 421 access road originates at the Ellwood Onshore Facility (EOF) to the northwest of the road's terminus. EOF is Venoco's oil and gas processing plant. The project site is located on land designated as urban by the Farmland Mapping and Monitoring Program (California Department of Conservation, 2012). The project would not convert any agricultural land to non-agricultural uses nor adversely affect any agricultural land. There would be no impact.

b) The project site is zoned for recreational use, Open Space/Active Recreation, and does not conflict with agricultural uses. The project site is not in a Williamson Act Contract (California Department of Conservation, 2013/2014). Therefore, there would be no impact.

c, d) There is no forest land on the project site and the proposed project would not conflict with forest land or cause rezoning of forest land. No forest land would be converted to non-forest uses. Therefore, there would be no impact.

e) The proposed project would involve maintenance and repair to an existing access road. No changes in use would result from the project and the project would not convert any land to new uses. Therefore, there would be no impact.

Cumulative Impacts

The proposed project would not contribute to any permanent cumulative adverse impact to agriculture or forest land. No land would be converted to a new use and no prime agricultural land would be lost.

Required/Recommended Mitigation Measures

No mitigation measures are necessary.

Residual Impact

Residual impacts (either project-specific or cumulative) on Agriculture and Forest Resources would remain less than significant as a result of project implementation.

AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Docu-ment**
a. Conflict with or obstruct implementation of the applicable air quality plan?			X		
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X		

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Document**
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X		
d. Expose sensitive receptors to substantial pollutant concentrations?			X		
e. Create objectionable odors affecting a substantial number of people?			X		

Existing Setting

Meteorological Setting

The project site is located on the coastal plain in the City of Goleta. The climate in and around the City of Goleta, as well as most of Southern California, is dominated by the strength and position of the semi-permanent high-pressure center over the Pacific Ocean near Hawaii. It creates cool summers, mild winters, and infrequent rainfall. It drives the cool daytime sea breeze, and it maintains a comfortable humidity range and ample sunshine after the frequent morning clouds dissipate. However, the same atmospheric processes that create the desirable living climate combine to restrict the ability of the atmosphere to disperse the air pollution generated by the population attracted in part by the desirable climate.

Temperatures in the Goleta area average 59 degrees annually. Daily and seasonal oscillations of mean temperature are small because of the moderating effects of the nearby oceanic thermal reservoir. In contrast to the steady temperature regime, rainfall is highly variable. Measurable precipitation occurs mainly from early November to mid-April. The Santa Barbara Airport weather station, located approximately one mile southwest of the project site, averages 16.3 inches of rain annually, with January and February as the wettest months.

The wind pattern on air pollution is that locally generated emissions are carried offshore at night, and toward inland Santa Barbara County by day. Dispersion of pollutants is restricted when the wind velocity for nighttime breezes is low. The lack of development and associated vehicles in inland Santa Barbara County, however, causes few air quality problems during nocturnal air stagnation. Both summer and winter air quality in the project area is generally very good.

The region also experiences periods of hot, dry winds from the desert, known as Santa Ana winds. If the Santa Ana winds are strong, they can carry suspended dust and

pollutants out over the ocean. If the winds are weak, they are opposed by breezes from the ocean and cause stagnation, resulting in high pollution events.

Existing Air Quality

The project site is located in the South Central Coast Air Basin (SCCAB), which encompasses San Luis Obispo, Santa Barbara, and Ventura counties. The site is located in Santa Barbara County. The California Air Resources Board (CARB) and the Santa Barbara County Air Pollution Control District (SBCAPCD) operate 18 ambient air monitoring stations that measure pollutant concentrations throughout Santa Barbara County (SBCAPCD, 2015).. The nearest monitoring station to the project site is the Goleta monitoring station, located approximately 4.5 miles away at 380 North Fairview Avenue, which monitors ozone (O_3), carbon monoxide (CO), coarse particulates (PM_{10}), fine particulates ($PM_{2.5}$), and nitrogen oxides (NO_x). Based on monitoring data between the years 2010 and 2012, the most recent three-year period available, the Goleta Fairview station's air quality exceeded the state standard of 0.07 parts per million (ppm) for O_3 once, in 2011, and exceeded the state standard of 50 micrograms per cubic meter ($\mu g/m^3$) for PM_{10} twice, in 2012. Air quality did not exceed state standards for CO, $PM_{2.5}$, or NO_x during this period, and no exceedances of federal air quality standards were recorded (SBCAPCD, 2015).

<u>Regulatory Framework</u>

Ambient Air Quality Standards (AAQS)

Federal and California law regulates Ambient Air Quality Standards (AAQS) and emergency episode criterial for various pollutants. Generally, state regulations have stricter standards than those at the federal level. AAQS are set at concentrations that provide a sufficient margin of safety to protect public health and welfare. Air quality at a given location can be described by the concentration of various pollutants in the atmosphere. The significance of a pollutant concentration is determined by comparing the concentration to an appropriate Federal and/or State ambient air quality standard.

Federal standards are established by the US Environmental Protection Agency (EPA) and are termed the National Ambient Air Quality Standards (NAAQS). California standards are established by the California Air Resources Board (CARB) and are called the California Ambient Air Quality Standards (CAAQS). The region generally has good air quality, as it attains or is considered in maintenance status for most ambient air quality standards. The SBCAPCD is required to monitor air pollutant levels to assure that Federal and State air quality standards are being met.

Air Quality Planning

State and Federal laws require that jurisdictions that do not meet clean air standards develop plans and programs that will bring those areas into compliance. These plans typically contain emission reduction measures and attainment schedules to meet

specified deadlines. If and when attainment is reached, the attainment plan will become a “maintenance plan.”

In 2001, the CARB developed an attainment plan that was designed to meet both Federal and State planning requirements. The Federal attainment plan was combined with those from other statewide non-attainment areas to become the State Implementation Plan (SIP). The 2001 Clean Air Plan (CAP) was adopted as the County portion of the SIP, designed to meet and maintain Federal clean air standards. The 2013 CAP, adopted by the SBCAPCD Board, incorporates updated data. The 2013 CAP provides a three-year update to the 2010 CAP and is currently the most recent adopted Clean Air Plan for meeting the state ozone standard. The 2013 CAP addresses both federal and state requirements. Federal requirements pertain to provisions of the federal Clean Air Act that apply to the City’s current designation as an attainment area for the federal 8-hour ozone standard. Areas that are designated as attainment for the federal 8-hour ozone standard and attainment for the previous federal 1-hour ozone standard with an approved maintenance plan must submit an 8-hour maintenance plan under section 110(a)(1) of the federal Clean Air Act. The California Clean Air Act, under Health and Safety Code sections 40924 and 40925, requires areas to update their clean air plans every three years with the goal of attaining the state 1-hour ozone standard. The 2013 CAP provides this three year plan.

A summary of the attainment status for Santa Barbara County is provided in Table 1. Santa Barbara County is designated as a nonattainment area for State ozone and PM_{10} standards, and is currently unclassified for the State $PM_{2.5}$ standard. The County is also unclassified for the Federal 3-month average lead and annual arithmetic mean $PM_{2.5}$ standards. The U.S. EPA has yet to make a final decision on the County’s attainment status for the Federal 1-hour sulfur dioxide standard. The County is in attainment for all other applicable State and Federal ambient air quality standards.

Table 1
Santa Barbara County Attainment Status

Pollutant	Averaging Time	State Status	Federal Status
Ozone	8 hour	Nonattainment	Unclassified/Attainment
	1 hour	Nonattainment	–
Carbon monoxide	8 hour	Attainment	Attainment
	1 hour	Attainment	Attainment
Nitrogen dioxide	Annual average	Attainment	Unclassified/Attainment
	1 hour	Attainment	Unclassified/Attainment
Sulfur dioxide	Annual average	–	–
	24 hour	Attainment	–
	1 hour	Attainment	EPA has yet to make final decision
Lead	Quarter	–	Attainment
	30 day average	Attainment	–
	3-month average	–	Unclassified
PM_{10}	Annual arithmetic mean	Nonattainment	Attainment
	24 hour	Nonattainment	Attainment
$PM_{2.5}$	Annual arithmetic mean	Unclassified	Unclassified
	24 hour	–	Unclassified/Attainment

Source: SBCAPCD (2015)

Thresholds of Significance

A significant air quality impact could occur if the proposed project resulted in any of the impacts noted in the above checklist.

In addition, pursuant to the City's *Environmental Thresholds and Guidelines Manual*, a significant adverse air quality impact may occur when a project, individually or cumulatively, triggers either of the following:

a) Interferes with progress toward the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NO_X and Reactive Organic Gases (ROG);
b) Equals or exceeds the State or Federal ambient air quality standards for any criteria pollutant (as determined by modeling);
c) Results in toxic or hazardous pollutants in amounts which may increase cancer risks for the affected population; or
d) Causes an odor nuisance problem impacting a considerable number of people.

Cumulative air quality impacts and consistency with the policies and measures in the City's General Plan and the Air Quality Attainment Plan (AQAP) should be determined for all projects (i.e., whether the project exceeds the AQAP standards).

The following significance thresholds have been established by the SBCAPCD (*Scope and Content of Air Quality Sections in Environmental Documents*, SBCAPCD, 2011). While the City of Goleta has not yet adopted any new threshold criteria, these SBCAPCD thresholds are used as a guideline for the impact analysis.

SBCAPCD Operational Impacts Thresholds

Based on SBCAPCD Thresholds, the project would result in a significant impact, either individually or cumulatively, if it would:

e) Emit 240 pounds per day or more of ROG and NO_X from all sources;
f) Emit 25 pounds per day or more of unmitigated ROG from any motor vehicle trips only;
g) Emit 25 pounds per day or more of unmitigated NO_X from any motor vehicle trips only;
h) Emit 80 pounds per day or more of PM_{10};
i) Cause or contribute to a violation of any California or National Ambient Air Quality standard (except ozone);
j) Exceed the SBCAPCD health risk public notification thresholds adopted by the SBCAPCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than 1.0 for non-cancer risk); or
k) Be inconsistent with Federal or State air quality plans for Santa Barbara County.

The cumulative contribution of project emissions to regional levels should be compared with existing programs and plans, including the most recent Clean Air Plan (SBCAPCD 2010).

l) Due to the County's non-attainment status for ozone and the regional nature of ozone as a pollutant, if a project's emissions from traffic sources of either of the ozone precursors (NO_X or ROG), exceed the operational thresholds, then the project's cumulative impacts are considered significant.

For projects that do not have significant ozone precursor emissions or localized pollutant impacts, if emissions have been taken into account in the 2010 Clean Air Plan growth projections, regional cumulative impacts may be considered to be less than significant.

SBCAPCD Construction Impacts Thresholds

Quantitative thresholds of significance are not currently in place for short-term emissions. However, CEQA requires that the short-term impacts such as exhaust emissions from construction equipment and fugitive dust generation during grading must be analyzed. The SBCAPCD recommends that construction-related NO_X, ROG, PM_{10}, and $PM_{2.5}$ emissions, from diesel and gasoline powered equipment, paving, and other activities, be quantified.

m) SBCAPCD uses 25 tons per year for NO_X and ROG as a guideline for determining the significance of construction impacts.

Under SBCAPCD Rule 202(D)(16) (SBCAPCD, Rule 202, 2012), if the combined emissions from all construction equipment used to construct a stationary source which requires an Authority to Construct permit, have the potential to exceed 25 tons of any pollutant, except carbon monoxide, in a 12-month period, the permittee must provide offsets under the provisions of Rule 804 (SBCAPCD, Rule 804, 2012) and demonstrate that no ambient air quality standard will be violated.

Project Specific Impacts

a) Emissions related to the repair and maintenance of the access road would not conflict with the implementation plan for the SBAQCD. All emissions would be temporary emissions related to construction activities and would fluctuate throughout the project's duration. The project would not introduce any new sources of emissions to the PRC 421 access road. Additionally, the project would not lead to new growth in the area. Because construction emissions would be temporary and no new emission sources would be introduced, implementation of the 2013 CAP would not be obstructed. Impacts would be less than significant.

b) The repair work on PRC 421 access road would not result in the violation of any ambient air quality standard or contribute to an existing or projected air quality violation. The repair work would be temporary construction work and the adverse air quality effects resulting from the repair and maintenance of the PRC 421 access road would be temporary. Equipment activity would persist for the duration of the project and different construction phases would require use of task-specific equipment. As a result, air emissions would fluctuate throughout the project's duration. The repair and maintenance activities proposed for the PRC 421 access road are considered to be construction activities. As such, no significance thresholds apply. As emissions of each pollutant would be temporary and limited to the periods of repair and maintenance work, impacts would be less than significant.

c) Emissions would not contribute to cumulative impacts on air quality throughout the South Central Air Coast Basin. All emissions would be temporary emissions associated with construction activities. There would be no operational emissions associated with the project. Therefore, impacts would be less than significant.

d) There are no sensitive receptors in the vicinity of the project site. The project site is bordered by the Pacific Ocean, the developed Sandpiper Golf Course, and Bell Creek/Bacara Resort. While the Bacara Resort could be considered a sensitive receptor, the edge of the resort is 0.42 mile away from the edge of the access road, with the nearest guestroom being 0.5 mile away from where the majority of work would occur. Additionally, emissions would be temporary and no new source of continuous emissions would be introduced to the area. Impacts would be less than significant.

e) Heavy equipment operation on the project site would emit odors during construction; however, such odors would be temporary and would cease to occur after construction. No other sources of objectionable odors have been identified for the proposed project. Impacts would be less than significant.

Cumulative Impacts

All project-related emissions would be temporary emissions related to construction and would cease upon completion. No new permanent sources of emissions would be introduced to the area. Therefore, the project would not contribute to any cumulative long-term increases in air pollutant emissions or impacts to local or regional air quality.

Required/Recommended Mitigation Measures

No mitigation measures are necessary.

Residual Impact

Residual impacts (either project-specific or cumulative) on Air Quality would remain less than significant as a result of project implementation.

BIOLOGICAL RESOURCES

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Document**
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X			
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X			
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		X			

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Document**
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X		
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X	

Existing Setting

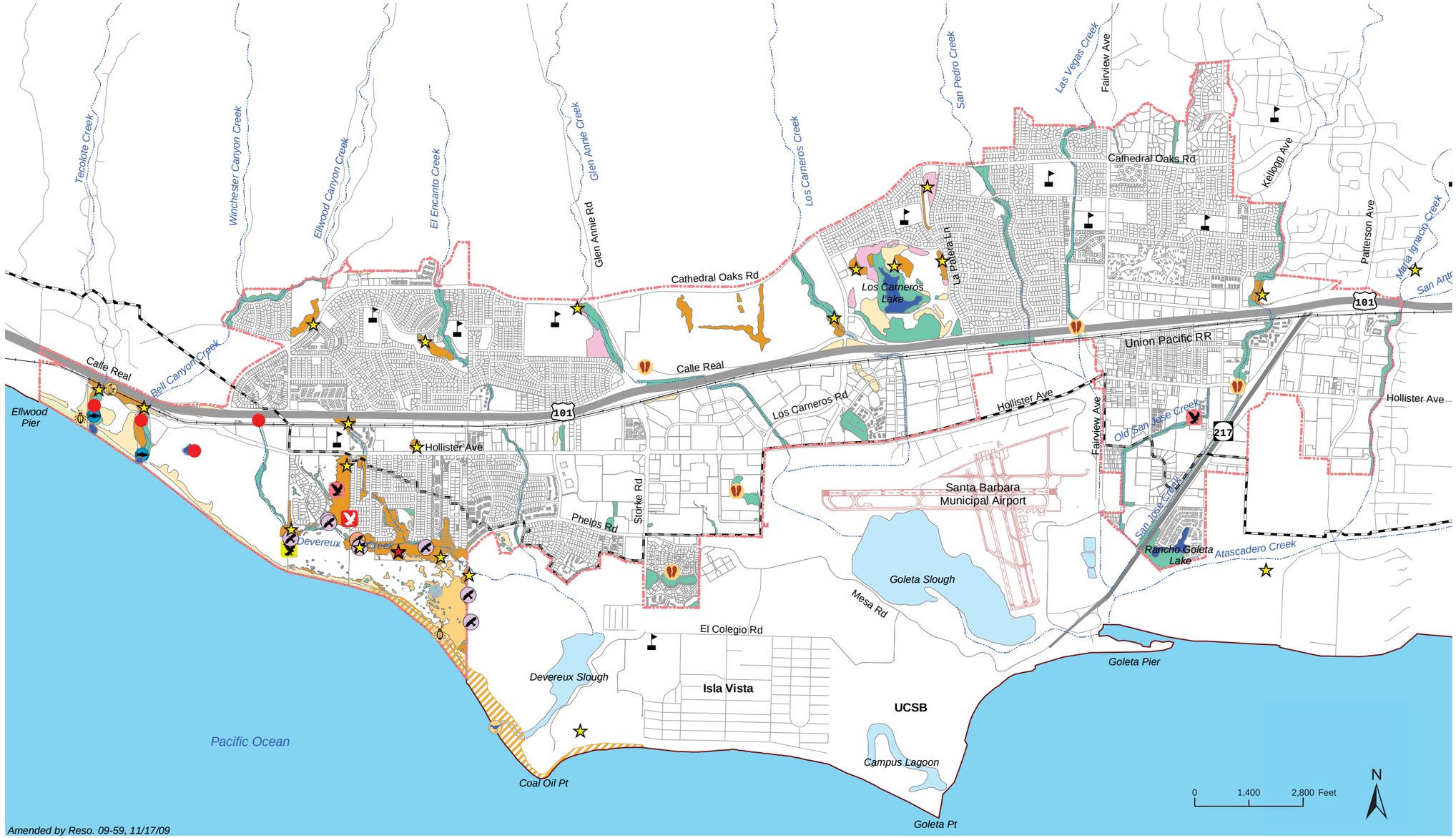
The PRC 421 access road is located on Sage Scrub/Dune/Bluff Scrub habitat, which is designated as an Environmentally Senstive Habitat Area (ESHA) by the Goleta General Plan, see Figure 4. The Goleta General Plan and the California Coastal Act require the protection of ESHAs against significant disruption of habitat.

Saltbush scrub, coastal saltmarsh, and coastal bluff scrub species are the predominant plants associations in the vicinity of the PRC 421 access road.

Saltbush scrub species observed include quail bush and Bermuda grass. African brass-buttons, salt grass, saltmarsh sandspurry, Mediterranean barley, and rabbitsfoot grass comprise the Coastal Salt Marsh species present on-site. Coastal bluff scrub is represented by coyote brush, coastal encelia, coastal goldenbush, and cliff aster among others (Santa Barbara, County of, 2001).

Three individual wetland areas that satisfy all three Army Corp wetland criterion (hydrophytic vegetation, wetlands hydrology, and hydric soils) have historically existed within the PRC 421 access road, totaling 6,125 square feet, were identified in 2001.

The three wetland sites are supported by seeps and located along the toe of the bluff immediately adjacent to the access road. Wetlands 1 and 2 are in the western portion of the access road bluff segment and Wetland 3 is at the eastern terminus of the access road. The dominant species in all of the wetland areas is saltgrass. The largest of the three wetlands, Wetland 3, also supports cattail, rabbitsfoot grass, African brassbuttons, and saltbrush sandspurry. Wetland 3 has surface waters that are sufficient to support breeding populations of Pacific tree frogs and western toads and to provide habitat for avian species, including: common yellowthroat, song sparrow, and black phoebe.



Legend

Environmentally Sensitive Habitats

- Beach and Shoreline
- Unvegetated Open Creek Channel
- Open Water
- Riparian/Marsh/Vernal Pool
- Native Grassland
- Sage Scrub/Dune/ Bluff Scrub
- Native Upland Woodlands /Savannahs
- Monarch Butterfly and/or Raptor Roosting Habitat
- Critical Habitat for the Western Snowy Plover

Special-Status Species

- Cooper's Hawk Nest
- Kite Nest
- Red-Shouldered Hawk Nest
- Red-Tailed Hawk Nest
- Vulture Roost
- Western Snowy Plover
- Tidewater Goby
- Red-Legged Frog
- Globose Dune Beetle
- Santa Barbara Honeysuckle
- Black-Flowered Figwort
- Southern Tarplant
- Monarch Butterfly Aggregation
- Ellwood Main Monarch Grove

Other Features

- Goleta City Boundary
- Coastal Zone
- Schools
- Creeks

Sources: Habitat mapping conducted by Jones & Stokes in April-May 2006 based on aerial imagery (1-foot resolution) and field observation, merged with 1) information on the occurrence of special status habitats and species collected by City from recent information from local environmental review ; 2) mapping of creeks, ponds, lakes and reservoir location based on USGS topographic map review and habitat management plan documents, air photo interpretation, and field survey; and 3) review of California Natural Diversity Database (CNDDB) records by Jones & Stokes for occurrence of special status species in the Goleta and Dos Pueblos quadrangles and vicinities (2006 databases). Habitats reflect those comprising an ESHA.

Note: ESHA locations are approximate. Any area not designated on the ESHA map that meets the ESHA criteria shall be accorded the same protections as if the area was shown on the map. ESHA buffers are not shown on this map. Refer to the applicable policy in the General Plan for the specific buffer widths.

Environmentally Sensitive Habitat Area

Source: City of Goleta, 2009

Figure 4

During the 2001 repair work, 475 square feet (sf) of Wetlands 1 and 2 were mitigated to maintain future road access, filled in with rock and road base. Wetland 3 was largely avoided, the site was fenced and about 20% (1,157 sf) was impacted to provide adequate access to the pier. A replacement ratio of 3:1 was required for Wetlands 1 and 2 and a replacement ration of 5:1 was required for Wetland 3.

All three of the wetlands have been partially excavated and backfilled with rock during past emergency repairs to the PRC 421 access road. The majority of the wetland area is north, landward, of the PRC 421 access road, however, some wet, un-vegetated soil is present in the roadbed (AMEC, 2014).

Thresholds of Significance

A significant impact on Biological Resources would occur if the proposed project resulted in any of the impacts noted in the above checklist. In addition, the City of Goleta's *Environmental Thresholds and Guidelines Manual* defines the following thresholds of significance:

Types of Impacts to Biological Resources

Disturbances to habitats or species may be significant, based on substantial evidence in the record, if they impact significant resources in the following ways:

a. Substantially reduce or eliminate species diversity or abundance.
b. Substantially reduce or eliminate quantity or quality of nesting areas.
c. Substantially limit reproductive capacity through loss of individuals or habitat.
d. Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food resources.
e. Substantially limit or fragment range and movement (geographic distribution of animals and/or seed dispersal routes).
f. Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.

Less Than Significant Impacts

The *Environmental Thresholds and Guidelines Manual* provides examples of areas in the City of Goleta where impacts to habitat are presumed to be less than significant, including:

a. Small acreages of non-native grassland if wildlife values are low.
b. Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies.
c. Areas of historical disturbance such as intensive agriculture.
d. Small pockets of habitats already significantly fragmented or isolated, and disturbed or degraded.
e. Areas of primarily ruderal species resulting from pre-existing man-made disturbance.

Project Specific Impacts

a, b, c) Three wetlands, supported by seeps, are present in the area surrounding the project site. While portions of wetlands 1 and 2 were filled in with rock and road base to maintain roadway access as part of previous repair work, portions of the wetlands on the landward side of the roadway are still present. The wetlands contain environmentally sensitive habitat and species such as coastal bluff scrub. Previous construction work has required the filling in of selected parts of the three wetlands. In order to prevent significant impacts to the wetlands and the species and habitats present, mitigation measures BIO-1 and BIO-2 are necessary.

d) The beach that is adjacent to the project site is nesting area for shore birds and grunion, including the Western Snowy Plover, a sensitive species. However, the beach adjacent to the PRC 421 access road is not a part of the Western Snowy Plover Critical Habitat (USFWS, 2007).The proposed project would not include machinery located on the beach. All equipment, vehicles and machinery would be operated from the access road. No construction activities would take place on the beach and species movement would not be impeded. The bluffs are not identified as sensitive habitat for any bird or wildlife species (Goleta General Plan, 2009). Therefore, impacts would be less than significant.

e) No trees are present on the project site. The proposed project would not remove any trees or conflict with any tree preservation policy or ordinance. The project would have no impact**.**

f) The proposed project would not conflict with any Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plan. The project would not change the use of the project site from a roadway nor expand the roadway area. All work would be contained on the roadway and sensitive habitat areas would be fenced. The project would have no impact.

Cumulative Impacts

Because the proposed project, as mitigated, would not result in significant impacts to biological resources, the project's contributions to cumulative impacts to biological resources would not be cumulatively considerable. Based on the above analysis and the project's consistency with local, regional and state conservation plans, the project's contribution cumulative policy impacts on biological resources would not be cumulatively considerable.

Required/Recommended Mitigation Measures

BIO-1 Wetlands 1, 2, and 3 shall be fenced off during all repair and maintenance work on the road.

BIO-2 If any portion of wetland is impacted during repair or maintenance work, in order to provide proper roadway access, then the wetland must be mitigated at a ratio 3:1 for Wetlands 1 and 2 and a ratio of 5:1 for Wetland 3. Final mitigation ratios may be adjusted through regulatory agency permits.

Residual Impact

Implementation of the mitigation measures above and adherence to the project description would reduce potential direct and indirect impacts to special status species to less than significant.

CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?			X		
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X		
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		
d. Disturb any human remains, including those interred outside of formal cemeteries?			X		

Existing Setting

The project site has been previously developed as a road. The City of Goleta General Plan does not recognize any historical or cultural resources within the project site (City of Goleta, 2006).

Thresholds of Significance

A significant impact on cultural resources would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist. Additional thresholds are contained in the City's Environmental Thresholds and Guidelines Manual. The City's adopted thresholds indicate that a project would result in a significant impact on a cultural resource if it results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired.

Project Specific Impacts

a-d) The project site has been previously developed as a road and no known archeological resources are present. Any excavation performed would be at eroded areas and potholes, just down enough to reach sound surface. The road would not be widened or extended to land that has not been previously disturbed. No known burial sites have been identified within the project site. Nonetheless, California Health and Safety Code §7050.5, Public Resource Code §5097.98, and §15064.5 of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that, if human remains are encountered during excavation, all work must halt, and the County Coroner must be notified (Section 7050.5 of the California Health and Safety Code). The coroner will determine whether the remains are of forensic interest. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, the coroner will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the most likely descendant (MLD) responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the Public Resources Code. The MLD should make his/her recommendations within 48 hours of their notification by the NAHC. This recommendation may include (A) the non-destructive removal and analysis of the human remains and items associated with Native American human remains, (B) preservation of Native American human remains and associated items in place; (C) relinquishment of Native American human remains and associated items to the descendants for treatment; or (D) other culturally appropriate treatment. Section 7052 of the Health and Safety Code also states that disturbance of Native American cemeteries is a felony. The road has previously been graded and there are no known historical, archaeological, paleontological or cultural resources. Therefore, with adherence to existing regulations, impacts would be less than significant.

Cumulative Impacts

The proposed project would not contribute to any cumulative permanent adverse impacts on cultural resources. No undeveloped land would be developed by the project.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Cultural Resources would remain less than significant as a result of project implementation.

GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X	
ii. Strong seismic ground shaking?				X	
iii. Seismic-related ground failure, including liquefaction?				X	
iv. Landslides?			X		
b. Result in substantial soil erosion or the loss of topsoil?			X		
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X		
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X		
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X	

Existing Setting

The project site is bordered by coastal bluffs to the east and the Pacific Ocean to the west. The project area has been developed as a road since the 1920's. The road fill is comprised of compacted dirt and gravel and is stabilized by rock on the seaward size. Road base is three inches thick (AMEC, 2014).

Thresholds of Significance

A significant impact on geology and soils would occur if the proposed project resulted in any of the impacts noted in the above checklist. The City's *Environmental Thresholds and Guidelines Manual* stipulates that a proposed project would result in a potentially

significant impact on geological processes if the project, and/or implementation of required mitigation measures, could result in increased erosion, landslides, soil creep, mudslides, and/or unstable slopes. In addition, impacts related to geology have the potential to be significant if the project involves any of the following characteristics:

a. The project site or any part of the project is located on land having substantial geologic constraints, as determined by the City of Goleta. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion.
b. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical.
c. The project proposes construction of a cut slope over 15-feet in height as measured from the lowest finished grade.
d. The project is located on slopes exceeding 20% grade.

<u>Project Specific Impacts</u>

a.i-iii) No geologic hazards have been identified in the project vicinity. The project site is not located within a known earthquake fault, as delineated by Alquist-Priolo Earthquake Fault Zoning Maps (California Department of Conservation, 2007). Seismic events could occur in the project area from earthquakes at nearby faults, including the San Andreas Fault, Santa Ynez/Santa Ynez River Fault, More Ranch Fault Zone, and the Lavigia Fault. Movement from these faults could cause significant damage to older buildings (AMEC, 2014).

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. During liquefaction, granular material transforms from a solid state into a liquefied state as a consequence of increased pore pressure. Unconsolidated silts, sands, and silty sands are most susceptible to liquefaction. If the intensity and duration of earthquake shaking are great enough, liquefaction can occur. Structures that are the most vulnerable to liquefaction include buildings with shallow foundations, railways, buried structures, retaining walls, utility structures, and towers. The City of Goleta has no record of damage to structures from liquefaction. However, areas of beach sand could have a high liquefaction potential, due to unconsolidated sand layers below the water table (AMEC 2014).

While seismic activity and liquefaction could occur at the project site, the proposed repair work to PRC 421 access road would not construct any new structures on the project site or involve any underground structures or foundations. The project site would be uninhabited and impacts from potential hazards would be less than significant.

a.iv) The access road is located in an area that is subject to landslides (Division of Mines and Geology, 1966) and is abutted by a steep bluff on the eastern side. Repair work would not infringe upon the bluffs. Prior to repair work, the PRC 421 access road would be staked at 5 foot intervals to ensure the road does not exceed its current twelve foot

width. Adherence to this limit will prevent bluff destabilization. The project would have less than significant impact on landslides with adherence to the access road width limit of 12 feet.

b) The project site is bordered by bluffs that have potential for erosion and could be undercut. However, the width of the road would be staked, approximately every five meters, at the existing twelve foot width prior to commencement of repair or maintenance work. This establishes specific limits to road construction and minimizes bluffside cut. Grading and soil displacement would be minimized and the road would not be extended or widened as a result of the project. Throughout clearing, grading, excavation, and transportation of cut/fill materials, a water truck would be used as needed to prevent dust from leaving the site and to create a crust after each day's activities cease. Traffic would be minimized through workers not involved in the movement of equipment, materials, or tools walking across the Sandpiper Golf Course to the project site. Impacts from erosion would be less than significant.

c) The proposed project would provide road repair and maintenance work in order to maintain road stability and accessibility. This is often necessary after large storm events, which can result in material from the adjacent bluffs landing in the road. The repair work would stabilize the roadway material and surrounding soil following disturbance. Additionally, the road would be kept at a twelve-foot width and would not be widened as part of the project. Prior to any work commencing, the width of the road would be staked at five meter intervals to prevent the bluff from being undercut. However, no liquefaction has been recorded in Goleta and hazards resulting from liquefaction and expansion are minimal due to the project site having no structures or underground component. Therefore, impacts would be less than significant.

d) Per the SLC 421 Recommissioning EIR, soils in the area of the PRC 421 access road are not compressible, however could have high expansion potential (AMEC, 2014). While expansive soils are not a geologic hazard on their own, they could potentially damage structures. However, the project consists of temporary road repair work and no new structures would be added to the site. The project would not create any risks to life or property. Impacts would be less than significant.

e) The project involves temporary repair work on an access road. The proposed project would not include the use of septic tanks or alternative waste disposal systems and therefore there would be no impact.

<u>Cumulative Impacts</u>

The project site is not in the vicinity of any earthquake fault zones, the risk of landslides and erosion would be minimized due to staking on the road that prevents widening of the road and undercutting of the bluffs. The project's impacts on geology and soils would be less than significant and the project's contribution to cumulative impacts would be less than significant since the project would not add to any cumulative geologic risk.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Geology and Soils would remain less than significant as a result of project implementation.

GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X	

Existing Setting

Climate Change Background

Parts of the Earth's atmosphere act as an insulating "blanket" for the planet. This "blanket" of various gases traps solar energy, which keeps the global average temperature in a range suitable for life. The collection of atmospheric gases that comprise this blanket are called "greenhouse gases," based on the idea that these gases trap heat like the glass walls of a greenhouse. These gases, mainly water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), and chlorofluorocarbons (CFCs), all act as effective global insulators, reflecting visible light and infrared radiation back to earth. Most scientists agree that human activities, such as producing electricity and driving internal combustion vehicles, have contributed to the elevated concentration of these gases in the atmosphere. As a result, the Earth's overall temperature is rising.

Climate change could impact the natural environment in California by triggering, among others things:

- Rising sea levels along the California coastline;
- Extreme-heat conditions, such as heat waves and very high temperatures, which could last longer and become more frequent;
- Increase in heat-related human deaths, an increase in infectious diseases, and a higher risk of respiratory problems caused by deteriorating air quality;

- Reduced snow pack and stream flow in the Sierra Nevada mountains, affecting winter recreation and water supplies;
- Potential increase in the severity of winter storms, affecting peak stream flows and flooding;
- Changes in growing season conditions that could affect California agriculture, causing variations in crop quality and yield; and
- Changes in distribution of plant and wildlife species due to changes in temperature, competition from colonizing species, changes in hydrologic cycles, changes in sea levels, and other climate-related effects.

According to the U.S. Environmental Protection Agency (EPA), a GHG is any gas that absorbs infrared radiation in the atmosphere. This absorption traps heat within the atmosphere creating a greenhouse effect that is slowly raising global temperatures. California law defines GHG to include the following: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6) (Health and Safety Code, § 38505(g)).

The effect each GHG has on climate change is measured as a combination of the volume of its emissions, and its global warming potential (GWP), and is expressed as a function of how much warming would be caused by the same mass of CO_2. Thus, GHG emissions are typically measured in terms of pounds or tons of CO_2 equivalents (CO_2e), and are often expressed in metric tons of CO_2 equivalents (MT CO_2e) or millions of metric tons of CO_2 equivalents (MMT CO_2e).

Global climate change issues are addressed through the efforts of various federal, state, regional, and local government agencies as well as national and international scientific and governmental conventions and programs. These agencies work jointly and individually to understand and regulate the effects of greenhouse gas emissions and resulting climate change through legislation, regulations, planning, policy-making, education, and a variety of programs. The significant agencies, conventions, and programs focused on global climate change are listed below.

- Federal U.S. Environmental Protection Agency
- California Air Resources Board
- California Executive Order S-3-05
- California Executive Order S-13-08
- California Global Warming Solutions Action of 2006 (AB 32)
- Senate Bill (SB) 97. SB 97, enacted in 2007
- State of California Climate Change Proposed Scoping Plan
- Senate Bill (SB) 375. SB 375
- Santa Barbara County Air Pollution Control District (SBCAPCD)
- City of Goleta Energy Efficiency Standards

Thresholds of Significance

CEQA Guidelines (14 California Code of Regulations §15000, et seq.) provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents. According to Appendix G of the CEQA Guidelines, the project would have a significant impact if it would:

A. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
B. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The CEQA Guidelines require a lead agency to make a good-faith effort based, to the extent possible, on scientific and factual data in order to describe, calculate, or estimate the amount of GHG emissions resulting from a project. They give discretion to the lead agency in whether to:

1. Use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; and/or
2. Rely on a qualitative analysis or performance-based standards.

In addition, a lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction of GHG emissions.

The Guidelines call on Lead Agencies to establish significance thresholds for their respective jurisdictions.

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines § 15355).

For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan). Currently, neither the State of California nor the

City of Goleta have established CEQA significance thresholds for GHG emissions. Indeed, many regulatory agencies are sorting through suggested thresholds and/or making project-by-project analyses. This approach is consistent with that suggested by California Air Pollution Control Officers Association (CAPCOA) in its technical advisory entitled "CEQA and Climate Change: Addressing Climate Change Through the California Environmental Quality Act Review" (CAPCOA, 2008):

> *…In the absence of regulatory standards for GHG emissions or other specific data to clearly define what constitutes a 'significant project,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice.*

Project Specific Impacts

a, b) Temporary GHG emissions would be created during maintenance and repair of the access road through the use of trucks and equipment. As construction would only occur periodically, dependent on storm activity, the emissions would not be constant. No additional GHG emissions would occur due to operation of the road because the road use would not change. The project would not conflict with any applicable plans, policies, or regulations. Given these considerations, GHG emissions from the project would only occur from temporary construction activities would be less than significant.

Cumulative Impacts

The proposed project would not result in any long-term increase in GHG emissions and, therefore, would not contribute to cumulative impacts due to GHG emissions.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Greenhouse Gas Emissions would remain less than significant as a result of project implementation.

HAZARDS AND HAZARDOUS MATERIALS

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Document**
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Document**
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X		
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X	
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X	
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X	
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X	
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X	

Existing Setting

The proposed project is bordered by coastal bluffs to the east and the Pacific Ocean to the west. The project area has been developed as a road since the 1920's. The road fill is comprised of compacted dirt and gravel and is stabilized by rock on the seaward size. Road base is three inches thick (AMEC, 2014).

Thresholds of Significance

A significant impact with regard to hazards and hazardous materials would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist. In addition, the City's Environmental Thresholds and Guidelines Manual addresses public safety impacts resulting from involuntary exposure to hazardous

materials. These thresholds focus on the activities that include the installation or modification to facilities that handle hazardous materials, transportation of hazardous materials, or non-hazardous land uses in proximity to hazardous facilities. Since the proposed project is limited to road repair, the City's risk-based thresholds are not applicable.

Project Specific Impacts

a, b) The proposed project would involve the repair and maintenance of an existing access road. The proposed project would not involve the routine transport, use, or disposal of hazardous substances, other than minor amounts used by standard construction vehicles. Vehicles would be filled with fuel offsite, prior to bringing the equipment to the project site. Should refueling be necessary during the project, it would be done on the access road west of EOF, which is paved and outside of the ESHA. No refueling would occur on the PRC 421 access road near ESHA, adjacent to the beach, or in the golf course. Appropriate drip mats would be placed under any stored equipment and for any necessary refueling that would occur at the EOF. For these reasons impacts from the transport, use, or disposal of hazardous materials would be less than significant.

c) The proposed project is not located within a quarter mile of a school. The nearest school is Ellwood Elementary School, located 0.7 mile to the northwest of the terminus of the access road. No impact from hazardous materials would occur in the vicinity of the school.

d) The following databases compiled pursuant to Government Code Section 65962.5 were checked for known hazardous materials contamination at the project site:

- Comprehensive Response, Compensation, and Liability Information System (CERCLIS) database;
- Geotracker search for leaking underground storage tanks (LUSTs); and
- The Department of Toxic Substance Control's Site Mitigation and Brownfields Database.

The project site is not located on a hazardous materials site listed on these databases. The nearest cleanup site to the project location is the EOF (State Water Resources Control Board, 2015). The area is potentially contaminated by crude oil, other solvent, or non-petroleum hydro-carbon. While this site is located nearby the project site, the proposed project would not interfere with activities at the EOF. Therefore, no impact would occur.

e, f) The proposed project would not be located within an airport land use plan. There is no private air strip in the vicinity of the project. The nearest airport, Santa Barbara Airport, is located over 2.5 miles away from the project site and no safety hazard would result from work in the project area. Therefore, no impact would occur.

g, h) The proposed project would not alter or interfere with any emergency response plan. The proposed project would allow for easier and safer access to the PRC 421 piers also owned by Venoco. The project site is located outside of the City's Wildland Fire Hazard Area. No impact from exposure to wildlife fires would or interference with emergency response plans would occur.

Cumulative Impacts

The project site is not in the vicinity of a school or airport and would not involve the use or transport of hazardous materials. The project would not contribute to cumulative impacts from hazards. Consequently, the project would not contribute to any cumulative impacts related to hazards or hazardous materials.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

The project would not result in any residual impacts on Hazards and Hazardous Materials.

HYDROLOGY AND WATER QUALITY

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Doc-ument**
a. Violate any water quality standards or waste discharge requirements?			X		
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X		
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			X		

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Document**
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X		
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X		
f. Otherwise substantially degrade water quality?			X		
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X	
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X	
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?				X	
j. Inundation by seiche, tsunami, or mudflow?			X		

Existing Setting

The project site runs along the coast, inland of the beach. Bluffs on the inland side of the access road extend up above the road. The project site is unoccupied and does not utilize a water source. The terminus of the access road lies partially within a Zone X flood zone, with 0.2% chance of annual flood. The remainder of the access road lies outside of the annual chance floodplain (FEMA, 2012). The project site lies within a tsunami inundation zone (California Department of Conservation, 2009).

Thresholds of Significance

A significant impact on hydrology and water quality would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist. In addition, the City's Environmental Thresholds and Guidelines Manual provides that a significant impact on hydrology and water resources would occur if a project would result in a substantial alteration of existing drainage patterns, alter the course of a stream or river,

or increase the rate of surface runoff to the extent that flooding occurs or substantially degrades water quality.

Project Specific Impacts

a, e, f) In Santa Barbara County, the Central Coast RWQCB administers state and federal requirements pertaining to the preservation of water quality. Under the federal Clean Water Act and California Water Code, the RWQCB issues National Pollution Discharge Elimination System (NPDES) permits for stormwater runoff. A NPDES General Permit for Storm Water Discharges Associated with Construction Activities is required when a project involves clearing, grading, disturbances to the ground, such as stockpiling, or excavation that results in soil disturbances of one or more acres of total land area. Because the project would not involve extensive ground disturbance on 1 or more acres, it is not required to have an NPDES permit for stormwater runoff. The proposed project would not alter runoff or discharge that is currently present at the site. As the project would not increase the footprint of the roadway, alter grading, or pave any surfaces, runoff would not be increased or altered and the capacity of the existing system would not be compromised. No additional source of pollution would be introduced as a result of the project and water quality would not be degraded. Therefore, impacts would be less than significant.

b) The project would not introduce additional impervious surfaces to the site or alter the current use of the project site. The proposed project would use groundwater and therefore not deplete groundwater supplies or alter groundwater recharge rates.

c, d) The proposed project involves the maintenance and repair of the PRC 421 access road. Repairs would not alter the boundaries or grade of the road and therefore would not alter runoff or drainage at the project site. New road base that would be used in repairs are consistent with what is already in place. No substantial erosion or siltation would occur as the project would not expand the access road or change the use of the road. Although the project site is partially within a flood zone with 0.2% chance of an annual flood, the use of the site would not change and the risk of flooding at the project site would not be increased as a result of the project. Therefore, impacts would be less than significant.

g, h, i) The proposed project would not add any structures or residences to the project site. The project site would remain unoccupied and would not alter, impede, or redirect flood flows or increase risk of structural damage due to a flood. Therefore, no impacts would occur.

j) While the project site lies in a tsunami inundation zone (California Department of Conservation), the project would only involve repair and maintenance work. The project would not introduce any structures to the project site or alter the landscape. Impacts would be less than significant.

Cumulative Impacts

The project would not use groundwater resources or introduce impervious services that would disrupt groundwater recharge. Drainage and runoff patterns would not be effected by project implementation. No structures would be introduced to the project site that would be subject to tsunami or flood risk or impede flood flows. Therefore, the project would not contribute to any significant cumulative impacts on hydrology or water quality.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Hydrology and Water Quality would remain less than significant as a result of project implementation.

LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Physically divide an established community?				X	
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for purpose of avoiding or mitigating an environmental effect?				X	
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X	

Existing Setting

The project site has a General Plan designation of Recreation and is zoned Recreation. Surrounding land uses include Sandpiper Golf Course, the Pacific Ocean, the EOF, and the Bacara Resort.

Thresholds of Significance

A significant land use and planning impact would occur if the proposed project resulted in any of the impacts noted in the above checklist. In addition, the City's Thresholds Manual provides guidelines related to "Quality of Life." Quality of Life is broadly defined as the aggregate effect of all impacts on individuals, families, communities, and other social groupings and on the way those groups function. Quality of life issues include loss

of privacy, neighborhood incompatibility, nuisance noise, not exceeding noise thresholds, increased traffic in quiet neighborhoods, and loss of sunlight/solar access.

Project Specific Impacts

a, b) The proposed project involves maintenance and repair work on an existing access road. The project site is not bordered by a community and no community would be divided by the project. The proposed project would not alter the use of the site or the surrounding uses and would not conflict with any applicable land use plan. Because the project site is not located near residences and the use of the site would not change, there would not be a Quality of Life impact. The project would not cause a loss of privacy, be incompatible with a neighborhood, cause excess nuisance noise, increase traffic in neighborhoods, or cause a loss of sunlight/solar access. Therefore, no impact would occur.

c) The proposed project would not alter any current use of the project site and would not conflict with a habitat conservation plan or natural community conservation plan. No conservation plan exists on the project site or adjacent to the project site. Therefore, impacts would be less than significant.

Cumulative Impacts

The proposed project would not alter the use of the project location or conflict with any habitat or conservation plans. Therefore, the project would not contribute to any cumulative impacts on Land Use and Planning.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Land Use and Planning would remain less than significant as a result of project implementation.

MINERAL RESOURCES

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Document**
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X	

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**	**See Prior Document**
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X	

Existing Setting

Thresholds of Significance

A significant impact on mineral resources would be expected to occur if the proposed project resulted in any of the impacts noted in the checklist above.

Project Specific Impacts

a, b) Mineral resources in the vicinity of the project site include the offshore oil and gas. The PRC 421 access road provide access to the PRC 421-1 and 421-2 piers and the existing wells on those piers. The proposed project would improve access to the piers and associated wells and would not alter the use of the project site nor reduce availability of known oil and gas resources. Therefore, no impacts would occur.

Cumulative Impacts

The proposed project would not affect mineral resources and, therefore, would not contribute to any significant cumulative impacts on mineral resources.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Mineral Resources would remain less than significant as a result of project implementation.

NOISE

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X		
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X		
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				X	
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X		
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X	
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X	

Existing Setting

Overview of Sound Measurement

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz). In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound pressure level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, Leq is summed over a one-hour period.

The sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Decibels cannot be added arithmetically, but rather are added on a logarithmic basis. Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA and a sound that is 10 dBA less than the ambient sound level would result in a negligible increase (less than 0.5 dBA) in total ambient sound levels. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while those along arterial streets are in the 50 to 60+ dBA range. Normal conversational levels are in the 60-65 dBA range and ambient noise levels greater than that can interrupt conversations.

Noise levels typically attenuate at a rate of 6 dBA per doubling of distance from point sources such as industrial machinery. Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. To evaluate community noise on a 24-hour basis, the day-night average sound level was developed (Ldn). Ldn is the average of all A-weighted levels for a 24-hour period with a 10 dBA upward adjustment added to those noise levels occurring between 10:00 PM and 7:00 AM to account for the general increased sensitivity of people to nighttime noise levels. The Community Noise Equivalent Level (CNEL) is identical to the Ldn with one exception. The CNEL adds 5 dBA to evening noise levels (7:00 PM to 10:00 PM). Thus, both the Ldn and CNEL noise measures represent a 24-hour average of A-weighted noise levels with Ldn providing a nighttime adjustment and CNEL providing both an evening and nighttime adjustment.

<u>Thresholds of Significance</u>

A significant noise impact would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist. In addition, based on the City of Goleta's *Environmental Thresholds and Guidelines Manual*, Section 12 Noise Thresholds, the following thresholds are used to determine whether significant noise impacts would occur

1. A development that would generate noise levels in excess of 65 dBa CNEL and could affect sensitive receptors would generally be presumed to have a significant impact.

2. Outdoor living areas of noise sensitive uses that are subject to noise levels in excess of 65 dBA CNEL would generally be presumed to be significantly

impacted by ambient noise. A significant impact would also generally occur where interior noise levels cannot be reduced to 45 dBA CNEL or less.

3. A project would generally have a significant effect on the environment if it would increase substantially the ambient noise levels for noise sensitive receptors in adjoining areas. Per Threshold 1 above, this may generally be presumed to occur when ambient noise levels affecting sensitive receptors are increased to 65 dBA CNEL or more. However, a significant effect may also occur when ambient noise levels affecting sensitive receptors increase substantially but remain less than 65 dBA CNEL, as determined on a case-by-case level.

4. Noise from grading and construction activity proposed within 1,600 feet of sensitive receptors, including schools, residential development, commercial lodging facilities, hospitals or care facilities, would generally result in a potentially significant impact. According to the US EPA guidelines, the average construction noise is 95 dBA at a 50-foot distance from the source. A 6 dBA drop occurs with a doubling of the distance from the source. Therefore, locations within 1,600 feet of the construction site could be affected by noise levels over 65 dBA. Construction within 1,600 feet of sensitive receptors on weekdays outside of the hours of 8:00AM to 5:00PM and on weekends would generally be presumed to have a significant effect. Noise attenuation barriers and muffling of grading equipment may also be required. Construction equipment generating noise levels above 95 dBA may require additional mitigation.

With regard to Threshold 3, the term “substantial increase” is not defined within the Thresholds Manual. The limits of perceptibility by ambient grade instrumentation (sound meters) or by humans in a laboratory environment is around 1.5 dBA. Under ambient conditions, people generally do not perceive that noise has clearly changed until there is a 3 dBA difference. A threshold of 3 dBA is commonly used to define “substantial increase.” Increases of +3 dBA require a doubling of traffic volumes on already noise-impacted roadways.

<u>Project Specific Impacts</u>

a, b) There are no sensitive receptors located within 1,600 feet of the project site. Since there are no sensitive receptors within 1,600 feet, the noise generated from construction is considered less than significant. Additionally, any noise or vibration generated by the project would be temporary due to the short term nature of the repair and maintenance work. For the reasons stated, impacts would be less than significant.

c) Noise levels would not permanently increase due to the project. The proposed project would temporarily generate some noise and vibrations that relate to the repair and maintenance work; however, the noise and vibration would be temporary and terminate upon completion of the work. Therefore, no impacts would occur.

d) Project activity would generate a temporary increase in the ambient noise levels for adjoining areas due to construction activities. However, the project site is not located near any sensitive receptors and noise would not exceed City guidelines. Therefore, impacts would be less than significant.

e, f) The project site is not located in an airport land use plan or within the vicinity of a private air strip. The nearest airport, Santa Barbara Airport, is located over 2.5 miles away. As the project is not within the vicinity of an airport, no impact would occur.

Cumulative Impacts

The proposed project would not have a significant impact on noise in the area and would not contribute to any long-term cumulative impacts to noise.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Noise would remain less than significant as a result of project implementation.

POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X	
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X	
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X	

Existing Setting

The proposed project would involve maintenance and repair work on an existing access road. The access road is bordered by the Sandpiper Golf Course and the beach and Pacific Ocean. The Bacara Resort is located to the northwest of the project site, on the other side of Bell Canyon and the EOF. There is no housing on the project site or

adjacent to ~~around~~ the project site. Within one half mile of the project site are the following two housing developments to the east and north of the project site: 1) The Bluffs Housing Development is comprised of 62 detached residences on 20 acres located east of the Sandpiper Golf Course and south of Hollister Avenue and 2) The Hideaway Housing Development includes approximately 98 attached housing units located north of Hollister Avenue and west of Las Armas Road.

Thresholds of Significance

A significant impact on population and housing would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist.

Project Specific Impacts

a, b, c) The proposed project would not induce population growth or displace any existing housing or people. The project would provide maintenance and repair to an existing access road that leads to two inactive Venoco wells. There would be no impact related to population or housing.

Cumulative Impacts

The proposed project would have no impact related to population or housing and would not contribute to any cumulative impacts related to population and housing.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Population and Housing would remain less than significant as a result of project implementation.

PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of these public services:				X	
fire protection?					
police protection?				X	
schools?				X	
parks?				X	
other public facilities?				X	

Existing Setting

The proposed project would involve maintenance and repair work on an existing access road. The access road is bordered by the Sandpiper Golf Course and the beach and Pacific Ocean. The Bacara Resort is located northwest of the project site, on the other side of Bell Canyon and the EOF. The Ellwood School is located about 4,000 feet to the north and east of the project site north of Hollister Avenue and east of Via Jero. The nearest Santa Barbara County Fire Department Station 11, which about is located about 2 miles east of the project site near the intersection of Storke Road and Phelps Road. The closest County of Santa Barbara Sheriff's Substation is located at the City of Goleta Offices at 130 Cremona Drive and is approximately 2.8 miles from the project site. Santa Barbara Shores County Park is located to the east, adjacent to the Sandpiper Golf Course.

Thresholds of Significance

A significant impact on public services would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist. In addition, the *Environmental Thresholds and Guidelines Manual* includes thresholds of significance for potential impacts on area schools. Specifically, under these thresholds, any project that would result in enough students to generate the need for an additional classroom using current State standards would be considered to result in a significant impact on area schools.

Project Specific Impacts

a) The proposed project would not lead to an increase in population or induce any growth that would increase use of fire protection services, police services, schools, parks, or other public facilities. The proposed repair and maintenance work would not change the current use of the project site. Therefore, the proposed project would not have create the need for new or expanded public services or otherwise have any impacts related to fire protection, police protection, schools, parks, or other public facilities.

Cumulative Impacts

The proposed project would have no impact related to public services or contribute to any cumulative impacts on public services.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Public Services would remain less than significant as a result of project implementation.

RECREATION

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Doc-ument
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X	
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X	

Existing Setting

The proposed project would involve maintenance and repair work on an existing access road. The access road is bordered by the Sandpiper Golf Course, Bacara Resort, and the beach and Pacific Ocean.

Thresholds of Significance

A significant impact on recreation would occur if the proposed project resulted in any of the impacts noted in the above checklist.

Project Specific Impacts

a,b) The project site is located next to a section of Ellwood Beach. People commonly jog and walk along this section of beach. Bacara Resort lies directly west of the access road and clientele commonly frequent the beach. Construction activities my deter people from using the area for these recreational purposes due to the presence of equipment and increased noise in the area. Other parts of the beach may be used at an increased level during the period of construction. Nonetheless, this stretch of Ellwood Beach would remain open to the public and disruption and alteration of recreational activities would be temporary. Further, the proposed project would not directly or indirectly add any population to the City and, therefore, would not result in a permanent increase in use of facilities or require the construction or expansion of recreation facilities.

Cumulative Impacts

The proposed project would not contribute to any significant impacts related to recreational facilities.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Recreation would remain less than significant as a result of project implementation.

TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				X	
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				X	
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X	
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X	
e. Result in inadequate emergency access?				X	
f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X	

Existing Setting

The proposed project would involve maintenance and repair work on an existing access road. The access road is bordered by the Sandpiper Golf Course, Bacara Resort, and the beach and Pacific Ocean. The road originates at the northwest corner of the Ellwood Onshore Facility (EOF) and is accessed via a private road at EOF. EOF is accessed via Hollister Avenue.

Thresholds of Significance

A significant project generated traffic impact would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist. Additional thresholds of significance are set forth in the City's Environmental Thresholds and Guidelines Manual.

Project Specific Impacts

a, b, c, d) The proposed project would not permanently increase traffic or vehicle trips on nearby roads. The project would involve maintenance and repair on an existing access road. During the project construction, there would be additional vehicular movement along Hollister Avenue leading up to the EOF and along the easement road from the southern end of the EOF out to the lease project site. This would be the result of materials and equipment deliveries associated with the repair and maintenance work. This additional traffic would be temporary and no permanent increase in vehicular trips or decrease in level of services would occur. No impacts would occur.

e) The proposed project would not impact emergency access to the site or increase traffic in the area in a way that would cause inadequate emergency service. No roadways in the vicinity of the PRC 421 access road would be altered or removed. Increases in traffic would be temporary and only during repair work. Because no roads would be altered or impeded and traffic increases would be temporary, emergency access would not be affected. Therefore, no impact would occur.

f) The proposed project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. No public transit route, bicycle path, or pedestrian facility is present on the PRC 421 access road. Additionally, the road is a private easement that only leads to PRC 421-1 and 421-2 piers. Therefore, no impact would occur.

Cumulative Impacts

The proposed project would not have any long-term impact to transportation and, therefore, would not contribute to any cumulative long-term impacts to transportation.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Transportation/Traffic would remain less than significant as a result of project implementation.

UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X	
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X	
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X	
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?				X	
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X	
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X	
g. Comply with federal, state, and local statutes and regulations related to solid waste?				X	

Existing Setting

The proposed project would involve maintenance and repair work on an existing access road. The access road is bordered by the Sandpiper Golf Course, Bacara Resort, and the beach and Pacific Ocean.

Thresholds of Significance

A significant impact on utilities and service systems would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist.

Project Specific Impacts

A -g) The proposed project would not utilize water, wastewater, or solid waste facilities. No facilities would need to be expanded and no new facilities would need to be constructed to accommodate the project. Any road material excavated during repair activities would be hauled from the project site and disposed of in an approved facility.

Cumulative Impacts

The proposed project would have no long-term impact to utilities or service systems and, therefore, would not contribute to any cumulative impacts to utilities or service systems.

Required/Recommended Mitigation Measures

No mitigation measures are required.

Residual Impact

Residual impacts (either project-specific or cumulative) on Utilities and Public Services would remain less than significant as a result of project implementation.

MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X			
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X		
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X		

a) The proposed project has the potential to adversely affect western snowy plover and wetland habitat. However, implementation of mitigation measures BIO-1 and BIO-2 would reduce these impacts to a less than significant level. The proposed project would not impair or eliminated any known prehistoric or historic resources. Impacts on unknown cultural resources would be less than significant due to the limited area and excavation of the project.

b) All potential environmental impacts of the project have been determined in this Initial Study to have either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated. In connection with the effects of any past projects, current projects, and probable future projects, the proposed project would have less than significant cumulative impacts (i.e., impacts would not be cumulatively considerable).

c) In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. All impacts related to these would be less than significant.

15. REFERENCES:

AMEC. Final Environmental Impact Report for the Revised PRC 421 Recommissioning Project. November 2014. Available: http://www.slc.ca.gov/Info/CEQA/Venoco_PRC_421.html

California Department of Conservation. Earthquake Fault Zones. 2007. Web Accessed July 2015. Available: http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm

California Department of Conservation. Santa Barbara County Important Farmland 2012. Web Accessed July 2015. Available: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/sba12.pdf

California Department of Conservation. Santa Barbara County Williamson Act FY 2013/2015. Web Accessed July 2015. Available: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Santa_Barbara_13_14_WA.pdf

California Department of Conservation. Tsunami Inundation Map for Emergency Planning. January 31, 2009. Available: http://www.quake.ca.gov/gmaps/WH/tsunamimaps.htm

Division of Mines and Geology. Landslide Hazard Maps of Southeastern Santa Barbara County. 1966. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_99-12/99-12%20Plate%201A.pdf

Federal Emergency Management Agency (FEMA). Flood Insurance Rate Map (FIRM). October 2012. Available: https://msc.fema.gov/portal/search?AddressQuery=goleta%2C%20ca

Goleta, City of. General Plan/Coastal Land Use Plan Visual and Historic Resources Element. October 2006. Available: http://www.cityofgoleta.org/city-hall/planning-and-environmental-review/general-plan/view-general-plan

Santa Barbara County Air Pollution Control District. Air Monitoring. Web Accessed August 2015. Available: http://www.ourair.org/biz/air-monitoring/

Santa Barbara County Air Pollution Control District. Meeting Air Quality Standards. Web Accessed August 2015. Available: http://www.ourair.org/air-quality-standards/

Santa Barbara County Association of Governments. 2013 Clean Air Plan. March 2015. Available: http://www.ourair.org/clean-air-plans/

Santa Barbara, County of. Final Proposed Mitigated Negative Declaration 01-ND-34: Venoco, Inc. – State Lease 421 Well Stabilization Project. October 2001.

State Water Resources Control Board. Geotracker Database. Web Accessed August 2015. Available: https://geotracker.waterboards.ca.gov/

United States Fish & Wildlife Service (USFWS). Recovery Plan for the Pacific Coast Population of the Western Snowy Plover. August 2007. Available: http://www.fws.gov/arcata/es/birds/WSP/plover.html

Mitigation Monitoring and Reporting Program

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the PRC 421 Access Road Maintenance and Repair Project, proposed in the City of Goleta, California. Public Resources Code Section 21081.6(a) (1) requires that a Lead Agency adopt an MMRP before approving a project in order to mitigate or avoid significant impacts that have been identified in Mitigated Negative Declaration (IS-MND). The purpose of the MMRP is to ensure that the required mitigation measures identified in the IS-MND are implemented as part of the overall project implementation. In addition to ensuring implementation of mitigation measures, the MMRP provides feedback to agency staff and decision-makers during project implementation, and identifies the need for enforcement action before irreversible environmental damage occurs.

The following table summarizes the mitigation measures for the issue area identified in the IS-MND for the PRC 421 Access Road Maintenance and Repair project. The table identifies each mitigation measure; the action required for the measure to be implemented; the time at which the monitoring is to occur; the monitoring frequency; and the agency or party responsible for ensuring that the monitoring is performed. In addition, the table includes columns for compliance verification. Where an impact was identified to be less than significant, no mitigation measures were required.

Mitigation Measure/Condition of Approval	Action Required	When Monitoring to Occur	Monitoring Frequency	Responsible Agency or Party	Compliance Verification		
					Initial	Date	Comments
BIOLOGICAL RESOURCES							
BIO-1 Protection of Sensitive Habitat. Wetlands 1, 2, and 3 shall be fenced off during all repair and maintenance work on the access road.	This mitigation measure must be included on maintenance or repair activity plans and reviewed to confirm establishment of appropriate fencing. A site inspection shall be conducted to ensure the fencing is in place prior to commencement of repair and maintenance activities.	Prior to the commencement of construction and ongoing during repair and maintenance activities for the access road.	Periodically during repair and maintenance activities for the road.	City Planning and Environmental Review Staff			
BIO-2 Habitat Restoration. If any portion of the wetland is impacted during repair or maintenance work, or order to provide proper roadway access, then the wetland must be mitigated at a ratio of 3:1 for Wetlands 1 and 2 and a ratio of 5:1 for Wetland 3**.**	If wetlands are impacted, the City of Goleta and all appropriate regulatory agencies must be notified immediately and appropriate permits must be submitted and approved. This condition must be printed on project plans submitted for the Coastal Development Permit or Land Use Permit, if required, prior to commencement of any repair and maintenance activities.	City Planning and Environmental Review staff must verify compliance with all regulatory agency permits before the issuance of any Permits and commencement of any additional repair or maintenance work for the access road.	Periodically during repair and maintenance activities for the road.	City Planning and Environmental Review Staff			

RESPONSES to COMMENTS on the DRAFT IS-MND

This section includes comments received during the circulation of the Draft Initial Study and Mitigated Negative Declaration (IS-MND) prepared for the PRC 421 Access Road Maintenance and Repair project.

The Draft IS-MND was circulated for a 30-day public review period that began on October 30, 2015 and concluded on December 4, 2015. The City received eight (8) comment letters/emails on the Draft IS-MND. The commenter and the page number on which each commenter's letter appears are listed below.

Letter Number and Commenter	Page
1. Scott Morgan, Director, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	2
2. Aaron O. Allen, Chief, North Coast Branch, Regulatory Division, Department of the Army, Los Angeles District, U.S. Army Corps of Engineers	5
3. Krista Nightingale, Air Quality Specialist, Santa Barbara County Air Pollution Control District	9
4. Mona Miyasato, County Executive Officer, County of Santa Barbara for: Ray Navarro, Fire Marshall, Santa Barbara County Fire Department	14
5. Barbara Massey	17
6. Ingeborg Cox, MD, MPH	21
7. Patricia A. Abel, State of California Natural Resources Agency, Department of Conservation, Division of Oil, Gas, and Geothermal Resources – District 3	25
8. Collette M. Thogerson, Ph.D., Assistant Field Supervisor, South Coast Division, U.S. Fish and Wildlife Service	27

The comment letters and responses follow. Each comment letter has been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

Letter 1

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

November 30, 2015

CITY OF GOLETA
CALIFORNIA
DEC 07 2015
RECEIVED

Anne Wells
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Subject: PRC 421 Access Road Maintenance and Repair Project
SCH#: 2015101097

Dear Anne Wells:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on November 25, 2015, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 1.1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2015101097
Project Title PRC 421 Access Road Maintenance and Repair Project
Lead Agency Goleta, City of

Type MND Mitigated Negative Declaration

Description Repair and maintenance of the PRC 421 access road for a period of 5 years. The project also includes past repair and maintenance activities. General activities include routine and typical storm maintenance involving the removal of muddy materials and placement of 2-3" road base; repair pot holes; and repair and replace rip rap lining the access road.

Lead Agency Contact

Name Anne Wells
Agency City of Goleta
Phone 805 961 7557 **Fax**
email
Address 130 Cremona Drive, Suite B
City Goleta **State** CA **Zip** 93117

Project Location

County Santa Barbara
City Goleta
Region
Lat / Long 34° 25' 42" N / 119° 54' 41" W
Cross Streets Hollister Ave and Cathedral Oaks Road
Parcel No. 079-210-059
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 101
Airports Santa Barbara
Railways UPRR
Waterways Bell Creek
Schools Ellwood ES
Land Use Access Road on a parcel zoned and designated Recreation

---

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse

---

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 5; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 3; Native American Heritage Commission; Public Utilities Commission

---

Date Received 10/27/2015 **Start of Review** 10/27/2015 **End of Review** 11/25/2015

Note: Blanks in data fields result from insufficient information provided by lead agency.

Letter 1

COMMENTER: Scott Morgan, Director, State of California – Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

DATE: November 30, 2015

Response 1.1

The commenter noted that no state agencies submitted comments to the State Clearinghouse received during the 30-day review period and that the City has complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. This comment is noted.

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, U.S. ARMY CORPS OF ENGINEERS
VENTURA FIELD OFFICE
2151 ALESSANDRO DRIVE, SUITE 110
VENTURA, CALIFORNIA 93001

November 10, 2015

Anne Wells, Advance Planning Manager
City of Goleta, Planning and Environmental Review
130 Cremona Drive, Suite B
Goleta, California 93117

DEPARTMENT OF THE ARMY PERMIT APPLICATION REQUEST

Dear Ms. Wells:

It has come to my attention that Venoco Inc. plans to implement a long-term maintenance plan for repair and reconstruction of an access road from the company's Ellwood Onshore Facility, through property owned by the adjacent Sandpiper Golf Course, and down to the existing PRC 421-1 and 421-2 piers near the city of Goleta, Santa Barbara County, California (34.4260 N, -119.9084 W).

This activity may require a Department of Army (DA) permit from the U.S. Army Corps of Engineers. A DA permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material other than incidental fallback within, "waters of the United States", including wetlands and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to the following activities;

a. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures; 2.1
b. mechanized land clearing and grading which involve filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the U.S.;
c. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the U.S.; and
d. placing pilings when such placement has or would have the effect of a discharge of fill material.

Furthermore, a DA permit is also required for structures or work in or affecting "navigable waters of the United States" pursuant to Section 10 of the Rivers and Harbors Act of 1899. Examples include, but are not limited to the following categories;

a. constructing a pier, revetment, bulkhead, jetty, aid to navigation, artificial reef or island, and any structures to be placed under or over a navigable water; and
b. dredging, dredge disposal, filling and excavation.

An application for a DA permit is available on our website: http://www.spl.usace.army.mil/Missions/Regulatory/PermitProcess.aspx. If you have any questions, please contact Ian Bordenave at 805-585-2151 or via e-mail at Ian.T.Bordenave@usace.army.mil. Please refer to this letter and SPL-2015-00817 in your reply. Please help me to evaluate and improve the regulatory experience for others by completing the customer survey form at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey.

Sincerely,

Aaron O. Allen, Ph.D
Chief, North Coast Branch
Regulatory Division

Enclosure

Jerry Hittleman

From: Bordenave, Ian T SPL <Ian.T.Bordenave@usace.army.mil>
Sent: Thursday, December 17, 2015 11:38 AM
To: Keith Wenal
Subject: RE: Venoco Access Road Permit (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Hi Keith,

In response to your inquiry regarding whether or not a Department of the Army (DA) permit would be necessary for periodic Pier 421 access road maintenance; after reviewing the project description that you have provided (per City of Goleta and California Coastal Commission permit applications), and after conducting a site visit on December 16, 2015, my answer would be that Venoco, Inc. does not need to obtain a DA permit for the activities outlined in its application. The proposed activities would take place outside of any jurisdictional waters of the U.S. per 33 CFR 322. 2.2

Keep in mind that major modification or augmentation (eg. expansion of the rock revetment, construction of a sea wall etc.) to the existing access road, that may have impacts on the aquatic or marine environment, would trigger the need to obtain a permit from the Department of the Army Corps of Engineers, Los Angeles Regulatory Division. This would also include emergency actions (ie. RGP-63) taken to address stochastic events such as a road wash-out due to a storm surge or heavy rain event. In these instances please refer correspondence to:

Aaron Allen, Ph.D.
Branch Chief, North Coast
Los Angeles Regulatory Division
2151 Alessandro Drive, Suite 110
Ventura, CA. 93001
(805) 585-2148
Aaron.O.Allen@usace.army.mil

Crystal Huerta
Senior Project Manager, Santa Barbara County Los Angeles Regulatory Division
2151 Alessandro Drive, Suite 110
Ventura, CA. 93001
(805) 585-2143
Crystal.Huerta@usace.army.mil

The two individuals listed above will address your questions and regulatory concerns in a timely manner consistent with the Corps' commitment to customer service.

Thank-you!

Ian Bordenave
Project Manager, North Coast Branch Regulatory Division U.S. Army Corps of Engineers, Los Angeles District
2151 Alessandro Drive, Suite 110, Ventura, CA 93001
(805) 585-2151
Ian.T.Bordenave@usace.army.mil

Letter 2

COMMENTER: Aaron O. Allen, Department of the Army, Los Angeles District, U.S. Army Corps of Engineers, Ventura Field Office

DATE: November 10, 2015

Response 2.1

The commenter states that this activity may require a Department of Army (DA) permit from the U.S. Army Corps of Engineers (USACOE). Please see Response 2.2 below.

Response 2.2

In a subsequent and related email to the applicant dated December 17, 2015, the commenter stated that "Venoco Inc. does not need to obtain a DA permit for the activities outlined in the application. The proposed activities would take place outside of any jurisdictional waters of the U.S. per 33 CFR 322." In addition, the commenter stated that "major modification or augmentation (e.g. expansion of the rock revetment, construction of a sea wall, etc.) to the existing access road that may have impacts on the aquatic or marine environment, would trigger the need to obtain a permit from the Department of Army Corps of Engineers, Los Angeles Regulatory Division. This would also include emergency actions (i.e. RGP-63) taken to address stochastic (or unpredictable) events such as a road wash-out due to a storm surge or heavy rain event." Based on the information contained in these communications from the USACOE, a DA permit is not required for the proposed access road repair and maintenance project or any recent repair activities; however, a DA permit may be required for future activities depending on the extent of the work needed.

Our Vision Clean Air

Santa Barbara County
Air Pollution Control District

December 1, 2015

Anne Wells
City of Goleta
Planning and Environmental Review
130 Cremona Drive, Suite B
Goleta, CA 93117

Re: APCD Conditions on PRC 421 Access Road Maintenance and Repair Project, 15-004-DP and 15-003-CDP, 15-135-MND

Dear Ms. Wells:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of periodic maintenance and repairs to the PRC 421 access road for five years. The following activities are covered by the permit:

- Perform routine and typical storm maintenance and install 2-3" of road base to restore an all-weather surface.
- Repair pot holes in the roadway created by runoff.
- Repair and/or replace rip rap lining the access road. Displace rip rap will be relocated using heavy equipment.

Additionally, the project includes activities completed to repair and maintain the PRC 421 access road in the past. Past maintenance activities consist of the addition of rock and plywood. Also, the removal of muddy materials that slough off the inland bluff and are deposited on the surface of the roadways, installation of 2-3" of road base to replace the removed material, and restoration of an all-weather surface. Equipment used for the described maintenance activities includes a front-end loader, rubber tired or tracked excavator, and dump truck.

The subject property is an access road located on the State Oil and Gas Lease No. PRC 421 and part of the parcel owned by Sandpiper Golf Course identified in the Assessor Parcel Map Book as APN 079-210-059. Venoco has a forty foot wide easement for use and maintenance of the PRC 421 access road, originating at the northwest corner of the Ellwood Onshore Facility and terminating at the PRC 421-1 and 421-2 piers. The access road is part of Venoco Inc. located at 7979 Hollister Avenue in the City of Goleta.

3.1

Air Pollution Control District staff offers the following suggested conditions:

1. Standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities. The name and telephone number of an on-site contact person must be provided to the APCD prior to issuance of grading/building permit issuance.

2. The State of California considers particulate matter emitted by diesel engines carcinogenic. Therefore, during project grading, construction, and hauling, construction contracts must specify

Louis D. Van Mullem, Jr. • Air Pollution Control Officer
260 North San Antonio Road, Suite A • Santa Barbara, CA • 93110 • 805.961.8800
OurAir.org • twitter.com/OurAirSBC

that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of particulate matter from diesel equipment as well as of ozone precursors.

3. All portable diesel-fired construction engines rated at 50 bhp or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to grading/building permit issuance. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8893 or via email at NightingaleK@sbcapcd.org.

Sincerely,

Krista Nightingale,
Air Quality Specialist
Technology and Environmental Assessment Division

Attachments: Fugitive Dust Control Measures
Diesel Particulate and NO_x Emission Measures

cc: TEA Chron File

Santa Barbara County
Air Pollution Control District

ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions.

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.

- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.

- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.

- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.

- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, <u>or</u> revegetating, <u>or</u> by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.

- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

  Plan Requirements: All requirements shall be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. **Timing:** Requirements shall be shown on plans or maps prior to land use clearance or map recordation. Condition shall be adhered to throughout all grading and construction periods.

  <u>MONITORING</u>: Lead Agency shall ensure measures are on project plans and maps to be recorded. Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

Santa Barbara County
Air Pollution Control District

ATTACHMENT B
DIESEL PARTICULATE AND NO_x EMISSION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is an updated list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

The following measures are recommended:

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

Plan Requirements: Measures shall be shown on grading and building plans. **Timing:** Measures shall be adhered to throughout grading, hauling and construction activities.

MONITORING: Lead Agency staff shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors shall respond to nuisance complaints.

Letter 3

COMMENTER: Krista Nightingale, Santa Barbara County Air Pollution Control District

DATE: December 1, 2015

Response 3.1

The commenter suggests conditions related to dust, particulate matter, and portable diesel-fired construction engines. These conditions will be included as part of the project conditions for the required for the Development Plan/ Coastal Development Permit being processed by the City.

County Of Santa Barbara

Mona Miyasato
County Executive Officer

105 East Anapamu Street, Room 406
Santa Barbara, California 93101
805-568-3400 • Fax 805-568-3414
www.countyofsb.org

Executive Office

December 3, 2015

Ms. Anne Wells
Advance Planning Manager
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93177

E-mail: awells@cityofgoleta.org

Re: PRC 421 Access Road Maintenance and Repair Project, Case No. 15-004-DP, 15-003-CDP, 15-135-MND

Dear Ms. Wells:

Thank you for the opportunity to comment on PRC 421 Access Road Maintenance and Repair Project. At this time, the County submits comments from the Fire Department. 4.1

If you should have further questions, please do not hesitate to contact my office directly or Glenn Russell, Director, Planning and Development Department, at 805-568-2085.

Sincerely,

Mona Miyasato
County Executive Officer

cc: Merrie Blackmar, Santa Barbara County Fire Department
Glenn Russell, Ph.D., Director, Santa Barbara County Planning and Development Department

Enclosures: Santa Barbra County Fire Department Comment Letter, dated November 19, 2015

Renée E. Bahl
Assistant County Executive Officer
rbahl@co.santa-barbara.ca.us

Terri Maus-Nisich
Assistant County Executive Officer
tmaus@countyofsb.org

Fire Department

"Serving the community since 1926"

HEADQUARTERS

4410 Cathedral Oaks Road
Santa Barbara, CA 93110-1042
(805) 681-5500 FAX: (805) 681-5563

Eric L. Peterson
Fire Chief
County Fire Warden

Rob Heckman
Deputy Fire Chief

November 19, 2015

Ms. Anne Wells, Advance Planning Manager
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Dear Ms. Wells:

SUBJECT: PRC 421 Access Road Maintenance and Repair Project

I have reviewed the above referenced project and have no comments on the project as presented at this time. 4.2

As always, if you have any questions or require further information, please call 681-5525 or 681-5523.

In the interest of life and fire safety,

Ray Navarro
Fire Marshal

RN: mkb

Serving the cities of Buellton, Goleta and Solvang, and the Communities of Casmalia, Cuyama, Gaviota, Hope Ranch, Los Alamos, Los Olivos, Mission Canyon, Mission Hills, Orcutt, Santa Maria, Sisquoc, Vandenberg Village

Letter 4

COMMENTER: Mona Miyasato, County Executive Officer, County of Santa Barbara for: Ray Navarro, Fire Marshal, Santa Barbara County Fire Department

DATE: November 19, 2015

Response 4.1

The County Executive Officer stated that she is attaching a comment from the Santa Barbara County Fire Department. The response to this letter is provided in Response No. 4.2.

Response 4.2

The commenter from the Santa Barbara County Fire Department stated that he has reviewed the project and has no comments on the project as presented at this time. This comment is noted.

PRC 421 Access Road Maintenance and Repair Project Comments
November 28, 2015

This is the first time I have ever heard of including previously completed, unpermitted work in an MND. There wasn't even the courtesy of a description of all the work that was done on each date on the list on page 3. This seems to give this previous, unpermitted work a blanket approval. I would like to know why the City of Goleta allowed the work to be done without requiring the appropriate environmental review and permitting. The Federal, State, and County staff do not properly monitor oil and gas companies and protect the citizens and it appears that neither does the City. 5.1 5.2 5.3

What is the composition of the road base used for the restoration? 5.4

On page 6, the laydown area to be used for employee's vehicles and equipment appears to be in an ESHA. Why aren't the vehicles required to park off site? Drip mats seem completely inadequate for handling the refueling which should also be done off site. 5.5 5.6

The environmental monitoring to ensure compliance mentioned on page 9 must be questioned since no environmental review and permitting was done previously. I question the environmental site inspections done by the environmental monitor on a number of recent projects including the Villages at Los Carneros and Westar. I hope more care is taken on this sensitive beach bluff project. 5.7

Page 33 is Figure 4 but there is no page 34. Is a page of information missing or is it a pagination mistake? 5.8

There should be a map showing the location of the three wetlands. 5.9

On page 67 b), there should be no speculation on the impacts of "probable future projects". This comment is inappropriate. This comment should not be used as an excuse to permit future unknown projects. 5.10

This appears to be a token environmental review document with only a quick look at the impacts. There was no discussion of the impact on the biological resources (ESHA) from the equipment and employee vehicle parking on the laydown area immediately to the west of the EOF. The refueling of equipment was only given a cursory mention. It was a quick read since it had little information. 5.11

This is an inadequate document and an embarrassment to the City. 5.12

Barbara Massey

Letter 5

COMMENTER: Barbara Massey

DATE: November 28, 2015

Response 5.1

The commenter states that they had never heard of including previously completed, unpermitted work in an IS-MND. The purpose of including a description of the past work in the IS-MND is to document and fully disclose to all interested parties the full project description and history of the project as required by the California Environmental Quality Act (CEQA). Past access road repairs (2001 – 2014) were performed to allow safe and passable access to Venoco's 421-1 and 421-2 piers for equipment associated with the permitted Caisson Wall Repair Project and for periodic minor road repairs. The maintenance road allows equipment to access the piers while protecting the sensitive habitat adjacent to the coastal bluffs and the sensitive beach environment by keeping maintenance equipment away from these resources.

Response 5.2

The commenter states that not all the work that has been done was listed in the "Past Repair and Maintenance" section of the project description in the draft IS-MND. As described within the project description in the "Past Repair and Maintenance Activities" section, regular repairs of the road have occurred since 2001, to control erosion, repair walls, filling ruts, and remove loose materials outside of the beach and sensitive wetland habitat areas. A major road repair project was performed by Venoco in 2001, under Emergency Permit E-01-027-G, issued by the County of Santa Barbara. In addition, in 2004, permitted road work was also performed in conjunction with the 421-1 Caisson Wall Repair project. This is the extent of the known work done on the access road since 2001.

Response 5.3

The commenter would like to know why the City of Goleta allowed previous work to be done without environmental review or permitting. The City of Goleta has not permitted or allowed any past road maintenance activities and has required that the Venoco Inc. file the current applications for a Development Plan and Coastal Development Permit to ensure that all work on the access road is done in accordance with local, state, and federal regulations.

Response 5.4

The commenter requested information about the composition of the road based used for restoration. The road base is comprised of ¾ inch aggregate, which is the same road base used by the City of Goleta and Santa Barbara County.

Response 5.5

The commenter states that the laydown area to be used for employee's vehicles and equipment appears to be in an environmentally sensitive habitat area (ESHA). The equipment laydown area will be in a previously established portion of the Ellwood Offshore Facility (EOF) immediately adjacent to the western fence. Project maintenance vehicles will be parked within the confines of the EOF, or on other established road areas along the western and northern EOF fence lines. These are legally established and previously developed areas within the EOF. Temporary parking of maintenance vehicles is not anticipated to have a significant impact on the adjacent environmentally sensitive habitat areas (ESHA).

Response 5.6

The commenter states that drip mats seem inadequate for refueling and that refueling should be done off site. Typically, all refueling will be done offsite prior to maintenance equipment arriving at the site. The work associated with the repair and maintenance project would not typically take more than one day to complete, as such, no refueling should be necessary.
Drip mats are an appropriate best management practice for use when vehicles are parked or staged within the confines of the EOF.

Response 5.7

The commenter questions the environmental monitoring to ensure compliance mentioned on IS-Draft MND page 9, as no environmental review and permitting was done previously. A Mitigation Monitoring and Reporting Program (MMRP) is included as part of the Final IS-MND, which outlines the necessary environmental monitoring measures and milestones required for future repair and maintenance activities as described in the project description.

Response 5.8

The commenter states that there is no page 34 in the document. Page 34 is the back side of the Figure 4 included as page 33 in the draft IS-MND. Consequently the next page after the 11x17 sheet is page 35.

Response 5.9

The commenter states that a map should be included showing the location of the three referenced wetlands. The main wetland adjacent to the access road is shown on Figure 2b, page 8 of the Final IS-MND. Other smaller wetlands areas along the road are described on page are described on page 35 of the MND. They will be safeguarded by the range of wetland protection and mitigation measures described on page 9 of the Final IS-MND and biology mitigation measure BIO-1 and BIO-2 in the Mitigation, Monitoring and Reporting Program (MMRP), similar to the larger wetland depicted in the figure. The extra measures on page 9 of the MND have been included as project conditions in the Development Plan and Coastal Development Permit.

Response 5.10

The commenter states that with respect to Mandatory Findings of Significance (b) on page 67, there should be no speculation on the impacts of "probable future projects" and that this comment should not be used as an excuse to permit future unknown projects. Finding (b) must consider probable future projects. Please note that any future repair and maintenance activities associated with access road will need to conform to the project description in the MND and all project mitigation measures and conditions. Any deviation from this description, mitigation measures, and conditions will require approval of a revised MND, Development Plan, and Coastal Development permit.

Response 5.11

The commenter states that there is no discussion of impacts to biological resources from equipment and employee parking at the laydown site and refueling activities. Please refer to Responses 5.5 and 5.6 above. All equipment and employee parking areas will be subject to the same resource protection conditions included in the Development Plan and Coastal Development Permit.

Response 5.12

The commenter states that the document is inadequate and an embarrassment to the City. This comment is noted.

December 3, 2015

Draft Mitigated Negative Declaration

PRC 421 Access Road Repair and Maintenance

To: Ann Wells and Councilmember's

Comments from: Ingeborg Cox MD, MPH

The report states that the PRC 421 access road is comprised of dirt and gravel: three inches of base gravel over compacted fill material.

According to the Final EIR of PRC 421, under geological resources it states that the access road, seawall and revetment may have been constructed on beach sand and may consist of fill soils of **unknown origin**. Has a Geotechnical Engineer been consulted in the meantime and has a more thorough testing of the road bed been done? 6.1

The final EIR mentions that the Monterey Formation in this area is considered to be geologically unstable and has the potential for slope failure or landslide. Has this been taken into consideration? On page 42 it states that "the project would not create any risks to life" but if you have a slope failure or landslide during repair work wouldn't the workers be at risk? 6.2

Why are the residences at "The Bluffs" and the "HideAway" not mentioned, and why is Ellwood School not considered? On page 59 of the report it states: "There is no housing..... around the project site." 6.3
Also there should be more analysis of the impact on the Bell Canyon ESHA which has been designated a riparian ESHA by Coastal Commission staff ecologist Dr. Jonna Engel. Bell Canyon Creek is also the home of some status species like the red legged frog and tidewater goby. The ESHAs near PRC 421 need more detail and not just mentioned. 6.4

It states on page 40 that the road fill is stabilized by rock on the seaward side. This riprap seawall is in poor condition in many spots along the access road with at least two areas without any boulders. In some places there is no bulkhead apparent. Also there is no mention of the existing 6-inch pipeline that, according to Figure 2-8 presented in the PRC 421 EIR, is located in the upper third of the access road. 6.5

On page four it states that displaced riprap will be relocated using heavy equipment. There is no mention what equipment will be used and what will be the weight of the large boulders when repairing the riprap wall. 6.6 This road extends approximately 1,300 feet, according to the EIR. Can the road withstand the weight? What will happen to the 6- inch pipe line? 6.7

When repairing a road like this isn't that considered ground-disturbing activity? Cannot erosion occur? On page 51 it states "Because the project would not involve extensive ground disturbance on 1 or more acres, it is not required to have an NPDES permit for storm water runoff." 6.8

In the report's figure 2b page 8, a circle is shown depicting the potential vehicle impacted area. This area appears to be in the beach. On page 9 it states "No activities would take place on the beach". Please explain how will this be accomplished? 6.9

Letter 6

COMMENTER: Ingeborg Cox, MD, MPH

DATE: December 3, 2015

Response 6.1

The commenter questions whether a geotechnical engineer has been consulted regarding the composition of the access road and has more thorough testing of the road been done. A geotechnical engineer has not been consulted regarding the proposed repair and maintenance project. Please note that the project is only for repair and maintenance of the existing road; any major repair projects, beyond the scope of the current project, would require additional review and may require input from a geotechnical engineer. The road base is ¾ inch aggregate, which is a standard road base used for roads in the City of Goleta and Santa Barbara County.

Response 6.2

The commenter questions whether the unstable Monterey Formation in this area has been taken into consideration and why this would not create any risks of life to workers during repair and maintenance activities on the road. It has been noted that the bluff on the north side of the road has been periodically sluffing off onto the road. The material will be removed as needed and its removal has not been a risk of safety or of life for maintenance workers in the past.

Response 6.3

The commenter asks why residences at the "Bluffs" and "Hideaway" housing developments, and Ellwood School, are not mentioned or considered in Section XIII, Population and Housing, in the draft IS-MND. These housing developments have been added to the Existing Setting subsection of the Population and Housing section of the MND and the Ellwood School has been added to the Existing Setting subsection of the Public Services Section of the Final MND. Although these land uses are within one half mile of the proposed project site, they will not be impacted by periodic minor repair and maintenance activities related to access road, which is located south of the Sandpiper Golf Course, below the existing coastal bluff adjacent to the shoreline.

Response 6.4

The commenter states that there should be more analysis of the impact on the Bell Canyon environmentally sensitive habitat (ESHA). A condition of approval has been included in the City's Development Plan and Coastal Development Permit that will require that a qualified biologist conduct pre-construction surveys for special status species and nesting birds protected under the Migratory Bird Treaty Act and California Fish and Wildlife Code Section 3503 (monarch butterflies, California red-legged frog, Western Snowy Plovers, white-tailed kites, and tidewater goby) within ESHA in Bell Canyon as well as other portions of the project area, a minimum of 30-days prior to the occurrence of any future repair and maintenance activities. If monarch butterfly aggregations are detected, a 100-foot buffer, as measured from the outer

extent of the tree canopy will be established and no construction activities will be allowed within the buffer area. If nesting birds are observed, avoidance measures to ensure that nests are not disturbed until after young have fledged. If other listed species are encountered, consultation with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) will be required.

Response 6.5

The commenter raises concerns about the poor condition of "many spots" in the rip-rap seawall along the access road. No work is proposed on the seaward revetment, except for replacement of existing rock as needed. No rocks will be placed seaward of the existing rip-rap in this area.

Response 6.6

The commenter questions why there is no mention of an existing 6-inch pipeline according to Figure 2-8 in the PRC 421 EIR. The existing pipeline is not currently in use and will not be impacted by proposed repair and maintenance activities as no excavation is proposed and no significant additional weight will be added on top of the pipeline.

Response 6.7

The commenter requests further information regarding how displaced rip-rap will be relocated using heavy equipment as stated on page 4 of the IS-MND. Additionally, the commenter questions the weight of the rip-rap and the effect of repair and maintenance activities on the access road and 6-inch pipe. An excavator working from the access road will be used to move and replace large rocks landward of the existing wall, as needed. As stated in Response No. 6.5, no rocks will be placed seaward of the existing rip-rap. Rocks are used to support and protect the road and no additional weight will be added to the access road.

Response 6.8

The commenter asks whether "ground-disturbing" activities such as repair and maintenance of the access road resulting in erosion and the possible need for a National Pollutant Discharge Elimination System (NPDES) permit. The access road repair and maintenance project will not involve extensive ground disturbance on one or more acres and an NPDES Permit for stormwater runoff will not be required.

Response 6.9

The commenter states that Figure 2b on page 8, depicts a vehicle impact area that appears to show impacts on the beach due to the nature of the circle within the figure. The diagram on Figure 2b represents the maximum turning radius of equipment on the road needed to access the wells on the piers should service be needed in the future. All vehicular activities would occur on the access road and not on the beach.

State of California • Natural Resources Agency
Department of Conservation
Division of Oil, Gas, and Geothermal Resources – District 3
195 South Broadway • Suite 101
Orcutt, CA 93455
(805) 937-7246 • FAX (805) 937-0673

Edmund G. Brown Jr., *Governor*

November 22, 2015

Ms. Imgrund, Advance Planning Contract Planner
Via Email – himgrund@cityofgoleta.org

Dear Ms. Imgrund:

PRC 421 ACCESS ROAD MAINTENANCE AND REPAIR
DRAFT MITIGATED NEGATIVE DECLARATION
CASE NO. 15-004-DP AND 15-003-CDP

The Division of Oil, Gas, and Geothermal Resources (Division) is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and abandonment of oil and gas wells. This is for the purposes of preventing: 1) damage to life, health, property, and natural resources; 2) damage to underground and surface waters suitable for irrigation or domestic use; 3) loss of oil, gas, or reservoir energy; and 4) damage to oil and gas deposits by infiltration of water and other causes. In addition, the Division is mandated by California Code of Regulations (CCR) Title 14 Division 2, Chapter 4, Subchapter 1.1 Section 1740 to govern the drilling, redrilling, production, maintenance, and plugging and abandonment of offshore oil and gas wells in accordance with the provisions of Division 3 of the Public Resources Code. 7.1

Under the PRC Section 3237(a)(3)(F) wells are deemed deserted if an operator fails to maintain access to the wells. The proposed road work ensures that the operator has the ability to maintain access to the two wells serviced by this road, and to move to the well locations any typical equipment should well work become necessary. 7.2

Thank you for the opportunity to comment on the PRC 421 Access Road Maintenance and Repair Draft Mitigated Negative Declaration.

Sincerely,

Patricia A. Abel
Deputy – Coastal District

cc: CEQA Unit

Letter 7

COMMENTER: Patricia A. Abel, Deputy – Coastal District, State of California, Natural Resources Agency, Department of Conservation, Division of Oil, Gas, and Geothermal Resources – District 3

DATE: November 22, 2015

Response 7.1

The commenter writes that the Division of Oil, Gas, and Geothermal Resources (Division) is mandated by Section 3106 of the Public Resources Code (PRC) to supervise drilling, operation, maintenance, and abandonment of oil and gas wells for the purposes of: (1) preventing damage to life, health, property and natural resources, (2) damage to underground and surface waters suitable for irrigation or domestic use, (3) loss of oil, gas, or reservoir energy, and (4) damage to oil and gas deposits by infiltration of water and other causes. Additionally, the Division governs the drilling, re-drilling, production, maintenance and plugging and abandonment of offshore oil and gas wells. The various duties of the Division are noted as being relevant to regulation of the PRC 421 wells and the subject access road.

Response 7.2

The commenter states that under PRC Section 3237(a)(3)(F) wells are deemed deserted if an operator fails to maintain access to the wells and that the proposed road work ensures that the operator has the ability to maintain access to the two wells serviced by this road. The purpose of the access road repair and maintenance project is to allow the 421-1 and 421-2 piers and wells to be maintained in their current condition.

From: Anne Wells
Sent: Tuesday, December 15, 2015 11:43 AM
To: Jerry Hittleman
Cc: Jasch Janowicz; Andy Newkirk
Subject: FW: PRC 421 Access Road Maintenance and Repair Project (2016-CPA-0049)

We need to respond

From: Thogerson, Collette [mailto:collette_thogerson@fws.gov]
Sent: Tuesday, December 15, 2015 11:24 AM
To: Anne Wells
Subject: PRC 421 Access Road Maintenance and Repair Project (2016-CPA-0049)

PRC 421 Access Road Maintenance and Repair Project

To: Anne Wells, Advance Planner Manager, City of Goleta - awells@cityofgoleta.org

We are concerned that the PRC 421 Access Road Maintenance and Repair Project in the City of Goleta may negatively impact several threatened and endangered species. Two listed species are likely to exist within or near the project area: the threatened California red-legged frog (*Rana draytonii*) and endangered tidewater goby (*Eucyclogobius newberryi*). We recommend that you conduct surveys prior to issuance of the requested permits to ensure that project activities will not directly or indirectly affect these species. If you have any questions, please contact me. Please include the following reference number in any correspondence: 2016-CPA-0049 8.1

Sincerely,

Collette Thogerson

Collette M. Thogerson, Ph.D.
Assistant Field Supervisor
South Coast Division
U.S. Fish and Wildlife Service
2493 Portola Road, Suite B
Ventura, CA 93003
PHONE: 805/644-1766 ext 345
collette_thogerson@fws.gov

Letter 8

COMMENTER: Collette M. Thogerson, Ph.D., Assistant Field Supervisor, South Coast Division, U.S. Fish and Wildlife Service

DATE: December 15, 2015

Response 8.1

The U.S. Fish and Wildlife Service (USFWS) communicated that the PRC 421 Access Road Maintenance and Repair project may negatively impact several threatened and endangered species such as the threatened California red-legged frog and endangered tidewater goby. The USFWS recommends surveys for these species prior to issuance of any grading or road work permits to ensure that there will be no direct or indirect impacts to these species. As stated in Response No. 6.4 above, a condition of approval has been included in the City's Development Plan and Coastal Development Permit that will require that a qualified biologist conduct pre-construction surveys for special status species and nesting birds protected under the Migratory Bird Treaty Act and California Fish and Wildlife Code Section 3503 (monarch butterflies, California red-legged frog, Western Snowy Plovers, white-tailed kites, and tidewater goby) within ESHA in Bell Canyon as well as other portions of the project area, a minimum of 30-days prior to the occurrence of any future repair and maintenance activities. If monarch butterfly aggregations are detected, a 100-foot buffer, as measured from the outer extent of the tree canopy will be established and no construction activities will be allowed within the buffer area. If nesting birds are observed, avoidance measures to ensure that nests are not disturbed until after young have fledged. If other listed species are encountered, consultation with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) will be required.