City of Carpinteria
Special City Council Meeting Agenda
Tuesday, July 15, 2025
Council Chamber, 5775 Carpinteria Avenue, Carpinteria, CA 93013

5:30 p.m. Special Meeting
In-Person and Virtual Participation Options

Attendance/Viewing Options:

- Attend the in-person meeting in City Council Chambers at City Hall (5775 Carpinteria Ave.).
- View the meeting live through the City's website (https://carpinteriaca.gov/city-hall/agendas-meetings/).
- View the meeting on Government Access Television Channel 21 (broadcast live and rebroadcast on the Wednesday and the Saturday following the meeting at 8:00 p.m. and 5:00 p.m., respectively).
- Call 669-900-9128 (and enter Webinar ID 849 5178 9727) to listen to the meeting.
- Join the City's Zoom webinar by CLICKING HERE. Alternatively, you can join the Zoom webinar by logging on to www.zoom.us, downloading the application, selecting "Join Meeting", and entering Webinar ID 849 5178 9727.
- Spanish interpretation will be available at the in-person meeting and through the City's Zoom webinar.

Public Comments

- Provide a live public comment in City Council Chambers at City Hall (5775 Carpinteria Ave.).
- Provide a live comment through the City's Zoom webinar platform (through the link provided above). To make public comments through this platform please use the "raise your hand" feature to notify staff that you would like to make a public comment during designated public comment times. Once it is your turn to provide a public comment, staff will unmute your microphone and you will be given a designated amount of time to provide your comment. At the end of your comment, staff will once again mute your microphone.
- Submit a written comment (as either a general public comment or on a specific agenda item) to be distributed to Council Members by **12:00 P.M. on the day of the meeting** by either submitting your comment via (1) email to PublicComment@carpinteriaca.gov, or (2) the **eComment** link on the City's agenda website available at https://carpinteriaca.gov/city-hall/agendas-meetings/. Please reference the agenda item to which your comment pertains. Although written comments become part of the record, they will not be read aloud at the meeting.

Please note that the City will make every effort to make the meeting accessible virtually; however, if one of the above virtual attendance/viewing or public comment options is unavailable due to technological issues, you are invited to take advantage of one of the other participation options outlined above (including attending and providing public comment in-person in the City Council Chambers). Additional options may be made available at the meeting.

Levine Act Warning

Applicants and their agents before the City Council are subject to the campaign disclosure provisions detailed in Government Code Section 84308. No City Council Member may accept, solicit, or direct a contribution of more than $500 from any party for 12 months following the date a final decision is rendered by the City. No City Council Member may accept, solicit, or direct any contribution from an agent of the party during the same time frame. This prohibition commences when an item involving the entitlement has been placed on the City Council's agenda for a public meeting, when the City Council Members knows the action is within the City Council's jurisdiction and it is reasonably foreseeable that it will come before the City Council as a decisionmaker, or when the proceeding is before the City Council for its decision. A party to a City proceeding —which includes both applicants and agents—shall disclose on the record of the proceeding any contribution of more than $500 made to any Council Member by the applicant, or any donations made by the agent, during the preceding 12 months. No party to a City proceeding, or agent, shall make a contribution to a Council Member during the proceeding and for 12 months following the date a final decision is rendered by the City. Prior to rendering a decision on a City proceeding, any Council Member who received contribution of more than $500 within the preceding 12 months from any party, or who received any donations from an agent, to a proceeding shall disclose that fact on the record of the proceeding, and shall be disqualified from participating in the proceeding. However, if any Council Member receives a contribution that otherwise would require disqualification, and returns the contribution within 30 days of knowing about the contribution and the relevant proceeding, the Council Member shall be permitted to participate in the proceeding. If you believe that these provisions apply to you or a Council Member, please inform the City Clerk at the earliest possible opportunity. Failure to do so may affect the City's ability to process your application.

CALL TO ORDER

ROLL CALL

PLEDGE OF ALLEGIANCE

PUBLIC COMMENT WILL ONLY BE HEARD CONCERNING THE AGENDIZED ITEM BELOW

PUBLIC HEARING:

1. Consideration of an appeal (filed by Frank Arredondo on May 15, 2025) of the Planning Commission's decision to accept and certify an Environmental Impact Report (EIR), select the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" as the preferred Project, and approve the Development Plan and Coastal Development Permit (21-2128-DP/CDP) for the proposed Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation project (collectively, "Planning Commission Action").

   Recommendation: Consider the filed appeal at a public hearing and adopt Resolution No. 6415 (Attachment A) thereby denying the appeal, and upholding the Planning Commission's Action.

   Staff Presenter: Nick Bobroff, Community Development Director

   a. Ex-parte Communication Disclosures
   b. Staff Report
   c. City Council Questions
   d. Open Public Hearing
      a. Applicant/Appellant
      b. Public
      c. Applicant/Appellant Response
   e. Close Public Hearing
   f. City Council Deliberation
   g. City Council Determination – Announce Motion and Vote

ADJOURNMENT

The next regular City Council meeting will be held July 28, 2025 at 5:30 p.m.

In compliance with the Americans with Disabilities Act, if you need assistance to participate in this meeting, please contact the City Clerk's Office at (805) 755-4403 or the California Relay Service at (866) 735-2929. Notification two business days prior to the meeting will enable the City to make reasonable arrangements for accessibility to this meeting.

Materials related to an agenda item submitted to the City Council after distribution of the agenda packet are available for public review at the City Clerk's Office, located at 5775 Carpinteria Avenue, Carpinteria, CA 93013 or by going to the City's website at https://carpinteriaca.gov/city-hall/agendas-meetings/.

This agenda was posted on Thursday, July 10, 2025, in the City Clerk's Office, on the City Hall Public Notices Board, and on the Internet.

Agenda Section: Public Hearing
Agenda Item No.: 1
City Council Meeting Date: July 15, 2025

City of Carpinteria

COUNCIL AGENDA STAFF REPORT
July 15, 2025

ITEM FOR COUNCIL CONSIDERATION

Consideration of an appeal (filed by Frank Arredondo on May 15, 2025) of the Planning Commission's decision to accept and certify an Environmental Impact Report (EIR), select the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" as the preferred Project, and approve the Development Plan and Coastal Development Permit (21-2128-DP/CDP) for the proposed Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation project (collectively, "Planning Commission Action").

STAFF RECOMMENDATION

Consider the filed appeal at a public hearing and adopt Resolution No. 6415 (Attachment A) thereby denying the appeal, and upholding the Planning Commission's Action.

Sample Motion: I move to adopt Resolution No. 6415 to deny the appeal, accept and certify the EIR, select the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" as the preferred Project, and approve the Development Plan and Coastal Development Permit (21-2128-DP/CDP) for the Chevron Carpinteria Oil and Gas Facility Decommissioning Project.

BACKGROUND

The Carpinteria Oil and Gas Processing Facility (Facility) is located in the City of Carpinteria, and is accessed from Dump Road off Carpinteria Avenue. The Facility encompasses several parcels totaling approximately 55 acres. The project site encompasses both the Facility and portions of the Tar Pits Park and City-owned submerged tidelands that are crossed by pipelines and other utilities that feed into the Facility.

Oil and gas processing equipment was initially constructed onsite in the 1950s to support production from the offshore Summerland field developed by the Standard, Humble, and Summerland State joint venture. Oil and gas first flowed through the Site in 1959 after the commissioning of offshore Platform Hazel. Produced gas that flowed to the Site from Platform Hazel, and later other offshore platforms, was processed onsite and then sold

to Southern California Gas Company via the Sales Gas Area (pipes, valves, meters, and equipment), which was also constructed in the late 1950s.

The Facility consisted of offices; production pipelines from offshore platforms; and a connected system of product separation, processing, and storage facilities. Processed natural gas from the Facility was fed into the SoCalGas network. Processed crude oil and natural gasoline were blended and shipped from the Facility by way of pipeline to Ventura, where it was piped to refineries in the Los Angeles area. Historically, refined products and crude oil were also transferred from the Facility via marine tanker. However, the marine terminal, formerly accessed by an offshore mooring, is no longer operational.

From 1960 to 1989, the Facility received oil and gas from Platform Hazel as well as several other offshore platforms constructed in the Santa Barbara Channel, including Hilda, Hope, and Heidi, and Gail and Grace. Upgrades and additions to the Facility were completed to accommodate the varied quality of the additional oil and gas volume. Abandonment of the wells and decommissioning/removal of offshore Platforms Hazel, Hilda, Hope, and Heidi from the Santa Barbara Channel were completed in 1996. The Applicant sold its Santa Barbara Channel assets to Venoco, Inc. in 1998. Platform Grace ceased operations in 1998 and Platform Gail in 2017. Chevron purchased the property as part of Venoco bankruptcy proceedings and is the operator of record and applicant for the decommissioning Project.

Project Description Summary

The project proposes to demolish and remove the Facility including, but not limited to, the onshore portions of the Facility (Onshore Facility), and State Waters Offshore Pipelines, and complete remediation of impacted soils and groundwater at the Facility (collectively, the Project). Remediation is proposed to comply with levels established in a Remedial Action Plan (RAP) that will be reviewed by the Santa Barbara County Public Health Department, Environmental Health Services (SBCEHS), Regional Water Quality Control Board (RWQCB), and United States Environmental Protection Agency (U.S. EPA). The Project proposal assumes the most stringent clean up levels for the purpose of determining soil excavation and truck trip estimates and therefore a maximum amount of remediation activities (e.g., truck trips, Site activities). The Applicant states remediation efforts will be performed along with preservation of existing Site resources, including mature trees and bluffs, and in coordination with Site constraints including buffer zones adjacent to the Union Pacific Railroad (UPRR) right-of-way (ROW). The most stringent clean up levels would also result in greater flexibility for future development on the Site meeting the most rigorous standards (e.g., unrestricted land use).

Decommissioning and remediation of the Facility will include the following activities:

Onshore Facility

- Idling and removal of all existing surface and subsurface equipment, piping, and structures within the Facility;

- Removal of concrete foundations, asphalt, oil spray, and road base within the Facility;
- Excavation/remediation of any impacted soils underlying the Facility in accordance with the Facility's Remedial Action Plan (RAP) and RAP Addendums, and appropriate regulatory guidance (once approved);
- Recycling/disposal of all materials removed from the Site; and
- Restoration of portions of the Site in accordance with the Site Restoration Plan (once approved).

Beach Crossing and State Waters Offshore Pipelines

- Pig and flush State Waters Offshore Pipelines in preparation for removal;
- Removal of State Waters Offshore Pipeline segments out to 3-nmi state waters limit;
- Removal of nearshore beach crossing pipeline segments;
- Recycling/disposal of all materials removed from the Site; and
- Onshore restoration in accordance with the Site Restoration Plan (once approved).

The Site includes the Facility, as well as the State Waters Offshore Pipelines and utilities leading into the Site from state waters, as further described below. Within the onshore portion of the Site, a number of operational areas/plant areas have been identified that contain idle structures, vessels, and piping proposed for demolition and remediation. The state waters offshore portion of the Site contains two primary pipeline and utility bundles that come to shore and lead into the Onshore Facility. Proposed activities within each area are listed below.

Onshore Facilities and Proposed Activities

- Main Plant Area (MPA) – Surface and subsurface facilities demolition, and soil remediation;
- Chevron Pipeline Area (CPA) – Surface and subsurface facilities demolition, and soil remediation;
- Former Marketing Terminal Area (FMTA) – Surface facilities demolition and soil remediation;
- Former Nursery Area (FNA) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels;
- Shop and Maintenance Area – Surface and subsurface facilities demolition and soil remediation;
- Marine Spill Response Corporation (MSRC) Lease Area – Surface facilities demolition and soil remediation;
- Peninsula Area – Soil remediation in coordination with SoCalGas facility demolition and City of Carpinteria skate park development;
- Buffer Zone Area (BZA)/Drainage Area No. 4 (DA4) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels; and

- Gravel Portion of Pier Parking Lot/FSBA – Surface and subsurface facilities demolition, and soil remediation/subsurface pipeline removal/abandonment in place.

State Waters Offshore Pipelines and Proposed Activities

- Platform Gail and Grace Pipeline Bundle and 10-inch Oil Pipeline – Removal from top of bluff to 3-nautical miles (nmi) state waters limit; and
- Marketing and Marine Terminal Pipeline Bundles – Removal offshore through top of bluff. Onshore pipelines will be abandoned in-place.

The Project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City is the Lead Agency with principal responsibility for considering the Project for approval (14 California Code of Regulations [CCR] (CEQA Guidelines) 15000 et seq.).

A more complete Project Description is included in Section 2, Project Description, of the Final EIR included as Attachment G to this Report.

Environmental Impact Report Summary

Pursuant to CEQA, the City is acting as the lead agency in accordance with CEQA Guidelines[1] Sections 15050-15051 and is responsible for preparing the environmental document for the Project. The purpose of the CEQA analysis is to determine whether the proposed project may have significant effects on the environment, to identify possible mitigation measures to reduce the severity of any significant effects, and to disclose the findings of this analysis to the public and decision makers. The prepared EIR for the City Council's consideration provides the factual basis for finding that the project will not have a significant effect on the environment with the inclusion of the identified mitigation measures.

The Final EIR identified Class I (e.g., significant, unavoidable) impacts associated with the project in the following categories: *Biological Resources, Hazardous Materials & Risk of Upset, and Hydrology & Water Resources*. The report identified Class II impacts (e.g., significant, but feasibly mitigated) in the following categories: *Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Climate Change & Greenhouse Gas Emissions, Hazardous Materials & Risk of Upset, Noise & Vibration, and Tribal Cultural Resources*. With the incorporation of identified mitigation measures, all of these impacts would be reduced to a less than significant level. Class III (less than significant) impacts were also identified for *Aesthetics, Air Quality, Biological Resources, Geology and Soils, Hazardous Materials & Risk of Upset, Hydrology and Water Resources, Land Use & Planning, Noise & Vibration, Transportation & Circulation, and Other*.

[1] References to the CEQA Guidelines in this Staff Report and attachments refer to Sections 15000 et seq of Title 14 of the California Code of Regulations.

In addition to disclosing the potential environmental effects of the Project, the EIR also evaluated three potential project alternatives which were identified as potentially meeting all or most project objectives to determine if any of these alternatives could further reduce the significance of identified potentially significant environmental effects. The three evaluated project alternatives were:

- **Alternative 1.** "No Project" Alternative, which would maintain the existing conditions;

- **Alternative 2.** "Full Removal of Facilities" Alternative, which would decommission all oil and gas facilities within the property and all related offshore facilities that can be addressed including plugging and abandonment of the seven wells that exist within the Site; removal and remediation of naturally occurring petroleum hydrocarbons; and removal of former Platforms Hazel and Hilda pipeline bundle; and

- **Alternative 3.** "Proposed Project Plus Hilda and Hazel Pipeline Removal" Alternative, which is a revised version of the Full Removal of Facilities Alternative (Alternative 2), but does not include removal and remediation of naturally occurring hydrocarbon seeps, plugging and abandonment of seven existing wells within the Site, or removal of the former Platforms Hazel and Hilda pipeline bundle further from shore, beyond a depth of 30 feet of water.

Alternative 3, "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative," was identified in the EIR as the environmentally superior alternative. It would achieve the basic objectives of the Project by accomplishing the components of the original Proposed Project. In addition, removing the former Platforms Hazel and Hilda pipeline bundle through the bluffs would prevent future erosion and avoid the pipelines becoming a burden on the public if removal is necessary in the future, as noted by the California Coastal Commission. (California Coastal Commission letter, 1/31/2024).

The Executive Summary of the Final EIR and a link to the full Final EIR are provided as part of Attachment G.

Planning Commission Action

On May 5, 2025, the Planning Commission held a public hearing to consider acceptance and certification of the EIR for the Project, approval of the Development Plan and Coastal Development Permit for onshore oil and gas facilities removals and remediation, and approval of Facility Decommissioning Plan within City Deeded Tidelands and Issuance of a Lease Quit Claim. As noted above, a copy of the Planning Commission staff report and attachments are included with this report as Attachment B.[2]

[2] Please see the Planning Commission staff report (Attachment B) for a detailed project description, accounting of the project's permit review history up to Planning Commission review, and zoning/policy

At the May 5th hearing, the Planning Commission received public comment on the project which predominately focused on two main issues: (1) Potential impacts of decommissioning activities on the harbor seal haulout and rookery; and (2) The alleged issues with the EIR's Cultural Resources analysis that are raised in this Appeal. This second issue is the subject of this appeal and will be addressed in more detail in the Discussion section of this staff report.

With regards to the potential harbor seal impacts, the public expressed concerns about the EIR's proposed plan for monitoring the seals and the potential disturbances from having humans and construction equipment in close proximity to the haulout/rookery. At the hearing, City staff clarified that the seal mitigation measures would be implemented during any project activities within 1,000' of the seal haul out area, and that the monitoring plan mandates coordination with Carpinteria Seal Watch, local volunteers trained in monitoring the harbor seals. Staff also explained the limited extent of truck trips nearby the rookery. Finally, staff referred interested persons to EIR Appendix C-6, which contains a preliminary draft version of the Harbor Seal Rookery Monitoring and Protection Plan (HSRMPP). The contents of the HSRMPP must still be reviewed and approved by the various regulatory agencies with authority over the harbor seals, including but not limited to, the California Coastal Commission and the City. Nevertheless, the HSRMPP provides additional details on the types of potential impacts to seals that could occur and the minimization efforts implemented by the project to avoid or reduce those impacts. Importantly, several of the concerns explicitly raised by public commenters are addressed in the draft HSRMPP, including required coordination with National Marine Fisheries Service staff and with Carpinteria Seal Watch. Importantly, the final contents of the HSRMPP are subject to City review and approval, and the City can require revisions or additional measures needed. Through this existing review authority, the City can ensure the project is as protective of the harbor seals as is reasonably feasible while allowing the necessary project activities to be completed.

Ultimately, the Planning Commission voted 4-0-1 (Chair Allen abstained due to conflict of interest arising out of the proximity of his home to the Site) to accept and certify the project EIR, selecting the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" (Alternative 3) as the preferred project, and to approve the Development Plan and Coastal Development Permit (#21-2128-DP/CDP), as presented. A copy of the Planning Commission Action Letter and adopted Resolution are included with this report as Attachment C. Minutes from the May 5, 2025 Planning Commission hearing were not available as of the publication date of this report, however, a video recording of the hearing is archived and available for viewing on the City's website.[3] Public comment letters submitted to the Planning Commission are included as Attachment D to this report.

consistency analysis. Attachments to the Planning Commission staff report include both the Draft and Proposed Final EIRs.

[3] The May 5, 2025 Planning Commission agenda and staff report, and a video recording of the hearing are archived on the City website and available for viewing at: https://carpinteriaca.gov/city-hall/agendas-meetings/

The Planning Commission's decision to certify the EIR and approve the project was subject to a 10-calendar day appeal period. Prior to the end of the 10-calendar day appeal period, on May 15th, Frank Arredondo filed an appeal with the City Clerk. A copy of the appeal is included as Attachment E to this report.

City Council Appeal Process

CMC section 14.78.040 provides that the decisions of the Planning Commission may be appealed to the City Council by persons or entities that appeared, either in person or in writing before the Planning Commission, or by an "aggrieved person" as that term is defined in CMC section 14.08. The appellant must state specifically in the appeal wherein the decision of the Planning Commission is not in accord with the purposes of the City's Zoning Code, or wherein it is claimed that there was an error of discretion by the Planning Commission. (CMC § 14.78.040(3).)

A copy of the Planning Commission report, and all attachments, is to be provided to the Council. The Council's consideration of any appeal is considered de novo, which means that the Council may consider all aspects of the project and is not limited to consideration of only the grounds stated in the appeal(s).

Pursuant to CMC section 14.78.040(5), because this Project is subject to the Coastal Appeals ("CA") Overlay district and is appealable to the California Coastal Commission ("CCC"), the City Council must consider the appeal(s) at a public hearing, and approve, conditionally approve, or deny the appeal(s). Approving or conditionally approving the appeal results in a reversal or modification of the Planning Commission's decision to accept and certify the Proposed Final EIR and to approve the project. Whereas, denying the appeal affirms the Planning Commission's decision to accept and certify the Proposed Final EIR as having: (1) adequately and accurately described and disclosed all potential project impacts; (2) satisfactorily reduced all identified potentially significant environmental effects to less than significant levels through the implementation of appropriate mitigation measures; and (3) satisfied the procedural and statutory requirements of CEQA; along with the approval of the Development Plan and Coastal Development Permit for the project. In the event the Council were to act to approve or conditionally approve the appeal in order to reject or modify the EIR, the Council would need to also select the preferred project from amongst the proposed project or project alternatives. Alternatively, the City Council can deny the appeal and affirm the Planning Commission's selection of a preferred project.

Notice of the time and place of said hearing shall be given at least ten (10) calendar days before the hearing. Consistent with this requirement, the City noticed the public hearing for the City Council to consider the appeal on July 3, 2025 through: (1) publication in the Coastal View News; (2) mailed notice to property owners within 300 feet and occupants within 100 feet of the project location; and (3) direct email correspondence to interested parties.

DISCUSSION

Summary Analysis of Appeals

The City Clerk received one appeal of the Planning Commission's decision. The appeal raised the following two issues:

1. **Misidentification of Procedure as Mitigation Measure.** The appellant argues that the cultural resources mitigation measures included within the Final EIR are required procedures and thus mischaracterized as mitigation. According to the appellant, these mitigation measures are more accurately characterized as parts of the CEQA monitoring and reporting process. Therefore, it would be incorrect to credit the EIR with a mitigation measure that is already procedurally required. Mr. Arredondo claims this is an error in discretion.

2. **Identification of Organizations for Native American Monitoring Work.** The appellant argues that the Final EIR requires that all cultural resource monitors be members of a federally recognized Santa Ynez Chumash tribe. Mr. Arredondo continues on in the appeal to argue that it is inappropriate for the Final EIR to include details about who will conduct a specific job within a proposed project. Instead, the lead agency should approve work through other authorizations separate from the CEQA process. Mr. Arredondo claims this is also an error in discretion.

Below are staff's responses to each of the appeal arguments described above.

Appeal Issue No. 1: Misidentification of Procedure as Mitigation Measure

Pursuant to the CEQA Guidelines, "public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature." (14 CCR § 15126.4(b)(3).) If, however, the project will result in potentially significant impacts, CEQA requires that an EIR "describe feasible measures which could minimize significant adverse impacts." (14 CCR § 15126.4(a)(1).)

The decommissioning project's Final EIR lists mitigation measures for minimizing the impact to archaeological sites under Cul.1(a)-(f) and Cul.2(a)-(b). The appeal does not specify which mitigation measures are misidentified. However, in Mr. Arredondo's May 5, 2025, comment letter to the Planning Commission, he asserts that ten of the eleven elements of the Cultural Resources Management Plan (CRMP), Cul.1a, are required procedures and not mitigation measures. (Attachment E.) The letter makes the same claim for at least six other measures. (*Id*.)

However, compliance with regulatory standards and requirements can properly be classified as mitigation. Numerous courts have upheld compliance with regulatory standards as adequate mitigation measures. (*Oakland Heritage Alliance v. City of*

Oakland (2011) 195 CA4th 884, 906; *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 CA5th 814, 860; *Leonoff v. Monterey County Bd. of Supervisors* (1990) 222 CA3d 1337, 1355.) In *Oakland Heritage Alliance*, for instance, the First District Court of Appeal explained that "a condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance." (*Oakland Heritage Alliance,* at p. 906). In the appeal, Mr. Arredondo has not offered any evidence to suggest that it would be unreasonable to expect compliance from Chevron or any other party. Therefore, the cultural resources mitigation measures satisfy CEQA requirements, and the Planning Commission did not commit an error of discretion.

Additionally, it is the City's pattern and practice to include regulatory measures as mitigation when they would reduce an identified impact, as doing so helps to ensure the measures are complied with. Even within other sections of the EIR, the City includes compliance with regulatory requirements as mitigation. For instance, measure Bio.1a provides that "[p]rior to commencement of any construction or decommissioning activities, the Applicant shall obtain compliance with the USFWS, NOAA Fisheries, and CDFW for components of the Project that have the potential to directly or indirectly impact federal or state-listed terrestrial or marine plant and animal species in the form of take permits/authorizations or written documentation from the USFWS, NOAA Fisheries, and CDFW that the proposed Project would not result in take of these species, or would not otherwise adversely affect these species." Accordingly, categorizing the cultural resource monitoring requirements as mitigation is consistent with the City's past pattern and practices and with the rest of the EIR.

In his May 5th letter, Mr. Arredondo also appears to argue that these measures do not qualify as mitigation measures because they are not designed to ensure "preservation in place" or "data recovery" as required in CEQA Guidelines Sections 15126.4(b)(3). However, the EIR does include measures aimed at "preservation in place" and "data recovery." The Cultural Resources mitigation measures are a suite of measures that are intended to work together to address potential impacts to cultural resources. For instance, Cul.1a includes specifications for the CRMP to document procedures to "ensure avoidance or minimization of impacts to cultural resources." Each of the elements set forth in Cul.1a, as well as measures Cul.1b and Cul.1c, are necessary elements for preservation and data recovery—e.g., monitoring and creation of maps to determine where resources may exist, procedures for halting work to avoid impacts to resources, worker training to ensure preservation and data recovery procedures are correctly implemented, etc. Mitigation measure Cul.1d provides for an exclusion zone to ensure that, to the extent feasible, cultural resources will be preserved in place. Similarly, Mitigation measure Cul.1e calls for data recovery of CA-SBA-6, the relevant archaeological site, prior to ground disturbance. Accordingly, these measures all work together to address and reduce the potential for significant effects to cultural resources. The procedural/regulatory requirements (e.g., monitoring, creation of maps, establishment of procedures, etc.) work hand-in-hand with the avoidance/exclusion measures (e.g., establishment of exclusion zones, requirements for halting work, etc.).

Accordingly, the measures set forth in the EIR are properly characterized as mitigation measures and the EIR "considered and discussed" measures to preserve resources and engage in data recovery as required by the CEQA Guidelines.

Finally, it is worth noting that Mr. Arredondo does not allege that the project will result in a significant and unavoidable impact. Additionally, the appeal does not include any recommendations for mitigation measures to reduce the potential impacts to cultural resources.

Appeal Issue No. 2: Identification of Organizations for Native American Monitoring Work

As Mr. Arredondo correctly identifies, the purpose of an EIR is to identify the significant effects of a project on the environment, identify potential alternatives, and indicate ways to mitigate significant effects. (Pub. Resources Code § 21001.1.) However, Mr. Arredondo misstates the final EIR when he claims that the report specifies that only the Sanya Ynez Chumash will perform the cultural monitoring work. Instead, mitigation measure Cul.1c states that "the monitoring shall be conducted under the supervision of a County-approved archaeologist and a Native American representative with minimum [professional quality standards] set forth by the [Secretary of the Interior]." This broad language does not designate any Tribe to perform the monitoring work.

Instead, Mr. Arredondo cites a request from a Tribe made during the Assembly Bill (AB) 52 consultation process. AB 52 requires public agencies to consult with Tribes to identify concerns within the CEQA process. (Assembly Bill No. 52 (2013-2014 Reg. Sess.)) During the AB 52 consultation for this project, one Tribe requested "the entire Project to be monitored by Chumash Tribal representatives." (Final EIR p. 4.12-2.) The final EIR contains this language to document the request, not to mandate a mitigation measure. As noted above, the mitigation measure is written broadly and does not indicate that any specific Tribe will perform the work. Mr. Arredondo also points to this language as a source of potential cronyism, nepotism, or affinity bias in selecting the representative. However, these allegations are unfounded as the final EIR sets no limitations on selecting the Native American representative.

In addition, the CRMP, which is being shared with the consent of the Advising Tribes[4] requires only that "Chevron shall also retain a Tribal Monitor that is an authorized representative of each of the Advising Tribes to monitor all ground disturbance in Project excavation areas." (Attachment F, Chevron Response to Appeal.) Similar to mitigation measure Cul.1c, the excerpt sets forth broad standards—requiring only that the representative be authorized by one of the Advising Tribes. Additionally, contrary to Mr. Arredondo's claims, the EIR and CRMP do not contain a requirement that the authorized monitor be a member of one of the Advising Tribes. Thus, the cultural monitor can be freely chosen outside of the CEQA process.

[4] The Advising Tribes include the Santa Ynez Band of Chumash Indians, the Coastal Band of the Chumash Nation, Barbareño/Ventureño Band of Mission Indians, and Barbareño Band of Chumash Indians.

For the reasons explained above, staff believes the filed appeal does not demonstrate that the decision of the Planning Commission was not in accord with the purposes of the City's Zoning Code or that there was an error of discretion by the Planning Commission. (CMC § 14.78.040(3).) Therefore, staff recommends the Council deny the appeal, thereby upholding the Planning Commission's Action.

OPTIONS

The Council can:

- Decide to deny the appeal, thereby affirming the Planning Commission's Action (staff's recommendation); or
- Decide to approve the appeal, thereby overturning the Planning Commission's Action; or
- Decide to conditionally approve the appeal, thereby modifying the Planning Commission's Action.

ATTACHMENTS

Attachment A: Resolution No. 6415
- Exhibit 1: Findings for Project Approval
- Exhibit 2: Proposed Plans
- Exhibit 3: Recommended Conditions of Approval

Attachment B: May 5, 2025 Planning Commission Staff Report and Attachments

Attachment C: Planning Commission Action Letter and Adopted Resolution

Attachment D: Public Comment Letters submitted to Planning Commission

Attachment E: Appeal Filed by Frank Arredondo

Attachment F: Chevron Response to Appeal

Attachment G: Final Environmental Impact Report (EIR)

Staff contact: Nick Bobroff, Director
Community Development Department
(805) 755-4407 / nickb@carpinteriaca.gov



Signature

Reviewed by: Michael Ramirez, City Manager
(805) 755-4400 / michaelr@carpinteriaca.gov



Signature

Attachment A.

City Council Resolution No. 6415

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

RESOLUTION NO. 6415

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CARPINTERIA, DENYING AN APPEAL (FILED BY FRANK ARREDONDO, DATED MAY 15, 2025), AND UPHOLDING THE CITY OF CARPINTERIA PLANNING COMMISSION'S DECISION TO APPROVE PROJECT 21-2128-DP/CDP (APPLICATION FILED OCTOBER 25, 2021 BY CHEVRON WEST COAST DECOMMISSIONING PROGRAM, APPLICANT) FOR A DEVELOPMENT PLAN AND COASTAL DEVELOPMENT PERMIT TO ALLOW FOR ONSHORE OIL AND GAS FACILITIES DECOMMISSIONING AND REMEDIATION; APPROVAL OF A FACILITY DECOMMISSIONING PLAN WITHIN CITY-DEEDED TIDELANDS AND ISSUANCE OF A LEASE QUIT CLAIM; AND APPROVAL AND CERTIFICATION OF AN ENVIRONMENTAL IMPACT REPORT (EIR) (STATE CLEARINGHOUSE NO. 2022080026) PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA). THE PROJECT APPLICATION INVOLVES APNs 001-170-003, 004, 014, 020, 021, 022, 023, ADDRESSED AS 5619, 5663, 5675 AND 5731 CARPINTERIA AVENUE, CARPINTERIA, CALIFORNIA 93013.

WHEREAS, the Planning Commission of the City of Carpinteria considered an application for a Development Plan and Coastal Development Permit filed by Chevron West Coast Decommissioning Program on October 25, 2021; and

WHEREAS, the application was subsequently deemed complete and accepted by the City as being consistent with the applicable submittal requirements on March 8, 2022; and

WHEREAS, the Planning Commission conducted a noticed public hearing on May 5, 2025, and received evidence regarding the application for the Development Plan and Coastal Development Permit; and

WHEREAS, in accordance with the California Environmental Quality Act, an Environmental Impact Report (EIR) dated April 2025 has been prepared for the project and has been noticed and subject to public review as required under CEQA; and

WHEREAS, the Planning Commission reviewed the policies of the General Plan/Coastal Plan and the Zoning Code standards that are relevant to the project; and

WHEREAS, the Planning Commission adopted Resolution No. PC-25-001, thereby having adopted and certified the Final Environmental Impact Report dated April 2025 prepared for the project, as amended (tables 5.2 and ES.3), as having satisfied the procedural and statutory requirements of the California Environmental Quality Act

(CEQA); and approved the Development Plan and Coastal Development Permit for the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative Project; and

WHEREAS, the Planning Commission Action was subject to a 10-calendar day local appeal period, commencing on May 6, 2025 and concluding on May 15, 2025 at 5:00 p.m.; and

WHEREAS, prior to the close of the appeal period, a timely appeal was filed by Frank Arredondo, dated May 15, 2025, alleging that there was an error of discretion by the Planning Commission; and

WHEREAS, the appeal was considered at a duly noticed public hearing held before the Carpinteria City Council to consider the appeal; and

WHEREAS, all Planning Commission staff report materials, including but not limited to, a statement of findings setting forth the reasons for the Planning Commission's decision were transmitted to the City Council; and

WHEREAS, the Carpinteria City Council reviewed and considered all pertinent staff reports, materials, and evidence before them, including all public comments; and

WHEREAS, the Carpinteria City Council reviewed and considered the Final Environmental Impact Report (FEIR), dated April 2025, prepared for the project pursuant to CEQA.

NOW, THEREFORE, BE IT RESOLVED as follows:

SECTION 1. The above recitals are true and correct, and incorporated herein by reference.

SECTION 2. The Carpinteria City Council hereby resolves that the appeal filed by Frank Arredondo is denied, thereby upholding the Planning Commission Action to certify the Environmental Impact Report prepared for the project (as amended); select the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative Project; and approve the Development Plan and Coastal Development Permit for the Project.

SECTION 3. The Environmental Impact Report (EIR) dated April 2025 prepared for the Project, as amended (tables 5.2 and ES.3), has been reviewed by the City, reflects the City's independent judgment and analysis, and is certified as having satisfied the procedural and statutory requirements of the California Environmental Quality Act (CEQA).

SECTION 4. The Development Plan/Coastal Development Permit is approved for the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative Project making the findings outlined in Exhibit 1.

SECTION 5. The Development Plan and Coastal Development Permit is approved for the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative Project consistent with the plans shown in Exhibit 2 and subject to the project conditions of approval set forth in Exhibit 3.

PASSED, APPROVED AND ADOPTED on the 15th day of July, 2025, by the following vote:

AYES: COUNCILMEMBER(S):

NOES: COUNCILMEMBER(S):

ABSENT: COUNCILMEMBER(S):

ABSTAIN: COUNCILMEMBER(S):

_____
Mayor, City of Carpinteria

ATTEST:

_____
Brian C. Barrett, CMC, CPMC
City Clerk, City of Carpinteria

I hereby certify that the foregoing resolution was adopted at a special meeting of the City Council of the City of Carpinteria held on July 15, 2025.

_____
Brian C. Barrett, CMC, CPMC
City Clerk, City of Carpinteria

APPROVED AS TO FORM:

_____
Jena Shoaf Acos, on behalf of Brownstein
Hyatt Farber Schreck, LLP acting as
City Attorney of the City of Carpinteria

Attachment A.

City Council Resolution No. 6415

Exhibit 1. Findings for Project Approval

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

EXHIBIT 1: FINDINGS FOR APPROVAL

CITY COUNCIL SPECIAL MEETING
PROJECT NO. 21-2128-DP/CDP
JULY 15, 2025

Chevron Carpinteria Oil and Gas Decommissioning Project

FINDINGS PURSUANT TO GOVERNMENT CODE, LOCAL COASTAL PLAN, GENERAL PLAN, AND TITLE 14 OF THE CARPINTERIA MUNICIPAL CODE

1.0 Administrative Findings

The City Council hereby incorporates by reference as though set forth in full all Community Development Department staff reports and attachments thereto presented to the Planning Commission and City Council, and all comments made or received either orally or in writing at the public hearings on this project and the associated Environmental Impact Report.

1.1 Procedures

Pursuant to the California Coastal Act, the Administrative Regulations of the California Coastal Commission and the City of Carpinteria's ("City") Local Coastal Program, it has been found that the process for public review of the subject Local Coastal Development Permit has been properly conducted as follows:

a. An application for a Development Plan and Coastal Development Permit was submitted on October 25, 2021, and deemed complete and accepted by the City as being consistent with the applicable submittal requirements on March 8, 2022. Said application and all related material have been available for public review at City offices since the date of submittal.

b. The application has been evaluated and found to conform to the applicable zone districts and to be consistent with the City's Coastal Land Use Plan, the Interpretive Guidelines of the California Coastal Commission and the California Coastal Act.

c. The project has been reviewed by the City's Planning Commission at a duly noticed public hearing which included, but is not limited to, mailed notice to all property owners within 300 feet of the subject property and residents within 100 feet of the property, publication in the local newspaper, the Coastal View News, and notification sent via email to interested persons.

d. The project has been reviewed by the City's City Council at a duly noticed public hearing which included, but is not limited to, mailed notice to all property owners within 300 feet of the subject property and residents within 100 feet of the property, publication in the local newspaper, the Coastal View News, and notification sent via email to interested persons.

2.0 California Environmental Quality Act

2.1 Introduction

The City Council for the City of Carpinteria (City) considers and relies on the Final Environmental Impact Report (EIR; State Clearinghouse Number 022080025) for the Chevron Carpinteria Oil and Gas Decommissioning Project in determining whether to carry out the project. The Final EIR consists of the Draft EIR, responses to comments on the Draft EIR, a list of persons and agencies commenting on the Draft EIR, a Mitigation Monitoring and Reporting Program, and technical appendices. The City has received, reviewed, considered, and relied on the information contained in the Final EIR, as well as information provided at hearings and submissions of testimony from official participating agencies, the public, and other agencies and organizations. Furthermore, the Final EIR reflects the lead agency's independent judgment and analysis.

Section 15091 of the State California Environmental Quality Act (CEQA) Guidelines (14 California Code of Regulations [CCR]) and Section 21081 of the Public Resources Code (PRC) require a lead agency to adopt findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must find that:

- *Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;*
- *Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or*
- *Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.*

Title 14 CCR Section 15091(b) requires that the City's findings be supported by substantial evidence in the record. Accordingly, the lead agency's record consists of, but is not limited to the following, which are located at the City of Carpinteria Community Development Department, Carpinteria, California:

- *Documentary and oral evidence, testimony and staff comments and responses*

received and reviewed by the Lead Agency during public review and the public hearings on the Chevron Carpinteria Oil and Gas Decommissioning Project.

- *The Chevron Carpinteria Oil and Gas Decommissioning Project Final Environmental Impact Report (April 2025).*

In addition to making a finding for each significant impact, if the lead agency approves a project without mitigating all of the significant impacts, it must prepare a statement of overriding considerations, in which it balances the benefits of the project against the unavoidable environmental risks. The statement of overriding considerations must explain the social, economic, or other reasons for approving the project despite its environmental impacts (14 CCR 15093, PRC 21081).

2.2 Procedures

This document contains the findings and statement of overriding considerations for the approval of the Project and expressly reflects the City's independent review and judgment (refer to Section 9). This document incorporates by reference the Final EIR. The City Council hereby incorporates by reference as though set forth in full all Community Development Department staff reports and attachments thereto presented to the Planning Commission and City Council, and all comments made or received either orally or in writing at the public hearings on this project.

The EIR, Project, and other portions of the administrative record constitute the record of proceedings in compliance with PRC Section 21081.6(a)(2) and State CEQA Guidelines Section 15091(e) and are available for review at:

City of Carpinteria, Community Development Department
5775 Carpinteria Avenue
Carpinteria, California 93013
Contact: Nick Bobroff

Having received, reviewed and considered the foregoing information, as well as any and all information in the record, the City Council of the City of Carpinteria hereby makes these Findings pursuant to, and in accordance with, PRC Section 21081.

The Final EIR was prepared in compliance with CEQA and State CEQA Guidelines. In accordance with Section 15121 of the State CEQA Guidelines, the purpose of the Final EIR is to serve as an informational document for the public and City decision makers. The Final EIR contains a project-level environmental review that fulfills the requirement of a project-level EIR. As defined in State CEQA Guidelines Section 15161, a project-level EIR:

…examines the environmental impacts of a specific development project. This type

of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.

On August 1, 2022, the City, as the Lead Agency, issued a Notice of Preparation (NOP) to inform the general public and agencies that an EIR would be prepared for the Project and to solicit comments on environmental issues to be addressed in the document. The public scoping comment period was extended by 30 days and closed on September 30, 2022. Comments received in response to the NOP were used to further refine the scope of the analysis and the technical studies in this EIR. Written comments received in response to the NOP are provided in Appendix D with an indication of specific EIR sections where topics related to individual comments are addressed.

The NOP was also submitted to the California Office of Planning and Research (State Clearinghouse) to officially solicit participation in determining the scope of the EIR. Information requested and input provided during the NOP comment period regarding the scope of the EIR are included in the EIR.

The City of Carpinteria issued a Draft EIR on November 30, 2023. The public comment period on the Draft EIR ran through January 31, 2024. The City of Carpinteria held a public comment meeting on December 18, 2023.

The public comments received on the Draft EIR were reviewed and responded to as required by CEQA and the CEQA Guidelines. This Final EIR has been prepared, incorporating all of the comments received, written responses to received comments, and the Draft EIR, along with any changes to the Draft EIR that resulted from the comments received.

The document and the Notice of Completion (NOC) were distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A Notice of Availability (NOA) was distributed to agencies, community stakeholders, and individuals. The NOA informed them of where they could view the document and how to comment. An electronic copy of the document was also posted online, and hard copies were made available by request. The NOA was filed with the County Clerk.

Responses to each written and verbal comment that the City received during the comment period on the Draft EIR are included in the Responses to Comments section of the Final EIR. The Draft EIR and Responses to Comments collectively comprise the Final EIR for the project.

The EIR has been reviewed by the City's Planning Commission at a duly noticed public hearing which included, but is not limited to, mailed notice to all property owners within 300 feet of the subject property, residents within 100 feet of the property and publication in the local newspaper, the Coastal View.

The EIR has been reviewed by the City Council at a duly noticed public hearing which included, but is not limited to, mailed notice to all property owners within 300 feet of the subject property, residents within 100 feet of the property and publication in the local newspaper, the Coastal View.

2.3 California Environmental Quality Act Findings

1. The Final EIR dated April 2025 was presented to the City Council and all voting members of the City Council have reviewed and considered the EIR prior to approving this project. The EIR reflects the independent judgment of the City Council and is adequate for this proposed project.

2. The City Council finds and certifies that the Final EIR dated April, 2025 constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA. The City Council further finds and certifies that the Final EIR has been completed in compliance with CEQA.

3. The documents and other materials which constitute the record of proceeding upon which this decision is based are in the custody of the City Clerk located at 5775 Carpinteria Ave, Carpinteria, CA.

4. Findings That Certain Impacts Are Less Than Significant. (see discussion below)

The City determined, based upon the threshold criteria for significance, the environmental analysis presented in the Final EIR, and the comments received by the public on the Draft EIR, no substantial evidence was submitted to or identified by the City which indicated that the project would have a significant impact on the following environmental areas. For details on the specific impacts, please see the respective Final EIR sections.

LESS THAN SIGNIFICANT (CLASS III) ENVIRONMENTAL EFFECTS OF THE PROJECT

Issue Area and Impact	Impact Number	Description	Project Impact Class	Location in Final EIR
Aesthetics	AE.1	Scenic Vistas	III	Final EIR Section 4.1
	AE.2	Scenic Resources	III	
	AE.3	Visual Quality and Character	III	
Air Quality	AQ.1	Standards	III	Final EIR Section 4.2
	AQ.3	Toxic Air Emissions	III	
Biological Resources	BIO.4	Movement of Wildlife	III	Final EIR Section 4.3

LESS THAN SIGNIFICANT (CLASS III) ENVIRONMENTAL EFFECTS OF THE PROJECT

Issue Area and Impact	Impact Number	Description	Project Impact Class	Location in Final EIR
	BIO.6	Conservation Plan Conflicts	III	
Geology and Soils	GEO.1	Earthquake Fault	III	Final EIR Section 4.5
	GEO.5	Expansive Soils	III	
	GEO.6	Septic Tanks	III	
Hazards and Hazardous Materials	HAZ.3	Hazards Proximate to Schools	III	Final EIR Section 4.7
	HAZ.4	Site Contamination	III	
	HAZ.5	Proximity to Airport	III	
	HAZ.6	Impair Emergency Response	III	
Hydrology and Water Quality	WR.2	Groundwater Supply	III	Final EIR Section 4.8
	WR.3	Drainage Patterns	III	
	WR.4	Pollutants	III	
	WR.5	Control Plans	III	
Land Use and Planning	LUP.1	Divide a Community	III	Final EIR Section 4.9
	LUP.2	Policy Conflict	III	
Noise	N.1	12-Hour CNEL	III	Final EIR Section 4.10
	N.3	Vibration	III	
	N.4	Airport Noise Conflicts	III	
	REC.2	Rec Facilities	III	
Transportation	T.1	Policy Conflicts	III	Final EIR Section 4.11
	T.2	VMT	III	
	T.3	Traffic Hazards	III	
	T.4	Emergency Access	III	
Other	All	Ag, Energy, Mineral, Housing, Public Services, Recreation, Utilities, Wildfire	III	Final EIR Section 4.13
			III	

5. Findings that Certain Impacts are Mitigated to Insignificance by Conditions of Approval. (See discussion below)

Class II impacts are significant but can be mitigated to a level of insignificance by measures identified in the EIR. When approving a project with Class II impacts, the decision-makers must make findings that changes or alterations to the project have been incorporated that reduce the impacts to a less than significant level.

This section presents the project's significant environmental impacts and feasible mitigation measures. State CEQA Guidelines Section 15091 (14 CCR) and PRC Section 21081 require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must make the following Finding:

1. Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
3. Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

Each of these findings must be supported by substantial evidence in the administrative record. The City determined and makes the finding, based upon the environmental analysis presented in the Final EIR and the comments received by the public on the Draft EIR, that the following impacts can be fully avoided or reduced to a less-than-significant level through the incorporation of feasible mitigation measures into the project, as identified in the Final EIR. For each of these identified impacts, changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR. For details on the specific impacts, please see the respective Final EIR sections.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Aesthetics	A.4	Night Lighting	II	A.4: Beach/Nearshore Night Lighting Minimization	Final EIR Section 4.1	The Project would create a temporary new source of substantial light or glare which would adversely affect day or nighttime views in the area. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure A.4 which requires that light be shielded and directed inward. By adhering to these measures, the night lighting impacts would be reduced to a less than significant level.
Air Quality	AQ.2	Odors	II	AQ.2: Odor control and Purging Plan	Final EIR Section 4.2	The Project may result in potentially significant odor emission impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure AQ.2 which requires use of degassing systems and other odor control tactics. By adhering to these measures, the odor impacts would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Biological Resources	BIO.1	Listed Species	II	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys Bio.1d: Fencing Bio.1e: Worker Education & Awareness Plan Bio.1f: Marine Wildlife Contingency & Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring & Protection Bio.1h: Wildlife Relocation Monitoring	Final EIR Section 4.3	The Project may result in potentially significant impacts to special status species. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.1(a)-(h) which implement various measures including retaining qualified biologists, adopting management plans, utilizing constructive boundaries, and providing awareness programs. By adhering to these measures, the impacts to these species would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	BIO.2	ESHA	II	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance		The Project could have a potentially significant impact on riparian habitat as a result of the temporary decommissioning activities. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.2(a)-(c) which implement various measures including avoiding impact areas, onsite mitigation, and preparation of a pre-decommissioning survey. By adhering to these measures, the impacts to these riparian areas would be reduced to a less than significant level.
	BIO.3	Wetlands	II	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Requirements Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Program		The Project could have a potentially significant impact on protected wetlands as a result of the temporary decommissioning activities. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.3(a)-(c) which implement various measures including permit compliance, preparation of a coastal wetlands mitigation and monitoring plan, and preparation of a pre-decommissioning survey. By adhering to these measures, the impacts to these wetlands would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	BIO.5	Policy Conflicts	II	Bio.5: Tree Removal Mitigation		The Project could have a potentially significant impact due to the removal of 62 non-native trees. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.5 which requires trees be replaced. By implementing this requirement, the impacts to these riparian areas would be reduced to a less than significant level.
Cultural and Tribal Cultural Resources	CUL.1	Known Resource CA-SBA-6	II	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials	Final EIR Section 4.4	The Project could have a potentially significant impact on archaeological resources due to grading and excavation work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a)-(f) which implement various measures including implementation of an awareness plan, cultural resource monitoring, avoidance of exclusion zones, curation of project materials, and preparation of a resource management plan. By adhering to these measures, the impacts to these archaeological resources would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	CUL.2	Human Remains	II	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery		The Project could potentially disturb human remains due to grading and excavation work. To mitigate against this potentially significant impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.2(a) and (b) which require the applicant to retain an on-call forensic anthropologist and follow specified procedures if human remains are discovered. By adhering to these measures, these impacts would be reduced to a less than significant level.
Geology and Soils	GEO.2	Erosion	II	Geo.2: Erosion Control Best Management Practices	Final EIR Section 4.5	The Project could result in substantial soil erosion due to the removal of contaminated soil. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.2 which requires that erosion control best management practices be followed. By adhering to these measures, this impact would be reduced to a less than significant level.
	GEO.3	Sedimentation	II	Geo.2: Erosion Control Best Management Practices		The Project could result in potentially significant siltation impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.2 which requires that erosion control best management practices be followed. By adhering to these measures, this impact would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	GEO.4	Unstable Bluffs	II	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removal Geo.4c: Bluff Stabilization Following Pipeline Removal		The Project's proposal to remove pipelines located in Carpinteria Bluffs could result in potentially significant erosion impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.4(a)-(c) which require that adoption of a stabilization plan, adherence to various measures to stabilize the bluff during pipeline removal, and adherence to various measures to stabilize the bluff following pipeline removal. By adhering to these measures, this erosion impact would be reduced to a less than significant level.
	GEO.7	Paleontological/Geologic Feature	II	Measures Cul.1a-f		The Project could have a potentially significant impact on paleontological resources due to grading and excavation work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a)-(f) which implement various measures including implementation of an awareness plan, cultural resource monitoring, avoidance of exclusion zones, curation of project materials, and preparation of a resource management plan. By adhering to these measures, the impacts to these resources would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Climate Change and GHG	GHG.1	GHG Emissions	II	GHG.1: GHG Emissions Reductions	Final EIR Section 4.6	The Project could have a potentially significant greenhouse gas emissions associated with the decommissioning activities. To mitigate against these impacts, changes or alterations have been required for the Project—specifically mitigation measure GHG.1 which requires reductions and/or offsets for emissions and preparation of a GHG reduction and reporting plan to track and enforce these. By adhering to these measures, these impacts would be reduced to a less than significant level.
	GHG.2	Plans	II	GHG.1: GHG Emissions Reductions		The Project could result in an exceedance of County GHG emission thresholds and thus conflict with an applicable plan regulating emissions. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure GHG.1 which requires reductions and/or offsets for emissions and preparation of a GHG reduction and reporting plan to track and enforce these. By adhering to these measures, this impact would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Hazards and Hazardous Materials	HAZ.1	Routine Operations	II	Haz.1: Contaminated Soil Handling	Final EIR Section 4.7	The Project could have a potentially significant impact associated with handling of contaminated soils. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.1 which requires preparation of and adherence to a contaminated soil handling management plan. By adhering to these measures, these impacts would be reduced to a less than significant level.
	HAZ.7	Wildland Fires	II	HAZ.7: Fire Response Planning		The Project could have a potentially significant impact associated with fire risk during the demolition or remediation phase of the Project. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.7 which requires implementation of various fire response planning measures including hydrant access, water inventories, availability of response equipment and equipment requirements. By adhering to these measures, these impacts would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Noise	N.2	Hourly Average Ambient Noise	II	N.2a: Construction Noise Control Measures N.2b: Nighttime Activities	Final EIR Section 4.10	The Project could have a potentially significant noise impact associated with temporary noise from decommissioning activities. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measures N.2(a) and (b) which require implementation of construction noise reduction measures such as installation of noise barriers, and prohibition of nighttime onshore activities. By adhering to these measures, these noise impacts would be reduced to a less than significant level.
Tribal Cultural Resources	TCR.1	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b	Final EIR Section 4.12	The Project could have a potentially significant impact on tribal-cultural resources due to decommissioning work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a) and (b) described above. By adhering to these measures, the impacts to these tribal-cultural resources would be reduced to a less than significant level.
	TCR.2	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b		The Project could have a potentially significant impact on tribal-cultural resources due to decommissioning work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a) and (b) described above. By adhering to these measures, the impacts to these tribal-cultural resources would be reduced to a less than significant level.

6. Findings that Certain Unavoidable Impacts are Mitigated to the Maximum Extent Feasible. (See discussion below).

Class I impacts are significant and unavoidable. To approve a project resulting in Class I impacts, the CEQA Guidelines require decision makers to make findings of overriding consideration that "...specific legal, technological, economic, social, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR...".

This section presents the project's significant environmental impacts and feasible mitigation measures. State CEQA Guidelines Section 15091 (14 CCR) and PRC Section 21081 require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must find that:

1. Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
3. Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

Each of these findings must be supported by substantial evidence in the administrative record. This section identifies impacts that can be reduced, but not to a less-than-significant level, through the incorporation of feasible mitigation measures into the project, and which therefore, remain significant and unavoidable, as identified in the Final EIR. Where adoption of feasible mitigation measures is not effective in avoiding an impact or reducing it to a less than significant level, the feasibility of adopting alternatives to the project is considered below. For details on the specific impacts, please see the respective Final EIR sections.

Significant and unavoidable Class I impacts would occur related to biological resources, hazardous materials and risk of upset, and hydrology and water resources.

SIGNIFICANT UNAVOIDABLE (CLASS I) ENVIRONMENTAL EFFECTS OF THE PROJECT FOR WHICH SUFFICIENT MITIGATION IS NOT AVAILABLE

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Findings Analysis
Biological Resources	BIO.7	Accidental Oil Spills	I	Bio.7: Oil Spill Contingency Plan	Final EIR Section 4.3	The Project could have a potentially significant impact on biological resources if an accidental oil spill were to occur. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Bio.7 was adopted which requires preparation of an oil spill contingency plan that includes, among other things, measures to minimize impacts to special status species and riparian habitat. Even with adherence to these measures, the potential impacts to these riparian areas would remain significant and unavoidable.
Hazardous Materials & Risk of Upset	HAZ.2	Accidental Releases	I	Haz.2a: Spill Response Planning Haz.2b: Asbestos and Lead Planning	Final EIR Section 4.7	The Project could have a potentially significant impact associated with accidental release of hazardous materials. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.2(a) and (b) which require various measures to address spill response planning and asbestos and lead exposure minimization planning. Even with adherence to these measures, these impacts would remain significant and unavoidable.
Hydrology & Water Resources	WR.1	Surface Water Quality Standards	I	WR.1: Stormwater Pollution Prevention Plan	Final EIR Section 4.8	The Project could have a potentially significant impact to water quality associated with accidental release of petroleum hydrocarbons into marine water. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure WR.1 which requires preparation of and adherence to a stormwater pollution prevention plan. Even with adherence to these measures, these impacts would remain significant and unavoidable.

7. Findings Regarding Significant Irreversible Environmental Changes and Findings Regarding Growth-Inducing Impacts. (See discussion below)

State CEQA Guidelines §15126.2(c) requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Such significant irreversible environmental changes may include the following:

- *Use of non-renewable resources during the initial and continued phases of the project that would be irreversible because a large commitment of such resources makes removal or non-use unlikely;*
- *Primary impacts and, particularly secondary impacts (such as highway improvement that provides access to a previously inaccessible area) that generally commit future generations to similar uses; or*
- *Irreversible damage which may result from environmental accidents associated with the project.*

As discussed in Section 6 of the Final EIR, there are no significant irreversible environmental changes/effects.

State CEQA Guidelines Section 15126.2(d) requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth. Generally speaking, a project may be considered growth inducing if it results in one or more of the five conditions identified below:

1. *Induces population growth;*
2. *Induces economic expansion;*
3. *Establishes a precedent setting action (e.g., an innovation, a radical change in zoning or general plan designation);*
4. *Results in development or encroachment in an isolated or adjacent area of open space (i.e., being distinct from "infill" development); or*
5. *Removes an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).*

As per Section 6 of the Final EIR, there are no growth inducing impacts associated with the Project.

8. Findings that Identified Project Mitigations/Alternatives are not Feasible. (See discussion below).

Because the project will result in significant and unavoidable environmental impacts as identified above, the City must consider the feasibility of any environmentally superior

alternatives to the project, as proposed. The City must evaluate whether one or more of these alternatives could substantially lessen or avoid the unavoidable significant environmental effects.

Specifically, where significant impacts are identified, State CEQA Guidelines Section 15126.6(a) requires EIRs to consider and discuss alternatives to the proposed actions:

> (a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

State CEQA Guidelines Section 15126.6(b) states the purpose of the alternatives analysis:

> (b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

State CEQA Guidelines Section 15126.6(c) describes the selection process for a range of reasonable alternatives:

> (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant

environmental impacts.

The range of alternatives required is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

As such, the environmental superiority and feasibility of each alternative to the project is considered in this section. Specifically, this section evaluates the effectiveness of these alternatives in reducing the significant and unavoidable impacts of the project.

As required by State CEQA Guidelines Section 15126.6(c), the selection of alternatives for this EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The following alternatives were considered but eliminated from further analysis by the City due to one or more of these factors:

- Removal of Offshore Facilities only Alternative;
- Removal of Onshore Facilities only Alternative; and
- Limitations on Trucking Destinations Alternative.

The following alternatives were carried forward for in depth analysis:

- No Project Alternative;
- Full Removal of Facilities Alternative

In addition, in response to comments made on the Draft EIR, an additional alternative, the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative, has been added to the Final EIR and is found to be the environmentally preferred alternative. The analysis for each alternative is provided below.

No Project Alternative

CEQA requires an evaluation of the No Project Alternative so that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project.

According to CEQA Guidelines §15126.6(3)(B), for a development project the No Project Alternative is the circumstances under which the Project does not proceed. If disapproval of the Project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed. CEQA defines the “no project” as:

[W]hat would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services (15126.6).

Under the No Project Alternative, the Project as proposed would not occur and the Applicant would not conduct the Site demolition and remediation activities proposed by the Project. The CPF would remain at the Site in a shut-down status and facilities would not be decommissioned. This would include onshore facilities, and offshore pipelines. It should be noted that remediation activities may still be required to proceed since the U.S. EPA and SBCEHS would likely continue to require that these facilities be cleaned up of contaminated materials and appropriately remediated. However, without the removal of above-ground equipment and tanks, it would be difficult to fully access all areas targeted for excavation and remediation.

Ability to Achieve Project Objectives: This Alternative would fail to meet all project objectives.

Feasibility: This alternative may not be feasible because there are regulatory requirements for clean up of the site which may be difficult to obtain if the infrastructure is not removed as under the Project.

Finding: As the removal of the contaminated soil would be a regulatory requirement, and leaving the aboveground infrastructure would make this difficult and potentially infeasible, this alternative would not achieve most of the Project objectives related to removing aboveground facilities and subsequently achieving soil remediation.

Full Removal of Facilities Alternative

The Project as proposed by the Applicant excludes a number of facilities that are not slated for decommissioning for a variety of reasons described below. Under this

alternative all oil and gas facilities within the property and all related offshore facilities that can be addressed would be fully decommissioned. Those facilities would include the plugging and abandonment of the seven wells that exist within the Project Site; removal and remediation of naturally occurring petroleum hydrocarbons which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area; and removal of former Platforms Hazel and Hilda pipeline bundle, which include two, 8-inch diameter and one, 6-inch diameter abandoned pipelines that come from offshore, across the beach near the western extent of the Project area and a 36-inch diameter corrugated metal vault located at the edge of the bluffs. Plugging and abandonment of the wells has not been required by CalGEM at this point. Removal of the pipelines from Platforms Hazel and Hilda was not required by the State Lands Commission, who was the Lead Agency for the removal of the Platforms in 1997.

Ability to Achieve Project Objectives: This Alternative could meet all project objectives.

Feasibility: Comments from the Applicant and others pointed out that the hydrocarbon seeps and historic wells are not required to be intervened by any regulatory agency and are not feasible under the existing Project. The California Coastal Commission has stated that the seeps are a chronic natural occurrence that is part of the environmental setting and would not be considered an impact. The seeps, which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area, are natural environmental features resulting from geological conditions. The California Coastal Commission commented that leaving the seeps undisturbed in their natural state would not be inconsistent with the Coastal Act. (California Coastal Commission letter, 1/31/2024). Previous attempts to cement over seeps in southern California have resulted in seeps moving around the cement cap. (Chevron letter, 1/31/2024). Abandonment of the historic wells on the property that were installed and operated by others are not proposed to be affected by the Proposed Project decommissioning activities and as such, are not considered the Applicant's responsibility. The California Geologic Energy Management Division (CalGEM) advised that the property owner would be responsible for well reabandonment if the property owner proposed construction that would prevent or impede well access, but the Proposed Project is not projected to build over or impede access to the historic wells. (CalGEM letter, 2/1/2024). CalGEM has determined that there is no regulatory requirement for Chevron to plug or abandon the wells as part of the Proposed Project.

Finding: This alternative was found infeasible due to issues discussed above.

Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative

The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative consists of all the components of the Proposed Project together with removal of the onshore and

nearshore portion of the former Platforms Hazel and Hilda pipeline bundle, which was abandoned in place as approved by the State Lands Commission during the platform removal project in 1997. This alternative is a revised version of the Full Removal of Facilities Alternative described above but does not include removal and remediation of naturally occurring hydrocarbon seeps, plugging and abandonment of seven existing wells within the Project Site, or removal of the former Platforms Hazel and Hilda pipeline bundle further from shore, beyond a depth of 30 feet of water.

Ability to Achieve Project Objectives: The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would achieve the basic objectives of the Project by accomplishing the components of the original Proposed Project. In addition, removing the former Platforms Hazel and Hilda pipeline bundle through the bluffs would prevent future erosion and avoid the pipelines becoming a burden on the public if removal is necessary in the future.

Feasibility: This alternative is feasible and there are no impediments for this alternative to move forward

Finding: Although the various alternatives have similar levels of impacts, the reduction of long-term geological impacts to the bluffs from elimination of the additional pipelines under the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative results in this alternative being the environmentally superior alternative.

9. Although the approval of this project allows the occurrence of significant effects identified in the final EIR, which effects are not substantially mitigated, the benefits of the project outweigh such effects and a Statement of Overriding Considerations is adopted pursuant to Sections 15091 through 15093 of Title 14 of the California Code of Regulations, as follows:

Pursuant to CEQA Section 21081(b) and State CEQA Guidelines Section 15093, the City has balanced the benefits of the proposed project against the unavoidable adverse impacts associated with the proposed project and has adopted all feasible mitigation measures. The City has also examined alternatives and has determined that adoption and implementation of the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative, is the most desirable, feasible, and appropriate action.

The Final EIR for the project identifies the following significant and unavoidable impacts of the project:

- Bio.7. Accidental Oil Spills. This is related to the potential for oil spills to occur during the execution of the project and affecting biological resources.
- Haz.2. Accidental Releases. This is related to the potential for oil spills to occur during the execution of the project.

- WR.1. Water Quality Standards. This impact is related to the potential of an oil spill in reaching or affecting water resources.

For projects which would result in significant environmental impacts that cannot be avoided, CEQA requires that the lead agency balance the benefits of these projects against the unavoidable environmental risks in determining whether to approve the projects. If the benefits of these projects outweigh the unavoidable impacts, those impacts may be considered acceptable (State CEQA Guidelines Section 15093[a]). CEQA requires that, before adopting such projects, the public agency adopt a Statement of Overriding Considerations setting forth the reasons why the agency finds that the benefits of the project outweigh the significant environmental effects caused by the project. This statement is provided below.

Statement of Overriding Considerations. The Planning Commission has identified the following overriding economic, social, and other public benefits of the project, which are additional reasons that the significant and unavoidable impacts identified in the Final EIR can be found acceptable, and hereby adopts them as a statement of overriding considerations:

a. The Project provides for a number of short and long-term beneficial effects to the area as a result of cleaning up an old, defunct oil and gas facility and offshore appurtenances.
b. The Project involves removal of a coastal-dependent industrial facility and associated infrastructure and site restoration to natural topography and vegetation. The Project would result in additional open space, natural habitat, and coastal recreation opportunities in the Project area. The Project would remove pipelines from the Project Site, bluff area, beach, nearshore and offshore areas out to three miles. No permanent development or structures are proposed in connection with the Project.
c. Although the Project would have some short-term impacts, its long-term beneficial effects are also discussed in the Final EIR Section 5.5 and summarized below:

    - Air Quality: operational criteria pollutant emissions, toxic emissions and odors would be reduced in the long term with removal of facilities and contamination, but would occur in the short term as a result of the decommissioning activities;
    - Hazardous Materials: Due to an elimination of contaminated soils and elimination of potential sources of an oil spill in the future by removal of facilities and upset hazards hazardous materials would be reduced in the

long term but would occur in the short term related to decommissioning activities;
- Aesthetics: The Project would include aesthetic benefits by having old and dilapidated structures removed from the coastal zone.
- Biological Resources: Biological resources would be left undisturbed after the temporary impact from decommissioning activities.
- Land Use: Land Use impacts are beneficial in the long term due to the elimination of an industrial land use on the Carpinteria Bluffs.
- Geological Impacts: Geological impacts would be reduced in the long term by removing pipelines from the bluffs that could cause long term erosion, but would occur in the short term related to decommissioning activities;
- Transportation: Traffic would be reduced in the long term due to the elimination of truck trips from the facility, but would occur in the short term related to decommissioning activities;

Accordingly, the City finds that the project's adverse, unavoidable environmental impacts are outweighed by these considerable benefits.

10. Adoption of Environmental Reporting and Monitoring Program. The project description, and conditions of approval, with their corresponding permit monitoring requirements, are hereby adopted as the monitoring program for this project to ensure compliance during project implementation.

Pursuant to State CEQA Guidelines Section 15091(a)(1), the City finds that implementation of the mitigation measures specified in the Final EIR would substantially lessen the significant environmental effects resulting from the implementation of the project. These mitigation measures have been required in or incorporated into the project. In accordance with State CEQA Guidelines Sections 15091(d) and 15097, which require a public agency to adopt a program for reporting or monitoring required changes or conditions of approval to substantially lessen significant environmental effects, the Mitigation Monitoring and Reporting Program provided in the Final EIR is hereby adopted as the mitigation monitoring and reporting program for this preferred project.

3.0 Development Plan Findings

Pursuant to Carpinteria Municipal Code §14.68.030(9), prior to approving or approving with conditions a development plan, the planning commission or city council shall determine that all of the following criteria have been met:

1. *The proposed development is in conformance with the provisions of the applicable zoning district, Local Coastal Plan and implementation programs, and*

General Plan.

The Project involves removal of a defunct coastal-dependent industrial facility and associated infrastructure and site restoration to natural topography and vegetation. The Project would result in additional open space, natural habitat, and coastal recreation opportunities in the Project area. Decommissioning of inoperable oil and gas facilities and improvements is consistent with the types of uses anticipated in the coastal-dependent industrial land use designation and corresponding zone district. Expansion of open space, habitat, and public recreation opportunities on the bluffs are also generally consistent with the City's vision for the Carpinteria Bluffs area.

2. *The proposed development is sited and designed to avoid risks to life and property due to geologic, flood, or fire hazards and that the proposed density of development is consistent with these objectives.*

   The Project is a decommissioning of an existing facility and as such it cannot occur anywhere else. Compliance with required project mitigation measures and required regulatory agency permits will help to ensure decommissioning and remediation work is completed in the safest manner possible. As such, the proposed development is sited, designed and conditioned to avoid risks to life and property due to geologic, flood, or fire hazards.

3. *The proposed development will not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.*

   The Project includes the demolition of oil and gas processing equipment, tanks, pipelines, and other structures onsite, remediation of contaminated soils, and restoration with native vegetation. The Project will have some temporary impacts, and have the potential for oil spills to occur; however, the long term beneficial effects of the Project outweigh the temporary impacts by removing an industrial unsightly facility from the coastal Carpinteria bluffs. Compliance with required project mitigation measures and required regulatory agency permits will help to ensure decommissioning and remediation work is completed in a manner that is most protective of the environment and surrounding sensitive resources.

4. *The proposed development will not conflict with any recorded easements acquired by the public at large for access through the property or use of the property or any easements granted to any public agency or required as a condition of approval.*

   The proposed decommissioning Project will not conflict with any recorded easements acquired by the public at large for access through the property or use

of the property or any easements granted to any public agency. While the Project may have some impacts on public use of nearby trails, these impacts would be temporary and not significant as discussed in the FEIR. No new easements are required as a project condition of approval.

5. *The proposed development will not adversely affect necessary community services and values including but not limited to traffic circulation, sewage disposal, fire protection, water supply, and police protection.*

   The proposed Project will not adversely affect community services and values including but not limited to traffic circulation, sewage disposal, fire protection, water supply, and police protection. The Project is temporary in nature and will not result in adverse impacts to, or additional demands placed upon these community services.

6. *The proposed development will not be detrimental to the peace, health, safety, comfort, convenience, property values, or general welfare of the neighborhood.*

   The proposed Project will have some temporary effects during the decommissioning activities; however, those impacts are temporary in nature and once the project is completed, neighbors and surrounding land users will be able to enjoy the absence of a dilapidated industrial facility within the coastal bluffs. Appropriate mitigation measures developed as part of the Project EIR have been incorporated into the adopted conditions of approval, and would further the reduce the severity of these temporary impacts to the maximum extent feasible.

4.0 Coastal Development Permit Findings

Pursuant to the California Coastal Act, the Administrative Regulations of the California Coastal Commission and the City's Local Coastal Program, it has been found that the permit requested may be issued based on the following findings:

1. *The proposed development is in conformity with the City's certified Local Coastal Program.*

   The Project Site is currently designated Coastal Dependent Industry (CDI) and Recreation (REC) by the General Plan/Coastal Land Use Plan. The CDI land use category identifies areas for industrial uses that are coastal dependent, such as aquaculture and pipeline/gas processing facilities which support offshore oil industries. Under the Carpinteria Municipal Code (CMC), the Project Site is zoned to the corresponding Coastal Industry District (M-CD). The onshore Project Site is currently developed with the Carpinteria Processing Facility, open space, a former marketing terminal, and Marine Spill Response Corporation

(MSRC) yard/offices north of the Union Pacific Railroad (UPRR) right-of-way (ROW). The onshore Project area south of the UPRR ROW is currently utilized for the Casitas Pier parking lot and offshore pipeline landings/bluff crossings. The Project includes demolition of all existing structures onsite and subsurface remediation of soils. The Project Site will be backfilled, final graded, and planted with native vegetation to match existing contours. No additional structures will be constructed as part of the Project. The proposed decommissioning Project is consistent with the City's certified Local Coastal Program. The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Attachment A.

City Council Resolution No. 6415

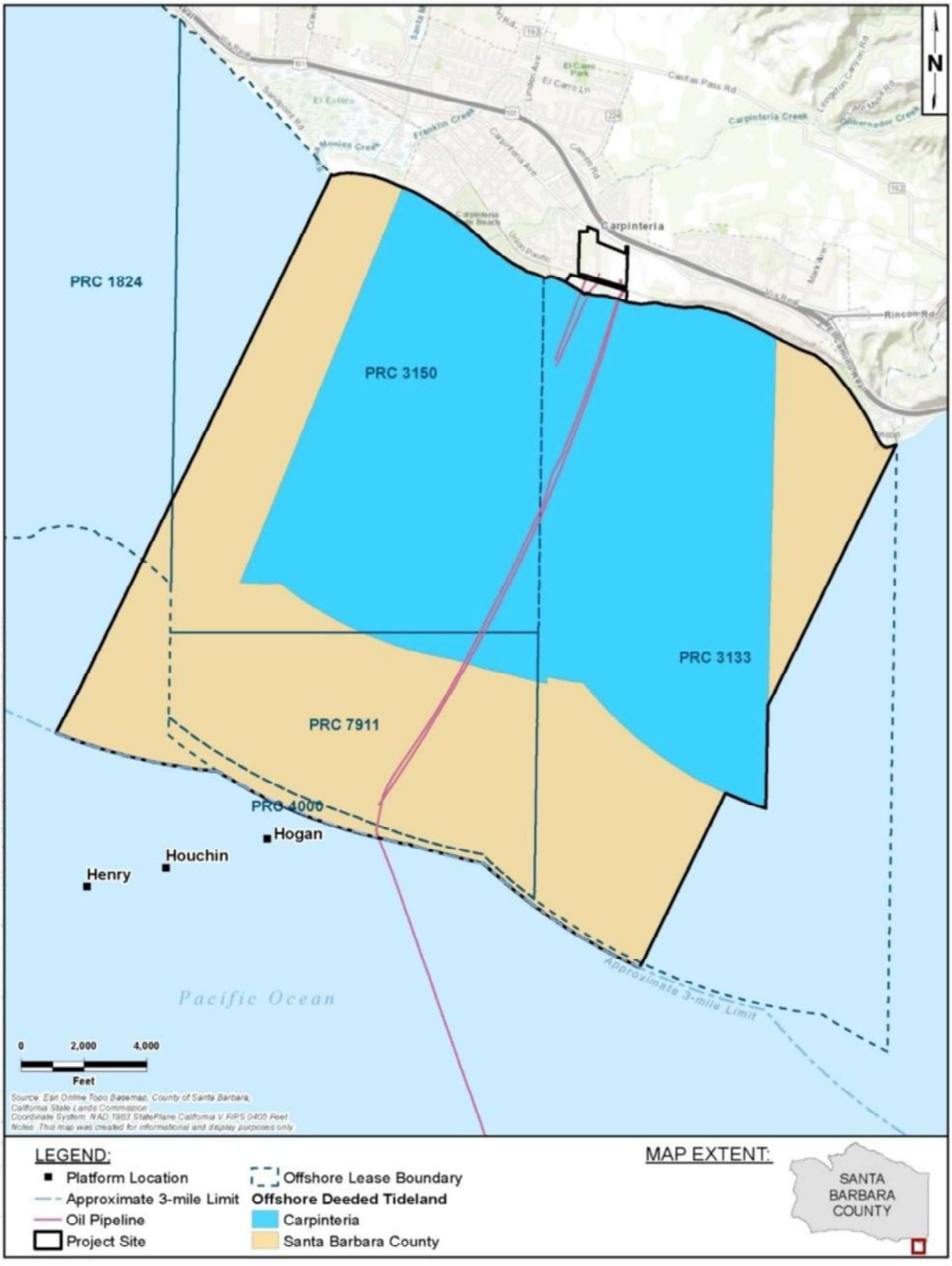
Exhibit 2. Project Figures

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

Figure 1 Project Site location Map



Source: Applicant Project Description, 2021.

Figure 2 Facility Overview



Source: Applicant Project Description, 2021.

Figure 3 **Site Area Assessor's Parcels and Land Use Zoning**



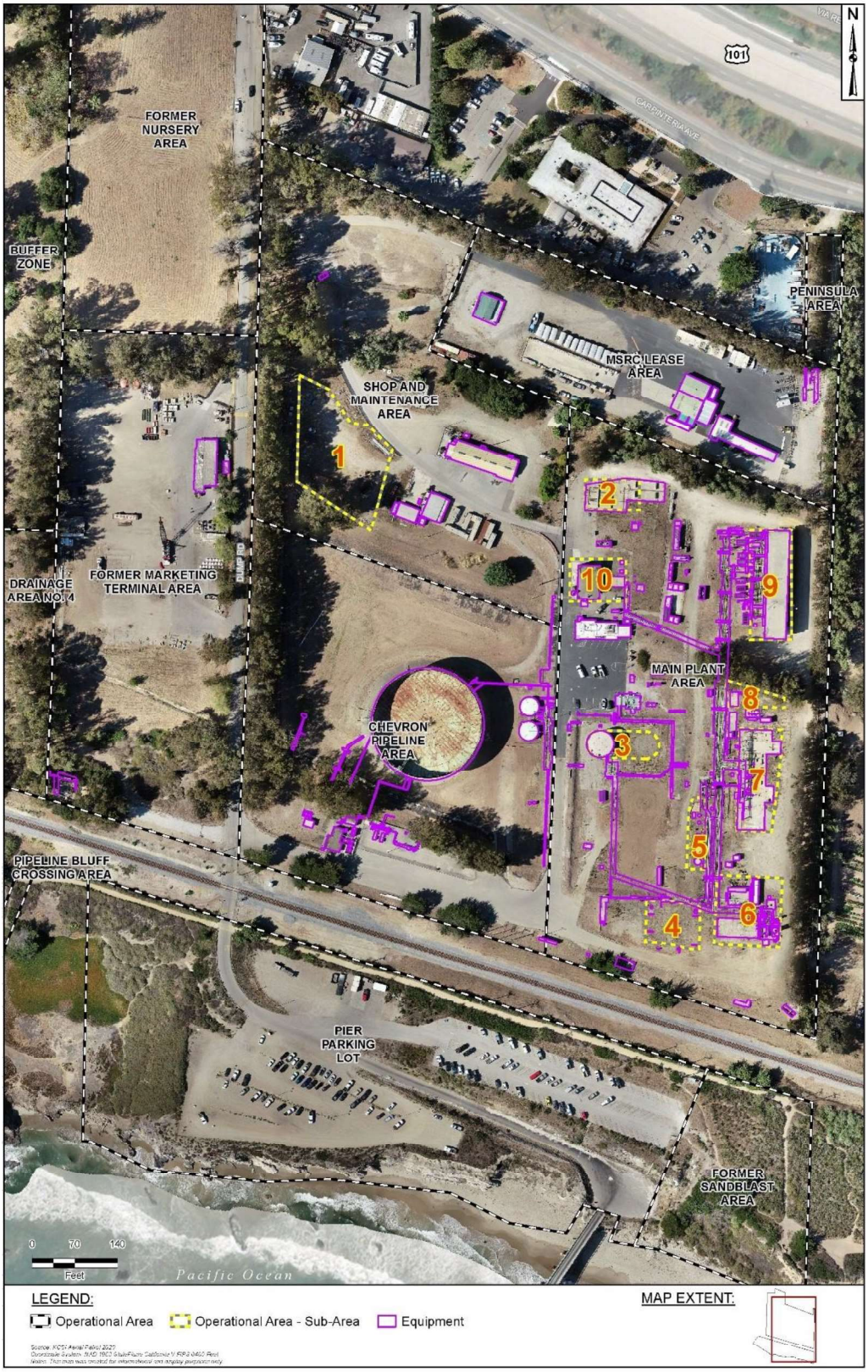
Source: Applicant Project Description, 2021.

Figure 4 Primary Operational Areas



Source: Applicant Project Description, 2021.

Figure 5 Onshore Facility Equipment Removal Areas



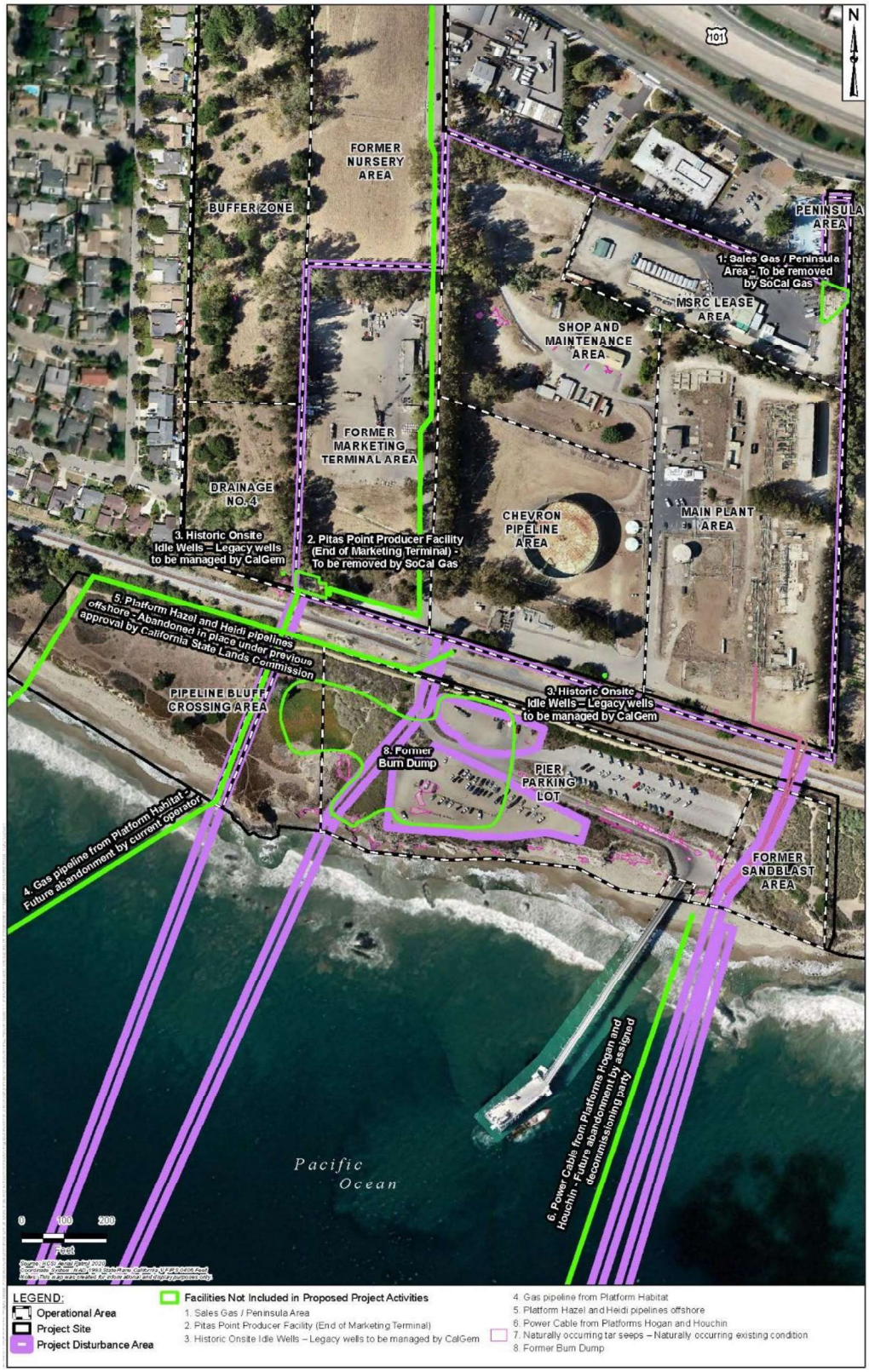
Source: Applicant Project Description, 2021.

Figure 6 Offshore Facility Equipment Removal Areas



Source: Applicant Project Description, 2021.

Figure 7 Facilities Not Proposed as Part of the Project



Source: Applicant Project Description, 2021.

Attachment A.

City Council Resolution No. 6415

Exhibit 3. Project Conditions of Approval

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

CITY COUNCIL HEARING

PROJECT 21-2128-DP/CDP

JULY 15, 2025

EXHIBIT 3: CONDITIONS OF APPROVAL

CHEVRON CARPINTERIA OIL AND GAS FACILITY DECOMMISSIONING PROJECT

The Conditions set forth in this permit affect the title and possession of the real property that is the subject of this permit and shall run with the real property or any portion thereof. All the terms, covenants, conditions and restrictions herein imposed shall be binding upon and inure to the benefit of the owner (applicant, developer), his or her heirs, administrators, executors, successors and assigns. Upon any sale, division or lease of real property, all the conditions of this permit shall apply separately to each portion of the real property and the owner (applicant, developer) and/or possessor of any such portion shall succeed to and be bound by the obligations imposed on the owner (applicant, developer) by this permit.

PROJECT DESCRIPTION

1. This Development Plan and Coastal Development Permit is based upon and limited to compliance with the project description, the hearing exhibits (Attachment A, Exhibit 2 to the staff report dated July 15, 2025) and conditions of approval set forth below. Any deviations from the project description, exhibits or conditions must be reviewed and approved by the City for conformity with this approval. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above-described approval will constitute a violation of permit approval.

   The project description is as follows:

   The Project proposes to demolish and remove the Carpinteria Processing Facility (CPF) including but not limited to the onshore portions of the CPF (Onshore Facility), and State Waters Offshore Pipelines and complete remediation of impacted soils and groundwater at the Facility. Remediation is proposed to comply with levels established in a Remedial Action Plan (RAP) that will be reviewed by the Santa Barbara County Public Health Department, Environmental Health Services (SBCEHS), Regional Water Quality Control Board (RWQCB), and United States Environmental Protection Agency (U.S. EPA). The Project proposal assumes the most stringent clean up levels for the purpose of determining soil excavation and truck trip estimates and therefore a maximum amount of remediation activities (e.g., truck trips, Site activities). The Applicant states remediation efforts will be performed along with preservation of existing Site resources, including mature trees and bluffs,

and in coordination with Site constraints including buffer zones adjacent to the Union Pacific Railroad (UPRR) right-of-way (ROW). The most stringent clean up levels would also result in greater flexibility for development on the Site meeting the most rigorous standards (e.g., unrestricted land use).

Decommissioning and remediation of the Facility will include the following activities:

Onshore Facility

- *Idling and removal of all existing surface and subsurface equipment, piping, and structures within the Facility;*
- *Removal of concrete foundations, asphalt, oil spray, and road base within the Facility;*
- *Excavation/remediation of any impacted soils underlying the Facility in accordance with the Facility's Remedial Action Plan (RAP) and RAP Addendums, and appropriate regulatory guidance (once approved);*
- *Recycling/disposal of all materials removed from the Project Site(s); and*
- *Restoration of the portions of the Site in accordance with the Site Restoration Plan (once approved).*

Beach Crossing and State Waters Offshore Pipelines

- *Pig and flush State Waters Offshore Pipelines in preparation for removal;*
- *Removal of State Waters Offshore Pipeline segments out to 3-nmi state waters limit;*
- *Removal of nearshore beach crossing pipeline segments;*
- *Recycling/disposal of all materials removed from the Project Site(s); and*
- *Onshore restoration in accordance with the Site Restoration Plan (once approved).*

The Project Site includes the Facility, as well as the State Waters Offshore Pipelines and utilities leading into the Project Site from state waters, as further described below. Within the onshore portion of the Project Site, a number of operational areas/plant areas have been identified that contain idle structures, vessels, and piping proposed for demolition and remediation. The state waters offshore portion of the Project Site contains two primary pipeline and utility bundles that come to shore and lead into the Onshore Facility. Proposed activities within each area are listed below.

Onshore Facilities and Proposed Activities

- *Main Plant Area (MPA) – Surface and subsurface facilities demolition, and soil remediation;*
- *Chevron Pipeline Area (CPA) - Surface and subsurface facilities demolition, and soil remediation;*
- *Former Marketing Terminal Area (FMTA) – Surface facilities demolition and soil remediation;*

- *Former Nursery Area (FNA) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels;*
- *Shop and Maintenance Area – Surface and subsurface facilities demolition and soil remediation;*
- *MSRC Lease Area – Surface facilities demolition and soil remediation;*
- *Peninsula Area - Soil remediation in coordination with SoCalGas facility demolition and City of Carpinteria skate park development;*
- *Buffer Zone Area (BZA)/Drainage Area No. 4 (DA4) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels; and*
- *Gravel Portion of Pier Parking Lot/Former Sand Blast Area (FSBA) – Surface and subsurface facilities demolition, and soil remediation/subsurface pipeline removal/abandonment in place.*

State Waters Offshore Pipelines and Proposed Activities

- *Platform Gail and Grace Pipeline Bundle and 10-inch Oil Pipeline – Removal from top of bluff to 3-nmi state waters limit; and*
- *Marketing and Marine Terminal Pipeline Bundles – Removal offshore through top of bluff. Onshore pipelines will be abandoned in-place.*
- *Removal of the onshore and nearshore portion of the former Platforms Hazel and Hilda pipeline bundle.*

MITIGATION MEASURES FROM THE CERTIFIED PROJECT ENVIRONMENTAL IMPACT REPORT (EIR)

2. **Aesthetics. Mitigation Measure A-4. Beach/Nearshore Night-Lighting Minimization.** No unobstructed or unshielded beam of exterior lighting shall be directed towards any area outside the exterior boundaries of the property. Project lighting in beach/nearshore work areas shall be as low an intensity as allowed by safety requirements and located, designed, and equipped to provide shielding and minimize lighting visible from residential areas.
   Plan Requirements/Timing: A beach/nearshore lighting plan shall be submitted to the City and approved prior to initiation of any beach or nearshore Project activities. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City.

3. **Air Quality Mitigation Measure AQ.2. Odor Control and Purging Plan.** The Applicant shall submit an Odor Control and Purging Plan that includes the use of degassing systems for equipment and pipeline purging operations that may be required and includes proactive measures to eliminate or reduce objectionable odors emanating from construction and decommissioning activities, and an action plan if odor issues or complaints arise.

4. **Biology. Mitigation Measure Bio.1a. Agency Approvals.** Prior to commencement of any construction or decommissioning activities, the Applicant shall obtain compliance with the USFWS, NOAA Fisheries, and CDFW for components of the Project that have the potential to directly or indirectly impact federal or state-listed terrestrial or marine plant and animal species in the form of take permits/authorizations or written documentation from the USFWS, NOAA Fisheries, and CDFW that the proposed Project would not result in take of these species, or would not otherwise adversely affect these species. Should a take permit/authorization be required, or conditions imposed by the USFWS, NOAA Fisheries, and CDFW to ensure that no take would result from the proposed Project or impacts are avoided and minimized, the Applicant shall implement all the terms and conditions of the USFWS/NOAA Fisheries/CDFW permits, authorizations, or recommendations to the satisfaction of these agencies. This EIR does not authorize, approve, or otherwise support a "take" of any listed species as defined under the federal or California Endangered Species Acts. The Applicant shall notify the City staff immediately of any potential violation of the federal and/or California Endangered Species Act.

5. **Mitigation Measure Bio.1b Habitat Restoration/Revegetation Plan.** The Preliminary Restoration/Revegetation Plan (Padre 2021e) indicates each Operational Area will be restored or, at a minimum, revegetated for erosion control, to the extent required to support future land use designations. The current plan shall be revised, or specific restoration plans (including restoration of topography and substrates in unvegetated areas) shall be developed for various Project components, including restoration and mitigation of special status species habitat (including trees, coastal wetlands shoreline/sandy beach habitat, and offshore habitat). The final plan(s) approved by the City shall be fully implemented to address adverse impacts to sensitive species habitats. Plans for restoration and revegetation shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. The Final Restoration/Revegetation Plan(s) shall identify the assumptions used to develop the proposed restoration strategy, timing for plan implementation, and performance standards to ensure special status species habitat has been restored. The Plan(s) shall include at a minimum:

    1. Ground Disturbance. Construction activities shall avoid or minimize impacts to special status species habitats, where feasible. All temporary disturbances including parking areas, lay down, storage areas, and other sites of surface disturbance shall be located in previously disturbed areas or in annual grassland and shall be mowed, versus graded, where feasible to keep root structures in place; thereby, facilitating future revegetation.
    2. Quantification of disturbance acreage and final restoration and mitigation requirements, including restoration of habitat for special status species such as shoreline/sandy beach foraging habitat for snowy plover and habitat for marine plant species. The Applicant shall conduct post-construction surveys of the entire Project Site in coordination with the City and/or City's

representative to quantify actual acres of disturbance to special status species habitat. At a minimum, a 1:1 mitigation ratio will be required to restore areas temporarily disturbed to pre-construction conditions and replace habitats permanently affected by the Project (final mitigation ratio will be determined during Project permit and approval process).

3. Description and map of location of restoration/revegetation and compensatory mitigation sites and assessment of appropriate reference areas to help guide restoration and mitigation efforts.
4. Soils within any disturbed area shall be stabilized through use of soil coating mulch, dust palliatives, compaction, reseeding, or other approved methods.
5. List of plant species to be used, sources of local seed, cuttings, container sizes, and seeding rates, and planting schedule. On-site seed collection should be initiated in the near future to accumulate sufficient propagule material for subsequent use in future years. On-site vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes (CDFW 2022).
6. Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include (for example) retention of woody material, logs, snags, rocks and brush piles (CDFW 2022).
7. A description of the irrigation methodology.
8. Measures to control non-native vegetation on site.
    a. Weed control treatments shall include legally permitted manual, mechanical, and/or chemical (e.g., herbicide) methods approved for application. Manual and mechanical are the preferred control methods, with the application of herbicides only under extreme circumstances and with the approval of regulatory agencies. The timing of the weed control treatment would be determined for each plant species with the goal of controlling populations before they start producing seeds. Consultation with a City-approved, qualified wildlife biologist or botanist would be required prior to implementing weed control treatments in order to develop strategies that avoid adverse effects on plants and wildlife.
    b. Where manual or mechanical weed control methods are used, plant debris would be disposed of at an appropriate off-site location.
    c. Herbicide application would comply with state and federal laws and regulations under the prescription of a Pest Control Advisor and would be implemented by a Licensed Qualified Applicator.
    d. All seed stock and straw materials used during Project construction and restoration phases shall be guaranteed weed-free. All imported fill used for site surface restoration will undergo standard weed control treatments prior to collection and import of soil to the Project Site. Upon completion of final contouring, follow-up weed control treatments described above in Mitigation Measure Bio 1b, 8(a) will be

implemented to ensure the post-project control of non-native vegetation establishment.

9. A detailed qualitative monitoring program including specific, measurable success criteria and suitable monitoring periods to ensure the successful establishment of all plant communities and trees. Monitoring of restoration areas shall extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought (minimum five years). Monitoring shall demonstrate a positive trend for native species cover, diversity, and abundance, and a negative trend for non-native species cover with no further manipulation of the Project Site occurring during this period. If manipulation of the Project Site is still occurring (replacing dead plants, irrigation, weeding) then this is still considered the installation period and shall not be used as monitoring data to determine success. The monitoring period shall start after the installation period has been completed and the Project Site is not being actively manipulated, as manipulation of the Project Site skews any data collection toward prematurely meeting success criteria that might not have been met had the Project Site been left alone (CDFW 2022).
10. And identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

Plan Requirements/Timing: The Final Restoration/Revegetation Plan(s) shall be approved by the City, and other permitting agencies if required, prior to issuance of Project permits, and implemented on schedule in accordance with the approved Plan including hydroseeding exposed soils prior to each rainy season. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

6. **Mitigation Measure Bio.1c Pre-construction Wildlife Surveys and Protection.**
    1. Monarch butterflies:
        a. Monarch butterfly habitat assessment: A qualified biologist shall be retained to conduct a habitat assessment a minimum of 60 days prior to Project implementation, including tree trimming activities. The qualified biologist shall assess habitat following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (Xerces 2017) or other protocols with prior approval by CDFW. The habitat assessment shall be conducted in consultation with site monitors with knowledge of the history of the grove to determine primary roosting trees and other structural components or flora integral to maintaining microclimate conditions. These plants shall be marked and avoided during project activities.
        b. Monarch Butterfly Management Plan: A Monarch Habitat Management Plan shall be developed, in consultation with CDFW, prior to Project implementation. The information gathered during the monarch habitat assessment shall be used to develop the plan following the guidance in

the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (Xerces 2017) or other protocols with prior approval by CDFW. The plan shall be adaptive, with specific goals and objectives, continued monitoring, and refinement over time. The plan shall include as an objective that the baseline population/individual occurrence numbers shall not decrease over three years due to Project activities and shall include adaptive and contingent measures to ensure this objective is met. The plan shall consider removal or trimming of hazard trees, removal or trimming of trees to create appropriate solar radiation patterns, a long-term tree planting strategy, and shrub and forb management. Trees within core overwintering habitat shall not be cut or trimmed except for specific grove management directed by the plan. Management activities in groves shall only be conducted between March 16 and September 14, in coordination with the qualified biologist (Marcum & Darst 2021). If construction, tree removal, or tree trimming needs to occur within 500 feet of monarchs, the plan needs to include prohibition of activities that create excessive dust, vibration, or physical disturbance; and suitable setbacks from the edge of the groves to preserve habitat quality.

c. Monarch butterfly Take Avoidance: If monarch butterflies are detected within the Project area, monarch overwintering habitat shall be avoided by delineating and observing a no-disturbance buffer of at least ½ mile from the outer edge of the habitat (Marcum & Darst 2021). If buffers cannot be maintained, then consultation with CDFW and the USFWS will occur to determine how to implement ground and tree-disturbing activities and avoid take.

Plan Requirements/Timing: The Monarch Butterfly Management Plan shall be submitted to the City and CDFW and approved prior to the initiation of work and implemented for all work between September 14 and March 15. The applicant will consult with CDFW and USFWS prior to removal of trees or shrubs within ½ mile of overwintering Monarch groves. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

2. Raptors: A City-approved wildlife biologist shall conduct a pre-construction survey of the entire Project Site to determine the presence of nesting raptors in trees surrounding the proposed Project Site. The City-approved wildlife biologist shall conduct a survey of all trees within 1,000 feet of all tree trimming or tree removal activities to determine the presence of nesting raptors in trees surrounding the proposed work areas. The biologist shall then, in coordination with the City, determine suitable buffer areas between the nests and construction or tree trimming activities if activities are scheduled to begin during the typical raptor nesting season (February 15 through August 1).

3. Nesting Bird Survey. If Project activities are scheduled between February 1 and August 31 (general nesting bird season), nesting bird surveys shall be completed by a qualified biologist no more than seven days prior to the start of work. The survey area shall include a minimum of 500 feet from all planned ground disturbance and vegetation removal including tree trimming or removals. If any active nests are discovered within or adjacent to work limits, an buffer of 500 feet for raptors and 250 feet for other birds shall be established to protect the nest until a qualified biologist has determined that the nest is no longer active and/or the young have fledged.

   Plan Requirements/Timing: A compliance plan shall be submitted to the City and approved prior to the initiation of work and issuance of grading permits, and implemented for all work between February 1 and August 31. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

4. Pre-Decommissioning Marine Biological Dive Surveys. No more than 60 days prior to commencement of offshore activities, a City-approved, qualified marine biologist shall conduct a pre-decommissioning marine biological survey of the sensitive habitat areas adjacent to the nearshore pipeline corridors. If sensitive habitats such as seagrass, surfgrass, hard substrate, or kelp beds are identified, anchor locations shall be relocated to avoid impacts to these protected habitats. If seagrass is identified, post-decommissioning surveys will be conducted to verify seagrass beds had not been impacted by Project related activities. If seagrass beds have been impacted, Chevron shall be required to prepare and implement eelgrass restoration as part of the Habitat Restoration and Revegetation Plan under Bio.1b that shall be approved by City. All eelgrass surveys and mitigation shall adhere to California Eelgrass Mitigation Policy. Adjustments to decommissioning methodologies in sensitive habitats may be made to the greatest extent feasible to reduce impacts to these areas. In addition, remote operated vehicle or multi-beam geophysical surveys shall be conducted at each anchor location to confirm the absence of hard-bottom habitat.

   Plan Requirements/Timing: The results of the pre-decommissioning marine biological dive surveys shall be submitted to the City, the CDFW, and NOAA Fisheries for review and fully implemented prior to the issuance of grading permits. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

7. **Mitigation Measure Bio.1d Fencing.** To minimize the amount of disturbance to wildlife habitat and important or sensitive biological resources, construction boundaries will be fenced with highly visibly fence and staked. Wildlife safe highly visible construction fencing shall be installed to identify the limits of grading/disturbance, which would reduce potential human trampling outside of the

construction limits and minimize the potential spread of non-native weeds or invasive plant species. Wildlife-safe construction fencing and flagging shall remain in place during construction and maintained and replaced as needed. The City-approved qualified biological monitor shall ensure environmentally sensitive areas within or near the construction zones are clearly marked for avoidance in the field. These areas include, but are not limited to, occurrences of special-status plants, trees to be avoided, sensitive vegetation communities or wildlife species adjacent to work areas, and jurisdictional resources. Project boundaries shall be clearly marked with fencing or staking that shall be replaced as needed and removed upon Project completion. Vehicles and equipment access shall follow marked routes. Indiscriminate vehicle travel shall not be allowed.
Plan Requirements/Timing: The detailed fencing plan, showing the location of required fencing installation, and timing of fencing removal, shall be submitted to the City for review and approval prior to the issuance of grading permits and depicted on all final Project plans. The fence shall be installed prior to the start of ground disturbance activities. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

8. **Mitigation Measure Bio.1e Worker Education and Awareness Plan.** Qualified City approved biologists shall provide an educational program for all personnel prior to initiation of any construction activities, including, but not limited to, facility demolition and remediation, tree trimming and tree removals, bluff pipeline removal, and offshore pipeline removal. The natural history, including sensitive species and habitats, shall be described as well as the current status, reasons for decline, and protection measures relevant to the species and habitat. The plan shall include the following:
    1. Point of contact information shall be provided for workers to report sightings of sensitive biological resources in the vicinity as described in the WEAP.
    2. Photographs of sensitive biological resources, general provisions and protections of the federal and state Endangered Species Act, and review of measures to be implemented during the construction activities to avoid and minimize adverse effects to sensitive species.
    3. Identification of Project activities that require biological surveys and monitoring for resource protection, as described in Project permits.
    4. Description of the markers for active bird nests, areas or trees marked for avoidance, or other mitigation areas, so that they shall know these are not to be disturbed without a biological monitor present.
    5. Workers shall be informed not to litter. All trash shall be contained during the day, picked up, and removed from the construction sites at the end of each day. During Project activities, all trash that may attract predators shall be properly contained, removed from the Project Site, and disposed of regularly. Following construction, all trash and construction debris would be removed from work areas.

Plan Requirements/Timing: The Worker Education and Awareness Plan shall be submitted to the City and approved prior to the issuance of grading permits. All workers, contractors, and visitors shall receive training prior to entering the Project area and performing any work. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor. The Applicant shall provide copies of the training attendance sheets to the City as a record of compliance with this measure on a monthly basis.

9. **Mitigation Measure Bio.1f. Marine Wildlife Contingency and Training Plan Implementation.** A Marine Wildlife Contingency and Training Plan shall be developed and implemented during all offshore Project activities to reduce or eliminate potential impacts of the proposed decommissioning activities on marine mammals and birds (marine wildlife). The Plan shall include monitoring vessel transit, anchoring, underwater surveys and pipe removal operations by a City-approved, designated monitor trained to detect marine wildlife. The monitor shall have the authority to halt marine operations that may adversely affect marine wildlife or marine habitat.
   Prevent Introduction of Non-Native Aquatic Species (NAS). All Project vessels shall be in compliance with California's state ballast management regulations.
   Plan Requirements/Timing: The Marine Wildlife Contingency and Training Plan shall be submitted to the City and approved prior to the issuance of grading permits. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated third party marine wildlife monitor.

10. **Mitigation Measure. Bio.1g Harbor Seal Rookery Monitoring and Protection.** The Carpinteria Harbor Seal Rookery Monitoring and Protection Plan (Padre 2021d; Appendix C-6) approved by the City shall be fully implemented during all Project-related activities within 1,000 feet of the haulout/rookery. A summary of the avoidance and protection measures included in the Carpinteria Harbor Seal Rookery Monitoring and Protection Plan are presented below (see Appendix C-6 for full text).
    1. The bluff and onshore pipeline removal shall be scheduled to occur between June 1 and November 30 to avoid pupping season. Project decommissioning activities within 1,000 feet of the rookery (except for areas within the 1,000 feet north of the railroad tracks) shall be scheduled to avoid pupping season (December 1 through May 31). Project activities shall be scheduled during low tide windows and limited to daylight hours only to maximize visibility and ensure safety during repair work.
    2. The size of the work zone shall be minimized and placement of visual screen barriers between the work area and seal rookery. In addition, noise minimization measures shall also be employed including low volume radio transmissions, timing concrete demolition to be performed outside of the pupping season and using noise dampening shields.
    3. Prior to the initiation of the Project, personnel shall be given marine wildlife sensitivity training. This training shall include specifics regarding Project restrictions, operational limits, and ingress/egress methodology. The crews

shall be instructed to wear neutral colored clothing, and to move slowly during ingress/egress as well as minimize hand gestures or signals during work activities to avoid startling the harbor seals.

4. The number of on-beach personnel and the amount of equipment shall be minimized and completely removed every day, and stored on the paved parking lot above the beach and away from the bluff edge.
5. The Project shall employ Best Management Practices (BMPs), including removal of trash and debris.
6. An approved Marine Wildlife Monitor (MWM) shall be employed and shall be responsible for briefing all Project personnel on the protective measures prior to initiating work each day and shall delineate the equipment and personnel ingress/egress corridors. The MWM shall remain onsite during all work to ensure that activities are limited to the immediate work area and shall have the authority to stop all operations to avoid harassment of seals. Harassment is defined by the sudden flushing of seals into the water, potentially separating nursing cow and pup pairs, or any abnormal or aggressive behaviors. The monitor shall record, photograph, and report compliance. The MWMs shall work directly with Seal Watch volunteers present at the overlook to coordinate direct observation of harbor seal activities during Project related activities. The MWM shall ensure that the Project is in compliance with all necessary permits, communication with appropriate agencies and Carpinteria Seal Watch Coordination, and that BMPs are followed.
7. The MWM shall count and record the number and species of all marine mammals that are within the Project area (within visual range along the beach) and take photographs of the Project Site and access route. At regular intervals during the day, the monitor shall record the number and location of harbor seals and document the decommissioning activities. Changes in the behavior or number of individuals and/or their proximity to the Project Site prior to, during, and immediately following noise-producing activities shall be recorded and photographed. The type of activity that promulgated changes in harbor seal abundance or behavior shall be recorded as well as notes on the weather, non-project human activities, and observations of avifauna and marine mammals outside the Project boundaries. Any activity that are considered to be harassment of a marine mammal, that activity shall be stopped immediately, and the Chevron Project Manager and NOAA Fisheries representative shall be contacted immediately via cell phone.
8. Data and observations that were recorded during the removal activities shall be presented in tabular and text format in a technical report that shall also include copies of photographs. The report shall summarize the Project decommissioning activities as well as protective measures and their effectiveness. The technical report shall be provided to the regulatory agencies within 30 days of completion of the final beach or bluff decommissioning activities.

Plan Requirements/Timing: The Carpinteria Harbor Seal Rookery Monitoring and Protection Plan shall be approved by the City prior to the issuance of Grading

permits, and fully implemented during all Project-related activities within 1,000 feet of the haulout/rookery. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

In addition to the above, noise mitigation measure N.2a will reduce noise impacts to wildlife species by requiring noise reduction with noise walls and temporary noise blankets, and implementation of mitigation measures WQ-1 would also protect biological resources from potential indirect impacts associated with degraded water quality.

11. **Mitigation Measure Bio.1h Wildlife Relocation Monitoring.** A City approved wildlife biologist shall conduct pre-disturbance surveys of the work area throughout each day of construction activities. The qualified biological monitor shall be on-site prior to and during all ground disturbing activities to move out of harm's way any special status species or other wildlife of low mobility that would be injured or killed by Project-related activities including any vegetation removal or tree trimming activities. The qualified biologist shall obtain all appropriate state and federal permits to handle any sensitive species potentially present in the Project area. **Plan Requirements/Timing**: The name and qualifications of all wildlife biologists shall be provided to City and CDFW and approved prior to the initiation of any Project-related work. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated wildlife monitor.

12. **Mitigation Measure Bio.2a ESHA Impact Avoidance.** Impacts to ESHA areas shall be avoided and minimized. Areas that support ESHA or other Sensitive Natural Communities shall be marked on Project plans and identified on the ground using construction fencing, or other means, to identify them as exclusion zones to all personnel and equipment (mitigation measure Bio.1d).

13. **Mitigation Measure Bio.2b Scrub Mitigation.** Areas that support Menzie's golden bush scrub and lemonade berry scrub that are removed or damaged during construction shall be mitigated onsite at a minimum 2:1 ratio, which shall be incorporated into the Final Habitat Restoration/Revegetation Plan (MM Bio.1b). **Plan Requirements/Timing**: The City shall review and approve the Final Habitat Revegetation/Restoration Plan to ensure compliance with compensatory mitigation requirements, as needed. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

14. **Mitigation Measure Bio.2c Essential Fish Habitat Avoidance.** No more than 60 days prior to commencement of offshore activities, a pre-decommissioning marine biological survey of nearshore pipeline corridors shall be conducted. All eelgrass surveys shall adhere to the California Eelgrass Mitigation Policy. Anchor pre-plots shall be developed and implemented to avoid kelp beds, rocky habitats, surfgrass,

and seagrass beds. Anchors shall be lowered vertically to the bottom and retrieved using a crown line as needed to avoid kelp beds, rocky reefs, surfgrass, and seagrass beds.
Plan Requirements/Timing: The results of the pre-decommissioning marine biological survey and anchor pre-plots shall be submitted to the City, CDFW, and NOAA Fisheries for review and fully implemented prior to pipeline removal.
Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

15. **Mitigation Measure Bio.3a Permitting Compliance with USACE, RWQCB, and CDFW Regulations.** The Applicant shall provide the City a copy of the Clean Water Act Section 401 and 404 permits and CDFW Streambed Alteration Agreement, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary. The Applicant shall implement all mitigation measures and conditions contained within Project permits for impacts upon determination of jurisdiction and permit issuance by agencies.
Plan Requirements/Timing: The Applicant shall submit copies of the CWA Section 401 and 404 permits, CDFW Streambed Alteration Agreement, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary to the City prior to initiation of Project activities. City staff will review permit requirements and ensure compliance, as appropriate.

16. **Mitigation Measure Bio.3b Wetlands Pre-construction Survey.** A City-approved wetlands biologist shall conduct a pre-construction survey of the Project Site to determine the potential for sediments or potential pollutants to flow off-site through surface water drainage ditches and determine the need for setbacks from open drainage ditches in Project areas. If the drainage ditches support wetland vegetation at the time of the survey as determined by the City-approved wetlands biologist, a 100-foot minimum setback shall be required.

17. **Mitigation Measure Bio.3c Coastal Wetlands Mitigation and Monitoring Plan.** A Coastal Wetlands Mitigation and Monitoring Plan shall be prepared by the Applicant and approved by the City and other resource agencies, as applicable, and fully implemented within 120 days of the completion of soil remediation and shall include the following:
    1. The permanent loss of 0.17 acre associated Wetland W-1 shall be replaced on a minimum 4:1 basis by expansion of existing wetlands in the Drainage No. 4 Area.
    2. The temporary loss of 0.1 acre within W-5 shall be mitigated at a minimum 4:1 ratio that shall include periodic monitoring to ensure the wetland naturally revegetates to pre-disturbance conditions, identification of contingency measure should natural revegetation not proceed as expected, as well as establishment or enhancement of wetland habitat elsewhere on the Project Site.

Compensatory wetland replacement shall not occur in any area (e.g., the buffer zone) that will be revegetated with other vegetation under MM Bio.1.b.9. A monitoring program that extends for a sufficient amount of time to ensure that new habitat is established, self-sustaining, and capable of surviving drought (minimum five years). Restoration Monitoring reports shall be submitted on a quarterly basis, or as needed, describing the methods and materials used for implementation of restoration. Annual reports will be submitted describing the status of the restoration efforts identifying whether plants are becoming established or if there are any problem areas, including where additional erosion control, weed control, or reseeding/replanting efforts may be needed. The monitoring report shall also note whether restoration sites appear to be developing sufficiently that performance criteria would be met within the projected time frame. Recommendations for additional monitoring and/or restoration treatments shall be provided if it appears that success criteria would not be met in any restoration or mitigation areas. The Annual monitoring report shall be submitted to the City and other oversight agencies for review.

Plan Requirements/Timing: A coastal wetlands mitigation plan shall be prepared by the Applicant, approved by the City, and fully implemented within 120 days of the completion of soil remediation. Monitoring: The coastal wetlands mitigation plan shall include methodology to assess the success of wetlands mitigation. Monitoring and reporting shall be conducted on an annual basis to ensure the success of wetlands mitigation.

18. **Mitigation Measure Bio.5 Tree Removal Mitigation.** The Applicant shall implement mitigation for all identified decommissioning-related tree impacts per current City of Carpinteria requirements for tree mitigation and replacement. Trees shall be required to be replaced at a ratio appropriate to ensure infill of any gap created in the windrow and with a tree type and size to be approved by the City. Replacement trees that fail to survive within the first five years after planting shall be replaced. Planting of native trees is required as are programs for phased removal and replacement of tamarisk windrows in favor of native tree windrows. The replacement trees must be monitored for seven years after planting.

19. **Mitigation Measure Bio.7 Oil Spill Contingency Plan.** An Oil Spill Contingency Plan (OSCP) shall be prepared that addresses protection of sensitive biological resources and revegetation of any areas disturbed during an oil spill or cleanup activities. The OSCP shall, at a minimum, include:
    1. Close coordination with CDFW's Office of Spill Prevention and Response (CDFW-OSPR). In the event of an oil spill, CDFW-OSPR and the U.S. Coast Guard or the U.S. EPA will form a unified command.
    2. The California Office of Emergency Response (CAL-OES) and National Response Center (NRC) shall be notified if a spill occurs (Cal-OES: 1-800-852-7550 and NRC: 1-800-424-8802).

3. A list of Oil Spill Response Organizations (OSROs), including Marine Spill Response Corporation (MSRC) and Patriot Environmental.
4. Measures to prevent spilled oil from reaching the harbor seal rookery.
5. Measures to minimize impacts on native vegetation and wildlife habitats, plant and animal species, and environmentally sensitive habitat areas during response and cleanup operations, including integration of a biologist on the initial response team to assist with identification of sensitive resources within areas affected by the oil spill and response, and to quantify impacts resulting from oil spill control and cleanup.
6. Low-impact site-specific techniques such as hand-cutting contaminated vegetation and using low-pressure water flushing from boats shall be specified in the OSHMP to remove spilled material from particularly sensitive wildlife habitats, such as coastal estuaries (i.e., Carpinteria Salt Marsh, Carpinteria Creek mouth), because procedures such as shoveling, bulldozing, raking, and drag-lining can cause more damage to a sensitive habitat than the oil spill itself. The OSCP shall evaluate the non-clean up option for ecologically vulnerable habitats such as coastal estuaries.
7. Spill response personnel shall be adequately trained for response in terrestrial environments, and spill containment and recovery equipment shall be maintained in full readiness. Inspection of equipment and periodic drills shall be conducted at least annually and the results evaluated so that spill response personnel are familiar with the equipment and with the Project area including sensitive onshore biological resources.
8. Stipulations for development and implementation of site-specific habitat restoration plans and other site-specific and species-specific measures appropriate for mitigating impacts on local populations of sensitive wildlife species and to restore native plant and animal communities to pre-spill conditions. Ingress and egress points, staging areas, and material stockpile areas that avoid sensitive habitat areas shall be identified. The OSCP shall include species- and site-specific procedures for collection, transportation and treatment of oiled wildlife, particularly for sensitive species.
9. Procedures for timely re-establishment of vegetation that replicates the habitats disturbed (or, in the case of disturbed habitats dominated by non-native species, replaces them with suitable native species) including: measures preventing invasion and/or spread of invasive or undesired plant species; restoration of wildlife habitat; restoration of native communities and native plant species propagated from local genetic sources including any sensitive plant species; and replacement of trees at the appropriate rate.
10. Monitoring procedures and minimum success criteria to be satisfied for restoration areas shall be determined. The success criteria shall consider the level of disturbance and condition of the adjacent habitats. Monitoring shall continue for three to five years, depending on habitat, or until success criteria are met. Appropriate remedial measures, such as replanting, erosion control or control of invasive plant species, shall be identified and implemented if it is determined that success criteria are not being met.

20. **Cultural Resources. Mitigation Measure Cul.1a Cultural Resources Management Plan.** Prior to ground disturbance, the Cultural Resources Management Plan (CRMP) shall be submitted to the City for review and approval. The CRMP shall be prepared by an archaeologist retained by Chevron that meets the minimum professional qualifications standards (PQS) set forth by the Secretary of the Interior (SOI). Native American representatives will review and comment on the CRMP. The purpose of the CRMP is to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b).The CRMP shall include, at a minimum:

    1. A description of the roles and responsibilities of cultural resources personnel (including Native American representatives), and the reporting relationships with Project construction management, including lines of communication and notification procedures. The CRMP should also include a "contact list" providing the names of important Project personnel, the agency they represent and/or their role, and their contact information;
    2. Description of how the monitoring shall occur;
    3. Description of frequency of monitoring (e.g., full-time, part time, spot checking);
    4. High-resolution maps for use by cultural resource monitors to identify locations of intact cultural deposits;
    5. Description of what resources are expected to be encountered;
    6. Description of circumstances that would result in the halting of work;
    7. Description of procedures for halting work on the site and notification procedures;
    8. Procedures for the appropriate treatment of human remains;
    9. Confidentiality of cultural information including location and data;
    10. Description of artifact collection, retention/disposal, and curation policies, including a statement that all cultural materials retained will be curated in accordance with the requirements of an identified, qualified curatorial facility, and that Chevron shall be responsible for all expenses associated with the curation of the materials at the qualified curatorial facility. If cultural materials are found within "contaminated" soil, and those materials are collected, then will have to be cleaned before they can be curated. The CRMP should describe the process to clean any materials from "contaminated" soil; and
    11. A description of monitoring reporting procedures including the requirement that reports resulting from the Project be filed with the Central Coast Information Center (CCIC) within one year of Project completion.

21. **Mitigation Measure Cul.1b Worker Cultural Resources Awareness Program.** A worker cultural resources awareness program shall be implemented for the Project. Prior to any ground-disturbing activity, Chevron shall provide an initial sensitivity training session to all Project employees, contractors, subcontractors, and other

workers prior to their involvement in any ground-disturbing activities, with subsequent training sessions to accommodate new personnel becoming involved in the Project. The program may be conducted together with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to cultural resources are provided by a qualified archaeologist and Native American representative.

The awareness program shall address:

1. The cultural sensitivity of the Project Site and how to identify these types of resources;
2. The awareness program shall address the CRMP and roles and responsibilities of Project personnel.
3. Specific procedures to be followed in the event of an inadvertent discovery;
4. Safety procedures when working with monitors; and
5. Consequences in the event of noncompliance.

22. **Mitigation Measure Cul.1c Cultural Resources Monitoring.** Cultural resources monitoring shall be conducted during Project-related ground-disturbing activities for the purpose of identifying and avoiding impacts to cultural resources, consistent with the monitoring plan detailed in the CRMP. Monitoring shall be required for all ground disturbances, even ground disturbances in areas outside the CA-SBA-6 boundary. The monitoring shall be conducted under the supervision of a County-approved archaeologist and a Native American representative with minimum PQS set forth by the SOI. In the event of any inadvertent discovery of prehistoric or historic period archaeological resources during construction, all work within 50 feet of the discovery shall immediately cease (or greater or lesser distance as needed to protect the discovery as determined in the field by the Project archaeologist or Native American representative). The Applicant shall immediately notify the City of Carpinteria if there is any inadvertent discovery of prehistoric or historic period archaeological resources during construction. The Project archaeologist in consultation with the City and Native American representative shall evaluate the significance of the discovery prior to resuming any activities that could impact the site/discovery. If the discovery is prehistoric in nature, the Native American representative shall provide input as part of the evaluation. If the Project archaeologist, following consultation with the City and Native American representative, determines that the find may qualify for listing in the CRHR, the site and sufficient buffer area shall be avoided until data recovery excavation, is prepared, implemented, and funded by the Applicant. The program shall include reasonable efforts to preserve (avoid) unique cultural resources; the capping of identified unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources which the preferred option being preservation (avoidance). Work shall not resume until authorization is received from the City.

23. **Mitigation Measure Cul.1d Exclusion Zones.** Prior to the issuance of the construction Notice to Proceed, Chevron shall, to the extent feasible, ensure that all intact portions of CA-SBA-6 shall be avoided during ground disturbance. Once the high-resolution map is created (consistent with mitigation measure Cul.1a.1), an exclusion zone shall be placed around each intact portion of CA-SBA-6. An exclusion zone is a fenced area where construction equipment and personnel are not permitted. The exclusion zone fencing shall be installed (and later removed) under the direction of a County-approved archaeologist and a Native American representative and shall be placed 10 feet beyond the boundary of the defined area to avoid inadvertent damage during installation.

24. **Mitigation Measure Cul.1e Phase III Data Recovery Excavations.** Any potentially intact portions of CA-SBA-6 that will be impacted by the Project should first be mitigated with Phase III data recovery excavations prior to ground disturbance. The Phase III data recovery excavations shall be conducted under the direction of a research design and testing plan prepared by an archaeologist in coordination with a Native American representative that meets the PQS set forth by the SOI and may consist of a combination of Data Recovery Excavation Units (DREUs) and Shovel Test Probes (STPs).

25. **Mitigation Measure Cul.1f Curation of Project Materials.** Prior to the issuance of the construction Notice to Proceed, Chevron in consultation with the City and Native American representative shall choose a single accredited repository at which to curate all archaeological materials recovered from the Project Site. If materials are recovered from "contaminated" soils it should be mentioned that those materials will have to be cleaned prior to curation. The repository shall be located in southern California so that the materials are available locally to Tribal members and researchers and shall meet the standards provided in the California State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections. The preferred repositories should be in Santa Barbara, which are located at UCSB and the Santa Barbara Museum of Natural History. Chevron shall work with the identified local curatorial facility and the Native American representative to transfer curation of materials currently in their possession or currently housed at a non-local facility, to the agreed-upon accredited local repository such that the materials can be accessioned as a unified collection. Subsequently, materials transferred from a non-local facility may require evaluation using current analytic methods to re-analyze artifacts and faunal remains that were recovered from CA-SBA-6 during previous excavations. If it is determined that there is no southern California curation facility that can accommodate the entire CA-SBA-6 collection, other accredited facilities in the State of California may be considered, if agreed upon by the Native American representative.

26. **Mitigation Measure Cul.2a On-Call Forensic Anthropologist.** Previous cultural resources studies have documented the disturbed context of CA-SBA-6 within the Project Site; however, human remains and burials have been encountered. Thus

prior to the issuance of the construction Notice to Proceed, Chevron shall retain a forensic anthropologist (or similar expert) to examine and positively identify bone fragments that are potentially human. The forensic anthropologist (or similar expert) may be able to positively identify bone fragments after reviewing photographs; however, a site visit may be necessary so the forensic anthropologist (or similar expert) can examine the bone fragments in-person and make a positive identification. The forensic anthropologist can be available in an on-call capacity and would not need to be present during all ground disturbance. Additionally, if numerous bone fragments are encountered during ground-disturbing activities, arrangements can be made for the forensic anthropologist to make regularly scheduled visits. Additionally, the following actions shall be taken:

1. No further disturbance shall occur in the area of any found human remains until the City has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative.
2. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by Chevron or their representative in order to determine proper treatment and disposition of the remains.
3. Chevron or their representative shall notify the Native American representative of the identification of human remains.
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
5. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered.

27. **Mitigation Measure Cul.2b Human Remains Discovery.** If human remains are discovered, the following actions shall be taken:
    1. Chevron or their representative shall contact the City and County Coroner.
    2. No further disturbance shall occur in the area of the find until the County Coroner has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative.
    3. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by Chevron or their representative in order to determine proper treatment and disposition of the remains.
    4. Chevron or their representative shall notify the Native American representative of the identification of human remains.
    5. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until

consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.

6. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered.

28. **Geology. Mitigation Measure Geo.2 Erosion Control Best Management Practices.** Erosion Control Best Management Practices (BMPs), including temporary berms and sedimentation traps, silt fencing, straw bales (rice straw bales are preferrable), and sandbags shall be installed adjacent to excavations and other ground disturbance areas prior to work involving ground disturbance. The BMPs shall include regular maintenance and inspection of the berms and sedimentation traps. Soil should be kept damp during grading activities to reduce the effects of dust generation. All exposed graded surfaces shall be reseeded with native ground cover to minimize erosion.
Plan Requirements/Timing: An Erosion Control Plan shall be submitted to the City and approved prior to any ground disturbance. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by a geologist.

29. **Mitigation Measure Geo.4a Bluff Stabilization Plan.** Areas immediately adjacent to the bluff face disturbed by removal of pipelines and related components shall be stabilized to avoid or minimize the potential for the Project to cause accelerated bluff retreat. As part of the Bluff Stabilization Plan, engineering studies shall be conducted to identify heavy equipment location and procedures for pipeline removal. Stabilization shall include backfill and compaction using suitable fill material, and revegetation with native species, and all other measures identified by a geotechnical engineer.
Plan Requirements/Timing: A bluff stabilization plan prepared by a geotechnical engineer including erosion controls, best management practices, maintenance, annual reporting, and City staff review of staging and construction plans, shall be submitted to the City and approved prior to any ground disturbance within 100 feet of the bluff face. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City.

30. **Mitigation Measure Geo.4b Bluff Stabilization During Pipeline Removals.** During the removal of over bluff pipeline, the following measures shall be implemented to reduce the potential bluff stability loss:
    - Equipment and personnel will maintain a safe distance from the bluff edge to ensure no excessive loading at the crest of the bluff topsoil.
    - Where applicable, removal of current bluff stabilization materials (i.e., concrete and rock riprap) shall be completed in a manner that avoids disturbance to adjacent undisturbed slopes.
    - Excavation of bluff top pipelines shall be conducted at a distance of 5 to 10 feet from the bluff edge, and the pipelines pulled in-line with the pipeline's

existing alignment so as to avoid additional disturbance to adjacent undisturbed slopes.
- All excavations and removals shall be monitored by a geotechnical engineer or geologist.

Plan Requirements/Timing: Bluff stabilization measures shall be implemented during any ground disturbance within 100 feet of the bluff face. Monitoring: Implementation of this measure shall be monitored by the City and a geologist or geotechnical engineer.

31. **Mitigation Measure Geo.4c Bluff Stabilization Following Pipeline Removal.** Areas immediately adjacent to the bluff face disturbed by the removal of pipelines and related components shall be stabilized to avoid or minimize the potential for the proposed Project to cause accelerated bluff retreat. Stabilization may include:
    - Removal of all non-native materials following pipeline removal.
    - To the extent feasible, recontouring of the disturbed slopes to reflect the contours of adjacent undisturbed slopes.
    - Backfill and compaction of bluff top excavations using suitable fill material.
    - Redirection and management of bluff top surface drainage away from disturbance areas to minimize over the bluff top surface flows.
    - Revegetation of all bluff top disturbance areas.

    Plan Requirements/Timing: A bluff stabilization shall be implemented immediately following the removal of all over the bluff pipeline segments. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City, and a geologist or geotechnical engineer immediately following pipeline removal.

32. **Greenhouse Gases. Mitigation Measure GHG.1 GHG Emissions Reductions.** The Permittee shall reduce or offset annual incremental greenhouse gas (GHG) emissions from Project-related sources. The incremental GHG emissions are those GHG emissions resulting from Project construction, operations, and related sources minus the County threshold of 1,000 metric tons per year CO2e (MTCO2e).

    The Permittee shall prepare and implement a GHG Reduction and Reporting Plan that describes how annual GHG emissions could be reduced or offset. The Plan shall include provisions for, and the outline of an annual report to the County that summarizes the emission reduction measures implemented, quantifies the Project-related estimated GHG emissions for the year, and demonstrates the quantity of credits surrendered. Each annual report shall reconcile the actual emissions of the previous year with the mitigation quantity, in terms of MTCO2e. The standard of performance for this mitigation is a reduction or offset of GHG emissions from Project-related sources at a one-to-one (1:1) ratio.

    On-site GHG reductions should be exhausted to the extent feasible prior to providing credits or offsets from off-site projects. If credits are derived from off-site mitigation,

preference should be given to those generated in Santa Barbara County. Implementing the required amount of any of the following types of emission reductions shall be an acceptable means of mitigation (order by local to national in preference):

- Onsite: GHG emission reduction onsite, including measures to electrify equipment, such as electrification of power supply instead of generators or lighting or other equivalent measures;
- Countywide: GHG reductions generated within the County by implementing a GHG reduction project consistent with any methodology approved by either the Santa Barbara County Board of Supervisors or the Santa Barbara County Air Pollution Control District (SBCAPCD) for the purpose of providing CEQA mitigation;
- Statewide: GHG reductions represented by registry offset credits listed with and verified by a CARB approved Offset Project Registry pursuant to Section 95980.1 of Title 17, Public Health Code (17 CCR 95980.1); or If applicable, GHG reductions created as a result of complying with Cap-and-Trade Program requirements related to stationary source emissions, as evidenced by the Permittee making auction purchases of State-owned Cap-and-Trade Program Allowances or CARB offset credits issued pursuant to Section 95981.1 of Title 17, Public Health Code (17 CCR 95981.1). Note that reductions to any on-site GHG reductions (such as reduced use of combustion equipment) will go towards reducing the stationary source's Cap-and-Trade obligation, and therefore are not applicable to mobile source GHG reduction credit. Or, freely allocated allowances held by the Applicant and allowances purchased by the Applicant from entities other than the State of California shall not be used as mitigation under this measure because they are tradable compliance instruments for the Cap-and-Trade Program. Or if applicable, if the Permittee has made auction purchases of State-owned Cap-and-Trade Program allowances to comply with Cap-and-Trade Program requirements and it has transferred funds to the State (e.g., for deposit into the Greenhouse Gas Reduction Fund (GGRF) for statewide GHG reductions), the levels of GHG offsets needed for mitigation under this measure may be reduced by the quantity of previously State-owned allowances purchased by the Permittee. The Permittee's demonstration of making auction purchases to fund acceptable mitigation shall occur in the GHG Reduction and Reporting Plan annual report after the applicable Cap-and-Trade compliance period, and the demonstration may rely on publicly available reports.
- Nationally: GHG reductions represented by registry offset credits listed with and verified by American Carbon Registry (ACR); Climate Action Reserve (CAR); or Verified Carbon Standard (VCS);

General criteria for acceptable credits include:

- Real: emission reduction must have actually occurred, as the result of a project yielding quantifiable and verifiable reductions or removals;

- Additional or Surplus: an emission reduction cannot be required by a law, rule, or other requirement;
- Quantifiable: reductions must be quantifiable through tools or tests that are reliable, based on applicable methodologies, and recorded with adequate documentation;
- Verifiable: the action taken to produce credits can be audited and there is sufficient evidence to show that the reduction occurred and was quantified correctly;
- Enforceable: an enforcement mechanism must exist to ensure that the reduction project is implemented correctly; and
- Permanent: emission reductions or removals must continue to occur for the expected life of the reduction requirement.

Plan Requirements/Timing: The GHG reductions achieved, credits surrendered provided, or any GHG offset project sponsored by the Permittee, must be supported by a demonstration to the City that the GHG reduction is real, additional, quantifiable, permanent, verifiable, and enforceable. The GHG Reduction and Reporting Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. The necessary annual quantity of verified credits under this plan shall be surrendered prior to April 15 of each calendar year following the year of initiating construction. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the GHG Reduction and Reporting Plan and any proposed GHG reduction credits prior to their use as mitigation. Subsequent annual reporting of GHG emissions and reduction/offset measures implemented will be reviewed and approved by the City in consultation with the SBCAPCD.

33. **Hazards. Mitigation Measure Haz.1 Contaminated Soil Handling.** The Project Applicant shall prepare and follow a contaminated soil handling management plan that addresses the following issues: Soil samples that exceed reactive organic compound (ROC) concentrations of 50 parts per million (ppm) require special soil handling procedures to be implemented under the plan. Those special soil handling procedures would include: (1) assuring sufficient moisture content of the soil to prevent dust during soil movement; (2) covering excavated soil with tarps/impermeable coverings to minimize the generation of wind-blown dust as well as minimize ROC emissions; (3) conduct ROC monitoring every 15 minutes during excavation activities; and (4) removal of soils from the Project Site within 24 hours.

    Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the Plan prior to its use as mitigation.

34. **Mitigation Measure Haz.2a Spill Response Planning.** Before the commencement of construction activities, the Applicant shall prepare a plan detailing the following performance measures to reduce the potential for releases to the

environment, and to ensure that the shortest scheduling associated with the Project in the marine environment is achieved. An engineering study shall be conducted prior to construction, which shall address at least 1) offshore equipment barge configuration and optimization with regards to tides and scheduling, including the use of supply boats and additional barges if needed and the use of offloading of equipment (including pumps, tanks, materials, etc.) to reduce the barge draft, which will allow for removal of the barge at lower high tides, and thereby reduce the potential for an extended schedule. This analysis shall be coordinated with the bathymetric survey to determine barge scheduling under different scenarios, including an extended schedule due to pipeline abandonment complications; 2) equipment needs for the barge; 3) fluids containment and handling, onshore re-fueling of equipment within contained areas utilizing best management practices, such as those defined by Caltrans, barge containment of spilled construction materials through the use of a barge sump and barge-edge spill containment walls, with the containment volume being greater than the largest tank on the barge; 4) barge weight and draft fully loaded as well as the capacity for fluids handling and storage, and a determination along with the bathymetric study, of the scheduling for tides; 5) equipment arrangement on the barge to allow for equipment movement and use between tasks; 6) refueling procedures and spill containment measures and equipment to prevent spills of fuel from reaching the marine environment; and 7) Emergency Response Equipment Availability - During the pipeline removal activities, a tender boat with sufficient boom shall be placed immediately offshore of the operations to ensure that any spills which occur and enter the marine environment are immediately contained. Contracting with Clean Seas, or another equivalent organization experienced in on-sea oil spill containment and recovery operations, shall be established before construction commences. In addition, the barge shall be equipped with sufficient sorbent pads and booms to provide immediate containment of oil released. These would be in addition to a response trailer located immediately onshore at the pier area.

Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the Fire Department, prior to initiation of the Project. Monitoring: The City, in consultation with the Fire District, will review and approve the Plan prior to its use as mitigation.

35. **Mitigation Measure Haz.2b Asbestos and Lead Planning.** An asbestos and lead exposure minimization plan shall be developed to limit the potential exposure of the public to asbestos and lead-containing materials. The plan shall include the following: 1) measures to prevent exposure, such as wetting of surfaces, prompt cleanup, and exhaust ventilation; and 2) prohibitions on dust-generating activities such as high-speed saws, compressed air, and dry sweeping of materials.

    Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the Plan prior to its use as mitigation.

36. **Mitigation Measure Haz.7 Fire Response Planning.** The Applicant shall ensure that fire response capabilities are in place during the entire Project, including the following: 1) hydrant access and capabilities; 2) fire water inventories, including hydrant flow testing to fire departments standards; 3) coordination and planning with the fire department to ensure proposer response equipment, training, communication, facilities access and capabilities are in place at all times; 4) the Applicant shall ensure that appropriate response equipment is located at all construction sites, including the availability of water trucks full of water and hot work requirements implementing a fire watch designated at all times; 5) all construction equipment used for any vegetation clearing shall be equipped with spark arrestors, and monitoring and training to prevent vehicle traffic off roadways to ensure activities do not impact dry brush and lead to fire; and 6) requirements shall be posted at all construction areas and placed on construction plans.
Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the Fire District, prior to initiation of the Project. Monitoring: The City, in consultation with the Fire District, will review and approve the Plan prior to its use as mitigation.

37. **Hydrology. Mitigation Measure WR.1 Stormwater Pollution Prevention Plan.** The construction contractor shall prepare a Stormwater Pollution Prevention Plan (SWPPP) that includes Best Management Practices (BMPs) to be implemented and monitored prior to and during decommissioning. The following BMPs shall be incorporated into the SWPPP to minimize potential decommissioning-related water quality impacts:
    1. Disturbed areas shall be stabilized or re-vegetated prior to the start of the rainy season. The work area shall be flagged to identify its limits. Vegetation shall not be removed or intentionally damaged beyond these limits.
    2. Construction materials shall be placed in designated areas where they could not enter water bodies or storm drains due to spillage or erosion.
    3. Waste and debris generated during decommissioning shall be stored in designated waste collection areas and containers away from watercourses and shall be disposed of regularly.
    4. During decommissioning, washing of trucks, paint, equipment, or similar activities shall occur only in areas where polluted water and materials can be contained for subsequent removal from the Project Site. Wash water shall not be discharged to the storm drains, street, drainage ditches, creeks, or wetlands. The washout area shall be isolated from water bodies, and wash water and waste shall be removed from the Project Site. The location of the washout area shall be clearly noted at the construction site with signs.
    5. All fueling of heavy equipment shall occur in a designated area removed from water bodies and other drainages, such that any spillage would not enter surface waters. The designated refueling area shall include a drain pan or drop cloth and absorbent materials to clean up spills. The location of the fueling area shall be clearly noted at the construction site with signs.

6. Vehicles and equipment shall be maintained properly to prevent leakage of hydrocarbons and coolant and shall be examined for leaks on a daily basis. All maintenance shall occur in a designated off-site area. The designated area shall include a drain pan or drop cloth and absorbent materials to clean up spills.
7. Any accidental spill of hydrocarbons or coolant that may occur on the construction site shall be cleaned up immediately. Absorbent materials shall be maintained on the construction site for this purpose.
8. Special considerations for work during the rainy season: stockpiled soils should be covered at the end of the workday.

Plan Requirements: A SWPPP shall be prepared and implemented prior to construction and shall include the above elements. The SWPPP shall be submitted to City Public Works for review and approval prior to the issuance of grading permits for the Project. Timing: The stormwater features and BMPs shall be installed and operational prior to initiation of grading. Monitoring: City Public Works staff shall site inspect for installation and maintenance in accordance with the approved plan and periodically thereafter to ensure proper maintenance over the duration of construction activities.

38. **Noise. Mitigation Measure N.2a Construction Noise Control.** During decommissioning activities, the Applicant shall implement the following measures to manage and reduce noise levels if necessary:
Inform residents and other noise sensitive receptors within 2,000 feet of Project work areas of anticipated noise disturbances two to four weeks prior to construction, including a contact telephone number to register noise complaints. The Project Applicant shall ensure that a noise liaison is assigned to respond to all public construction noise complaints in a timely manner, and either a) the telephone number is staffed by the noise liaison during construction hours; or b) the phone number is connected to an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. Noise complaints shall be forwarded to the City within 24 hours, along with the Operator/Applicant's initial response to the complaint. The noise complaint telephone number shall be posted in a manner visible to passersby and provided individually to potentially affected residences as part of the notification efforts.
Should complaints be received and verified and considered to be a disturbance issue (more than 3 complaints), as determined by the City, the Applicant shall implement the following to reduce noise:
    - Schedule construction activities to avoid operating construction spreads in the same location or the same distance from the same receptor simultaneously;
    - Noise monitoring shall be conducted at the closest residences to ensure that noise levels are acceptable. A noise monitoring schedule and description shall be submitted to the City prior to construction activities;
    - Limits on noisy activities, including back-up beepers, shall be implemented, and smart back-up alarms shall be used with mobile construction equipment

that automatically adjust the sound level of the alarm in response to ambient noise levels or back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction shall be utilized instead;

- Noise barriers shall be installed to reduce the potential impact of noise on the area residences during the peak hour. Noise barriers shall be composed of temporary, movable K-rails with a noise blanket wall on top at least 16 feet high or other equivalent method.

Plan Requirements/Timing: The proposed arrangement shall be reviewed and approved by the City prior to initiation of the Project. Monitoring: The City will review and approve the arrangement and schedule and description prior to its use as mitigation.

39. **Mitigation Measure N.2b Nighttime Activities.** Noise activities, including construction equipment and truck movements, during the nighttime shall be prohibited for onshore activities in order to reduce the potential for impacts to areas residences, and Zoning Ordinance 15.16.170 time limits shall be strictly complied with.
Plan Requirements/Timing: The construction documents shall reflect the limitation on construction activities and shall be reviewed and approved by the City prior to initiation of the Project. Monitoring: The City will review and approve the schedule and description prior to its use as mitigation.

PROJECT SPECIFIC CONDITIONS

40. **Mitigation Compliance, Monitoring and Reporting Requirement.**
Owner/Applicant shall submit to the Community Development Department a draft monitoring program for the mitigation measures identified in the Certified EIR, approved Project Description and Conditions of Approval for review and comment. A City-approved biologist and mitigation monitors responsible for permit compliance monitoring shall be retained by the City and paid for by the applicant. The mitigation monitoring program shall include, but not be limited to the following elements for the entirety of the project:
    - Mitigation Measures. A list of the project's mitigation measures.
    - Implementation of Mitigation. Timing and party responsible for implementation of each mitigation measure.
    - Mitigation Monitoring. Timing and party responsible for monitoring of each mitigation measure and a list of mitigation monitors to be retained.
    - Mitigation Reporting. Procedures, timing and responsible party for reporting to the City on project mitigation compliance and monitoring.
    - Copies of all required regulatory agency permits and approvals, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary, shall be submitted to the City prior to initiation of Project activities.

41. **Maintenance.** The applicant shall be responsible for maintaining the premises in a clean and orderly condition at all times. This includes, but is not limited to the following:

    a. Parking lots and equipment staging/storage areas shall be cleaned on a regular basis. Cleaning activities shall include the removal of litter; spot cleaning of oil, fuel and other automotive leaks; vacuum sweeping and pressure washing when necessary;

    b. All trash/recycling shall be properly disposed of in the appropriate receptacles provided on site. The applicant shall regularly inspect the perimeter of the site to ensure that trash is not leaving the premises via wind or runoff;

    c. All structures and improvements, including but not limited to, fencing, on site shall maintain a tidy appearance and be kept in good working order; and

    Plan Requirements: This requirement shall be included in the approved conditions of approval signed by the landowner prior to approval of any Building Permit for physical development. Timing: CDD shall monitor in the field as required. Monitoring: CDD staff shall periodically inspect the site to ensure compliance with this condition. If it is found that the site is not being maintained in a manner consistent with this condition, the matter shall be referred to the City's Code Compliance staff for resolution.

42. **Lighting.** All exterior construction safety night lighting set up on the project site shall be of low intensity, low glare design, minimum height, and shall be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels. Monitoring: Building and/or Engineering Inspector shall inspect construction site to ensure that temporary exterior construction lighting fixtures have been installed consistent with this condition and any required mitigation measures.

43. **Dust Control.** Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site by following the dust control measures listed below. During clearing, grading, earth moving, excavation or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.

    a. 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 shall include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency shall be required whenever the winds speed exceeds 15 miles per hour. Reclaimed water should be used whenever possible.

    b. Minimize amount of disturbed area.

c. 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 form the point of origin.

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

Plan Requirements: All requirements shall be shown on the building plans. Timing: Condition shall be adhered to throughout all construction activities. Monitoring: CDD shall ensure measures are on plans. Building Inspector shall spot check and ensure compliance onsite. APCD inspectors shall respond to nuisance complaints.

44. **Dust Monitoring.** 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. Plan Requirements: The name and telephone number of such persons shall be provided to the APCD. Timing: The dust monitor shall be designated prior to issuance of a Grading or Building Permit. Monitoring: CDD shall contact the designated monitor as necessary to ensure compliance with dust control measures.

45. **Construction Equipment Standards.** The following Diesel Exhaust Control Measures should be implemented during construction activities:

    a. Diesel construction equipment meeting the California Air Resources Board's current emission standards for off-road heavy-duty diesel engines shall be used.

    b. The engine size of construction equipment shall be the minimum practical size.

    c. The number of construction equipment operation simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

    d. Construction equipment shall be maintained in tune per the manufacturer's specifications.

    e. Construction equipment operating onsite shall be equipped with two to four degree engine timing retard or pre-combustion chamber engines.

    f. Catalytic converters shall be installed on gasoline-powered equipment, if feasible.

    g. Catalytic converters, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California shall be installed on equipment operating onsite.

h. Diesel powered equipment should be replaced by electric equipment whenever feasible.

i. State law requires that idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units should be used whenever possible.

Plan Requirements: All requirements shall be shown on grading and building plans. Timing: Condition shall be adhered to throughout all grading and construction activities. Monitoring: CDD shall ensure measures are on plans. Grading and Building Inspectors shall spot check and ensure compliance onsite.

46. **City Environmental Monitor:** Prior to submittal of any demolition permits or initiation of site activities, the Applicant shall provide the funding for a City Environmental Monitor to oversee and monitor compliance with City Conditions of Approval and EIR mitigation measures. The Environmental Monitor shall assist the City in condition compliance and mitigation monitoring for all applicable demolition construction, soil remediation, and site restoration stages of the Project.

The Applicant will prepare a working monitoring plan that reflects the City-approved environmental mitigation measures/conditions of approval.

1. goals, responsibilities, authorities, and procedures for verifying compliance with environmental conditions of approval/mitigation measures;
2. lines of communication and reporting methods;
3. tracking construction crew training regarding environmental sensitivities;
4. daily and weekly reporting of compliance;
5. authority to stop work; and
6. action to be taken in the event of non-compliance.

The Environmental Monitor shall be a City employee or under contract to the City, and the entire expense of retaining and supervising the Environmental Monitor, including the City's administrative and overhead fees, shall be paid by the Applicant.

The Applicant shall also be responsible for funding inspection and monitoring work as needed for mitigation measures requiring use of individuals with special expertise (e.g., marine biologist). The County's Environmental Monitor will retain and coordinate with specialists as necessary to ensure their availability at appropriate times (i.e., prior to issuance of construction permits, during construction or post-approval, etc.). The Environmental Monitor will coordinate with the Applicant's construction site monitors and permitting and responsible agencies during construction.

Monitoring/compliance: Prior to submittal of a construction permit, the Applicant shall provide a detailed Project description, detailed technical work related to any of the Conditions of Approval, and the construction work schedule, including any additional technical work/oversight conducted by the Applicant. This information will

be used to obtain the monitor's work scope. Once the consultant is selected and costs are obtained, a trust account will be established to deposit the required funds. Prior to ground disturbance, all construction workers shall be informed about the monitor and their role at the work site. This may be included as a part of any preconstruction meeting. During construction, all approved protection measures, if any, shall be kept in good working order by the Applicant and any necessary corrective measures addressed promptly by the Applicant upon discovery. The monitor shall be present as specified in the approved work scope. Prior to final inspection of the construction permit, the Environmental Monitor shall submit to the City a final post-construction compliance report. Any outstanding items identified shall be addressed to the satisfaction of the City Environmental Coordinator.

47. **Traffic Management Plan.** Provide a detailed Traffic Management Plan for review by Public Works, Community Development, Carpinteria-Summerland Fire Protection District and the Santa Barbara County Sheriff's Office, and obtain approval from the Public Works Director in consultation with the Community Development Director. The plan shall identify:
    - Construction Phases. Project construction stage exhibits including work descriptions.
    - Staging and Parking Areas. Equipment staging, materials storage and construction worker parking areas.
    - Truck Routes. Construction truck routes to minimize noise and traffic effects to residential neighborhoods.
    - City Street Closures and Detours. Any proposed closures of City streets and/or detours, by construction stage.
    - Signs and Traffic Control Measures. Signage and other planned temporary traffic control measures, by construction stage.
    - Public Awareness. A program for public awareness and outreach to commuters, property owners, businesses, residents and agencies affected by project construction.
    - Maintenance of Access. Plans for providing access to businesses, coastal dependent uses and recreational uses during construction.
    - Coordination and Reporting. A program for ongoing reporting and coordination with the City and other affected agencies throughout construction.

48. **Pre-Construction Conference.** Prior to commencement of construction, a preconstruction conference shall be held by the Resident Engineer to include construction processes and environmental mitigation and monitoring. The conference shall include representatives from Public Works, Community Development, Project Engineer, Contractor and Subcontractor(s), Biologist, and Mitigation Monitors.

DEVELOPMENT PLAN CONDITIONS

49. Approval of the Final Development Plan shall expire two years after the final local action by the City or the CA Coastal Commission on appeal, unless prior to the expiration date, substantial physical construction has been completed on the development or a time extension has been applied for by the applicant. The decisionmaker with jurisdiction over the project may, upon good cause shown, grant a time extension.

50. No permits for development, including grading, shall be issued except in conformance with an approved Final Development Plan. The size, shape, arrangement, use and location of buildings, walkways, parking areas and landscaped areas shall be developed in conformity with the approved Development Plan marked Exhibit 2, dated July 15, 2025. Substantial conformity shall be determined by the Community Development Department Director.

51. On the date a subsequent Development Plan is approved for this site, any previously approved but unbuilt plans shall become null and void.

52. If the applicant requests a time extension for this permit, the permit may be revised to include updated language to standard conditions and/or mitigation measures and additional conditions and/or mitigation measures which reflect changed circumstances or additional identified project impacts. Mitigation fees shall be those in effect at the time of issuance of a Building Permit.

53. An approval granted by the Planning Commission/City Council does not constitute a Building Permit, Demolition Permit, Engineering Permit, or authorization to begin any construction. Appropriate permits issued by the Building Division and Public Works Department must be obtained prior to constructing, enlarging, moving, converting, or demolishing any building or structure within the City, or undertaking any excavation or earthwork activities.

APPEALABLE CDP CONDITIONS

54. If the City determines at a noticed public hearing that the permittee is not in compliance with any conditions of this permit pursuant to the provisions of the Carpinteria Municipal Code, the City may, in addition to revoking the permit pursuant to said section, amend, alter, delete or add conditions to this permit.

55. The applicant's acceptance of this permit and/or commencement of construction and/or operations under this permit shall be deemed acceptance of all conditions of this permit by the permittee.

56. The approval of this Appealable CDP shall expire two years from the date of the final local action or, if appealed, the date of action by the California Coastal Commission on the appeal, if the permit for use, building or structure has not been issued.

57. The use and/or decommissioning and remediation activities, authorized by this approval cannot commence until the Coastal Development Permit and necessary Building Permits have been issued. Prior to the issuance of the Coastal Development Permit, all of the project conditions that are required to be satisfied prior to issuance of the Coastal Development Permit must be satisfied.

CITY RULES & REGULATIONS/LEGAL REQUIREMENTS

58. Before using any land or structure, or commencing any work pertaining to the erection, moving, alteration, enlarging, or rebuilding of any building, structure, or improvement, the applicant shall obtain a Building Permit. These Permits are required by ordinance and are necessary to ensure implementation of the conditions required by the Planning Commission. Before any Permit will be issued by Community Development, the applicant must obtain written clearance from all departments having conditions; such clearance shall indicate that the applicant has satisfied all pre-construction conditions. A form for such clearance is available from Community Development.

59. Prior to Building Permit issuance, the applicant shall sign an Agreement to Allow Zoning Compliance Inspections. The Agreement will allow CDD staff to conduct zoning inspections for the purpose of ensuring compliance with the City's Municipal Code requirements.

60. If, at any time, the City or Planning Commission determines that there has been, or may be, a violation of the findings or conditions of this Development Plan and Coastal Development Plan, or of the Municipal Code regulations, a public hearing may be held before the Planning Commission to review this permit. At said hearing, the Planning Commission may add additional conditions, or recommend enforcement actions, or revoke the permit entirely, as necessary to ensure compliance with the Municipal Code, and to provide for the health, safety, and general welfare of the City. The applicant shall reimburse the City for all costs associated with gaining compliance with the original conditions of approval.

61. Any minor changes may be approved by the City Manager and/or Community Development Director. Any major changes will require the filing of a revision application to be considered by the City Council.

62. All requirements of the City of Carpinteria (including but not limited to public improvements as defined in the City of Carpinteria Municipal Code (CMC), Section 15.16.110) and any other applicable requirements of any law or agency of the State and/or any government entity or District shall be met.

63. Any and all damage or injury to public property resulting from this development, including without limitation, City streets, shall be corrected or result in being repaired and restored to its original or better condition.

64. No building permits shall be issued for this project prior to meeting all required terms and conditions listed herein. When not specified herein, all conditions shall be satisfied prior to issuance of a building permit or prior to occupancy when allowed by the Community Development Director.

65. To allow time for the utility companies to locate and mark their facilities for the contractor, the applicant shall telephone Underground Service Alert (USA) toll free at 1-800-227-2600 a minimum of 48 hours prior to the start of construction. For best response, provide as much notice as possible, up to 10 working days.

66. Prior to initiation of any decommissioning or remediation activities, applicant shall consult with the Carpinteria Sanitary District and Carpinteria Valley Water District to appropriately locate and protect in place any service laterals and mains located within the Project Site that are not proposed to be abandoned as part of the approved project. Authorization from the respective districts will be required before any Building, Demolition or Engineering Permits are issued.

67. Applicant shall first obtain a permit from the Carpinteria Sanitary District in the event the applicant seeks to discharge any wastewater from the decommissioning or remediation activities into Carpinteria Sanitary District-owned facilities. Applicant shall implement standard Best Management Practices to prevent unauthorized or accidental discharges to the sanitary sewer system.

68. Compliance with the attached Departmental and District letters is required as follows:

    a. City of Carpinteria Public Works Department/Engineering dated April 29, 2025
    b. Santa Barbara County Air Pollution Control District dated April 25, 2025

69. All applicable final conditions of approval shall be printed in their entirety on applicable pages of grading/construction or building plans submitted to CDD. These shall be graphically illustrated where feasible. The approved set of plans shall be retained at the construction site for review by the Building Inspector during the course of construction.

70. Applicant shall ensure that the project complies with all approved plans and all project conditions including those which must be monitored after the project is built and occupied. To accomplish this, applicant agrees to contact CDD at least two weeks prior to commencement of construction activities to schedule an onsite pre-

construction meeting with the owner, other agency personnel and with key construction personnel.

71. Prior to issuance of a Building Permit, the applicant shall provide a signed copy of the Conditions of Approval.

72. This approval is not valid until a Building Permit for the development has been obtained. Failure to obtain said Building Permit shall render this approval null and void. Prior to the approval of the Building Permit, all of the conditions listed in this approval are required to be satisfied. Upon issuance of the Building Permit, the approval shall be valid. The effective date of this Permit shall be the date of expiration of the appeal period, or if appealed, the date of action by the Planning Commission.

73. The owner/applicant/developer ("Owner") hereby agrees to defend, indemnify and hold harmless the City, its officers, employees, agents, consultants and independent contractors ("City's Agents") from any claim, action or proceeding ("Claims") against the City and the City's Agents to attack, review, set aside, void or annul, in whole or in part, the City's approval of the Chevron Carpinteria Oil and Gas Facility Decommissioning Project (the "Project"), or any condition attached thereto, or any proceedings, acts or determinations taken, done or made prior to the approval that were part of the approval process. Owner further agrees to indemnify and hold harmless the City and the City's Agents from any award of attorneys' fees or court costs made in connection with any Claim. Owner further agrees to pay any and all City costs, permit fees, attorneys' fees, engineering fees, license fees and taxes arising out of or concerning the Project, whether incurred prior to or subsequent to the date of approval and that the City's costs shall be reimbursed prior to this approval becoming valid. These commitments of defense and indemnification are material conditions of the approval of the Project. Nothing contained in this condition shall prevent the City or the City's Agents from independently defending any Claim. If the City or the City's Agents decide to independently defend a Claim, the City and the City's Agents shall bear their own attorneys' fees, expenses and costs of that independent defense.

74. In the event that any Condition of Approval imposing a fee, exaction, dedication or other mitigation measure is challenged by Applicant/Owner/Developer/Permittee in an action filed in a court of law or threatened to be filed therein which action is brought within the time period provided by law, this approval shall be suspended pending dismissal of such action, the expiration of the limitation period applicable to such action, or final resolution of such action. If any Condition of Approval is invalidated by a court of law, the entire project shall be reviewed by the City and substitute Conditions of Approval may be imposed.

75. Any change of use in the proposed building or structure shall be subject to environmental analysis and appropriate review by the City including Building Code compliance.

76. Written authorization to proceed and consent to conditions of approval by the legal owner of the property shall be provided to the City prior to building permit issuance.

Approved by the City Council on July 15, 2025

I HAVE READ AND UNDERSTOOD, AND I WILL COMPLY

WITH ALL ABOVE STATED CONDITIONS OF THIS PERMIT.

_____

Applicant/Property Owner Date

CITY OF CARPINTERIA, CALIFORNIA

Public Works Department
Memorandum

To: Nick Bobroff, Community Development Director
Community Development Department

From: John L. Ilasin, Public Works Director/City Engineer /s/

Date: April 29, 2025

Subject: 5675 Carpinteria Avenue, Project No. 21-2128-DP/CDP

The Public Works Department has reviewed the project submittal dated October 21, 2021, and has the following conditions of approval:

CONDITIONS OF APPROVAL

1. An Engineering Permit shall be obtained from the City Engineer for any improvements or other encroachment work within the City of Carpinteria public right-of-way and/or public property.

2. All improvements within the City of Carpinteria public right-of-way and/or public property shall be completed to the satisfaction of the City Engineer prior to the issuance of a Certificate of Occupancy.

3. An Engineering Permit shall be obtained from the City Engineer for earthwork excavation or fill that exceeds three feet in vertical depth at its deepest point, measured from the natural ground slope, and/or thirty cubic yards of material moved in any twelve-month period.

4. Record drawings or as-built plans shall be submitted to the City Engineer at time of final inspection for all work covered by an Engineering Permit. The record drawings or as-built plans shall be the original construction tracings or permanent mylar copies of a quality acceptable by the City Engineer.

5. A Transportation Permit shall be obtained from the City Engineer for operating or moving any vehicle or combination of vehicles or special mobile equipment in any of the acts as listed in Carpinteria Municipal Code Section 12.12.010.

6. All existing private property encroachments shall be removed from the City of Carpinteria public right-of-way and/or public property.

7. All new and existing utility services shall be installed underground from the closest point of connection or utility pole and completed prior to any paving required for the project. No new utility poles shall be installed.

8. Stormwater control plans shall be in conformance with the County of Santa Barbara Technical Guide for Low Impact Development.

9. A Maintenance Agreement for permanent stormwater quality best management practices shall be submitted to the City Engineer for review and approval. The Maintenance Agreement shall include, at minimum, the following elements: (1) Operations and Maintenance Plan; (2) Legal description and plat of property; (3) Site plan of all permanent stormwater quality best management practices; (4) Property owner's printed name, signature, and date of signing; and (5) Notary public acknowledgement.

10. Improvements in areas of special flood hazards as shown in the latest effective flood insurance rate map shall be constructed in conformance with the City floodplain management regulations (Carpinteria Municipal Code Chapter 15.50).

11. Construction and demolition debris generated shall be reported in conformance with the Construction and Demolition Debris Recycling Program. Sixty-five percent (65%) or more of all construction and demolition debris shall be diverted from the landfill. The Construction and Demolition Debris Recycling Program forms shall be completed and submitted to the City Engineer prior to the issuance of a Certificate of Occupancy.

12. Construction and demolition debris shall be separated on site into reuse, recycling, or disposal. Separate bins or containers for recycling of construction and demolition debris shall be provided on site.

13. Self-hauled disposal receipts from transfer stations shall be submitted to the City Engineer prior to the issuance of a Certificate of Occupancy.

14. Any self-hauled construction and demolition debris shall be reported in writing to the City Engineer. A contract waste hauler may be allowed for disposal of construction and demolition debris subject to the approval of the City Engineer.

End of Comments

April 25, 2025

Nick Bobroff
City of Carpinteria
Community Development Department
5775 Carpinteria Avenue
Carpinteria, CA 93013

Sent Via Email: nickb@carpinteriaca.gov

Re: Santa Barbara County Air Pollution Control District Suggested Conditions for the Chevron Carpinteria Oil and Gas Facility Decommissioning Project, Project No. 21-2128-DP/CDP

Dear Mr. Bobroff:

The Santa Barbara County Air Pollution Control District (District) has reviewed the project that consists of the decommissioning and remediation of the Oil and Gas Processing Facilities owned and operated by Chevron. The proposed project-related activities include the removal of nearshore/offshore pipelines out to three nautical miles (the state waters limit) and the complete remediation of impacted soils and groundwater at the onshore facility. The subject property, a 64-acre parcel zoned Coastal Industry District (M-CD) and Recreation (REC) and identified in the Assessor Parcel Map Book as APN 001-170-003, 004, 021, 022, 023, is located at 5675 and 5663 Carpinteria Avenue in the City of Carpinteria.

The proposed project is subject to the following **regulatory requirements and advisories** that should be included as conditions of approval in the applicable land use permit:

1. **District Permit**: The proposed project includes operations (including contaminated soil remediation) subject to District permitting requirements, rules, and regulations, therefore the project will be required to obtain an Authority to Construct (ATC) and/or Permit to Operate permits from the District prior to the start of construction/demolition activities. Proof of receipt of the required District permits shall be submitted by the applicant to planning staff. The District permit process can take several months. To avoid delay, the applicant is encouraged to submit their permit application to the District as soon as possible, see www.ourair.org/permit-applications/ to download the necessary application(s). See www.ourair.org/csc-projects for information on contaminated soil clean-up.

2. **Diesel Engines**: All portable diesel-fired construction engines rated at 50 brake horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or District permits. Generally, construction engines with PERP certificates are exempt from the District permit, provided they will be on-site for less than 12 months. In some situations, portable and/or temporary engines, require a District permit irrespective of PERP-registration status. See www.ourair.org/wp-content/uploads/PERPfaq.pdf for more information on the operation of PERP-registered engines at stationary sources.

3. **Asbestos**: The applicant is required to complete and submit an Asbestos Demolition/Renovation Notification (District Form ENF-28, available at www.ourair.org/compliance-forms) for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed notification should be

presented or mailed to the District with a minimum of 10 working days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. For additional information, see www.ourair.org/asbestos/ or contact the District's Compliance Division at (805) 979-8050.

4. **Marine Vessels**: Prior to the start of demolition activities, a written permit exemption or Authority to Construct/Permit to Operate permits must be obtained for the operation of marine vessel engines. The District will evaluate the duration and emissions from the project to determine if the project is subject to Regulation VIII, *New Source Review*, and if so, which requirements will apply. Pursuant to District Rule 202.F.8., the project may qualify for a written permit exemption if the duration of the activities do not exceed 12 consecutive months and the potential to emit of such engines is less than 10 tons per stationary source of oxides of nitrogen (NOx), oxides of sulfur (SOx), reactive organic compounds (ROC), or particulate matter (PM). To qualify for this exemption, the owner or operator of the stationary source shall submit a written request for exemption to the District. The District will make a determination in writing approving or denying the request. The request shall identify the marine vessels, project activities, duration, and shall include the emission calculations and assumptions demonstrating that the engines meet the exemption criteria. Alternatively, an owner or operator of the stationary source may qualify for an exemption by obtaining an Authority to Construct and Permit to Operate which limits the potential to emit of such equipment to less than 10 tons per year. Such Authority to Construct/Permit to Operate shall be exempt from Regulation VIII.

5. **Onsite Storage**: If there is any planned or potential storage of Reactive Organic Compound (ROC) containing liquids or solids (e.g. ROC-impacted soils), the applicant must obtain a District permit or written exemption from permit.

6. **Pipeline Purging.** Pipeline purging operations have the potential for odor generation. In order to prevent odors from causing a violation of District Rule 303, *Nuisance*, the District recommends that carbon canisters or a thermal oxidizer be employed to control vapors released during pipeline decommissioning activities. Some companies already have permits with the District for thermal oxidizer units. The applicant should consider using an already permitted unit through a company, or could contact the District to obtain a permit or written permit exemption.

7. **Prohibitory Dust Rules**: Construction/demolition activities are subject to District Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*. This rule establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites, includes measures for minimizing fugitive dust from on-site activities, and from trucks moving on- and off-site. Please see www.ourair.org/wp-content/uploads/rule345.pdf. Activities subject to Rule 345 are also subject to Rule 302 (*Visible Emissions*) and Rule 303 (*Nuisance*).

8. **Idling**: Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation. See https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling.

9. **Fugitive Dust Measures**: To reduce the potential for violations of District Rule 345 *(Control of Fugitive Dust from Construction and Demolition Activities)*, Rule 302 *(Visible Emissions)*, and Rule 303 *(Nuisance)*, standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities.

10. **Diesel Exhaust Measures**: The State of California considers particulate matter emitted by diesel engines carcinogenic. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of particulate matter (as well as of ozone precursors) from diesel equipment. Recommended measures should be implemented to the maximum extent feasible.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8337 or via email at BarhamC@sbcapcd.org.

Sincerely,

Carly Barham

Carly Barham,
Planning Division

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

cc: Planning Chron File
Permitted Sources File SSID 00027 FID 00027

apcd air pollution control district
SANTA BARBARA COUNTY

ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

Projects involving earthmoving activities are expected to manage fugitive dust emissions such that emissions do not exceed APCD's visible emissions limit (APCD Rule 302), create a public nuisance (APCD Rule 303), and are in compliance with the APCD's requirements and standards for visible dust (APCD Rule 345). The following measures should be implemented to reduce fugitive dust emissions and impacts.

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained 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.
- Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces.
- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.
- If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than one day 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. The amount of excavated material or waste materials stored at the site should be minimized.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, or if previously graded areas remain inactive for more than 10 calendar days, treat the disturbed area by watering, OR using roll-compaction, OR revegetating or hydroseeding, OR by applying non-toxic soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks etc. proposed to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress.

All measures required by the Lead Agency shall be shown on grading and building plans and/or as a separate information sheet listing the conditions of approval to be recorded with the map prior to grading/building permit issuance and/or map recordation. Conditions shall be adhered to throughout all grading and construction periods. The name and telephone number of a dust control contact shall be provided to the APCD prior to grading/building permit issuance and/or map clearance. The Lead Agency shall ensure measures are on project plans and/or recorded with maps. The Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

apcd air pollution control district
SANTA BARBARA COUNTY

ATTACHMENT B

CONSTRUCTION DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

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

The following measures are required by state law:

- **Portable Engines**: All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program (PERP)[1] OR shall obtain an APCD permit.
- **Off-Road Equipment**: Fleet owners of diesel-fueled mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation[2]. All off-road vehicles subject to this regulation must use renewable diesel fuel, with some limited exceptions.
- **Diesel Trucks**: Fleet owners of on-road diesel-fueled heavy-duty trucks and buses are subject to CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), the Statewide Truck and Bus Regulation, and the Advanced Clean Fleets Regulation to reduce emissions from trucks and buses.[3]
- **Idling:** Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.[4] Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation.

The following measures are recommended:

- At a minimum, off-road diesel equipment should be equipped with engines compliant with, or certified to meet or exceed, CARB Tier 4 emission standards. Where available, off-road construction equipment should be zero-emission. Alternative/renewable fuels such as compressed natural gas (CNG), liquefied natural gas (LNG), or propane should be utilized to the maximum extent feasible when zero-emission is not available. Electric auxiliary power units should be used. The Lead Agency should require commitments to Tier 4 and/or zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- On-road heavy-duty equipment with model year 2014 or newer engines, or powered by zero- or near zero-emission technology, should be used whenever feasible.
- All portable generators should be powered by a source other than diesel or gasoline (i.e., battery, natural gas, propane, etc.)
- All construction equipment should be maintained in tune per the manufacturer's specifications.
- The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Proposed truck routes should minimize impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows. Construction activity schedules and hours should be planned and adjusted as feasible to maximize distance from existing sensitive receptors and minimize exposure to air pollution.

Prior to grading/building permit issuance and/or map recordation, all measures required by the Lead Agency shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout grading and construction periods. The contractor shall retain onsite the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles and have it available for inspection. The Lead Agency shall ensure measures are on project plans and/or recorded with maps and ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

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1 https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp
2 https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation
3 https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/truckstop
4 https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about

Attachment B.

May 5, 2025 Planning Commission Staff Report and Attachments

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

PLANNING COMMISSION STAFF REPORT

MEETING DATE: May 5, 2025

ITEM FOR CONSIDERATION

Chevron Carpinteria Oil and Gas Facility Decommissioning

PROJECT 21-2128-DP/CDP

Request from Chevron West Coast Decommissioning Program to accept and certify the Environmental Impact Report (State Clearing House No. 2022080026), and to grant a Development Plan and Coastal Development Permit for onshore oil and gas facilities removals and remediation; and approval of Facility Decommissioning Plan within City Deeded Tidelands and Issuance of a Lease Quit Claim.

Report prepared by: Luis Perez, Project Manager
MRS Environmental Inc.

SIGNATURE

Reviewed by: Nick Bobroff, Director
Community Development Department

SIGNATURE

Applicant / Owner: Chevron West Coast Decommissioning Program

Project Location: 5619, 5663, 5675 and 5731 Carpinteria Avenue, Carpinteria, California 93013

APNs: 001-170-003, 004, 014, 020, 021, 022, 023

Zoning: Coastal Industry District (M-CD) and Recreation (REC)

General Plan Designation: Coastal Dependent Industry (CDI) and Open Space Recreation (OS/R)



I. RECOMMENDATION

Adopt the attached Resolution PC-25-001, thereby acting on behalf of the City of Carpinteria as the Lead agency as defined by the California Environmental Quality Act (CEQA), accepting and

certifying the Environmental Impact Report (EIR) for the Chevron Oil and Gas Decommissioning Project as having satisfied the procedural and statutory requirements of CEQA; selecting the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" as the preferred Project; and approving the Development Plan and Coastal Development Permit (21-2128-DP/CDP) for the proposed Chevron Carpinteria Oil and Gas Facility Decommissioning Project to allow for the Project to occur as detailed in the Project Description below.

II. PROPOSED PROJECT DESCRIPTION

Development Plan and Coastal Development Permit: A Development Plan and Coastal Development Permit are required to allow the proposed development as described below.

Proposed Project

The Project proposes to demolish and remove the Carpinteria Oil and Gas Processing Facility (Facility) including, but not limited to, the onshore portions of the Facility (Onshore Facility), and State Waters Offshore Pipelines, and complete remediation of impacted soils and groundwater at the Facility. Remediation is proposed to comply with levels established in a Remedial Action Plan (RAP) that will be reviewed by the Santa Barbara County Public Health Department, Environmental Health Services (SBCEHS), Regional Water Quality Control Board (RWQCB), and United States Environmental Protection Agency (U.S. EPA). The Project proposal assumes the most stringent clean up levels for the purpose of determining soil excavation and truck trip estimates and therefore a maximum amount of remediation activities (e.g., truck trips, Site activities). The Applicant states remediation efforts will be performed along with preservation of existing Site resources, including mature trees and bluffs, and in coordination with Site constraints including buffer zones adjacent to the Union Pacific Railroad (UPRR) right-of-way (ROW). The most stringent clean up levels would also result in greater flexibility for future development on the Site meeting the most rigorous standards (e.g., unrestricted land use).

Decommissioning and remediation of the Facility will include the following activities:

Onshore Facility

- Idling and removal of all existing surface and subsurface equipment, piping, and structures within the Facility;
- Removal of concrete foundations, asphalt, oil spray, and road base within the Facility;
- Excavation/remediation of any impacted soils underlying the Facility in accordance with the Facility's Remedial Action Plan (RAP) and RAP Addendums, and appropriate regulatory guidance (once approved);
- Recycling/disposal of all materials removed from the Project Site(s); and
- Restoration of portions of the Site in accordance with the Site Restoration Plan (once approved).

Beach Crossing and State Waters Offshore Pipelines

- Pig and flush State Waters Offshore Pipelines in preparation for removal;
- Removal of State Waters Offshore Pipeline segments out to 3-nmi state waters limit;
- Removal of nearshore beach crossing pipeline segments;
- Recycling/disposal of all materials removed from the Project Site(s); and
- Onshore restoration in accordance with the Site Restoration Plan (once approved).

The Project Site includes the Facility, as well as the State Wates Offshore Pipelines and utilities leading into the Project Site from state waters, as further described below. Within the onshore portion of the Project Site, a number of operational areas/plant areas have been identified that contain idle structures, vessels, and piping proposed for demolition and remediation. The state waters offshore portion of the Project Site contains two primary pipeline and utility bundles that come to shore and lead into the Onshore Facility. Proposed activities within each area are listed below.

Onshore Facilities and Proposed Activities

- Main Plant Area (MPA) – Surface and subsurface facilities demolition, and soil remediation;
- Chevron Pipeline Area (CPA) - Surface and subsurface facilities demolition, and soil remediation;
- Former Marketing Terminal Area (FMTA) – Surface facilities demolition and soil remediation;
- Former Nursery Area (FNA) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels;
- Shop and Maintenance Area – Surface and subsurface facilities demolition and soil remediation;
- Marine Spill Response Corporation (MSRC) Lease Area – Surface facilities demolition and soil remediation;
- Peninsula Area - Soil remediation in coordination with SoCalGas facility demolition and City of Carpinteria skate park development;
- Buffer Zone Area (BZA)/Drainage Area No. 4 (DA4) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels; and
- Gravel Portion of Pier Parking Lot/FSBA – Surface and subsurface facilities demolition, and soil remediation/subsurface pipeline removal/abandonment in place.

State Waters Offshore Pipelines and Proposed Activities

- Platform Gail and Grace Pipeline Bundle and 10-inch Oil Pipeline – Removal from top of bluff to 3-nmi state waters limit; and
- Marketing and Marine Terminal Pipeline Bundles – Removal offshore through top of bluff. Onshore pipelines will be abandoned in-place.

The Project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City is the Lead Agency with principal responsibility for considering the Project for approval (14 California Code of Regulations [CCR] (CEQA Guidelines) 15000 et seq.).

A more complete Project Description is included in Section 2, Project Description, of the Final EIR included as Attachment B to this Report.

Environmentally Superior Alternative.

The “Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative” consists of all the components of the Proposed Project (described above) together with removal of the onshore and nearshore portions of the former Platforms Hazel and Hilda pipeline bundle, which was abandoned in place as approved by the State Lands Commission during the platform removal project in 1997. This alternative is a revised version of the “Full Removal of Facilities Alternative” described in Section

5.3.2 of the Final EIR, but does not include removal and remediation of naturally occurring hydrocarbon seeps, plugging and abandonment of seven existing wells within the Project Site, or removal of the former Platforms Hazel and Hilda pipeline bundle further from shore, beyond a depth of 30 feet of water.

Comments from the Applicant and others pointed out that the hydrocarbon seeps and historic wells are not required to be remediated by any regulatory agency and are not feasible under the existing Project. The California Coastal Commission has stated that the seeps are a chronic natural occurrence that is part of the environmental setting and would not be considered an impact. The seeps, which include a number of seep areas within the BZA, MSRC Area, MPA, and Pier Parking Lot Area, are natural environmental features resulting from geological conditions. The California Coastal Commission commented that leaving the seeps undisturbed in their natural state would not be inconsistent with the Coastal Act. (California Coastal Commission letter, 1/31/2024). Previous attempts to cement over seeps in southern California have resulted in seeps moving around the cement cap. (Chevron letter, 1/31/2024). Abandonment of the historic wells on the property that were installed and operated by others are not proposed to be affected by the Proposed Project decommissioning activities. The California Geologic Energy Management Division (CalGEM) advised that the property owner would be responsible for well reabandonment if the property owner proposed construction that would prevent or impede well access, but the Proposed Project is not projected to build over or impede access to the historic wells. (CalGEM letter, 2/1/2024). CalGEM has determined that there is no regulatory requirement for Chevron to plug or abandon the wells as part of the Proposed Project. Accordingly, the City does not have any regulatory authority to require that Chevron decommission these existing historic wells, nor can the City require the applicant to remediate natural seeps.

In response, the City requested and the Applicant has agreed to propose and, if approved, carry out the revised "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" which consists of the original Proposed Project together with partial removal of the former Platforms Hazel and Hilda pipeline bundle, but does not disturb the naturally occurring seeps or historic wells. Under this alternative, in addition to the Proposed Project, the Applicant would remove a portion of the former Platforms Hazel and Hilda pipeline bundle, onshore from the base of the bluff and offshore for approximately 1,400 feet, to a depth of 30 feet of water. The rest of the offshore pipeline bundle would remain abandoned in place, with the ends sealed by mechanical plugs. The 30-foot water depth was selected to ensure that the work barge has sufficient water depth to work safely and in accordance with the proposed removal procedures for the adjacent marine terminal pipelines. In addition, the related 36-inch diameter corrugated metal vault located on the bluff would be fully removed.

The "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" would achieve the basic objectives of the Project by accomplishing the components of the original Proposed Project. In addition, removing the former Platforms Hazel and Hilda pipeline bundle through the bluffs would prevent future erosion and avoid the pipelines becoming a burden on the public if removal is necessary in the future, as noted by the California Coastal Commission. (California Coastal Commission letter, 1/31/2024).

Figures are attached as Attachment A, Exhibit 2.

Additional Permit Approvals

Following acceptance and certification of the EIR by the Planning Commission, acting on behalf of the City of Carpinteria as Lead Agency, as having satisfied the requirements of CEQA, additional permits and/or approvals for the Chevron Carpinteria Oil and Gas Facility Decommissioning Project are required from the following jurisdictions:

- Santa Barbara County Department of Planning and Development - Approval of Pipeline Right of Way Lease Agreement within County Deeded Tidelands. Removal of Project components located within County deeded tidelands. Activities within designated coastal zone.
- Santa Barbara County Public Health Department, Environmental Health Services Department. - Approval of Remedial Action Plan. Establishment of remediation levels for any onshore impacted soil.
- Santa Barbara County Air Pollution Control District (SBCAPCD). - Portable Engine Permits for onshore facilities, Contaminated Soil Clean Up, Marine Engine Permits for offshore activities, Storage of ROC-containing liquids or solids, Odor control equipment.
- California Coastal Commission (CCC). - Federal Consistency Determination for all Federal approvals and permits. Coastal Development Permit for actions within State Waters. Appeals jurisdiction of Coastal Development Permits issued for onshore activities with the Coastal Zone.
- California Department of Fish and Wildlife (CDFW). - Consultation under State Endangered Species Act. Section 1601 approval for work within designated waterways. Activities affecting State Waters biological resources. Onshore activities affecting onshore biological resources including streams and wetlands.
- Regional Water Quality Control Board (RWQCB). - Section 401 certification in association with 404 Permit Approvals. Stormwater permits for all onshore excavations. Approval of Remedial Action Plan.
- California State Office of Historic Preservation (OHP) and the State Historical Preservation Office (SHPO). - Consultation under Section 106. Impacts to historic and pre-historic resources.
- California State Fire Marshal, Hazardous Liquid Pipeline Safety Division. - Pipeline inspections and safety. Consultation with CalGEM and California State Lands Commission (CSLC).
- U.S. Army Corps of Engineers (U.S. ACOE). - Issuance of a 404 Permit associated with excavation and related bottom disturbance.
- United States Fish & Wildlife Service (USFWS). - Consultation under the Endangered Species Act (Section 7) and Issuance of Biological Opinion/Incidental Take Permit (if necessary).
- National Oceanic & Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS). - Consultation under the Federal Endangered Species Act, Section 7, Marine Mammal Protection Act, Essential Fish Habitat Assessment. Issuance of Biological Opinion/Incidental Take Permit (if necessary).
- U.S. Environmental Protection Agency (U.S. EPA). - Issuance of NPDES permit (if necessary) for offshore discharges. Termination of existing NPDES Permits associated with facility operations. Approval of remedial activities for PCBs.
- United States Coast Guard (USCG). - Notice to Mariners for activities that may affect navigable waters.

III. BACKGROUND

Site Characteristics and Background

Project Setting

The Project Site is located in the City of Carpinteria; access to the Project Site is from U.S. Highway 101 to Bailard Avenue and west onto Carpinteria Avenue to Dump Road. The Project Site is bisected by Dump Road (a private, two-lane roadway) from west to east, and by the UPRR from north to south. The eastern portion of the Project Site remains predominantly developed by oil and gas processing equipment, ancillary equipment, and other support facilities/buildings. A large above-ground tank (Tank 861) is the predominant feature onsite. The western portion of the Site is primarily open space. The southern third of the Project Site is open space along the bluffs, and two large parking areas utilized in support of the Casitas Pier operations.

The nearshore beach area along Tar Pits Park/Carpinteria State Beach provides public recreational access. A known harbor seal rookery is located approximately 70 feet to the east of Casitas Pier. The City closes public access to the beach from December 1st to May 31st per Carpinteria Municipal Code (CMC) §12.24.090 to avoid human interference with harbor seal pupping at the rookery. However, during the open season, the beach is accessible to the public at low tides from both the west and east. The pipelines and utilities that cross the beach in this area are in some cases above ground, on risers, or are seasonally exposed to view. Offshore water depths range up to 148 feet out to federal waters. The Project Site location, including the State Waters Offshore Pipelines sections, is shown in Attachment A, Exhibit 2 and provides an aerial view of the Facility, beach, and near offshore area.

The Project Site encompasses the Operational Project Areas within Chevron's property (Assessor's Parcel Numbers [APNs] 001-170-003, 001-170-004, 001-170-014, 001-170-021, 001-170-022, and 001-170-023, totaling approximately ~55 acres). The Project Site also includes a portion of Tar Pits Park (APN 001-170-020), which is crossed by several of the pipelines slated for removal. The Project Site is located on a relatively flat coastal terrace, and slopes slightly downward to the south and west. Coastal bluffs of between 35 and 50 feet in height descend from the terrace to a narrow sand beach. The State Waters Offshore Pipelines previously associated with the Facility are also proposed for removal from the shoreline out to the 3-mile State waters limit offshore within deeded tidelands to the City of Carpinteria and Santa Barbara County. These State Waters Offshore Pipelines are located within State Lease Nos. PRC 3133, 3150, 7911, and 4000 on submerged lands leased from the City (from shore to 2 miles offshore) and County (from 2 to 3 miles offshore).

The Project Site is currently designated Coastal Dependent Industry (CDI) and Open Space/Recreation (OSR), according to the adopted Land Use Map of the City's General Plan/Coastal Land Use Plan (GP/CLUP). The CDI land use category identifies areas for industrial uses that are coastal dependent, such as aquaculture and pipeline/gas processing facilities which support offshore oil industries. The OSR land use category provides for recreational areas (passive or active), including City parks, beaches, gold courses and related uses. It also identifies open space areas.

Under the City Municipal Code (CMC), the Project Site is zoned Coastal Industry District (M-CD). The current zoning designations of the Project Site and surrounding areas are shown in Figure 2-3. The onshore portion of the Project Site is currently developed with the Onshore Facility, open space, a former marketing terminal, and Marine Spill Response Corporation (MSRC) yard/offices north of the UPRR ROW. The onshore Project Site area south of the UPRR ROW is currently utilized for the Casitas Pier parking lot and State Waters Offshore Pipelines landings/bluff crossings.

The Project includes demolition of all existing Facility structures and subsurface remediation of the soils underlying the Facility. Any portions of the Project Site requiring remedial excavation within the Facility will be backfilled, final graded, and planted with native vegetation to match existing contours.

No additional structures will be constructed as part of the Project. Surrounding land uses include the Carpinteria City Hall campus, Carpinteria Avenue, and U.S. Highway 101 to the north, the Pacific Ocean to the south, the Concha Loma single-family residential neighborhood to the west, and a public golf driving range, agriculture, and open space to the east.

Site History and Use

The Project Site is located within an area that has been historically utilized for agricultural production and more recently for oil and gas development support activities. Historical agricultural production activities documented at the Project Site from the 1920s through 1959 included dry farming, row crop production, orchards (fruit trees and nuts), and commercial flower production (plant nursery).

Oil and gas processing equipment was initially constructed onsite in the 1950s to support production from the offshore Summerland field developed by the Standard, Humble, and Summerland State (SHSS) joint venture. Oil and gas first flowed through the Project Site in 1959 after the commissioning of offshore Platform Hazel. The processed oil was metered and transferred to Tank 861, a 217,000-barrel capacity above-ground storage tank (AST) with a floating top roof operated by Standard Oil's Pipeline Department (now Chevron Pipeline & Power). Produced gas that flowed to the Project Site from Platform Hazel and later other offshore platforms was processed onsite and then sold to Southern California Gas Company (SoCalGas) via the Sales Gas Area (pipes, valves, meters, and equipment), which was also constructed in the late 1950s.

Historically, processing levels at the Chevron facility have been as high as 20,000 barrels per day of crude oil and 20 million standard cubic feet (MMSCF) per day of natural gas. The Chevron processing plant consisted of offices, production pipelines from offshore platforms, a connected system of product separation, processing, and storage facilities. Processed natural gas from the plant was fed into the SoCalGas network. Processed crude oil and natural gasoline were blended and shipped from the Chevron facility by way of pipeline to Ventura, from where it was piped to refineries in the Los Angeles area.

Historically, refined products and crude oil were also transferred from the Carpinteria facilities via marine tanker. However, the marine terminal, formerly accessed by an offshore mooring, is no longer operational. From 1960 to 1989, the oil and gas plant received oil and gas from several other offshore platforms constructed in the Santa Barbara Channel, including Hilda, Hope,

Hazel, and Heidi (Carpinteria Field), and Grace and Gail (Santa Clara Field and Sockeye Field). Upgrades and additions to the Plant facilities were completed to accommodate the varied quality of the additional oil and gas volume. Abandonment of the wells and decommissioning/removal of offshore Platforms Hazel, Hilda, Hope, and Heidi (4H Platforms) from the Santa Barbara Channel were completed in 1996.

Chevron sold its Santa Barbara Channel assets to Venoco, Inc. in 1998. Although Platform Grace ceased production in 1998, the Plant and Tank 861 continued to receive oil and gas production from Platform Gail until approximately 2017. Chevron purchased the property as part of Venoco bankruptcy proceedings, and is the Operator of record and Applicant for the decommissioning Project.

Architectural Review Board (ARB)

The Project as proposed is a decommissioning project and there is no development proposed that would warrant Architectural Review Board review.

IV. ENVIRONMENTAL

The Project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City is the Lead Agency with principal responsibility for considering the Project for approval (14 California Code of Regulations [CCR] (CEQA Guidelines) 15000 et seq.). An Environmental Impact Report (EIR) has been prepared to address the environmental impacts associated with the Decommissioning and Remediation of the Chevron Carpinteria Oil and Gas Processing Facility.

The City, as Lead Agency under the CEQA, determined that the Project required the preparation of an EIR since the Project could have significant environmental effects. CEQA Public Resources Code (PRC) Sections 21000 et seq., requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. This EIR has been prepared to satisfy CEQA requirements pursuant to PRC Sections 21000-21989 and the CEQA Guidelines, Title 14 of the CCR, Division 6, Chapter 3, Section 15000 et seq.

CEQA requires preparation of an EIR for any project that a Lead Agency determines may have a significant impact on the environment. EIRs are informational documents “which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project” (Guidelines Sec. 15121).

An EIR is a public informational document designed to provide decision-makers and the public with an analysis of the environmental effects of a proposed project, to indicate possible ways to reduce or avoid significant effects, and to describe reasonable alternatives to a project. An EIR must also disclose significant environmental impacts that cannot be avoided, growth-inducing impacts, effects not found to be significant, and significant cumulative impacts of past, present, and reasonably foreseeable probable future projects, as well as mitigation measures, alternatives to the Project, and areas of controversy.

As an "informational document" (see Section 15121(a) of the CEQA Guidelines) this EIR is intended to inform the City, other public agencies with discretionary authority over aspects of the Project, the general public, the local community, and other organizations, entities, and interested persons of the Project's scope, significant environmental effects, feasible measures to avoid or minimize the significant effects, and a reasonable range of feasible alternatives to the Project that would avoid or substantially lessen the significant effects. CEQA states that "each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." (PRC § 21002.1(b).) The State CEQA Guidelines, Section 15126.6 (e)(2), state that if the environmentally superior alternative is the No Project Alternative, then an environmentally superior alternative must be identified from among the other alternatives.

Before any action may be taken on the Project, the City of Carpinteria, as Lead Agency under CEQA, must certify that it has reviewed and considered the information in the Final EIR (consisting of the Draft EIR, comments submitted during the Draft EIR public review period and responses to all comments), that it has exercised its independent judgment and analysis, and that the Final EIR has been completed in compliance with the requirements of CEQA. Certification of the Final EIR by the Lead Agency does not constitute approval or denial of the Project.

The Planning Commission is responsible for accepting and certifying the Proposed Final EIR as having: 1.) Adequately and accurately described and disclosed all potential project impacts; 2.) Satisfactorily reducing all identified potentially significant environmental effects to less than significant levels through the implementation of appropriate mitigation measures or adopting a statement of overriding considerations for impacts that remain significant and unmitigable; and 3.) Satisfying the procedural and statutory requirements of CEQA. As part of the action in certifying the EIR, the Planning Commission must also select the preferred project from amongst the Proposed Project or project alternatives.

V. ANALYSIS

Environmental Impact Report

On August 1, 2022, the City, as the Lead Agency, issued a Notice of Preparation (NOP) to inform the general public and agencies that an EIR would be prepared for the Project and to solicit comments on environmental issues to be addressed in the document. The public scoping comment period was extended by 30 days and closed on September 30, 2022. Comments received in response to the NOP were used to further refine the scope of the analysis and the technical studies in this EIR.

The City of Carpinteria issued a Draft EIR on November 30, 2023. The public comment period on the Draft EIR ran through January 31, 2024. The City of Carpinteria held a public comment meeting on December 18, 2023 as part of the Environmental Review Committee (ERC) meeting and comments were received from the public and members of the ERC. The ERC voted 4-0 (ERC Member Erin Maker was absent) to recommend acceptance of the EIR to the Planning Commission with the comments received during the meeting. All comments are responded to as part of Appendix I in the Final EIR, and the Final EIR has been amended as needed in response to the comments.

The public comments received on the Draft EIR were reviewed and responded to as required by CEQA and the CEQA Guidelines. The Final EIR has been prepared, incorporating all of the comments received, written responses to received comments, and the Draft EIR, along with any changes to the Draft EIR that resulted from the comments received.

The Draft EIR (paper copy form) as well as the Final EIR are available to the general public for review at these locations:

- City of Carpinteria Community Development Department
- City of Carpinteria Public Library

The Draft EIR and the Final EIR are also available on the City of Carpinteria's website at: https://carpinteriaca.gov/city-hall/community-development/oil-gas-information/oil-processing-facility-decommissioning/

Revision marks showing the changes from the Draft EIR are shown in the Final EIR where changes are shown as lines in the margins, and added text is shown underlined. Deleted text is not shown due to formatting issues.

The Final EIR contains the following major sections:

Executive Summary – Provides an overview of the Project, a summary of the significant impacts and associated mitigation measures identified for the Project.

Impact Summary Table – Provides a summary of the identified impacts for the Project. The table also provides a summary of identified mitigation measures for each impact.

Section 1: Introduction – Provides an overview of the Project evaluated in the EIR. This section also discusses agency use of the document and provides a summary of the contents of the EIR.

Section 2: Project Description – Provides objectives stated by Chevron for the Project, and a detailed description of the Project.

Section 3: Cumulative Projects Description – Provides a description of the projects that have been included in the cumulative projects' analysis. The cumulative analysis contained in this document covers the cumulative impacts of past, present, and reasonably foreseeable projects located in the vicinity of the Project.

Section 4: Analysis of Environmental Issues – Describes the existing conditions found in the Project area and vicinity and assesses the potential environmental impacts that could occur if the Project were implemented. These potential impacts are compared to various "Thresholds of Significance" (or significance criteria) to determine the severity of the impacts. Mitigation measures intended to reduce significant impacts are identified where feasible.

Section 5: Description of Alternatives/Alternatives Analysis/Environmentally Superior Alternative– Provides descriptions of the proposed alternatives that were considered and rejected for further analysis, and the Project alternatives selected to be evaluated in this document. It also provides an analysis of alternatives to the Project that could lessen any identified significant impacts while still achieving most of the basic Project objectives. It also includes the impact analysis for the alternatives evaluated in the EIR. Finally, it summarizes the environmental advantages and disadvantages of the alternatives compared to the Project, and it identifies the environmentally superior alternative.

Section 6: Other CEQA-Mandated Sections – Discusses the significant irreversible environmental changes which would be caused by the Project should it be implemented. This section also discusses the growth inducing impacts that may result from the Project and known areas of controversy.

Section 7: Summary of Mitigation Measures and Mitigation Monitoring Program – Contains a listing of all identified mitigation measures that should be included as conditions of Project approval for the Project.

Section 8: List of EIR Preparers, Agencies and Individuals Consulted During EIR Preparation – Identifies and presents the qualifications of those who prepared the document. Lists reference materials used and persons contacted to prepare the document.

The Final EIR also contains a number of appendices that support the EIR and its analysis:

Appendix A – Project Design Information

Appendix B – Air Quality Calculations

Appendix C – Biological Studies

- Terrestrial Biological Resources Study for the Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities (Padre 2022a, Appendix C-1).
- Tree Report for the Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities (Padre 2021a, Appendix C-2).
- Tree Maintenance and Hazard Reduction Plan (Padre 2023, Appendix C-3).
- Wetlands Delineation Report for the Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities (Padre 2021b, Appendix C-4).
- Marine Resources Biological Report for the Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities (Padre 2021c, Appendix C-5).
- Carpinteria Harbor Seal Monitoring and Protection Plan for the Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities (Padre 2021d, Appendix C-6).
- Preliminary Revegetation/Restoration Plan for the Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities (Padre 2021e, Appendix C-7).
- Essential Fish Habitat Assessment for the Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities (Padre 2021f, Appendix C-8).
- Supplemental Marine Surveys and Habitat Characterization Technical Letter-Report for Carpinteria Oil and Gas Processing Facilities (Padre 2022b, Appendix C-9).

Appendix D – Notice of Preparation, Initial Study, Comments, and Responses

Appendix E – Bluff Retreat Evaluation Report

Appendix F – Cultural Resources Assessment (Not available due to sensitive nature)

Appendix G – Noise Assessment

Appendix H – Traffic Analysis

Appendix I – Draft EIR Comments and Responses

Appendix J – Stormwater Pollution Prevention Plan

The Final EIR is included as Attachment B. The table below provides a brief description of the impacts and mitigation measures found for the Project.

Table 1 Summary of Project Impacts and Mitigation Measures

Issue Area	Impact	Description	Class*	Mitigation Measures
Aesthetics	A.1	Scenic Vistas	III	-
	A.2	Scenic Resources	III	-
	A.3	Visual Character/Quality	III	-
	A.4	Night Lighting	II	A.4: Beach/Nearshore Night Lighting Minimization
Air Quality	AQ.1	Standards	III	-
	AQ.2	Odors	II	AQ.2. Odor Control and Purging Plan
	AQ.3	Toxic Air Emissions	III	-
Biological Resources	Bio.1	Listed Species	II	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys Bio.1d: Fencing Bio.1e: Worker Education & Awareness Plan Bio.1f: Marine Wildlife Contingency & Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring & Protection Bio.1h: Wildlife Relocation Monitoring
	Bio.2	ESHA	II	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance
	Bio.3	Wetlands	II	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Requirements Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Program
	Bio.4	Movement of Wildlife	III	-
	Bio.5	Policy Conflicts	II	Bio.5: Tree Removal Mitigation
	Bio.6	Conservation Plan Conflicts	III	-
	Bio.7	**Accidental Oil Spills**	**I**	**Bio.7: Oil Spill Contingency Plan**
Cultural Resources	Cul.1	Known Resource CA-SBA-6	II	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
	Cul.2	Human Remains	II	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery
Geology & Soils	Geo.1	Earthquake Fault	III	-
	Geo.2	Erosion	II	Geo.2: Erosion Control Best Management Practices

Table 1 Summary of Project Impacts and Mitigation Measures

Issue Area	Impact	Description	Class*	Mitigation Measures
	Geo.3	Sedimentation	II	Measure Geo.2
	Geo.4	Unstable Bluffs	II	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removal Geo.4c: Bluff Stabilization Following Pipeline Removal
	Geo.5	Expansive Soils	III	-
	Geo.6	Septic Tanks	III	-
	Geo.7	Paleontological/Geologic Feature	II	Measures Cul.1a-f
Climate Change & GHG	GHG.1	GHG Emissions	II	GHG.1: GHG Emissions Reductions
	GHG.2	Plans	II	Measure GHG.1
Hazardous Materials & Risk of Upset	Haz.1	Routine Operations	II	Haz.1: Contaminated Soil Handling
	Haz.2	**Accidental Releases**	**I**	**Haz.2a: Spill Response Planning** **Haz.2b: Asbestos and Lead Planning**
	Haz.3	Schools	III	-
	Haz.4	Site Contamination	III	-
	Haz.5	Airports	III	-
	Haz.6	Emergency Response	III	-
	Haz.7	Wildland Fires	II	Haz.7: Fire Response Planning
Hydrology & Water Resources	**WR.1**	**Standards**	**I**	**WR.1: Stormwater Pollution Prevention Plan**
	WR.2	Groundwater Supplies	III	-
	WR.3	Drainage Patterns	III	-
	WR.4	Pollutants	III	-
	WR.5	Control Plans	III	-
Land Use & Planning	LU.1	Create Divisions	III	-
	LU.2	Policy Conflict	III	-
Noise & Vibration	N.1	12-hour CNEL	III	
	N.2	Hourly Average Ambient Noise	II	N.2a: Noise Barriers N.2b: Nighttime Activities
	N.3	Vibration	III	-
	N.4	Airport Noise Conflicts	III	-
Transportation & Circulation	T.1	Policy Conflicts	III	-
	T.2	VMT	III	-
	T.3	Traffic Hazards	III	-
	T.4	Emergency Access	III	-
Tribal Cultural Resources	TCR.1	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b
	TCR.2	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b
Other	All	Ag, Energy, Mineral, Housing, Public Services, Recreation, Utilities, Wildfire	III	-

*Class I = Significant and Unavoidable; Class II = Less than Significant with Mitigation; Class III = Less than Significant; Class IV = Beneficial.

Alternatives to the Project were developed per CEQA Guidelines Section 15126.6. Section 5.0, Environmental Analysis and Comparison of Alternatives, of the Final EIR provides a complete description of all alternatives considered, including an explanation for rejecting potential alternatives for further analysis. In addition, in response to comments made on the Draft EIR, an additional alternative, the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative," has been added to this EIR, which is included in the comparative analysis.

Table 2 below provides a relative comparison of the Class I, Class II, and Class III impacts of each alternative to the Project by issue area and impact.

Table 2 Alternatives Comparison

Issue Area	Proposed Project	No Project	Full Removal	Project plus Hilda and Hazel Pipelines
Aesthetics	Class III	Class III	Class II	Class III
Air Quality	Class II	Class III↓	Class II↑	Class II↑
Biological Resources	Class I	Class I	Class I	Class I
Cultural Resources	Class II	Class II	Class II	Class II
Geology & Soils	Class II	Class II	Class II↑	Class II↓
Climate Change & GHG	Class II	Class II↓	Class II↑	Class II↑
Hazardous Materials & Risk of Upset	Class I	Class I	Class I	Class I
Hydrology & Water Resources	Class I	Class I	Class I	Class I
Land Use & Planning	Class III	Class II	Class IV	Class III
Noise & Vibration	Class II	Class II↓	Class II↑	Class II↑
Transportation & Circulation	Class III	Class III↓	Class III↑	Class III↑
Tribal Cultural Resources	Class II	Class II	Class II	Class II
Other	Class III	Class III	Class II	Class III

Notes: ↓ = decrease in severity, ↑ = increase in severity

As the discussion above indicates, impacts from the various alternatives and the proposed Project are similar in classification for those impacts that are significant and mitigable. There are also some slight differences in severity as indicated above for those impacts that are significant and mitigable and for those impacts that are less than significant. However, because the "Full Removal Alternative" is not considered feasible and there are no regulatory requirements for this alternative, this alternative is not considered environmentally superior. Finally, although the various alternatives have similar levels of impacts, the reduction of long-term geological impacts to the bluffs from elimination of the additional pipelines under the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" results in this alternative being the environmentally superior alternative.

Carpinteria Municipal Code, Title 14- Zoning

The discussion below provides an analysis of the project in terms of its compliance with the development standards of Title 14, Zoning, of the Carpinteria Municipal Code (CMC).

Coastal Industry District (M-CD), CMC 14.30

Most of the property that makes up the Carpinteria Oil and Gas Facility is zoned Coastal Industry District (M-CD). The purpose and intent of the M-CD district is to provide for certain energy and industrial uses that require a site on or adjacent to the sea in order to be able to function at all, while providing standards and conditions that will ensure that environmental damage will be avoided or minimized to the maximum extent feasible. Uses permissible within the M-CD District subject to Development Plan and Coastal Development Plan approval include, but are not limited to, onshore facilities necessary for the exploration, development, production and/or transportation of offshore oil and gas resources, marine terminals required for waterborne shipment of crude oil or petroleum products, oil spill and cleanup facilities, and various accessory or appurtenant structures, equipment and facilities used in the exploration, development or production of oil, gas or other hydrocarbon substances. (CMC 14.30.030).

Most of the major facilities and improvements located within the Carpinteria Oil and Gas Facility date to the 1950s, prior to the City's incorporation and certification of the City's Local Coastal Program. The original Facility was authorized under the jurisdiction of the County of Santa Barbara; no Development Plan was required at the time. In the absence of an existing Development Plan, staff has required the proposed decommissioning and remediation activities to obtain a Development Plan pursuant to the requirements of the M-CD district. However, as no new structures or improvements are contemplated as part of the proposed Project, which instead seeks to remove existing facilities and improvements, the development standards for the M-CD District would not be applicable to this project.

Recreation District (REC), CMC 14.38

Several of the pipeline bundles proposed for removal or abandonment pass through what is now Tar Pits Park. The construction of these pipeline bundles predate the current Recreation District (REC) zoning designation and use of the area as a public open space. Removal of pipeline segments and associated equipment through Tar Pits Park and across the adjacent sandy beach and shoreline will result in temporary disturbances to the area, including but not limited to, potential impacts to sensitive resources and use by the public for recreational purposes. Temporary impacts will be minimized to the maximum extent feasible and are not anticipated to result in any permanent loss or impacts to the ongoing use of the area for habitat protection and public recreational use. In fact, the project would have a beneficial impact by removing legal nonconforming equipment and facilities from within the REC-zoned area. Accordingly, the proposed Project can be found consistent with the provisions for the REC District.

Environmentally Sensitive Habitat Area (ESH) Overlay District, CMC 14.42

Portions of the Project Site, including but not limited to, areas containing wetlands, native plant communities, butterfly trees, harbor seal rookery and hauling grounds, rocky points and intertidal areas, and subtidal reefs are designated as ESH and are subject to the provisions of the ESH Overlay District. The purpose of the ESH overlay district is to protect and preserve areas in which plant or animal life or their habitats are either rare or especially valuable because of their role in the ecosystem and which could be easily disturbed or degraded by human activities and developments. The intent of this district is to ensure that all development in such areas is designed and carried out in a manner that will provide maximum protection to sensitive habitat areas.

While the proposed project is unique in that it seeks approval to decommission and remove existing facilities and improvements rather than construct new development, decommissioning and remediation activities nevertheless have the potential to harm or impact sensitive resources located within the Project Site. Consistent with the avoidance and minimization standards outlined in the ESH Overlay District for various sensitive resources, the EIR prepared for the project identifies and assesses the significance of potential environmental effects, and identifies feasible mitigation measures to reduce the severity of impacts to sensitive resources to the maximum extent feasible. Additionally, as described in the Project Description, following the decommissioning and removal of existing facilities and improvements, and successful remediation of soils, certain areas of the Facility would be regraded and revegetated with native vegetation. With incorporation of all required mitigation measures, the project can be found to be consistent with the provisions of the ESH Overlay District.

Coastal Appeals (CA) Overlay District, CMC 14.48

The project is located within the appeals jurisdiction of the California Coastal Commission due to its location between the first public road (e.g., Carpinteria Avenue) and the sea. Accordingly, the City's final local action on the project, either the Planning Commission decision or the City Council action on appeal, would be appealable to the California Coastal Commission. Projects located within the CA Overlay District are subject to the appeals procedures outlined in CMC chapter 14.78.

The portions of the project located seaward of the coastal bluff face (i.e., pipeline removals across the sandy beach and out 3 nm. to the State waters limit fall within the California Coastal Commission's retained permit jurisdiction and will require approval of a Coastal Development Permit directly from the California Coastal Commission.

Coastal Plan Development Standards, CMC 14.50.010

The Coastal Plan Development Standards chapter of the CMC contains a number of coastal resource protection policies originally adopted as part of the City's Coastal Land Use Plan that were then incorporated into the Zoning Code to serve as development standards for proposed development in or near areas with known sensitive coastal resources. Development standards address beach and bluff development, hazards, environmentally sensitive habitats, visual impacts of development, and oil and gas facilities and pipelines.

As discussed elsewhere throughout this report, the Project can be found to be generally consistent with the intent of these coastal resource protection policies and standards. The Project involves the decommissioning and removal of an Oil and Gas Facility from within the Carpinteria Bluffs 0 area, including above ground tanks and equipment, and below grade pipelines and facilities that traverse public recreational areas on the bluffs, adjacent sandy beach, intertidal, and nearshore areas. Successful decommissioning and removal of these areas, and remediation of soils in the area would result in net beneficial impacts to sensitive coastal resources in the area. Temporary construction-phase impacts to sensitive habitats and resources can be reasonably mitigated through incorporation of mitigation measures identified in the Project EIR.

General Plan/Coastal Land Use Plan

The City of Carpinteria General Plan/Coastal Land Use Plan (GP/CLUP) is the primary planning document for the City. Since the City and the onshore Project area are located within the Coastal Zone, and the City's LCP has been certified in accordance with, and enacts the regulation set forth by the California Coastal Act (CCA), the City is the lead permitting agency on behalf of the Project. The offshore Project site is also located within State waters within the coastal zone. The following analysis demonstrates the proposed Project's consistency with the applicable policies of the City's GP/CLUP.

Land Use Element

Policy LU-1d. *Ensure that the type, location, and intensity of land uses planned adjacent to any parcel designated open space/recreation or agriculture are compatible with these public resources and will not be detrimental to the resource.*

The Project Site is currently zoned coastal dependent industry and recreation. The Project site is not zoned for or utilized in support of agricultural operations. Project activities would remove existing structures and remediate soils onsite; and leave the Project site as graded and recompacted open space or restored with native vegetation. No impact to designated farmlands would result. During demolition and soil excavation, additional dust would be generated that would have the potential to affect adjacent properties along the eastern boundary of the Project site. Implementation of best management practices for dust suppression would minimize dust generation from the Project site and mitigate potential impacts to adjacent agricultural uses.

Decommissioning activities, particularly related to pipeline abandonment or removal through the Tarpits Park and coastal bluff areas, and across the sandy beach in several locations, would have temporary construction impacts to these open space/recreational resources. Mitigation measures have been identified to avoid or reduce impacts to the maximum extent feasible, however temporary disturbances or interruption of public acess through these resource areas cannot be entirely avoided. Nevertheless, the long-term net benefit of the proper decommissioning and abandonment/removal of these facilities would result in a reduction of potential future hazards and access impediments from eroded or exposed facilities.

Objective LU-2. *Protect the natural environment within and surrounding Carpinteria.*

Policy LU-2b. *Regulate all development, including agriculture, to avoid adverse impacts on habitat resources. Standards for habitat protection are established in the Open Space, Recreation, and Conservation Element policies.*

The Project is intended to remove existing equipment and subsurface facilities and return the Project Site to pre-developed conditions. North of the UPRR ROW, the western portion of the Project Site will remain as restored open space. The area east of Dump Road will be cleared of equipment, regraded, and compacted. Approximately 60 non-native blue gum eucalyptus trees and 2 Monterey cypress trees will require removal in order to allow for soil restoration in the southeastern corner of the Main Plant Area. However, removal of trees that comprise the Monarch butterfly aggregation area is not proposed, and removal activities would be located at least 800 feet from the aggregation area. Additionally, to avoid impacts to nesting birds, all tree removals would occur outside of the active nesting period. The area(s) south of the UPRR ROW within the bluffs and gravel parking lot area will be cleared of equipment, regraded, and be replanted with a native seed mix in accordance with a restoration plan to establish additional habitat/open space within this area (Mitigation Measures Bio.1a through Bio.7). Pipeline removal would entail temporary construction activity and disturbances on portions of the sandy beach within the Project Site, including in proximity to the Harbor Seal Rookery area. Mitigation measures Bio 1a through 1h are intended to help avoid and minimize impacts to sensitive species, including but not limited to the Harbor Seals, while allowing the decommissioning and remediation activities to be completed.

The Project would result in removal of an industrial use and equipment and, with site restoration, enhance area habitat resources; therefore, the Project would be consistent with City Land Use Element Objective LU-2 and Policy LU-2b.

Objective LU-3. *Preserve the small beach town character of the built environment of Carpinteira, encouraging compatibile revitalization and avoiding sprawl development at the City's edge.*

Policy LU-3k. *Prepare a study for the future reuse of the existing Carpinteria oil & gas plant and Bluffs Area 0 (California Coastal Act § 30255, 30260, 30262, 30263). Future reuse of the Carpinteria oil & gas plant and Bluffs Area 0 shall incorporate public access, coastal recreation and open space/habitat restoration uses to the maximum extent feasible, and shall at minimum provide for vertical and lateral public access to and along the Coastal Trail.*

The Project would remove existing equipment and subsurface facilities and return the Project Site to pre-developed, natural conditions. As such, the Project would not conflict with any future use or impact future public access, coastal recreation, or open space uses the City may plan for the Project area or Bluffs Area O. Therefore, the Project would be consistent with Land Use Element Objective LU-3 and Policy LU-3k.

As part of the City's update to its General Plan/Coastal Land Use Plan, which is currently underway, the future reuse of the Project Site is being studied as part of focused changes to the City's Land Use Map.

Community Design Element

Objective CD-3. *The design of the community should be consistent with the desire to protect views of the mountains and the sea (California Coastal Act of 1976 §30251).*

Objective CDS6-2. *Ensure that development is controlled to avoid impacts to significant viewsheds, vistas, and view corridors.*

The Project would remove industrial structures and tanks from the Project Site and no new structures would be constructed. Therefore, the Project would enhance the existing area viewshed and view corridors.

The Project may result in temporary impacts to views from the presence of construction equipment intermittently for approximately 670 days over the course of approximately three years to remove equipment and remediate the Project Site. Project activities may be visible at the onshore facility while working in open areas not shielded by existing vegetation or windrow trees or on taller facility components; or within areas south of the UPRR along the bluffs, at Tar Pits Park, and offshore. During this time, decommissioning activities may have a temporary impact to aesthetics from the viewshed along U.S. Highway 101 and Carpinteria Avenue, to passengers on the UPRR, and to recreational users along the bluff trails, Tar Pits Park, the beach or vessels offshore. These potential impacts would be short-term and temporary and not cause a significant impact to viewsheds or view corridors.

The Project includes removal of approximately four percent of the trees on the Project Site (62 of 1,500 present). Tree removal would be limited to the southeastern corner of the Main Plant Area

and southern portion of the Chevron Pipeline Area, with 40 of the trees to be removed part of the north-south oriented windrow along the eastern Project Site boundary. This windrow is composed of two parallel rows of trees, with the outer row (eastern) unaffected by the Project. Therefore, the visual barrier along the eastern Project Site boundary would be retained.

The Project would enhance the existing viewshed and, as a result, would be consistent with Community Design Element Objectives CD-3 and CDS6-2.

Policy CDS6-b. *Development on the Bluffs shall not obstruct existing view corridors of the ocean and bluff top edge. In addition, views of the ocean and mountains for users of the Carpinteria Bluffs Nature Park and coastal trail(s), for bluffs area property owners and visitors, and for passing motorists, shall be maintained.*

The Project would remove industrial equipment from the Project Site and return the area to pre-developed natural conditions. The Project does not involve any development on the Bluffs. Therefore, the Project would enhance the existing viewshed in the Bluffs area including views of the ocean, mountains, and coastal trails. Thus, the Project would be consistent with Community Design Element Policy CDS6-b.

Objective CD-12. *Development should fit quietly into the area's natural and introduced landscape, deferring to open spaces, existing natural features, and native and sensitive habitats.*

Policy CD-12a. *Landscape plantings shall be respectful of the natural character of the City and enhance existing native plant communities and environmentally sensitive habitat areas.*

Policy CDS6-d. *Landscape planning shall be respectful of the natural character of the Bluffs and enhance existing native plant communities and environmentally sensitive habitat areas.*

The Project would remove industrial equipment from the Project Site and return the area to pre-developed natural conditions. The Project proposes to restore the Project Site, including the Bluffs area, with native plants and trees; all restoration and landscaping would be completed under a restoration plan that would be submitted to, reviewed, and approved by the City.

As the landscaping plan would utilize native plants and would be completed under a restoration plan approved by the City, the Project would be consistent with Community Design Element Objective CD-12 and Policies CD-12a and CDS6-d (Mitigation Measure Bio.1b).

Policy CDS6-e. *Exterior and interior lighting of development projects shall be low intensity and designed so as to minimize direct view of light sources and diffusers, and to minimize halo and spillover effects.*

The Project proposes to conduct work activities predominantly during daytime hours with some nighttime operations required to take advantage of tide and weather conditions. Nighttime lighting would also occur with offshore lighting associated with safe vessel operations or portable light towers to facilitate safe working conditions onshore until work activities are completed in the early evening. Mitigation Measure A.4 is intended to limit and minimize potential impacts from night lighting for work occurring on the sandy beach or nearshore, where pipeline removal work may be tidally or condition-dependent.

Therefore, nighttime work illumination could impact adjacent recreational users, and the adjacent Concha Loma neighborhood, however, these potential light impacts would be short-term and temporary. Lighting from Project activities is not expected to be visible from Carpinteria Avenue or U.S. Highway 101 due to existing vegetation and fencing located on the northern boundary of the Project Site that would block these views.

The Project does not involve the installation of any permanent lighting sources; therefore, the Project would be consistent with Community Design Element CDS6-e.

Policy CD-13a. *Lighting for development adjacent to an ESHA shall be designed to further minimize potential impacts to habitat.*

Policy CD-13b. *Lighting shall be low intensity and located and designed so as to minimize direct view of light sources and diffusers and to minimize halo and spillover effects.*

The Project does not involve the installation of any permanent lighting sources; therefore, the Project would be consistent with Community Design Element Policies CD-13a and 13b. Temporary night lighting impacts associated with the potential for limited nighttime work to allow for the removal of the pipelines from across the sandy beach and nearshore waters would be limited and minimized through the incorporation of Mitigation Measure A.4. Night Lighting.

Circulation Element

Policy C-3h. *Require all new projects to demonstrate safe traffic flow integration with the Master Plan of Streets as well as street/drainage improvements function. This shall include construction traffic and the designation of construction routes.*

Policy C-3k. *Segregate by design, enforcement and traffic pattern, routes of significant industrial and residential conflict.*

Objective C-5. *Provide a system of safe and functional truck routes.*

The Project would not introduce any permanent structures or facilities that would result in a permanent increase to existing traffic flow or impact existing street drainage function.

The Project would generate temporary vehicle trips during decommissioning and remediation activities including truck trips for contaminated soil removal. Based on the traffic study provided by the Applicant (FEIR Appendix H), the Project would generate 62 vehicle trips per day associated with worker transportation and trucking activities.

The Governor's Office of Planning and Research (OPR) issued a technical guidance document on evaluation of transportation impacts for CEQA (*Technical Guidance on Evaluating Transportation Impacts in CEQA, December 2018*) providing a 110 vehicle trips per day significance threshold, and Project temporary traffic impacts would be below the OPR threshold.

In addition, the Project proposes to route truck trips both to and from the Project Site along Carpinteria Avenue to the Bailard Avenue on/off ramp to U.S. Highway 101, thus avoiding truck traffic west on Carpinteria Avenue from the Project Site to the downtown portion of the City.

The Project would be consistent with Circulation Element Policies C-3h and C-3k, and Objective C-5 because it does not involve any permanent traffic sources, temporary traffic impacts are below the OPR threshold, and construction traffic would be routed away from the City.

Open Space, Recreation & Conservation Element

Objective OSC-1. *Protect, preserve and enhance local natural resources and habitats.*

Policy OSC-1a. *Protect Environmentally Sensitive Habitat Areas (ESHA) from development and maintain them as natural open space or passive recreational areas.*

The Project does not involve any permanent development in an ESHA, open space, or recreational area. Rather, the Project would result in removal of an industrial use and equipment and, with site restoration following temporary construction disturbances, establish additional habitat/open space within the area. Therefore, the Project would be consistent with Open Space, Recreation & Conservation Element Objective OSC-1 and Policy OSC-1a. In addition, the implementation of Mitigation Measures Bio.2a- 2c would mitigate impacts to ESHAs to less than significant.

Policy OSC-1b. *Prohibit activities, including development, that could damage or destroy ESHA.*

The Project does not involve any permanent development in an ESHA and would result in removal of an industrial use and equipment and, with site restoration, establish additional habitat/open space within the area. In addition, the implementation of Mitigation Measures Bio.2a- 2c would mitigate impacts to ESHAs to less than significant. Therefore, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-1b.

Policy OSC-1c. *Establish and support preservation and restoration programs for ESHA, including but not limited to Carpinteria Creek, Carpinteria Bluffs, Carpinteria Salt Marsh, seal rookery, Carpinteria reef, Pismo clam beds and the intertidal zones along the shoreline.*

The Project would result in removal of an industrial use and equipment (pipelines) on the Carpinteria Bluffs, the seal rookery, near shore, intertidal, and offshore areas. Removal of this industrial infrastructure along with associated City approved restoration efforts would support the Project Site ESHAs consistent with Open Space, Recreation & Conservation Element Policy OSC-1c. In addition, the implementation of Mitigation Measures Bio.2a- 2c would mitigate impacts to ESHAs to less than significant.

Objective OSC-2. *Preserve and restore the natural resources of the Carpinteria Bluffs.*

As noted above, the Project would result in removal and restoration of an industrial use and equipment (pipelines) on the Carpinteria Bluffs consistent with Open Space, Recreation & Conservation Element Objective OSC-2.

Policy OSC-2c. *Preserve all coastal bluff scrub habitat designated as open space with an appropriate buffer.*

The Project would result in removal and restoration of an industrial use and equipment (pipelines) on the Carpinteria Bluffs thus removing infrastructure from coastal bluff scrub

habitat. Disturbed areas would be revegetated and restored with native bluff scrub plantings, thereby supporting efforts to preserve such areas along the Carpinteria Bluffs. Therefore, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-2c.

Policy OSC-2f. *Protect significant historical and archaeological resources within the Bluffs Area.*

The Project Site is in an area considered sensitive for archaeological resources and therefore there is a potential for the Project to impact onshore archaeological resources. These potential impacts may include the Bluffs Area. The Applicant has proposed a number of measures to minimize potential impacts including a cultural resources management plan, a worker cultural resources awareness program, cultural resources monitoring, exclusion zones, the use of an on-call forensic anthropologist, curation of discovered materials, and Phase III data recovery excavations if necessary (Mitigation Measures Cul.1a through Cul.2b).

With the measures noted above to protect potential archaeological, paleontological, and cultural resources the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-2f.

Policy OSC-2h. *Preserve public enjoyment of Carpinteria Bluff view sheds by ensuring that they are not significantly degraded through development. All development applications shall be required to provide information adequate to identify existing and future public views and to demonstrate how the project proposes to avoid significant disruption of the view sheds identified. The location, size and density of development on the Bluffs shall be determined in part by the view sheds identified and what is necessary to protect them.*

The Project would remove industrial structures and tanks from the Project Site, and no new structures would be constructed. Therefore, the Project would enhance the existing area viewshed and view corridors including the Carpinteria Bluff viewshed.

The Project may result in temporary impacts to views from the presence of construction equipment intermittently for approximately 670 days over the course of approximately three years to remove equipment and remediate the Project Site. Project activities may be visible at the onshore facility while working in open areas not shielded by existing vegetation or windrow trees or on taller facility components; or within areas south of the UPRR along the bluffs, at Tar Pits Park, and offshore. During this time, decommissioning activities may have a temporary impact to aesthetics from the viewshed along U.S. Highway 101 and Carpinteria Avenue, to passengers on the UPRR, and to recreational users along the bluff trails, Tar Pits Park, beach, or vessels offshore. These potential impacts would be short-term and temporary, and not cause a significant impact to viewsheds or view corridors.

The Project includes removal of approximately four percent of the trees on the Project Site (62 of 1,500 present). Tree removal would be limited to the southeastern corner of the Main Plant Area and southern portion of the Chevron Pipeline Area, with 40 of the trees to be removed part of the north-south oriented windrow along the eastern Project Site boundary. This windrow is composed of two parallel rows of trees, with the outer row (eastern) unaffected by the Project. Therefore, the visual barrier along the eastern Project Site boundary would be retained.

As the result of the Project would enhance the existing viewshed, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-2h

Policy OSC-2i. *Preserve all windrow trees as one part of a contiguous and naturally preserved open space system across the whole of the Carpinteria Bluffs. Thinning, pruning and removal of trees shall be limited to what is necessary to maintain the trees in a healthful condition and to remove any hazardous condition. When a tree is approved by the City for removal, it shall be required to be replaced at a ratio appropriate to ensure infill of any gap created in the windrow and with a native, locally occurring tree, type and size to be approved by the City. Replacement trees that fail to survive within the first five years after planting shall be replaced. Programs for phased removal and replacement of tamarisk windrows with native tree windrows are encouraged. Development or other activity proposed on parcels including windrows shall be set back a minimum of 10 feet from the drip line of the trees and shall not result in compacting of soil or other potential damage to the trees' root system or water source.*

The Project includes removal of approximately four percent of the trees on the Project Site (62 of 1,500 present). Tree removal would be limited to the southeastern corner of the Main Plant Area and southern portion of the Chevron Pipeline Area, with 40 of the trees to be removed part of the north-south oriented windrow along the eastern Project Site boundary. This windrow is composed of two parallel rows of trees, with the outer row (eastern) unaffected by the Project. Therefore, the visual barrier along the eastern Project Site boundary would be retained.

Project tree removal would be approved by the City as part of the review and permitting of the Project and any replacement trees or other mitigation is included as part of Mitigation Measure Bio.5. The Project does not involve any permanent development on parcels with windrows. The Project would therefore be consistent with Open Space, Recreation & Conservation Element Policy OSC-2i.

Objective OSC-3. *Preserve and restore wetlands such as the Carpinteria Salt Marsh.*

Policy OSC-3c. *Development adjacent to the required buffer around wetlands should not result in adverse impacts including but not limited to sediment, runoff, chemical and fertilizer contamination, noise, light pollution and other disturbances.*

The Project does not involve any permanent development adjacent to a wetland buffer; however, the Project has the potential to impact two wetland areas during equipment removal.

Removal of Tank 861 and related earthwork in the Chevron Pipeline Area and pipeline removal along the bluff face in the western portion of the Pier Parking Lot Area would impact Wetland W-1 and Wetland W-5, respectively, as identified in the Project EIR. The Applicant has proposed the expansion of the existing wetland within the Drainage Area 4 to mitigate these impacts and proposes to provide the City with a coastal wetlands mitigation plan.

Project activities would also have the potential for impacts to wetland areas from impacts to surface water quality from equipment removal and grading. These potential impacts would be minimized through the use of engineering controls/BMPs, the implementation of a SWPPP, and a State Water Resources Control Board's Statewide Construction General Permit.

With the Applicant-proposed measures and the adoption of Mitigation Measures Bio.3a- 3c, and City approval of the same and the measures to minimize sediment, runoff, and other temporary disturbances, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-3c.

Objective OSC-4. *Preserve the biological diversity of shoreline habitats.*

Policy OSC-4a. *Protect the marine resources of the Carpinteria tidepools and Reef and other rocky reefs and intertidal areas. If evidence of depletion of these resources is presented, work with the California Department of Fish and Game to assess the extent of damage and implement mitigating measures.*

Offshore and intertidal pipeline removal activities would be limited to the pipeline corridor areas only; removal of these pipelines would be a net benefit to these marine resources. Pipeline removal activities, including vessel anchor placement/retrieval would be conducted in accordance with a Project-specific anchoring plan to avoid areas of known kelp beds and rocky reef habitats. Pipeline removal activities across the sandy beach would be staged and completed in a manner to reduce impacts to the maximum extent feasible, subject to any permit conditions from the California Coastal Commission. Therefore, the Project would be consistent with Open Space, Recreation & Conservation Element Objective OSC-4 and Policy OSC-4a.

Objective OSC-5. *Protect the Harbor Seal Hauling Ground from human disturbance.*

Policy OSC-5a. *Harbor Seal Hauling Grounds should not be altered or disturbed by recreational, industrial, or any other uses. Emergency maintenance or repair of existing pipelines in the vicinity of the adjacent Carpinteria oil & gas plant pier should be permitted as necessary, as long as disturbances to the harbor seal hauling grounds are minimized. Such repairs should be limited to the period of June 1 to November 30 if possible.*

The Carpinteria harbor seal rookery is located within the Project Site on the east side of the Gail and Grace pipeline bundle and the 10-inch oil pipeline on risers. Project decommissioning activities, including removal of cement armaments and cutting of the pipe into sections and pulling of pipe sections offshore, have the potential to cause disturbance to harbor seals if they are hauled-out on the beach during Project activities. Therefore, the Project is not scheduled to conduct these activities during the period of December 1 through May 31. In addition, the adoption of Mitigation Measure Bio.1g would provide a Harbor Seal Rookery Monitoring and Protection Plan for all Project-related activities within 1,000 feet of the haul-out/rookery.

With the Project schedule to avoid the harbor seal haul out season and City approval of a Harbor Seal Rookery Monitoring and Protection Plan, the Project would be consistent with Open Space, Recreation & Conservation Element Objective OSC-5 and Policy OSC-5a. Decommissioning activities would also be required to comply with any relevant additional permit conditions of other regulatory agencies with oversight authority of the harbor seals and/or decommissioning activities within nearshore waters (Mitigation Measure Bio. 1a).

Objective OSC-6. *Preserve the natural environmental qualities of creekways and protect riparian habitat.*

Policy OSC-6e. *Natural drainage patterns and runoff rates and volumes shall be preserved to the greatest degree feasible by minimizing changes to natural topography and minimizing the areas of impervious surfaces created by new development.*

The Project proposes to remove equipment, concrete foundations, and asphalt and oil sprayed areas which would reduce the existing amount of impervious surfaces. The Project also would regrade the site area back to pre-development natural topography and does not involve any alteration to existing drainage patterns. Therefore, the Project would be consistent with Open Space, Recreation & Conservation Element Objective OSC-6 and Policy OSC-6e.

Policy OSC-6f. *All development shall be evaluated for potential adverse impacts to water quality and shall consider Site Design, Source Control and Treatment Control BMPs in order to minimize polluted runoff and water quality impacts resulting from the development. In order to maximize the reduction of water quality impacts, BMPs should be incorporated into the project design in the following progression: (1) Site Design BMPs, (2) Source Control BMPs, and (3) Treatment Control BMPs.*

The Project would include a remedial action plan and a SWPPP in accordance with mitigation Measure WR.1. These plans would include controls, mitigation measures, and BMPs that would minimize the potential for releases of diesel fuel, gasoline, coolant, hydraulic oil, and lubricants associated with the use of heavy construction equipment. Water associated with flushing or cleaning of facility infrastructure would be contained and disposed under a Regional Water Quality Control Board (RWQCB) permit, to the Carpinteria Sanitary District municipal wastewater collection system under a National Pollutant Discharge Elimination System (NPDES) permit or would be trucked offsite to an approved hazardous waste landfill. In addition, the Project would include an OSCRP to minimize the impact of any spills.

The flushing and removal of offshore pipeline segment has the potential to impact marine waters. The Project Applicant maintains an agreement with MSRC (spill response co-op) for spill response support services. With the spill response capabilities of MSRC and the implementation of the Project OSCRP, potential impacts to marine waters would be minimized.

Erosion and sedimentation impacts resulting from decommissioning, remediation and earthwork activities would be addressed through mitigation measure GEO. 2, which requires implementation of erosion control best management practices.

As the Project includes controls, mitigation measures, and BMPs to minimize potential runoff and would be completed under permits from the City, the RWQCB, and the NPDES, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-6f.

Objective OSC-7. *Conserve native plant communities.*

Policy OSC-7a. *Oak trees and oak woodlands, because they are particularly sensitive to environmental conditions, as well as walnut, sycamore, and other native trees, shall be protected through appropriate development standards.*

No native trees are proposed for removal as part of the Project. Decommissioned and remediated areas would be replanted and restored with native vegetation; therefore, the Project would be

consistent with Open Space, Recreation & Conservation Element Objective OSC-7 and Policy OSC-7a.

Policy OSC-7b. *When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. Structures shall be sited and designed to minimize the impact of grading, paving construction of roads, runoff and erosion on native vegetation. Sensitive resources that exhibit any level of disturbance shall be maintained, and if feasible, restored. New development shall include measures to restore any disturbed or degraded habitat on the project site. Cut and fill slopes and all areas disturbed by construction activities shall be landscaped or revegetated at the completion of grading. Plantings shall be of native, drought-tolerant plant species consistent with the existing native vegetation on the site. Invasive plant species that tend to supplant native species shall be prohibited.*

The Project is intended to remove existing equipment and subsurface facilities and return the Project Site to pre-developed conditions. Grading activities would return the Project Site to pre-development natural topography. No structures, paving, roads, or other infrastructure is proposed for the Project. The Project would include a site restoration plan, to be approved by the City, that includes the use of native, drought-tolerant plant species consistent with the native vegetation on the Project Site. Therefore, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-7b.

Objective OSC-8. *Protect and conserve Monarch Butterfly tree habitat.*

OSC-8a. *Protect trees supporting Monarch butterfly populations.*

The Project does not include disturbance or removal of any trees observed during past biological surveys to contain Monarch butterfly populations (aggregations). The Project includes some non-native tree removal; however, the trees proposed for removal are located 800 feet from the known aggregation areas and would not be expected to impact the aggregations. In addition, the Applicant has proposed a compliance plan to avoid the Monarch butterfly; the plan would be approved by the City prior to initiation of the Project. The plan would include surveys in the aggregation area(s) by a qualified biologist prior to any work activity from October through December and if roosting Monarch butterflies are found, work within 50 feet of the aggregation area tree canopy perimeter would be postponed until the Monarch butterflies have abandoned the aggregation area. Therefore, trees supporting the Monarch butterfly in the Project area would be protected and the Project would be consistent with Open Space, Recreation & Conservation Element Objective OSC-8 and Policy OSC-8a.

Policy OSC-10a. *Minimize the erosion and contamination of beaches. Minimize the sedimentation, channelization and contamination of surface water bodies.*

Beach and intertidal pipeline removal activities would be limited to the pipeline corridor areas only; removal of these pipelines would be a net benefit to these marine resources.

To prevent sedimentation or contamination of surface water bodies, the Project would include a remedial action plan and a SWPPP as part of Mitigation Measure WR.1. These plans would include controls, mitigation measures, and BMPs that would minimize the potential for releases of diesel fuel, gasoline, coolant, hydraulic oil, and lubricants associated with the use of heavy construction equipment. Water associated with flushing or cleaning of facility infrastructure

would be contained and disposed under a RWQCB permit, to the Carpinteria Sanitary District municipal wastewater collection system under a NPDES permit or would be trucked offsite to an approved hazardous waste landfill. In addition, the Project would include an OSCRP to minimize the impact of any spills. The Project would return the Project Site to pre-development natural topography and thus would not cause channelization of a surface water body. Thus, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-10a.

Policy OSC-10c. *Degradation of the water quality of groundwater basins, nearby streams or wetlands, or any other waterbody shall not result from development. Pollutants such as sediments, litter, metals, nutrients, chemicals, fuels or other petroleum hydrocarbons, lubricants, raw sewage, organic matter and other harmful waste shall not be discharged into or alongside any waterbody during or after construction.*

The Project includes a remedial action plan that includes controls, mitigation measures, and BMPs that would minimize the potential for releases of diesel fuel, gasoline, coolant, hydraulic oil, and lubricants associated with the use of heavy construction equipment. Water associated with flushing or cleaning of facility infrastructure would be contained and disposed under a RWQCB permit to the Carpinteria Sanitary District municipal wastewater collection system under a NPDES permit or would be trucked offsite to an approved hazardous waste landfill. Potential erosion and sedimentation impacts would be avoided and mitigated through implementation of erosion control best management practices pursuant to mitigation measure GEO. 2.

The Project would not be expected to impact waters of the Carpinteria Groundwater Basin aquifer because those aquifers are located well below the depth of Project excavations. Therefore, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-10c.

Objective OSC-11. *Carpinteria will conduct its planning and administrative activities so as to maintain the best possible air quality.*

The Project applicant included a number of measures as part of the planning for the Project to include modern tier engines to reduce emissions to the highest extent possible. In addition, the Project has been reviewed and conditioned by the Air Pollution Control District (APCD) to include measures to reduce potential emissions consistent with this Policy.

Policy OSC-11a. *Carefully review development that will significantly impact air quality.*

The Project has been extensively reviewed as part of the EIR and by the APCD to include measures to reduce emissions to the highest extent feasible consistent with this policy. The Project is temporary in nature and will not result in long term emissions. Construction emissions are considered significant but mitigable with the addition of the mitigation measures and proposed conditions of approval.

Policy OSC-12b. *Work with the oil and gas plant operator(s) to remove obsolete equipment, to upgrade all facilities to current safety standards, and to consolidate activities in order to eliminate redundancy.*

The Project is to remove the oil and gas plant equipment, associated onshore and offshore pipelines and return the Project Site to pre-development natural topography; therefore, the Project would be consistent with Open Space, Recreation & Conservation Element Policy OSC-12c.

Objective OSC-13. *Preserve Carpinteria's visual resources.*

Policy OSC-13g. *Require new development to protect scenic resources by utilizing natural landforms and native vegetation for screening structures, access roads, building foundations, and cut and fill slopes in project design which otherwise complies with visual resource protection policies.*

Policy OSC-13h. *Plans for development shall minimize cut and fill operations. Plans that do not minimize cut and fill shall be denied.*

Policy OSC-13i. *Design all development to fit the site topography, soils, geology, hydrology, and other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Preserve all natural landforms, natural drainage systems, and native vegetation. Require all areas on the site not suited to development, as evidenced by competent soils, geology and hydrology investigation and reports remain as open space.*

As described elsewhere in this report, the Project involves the decommissioning and removal of surface and sub-surface equipment and facilities (including pipelines) associated with the former Oil and Gas Facility. Removal of above ground tanks and equipment, and associated improvements would result in a net benefit to the visual resource quality of the area. Areas where decommissioning and soils remediation occur would be regraded to restore the area to its pre-development historical topography and drainage patterns, and replanted with native vegetation appropriate to the bluffs setting. Accordingly, the Project can be found consistent with the above Objective and related Policies.

Policy OSC-14b. *Provide for passive recreation uses of natural open space areas, such as along creeks and the Bluffs 1 areas, where such uses would not damage the resources being protected.*

The Project area(s) south of the UPRR ROW within the bluffs and gravel parking lot area would be cleared of equipment, regraded, and planted with native seed mix to establish additional habitat/open space within this area. The Project would not conflict with passive recreation of natural open spaces, area creeks, or the Bluffs 1 area and would therefore be consistent with Open Space, Recreation & Conservation Element Policy OSC-14b.

Policy OSC-14f. *No unrelated development shall be permitted in publicly owned recreational areas except pipelines to serve coastal dependent industrial uses when no alternative route is feasible.*

As part of the Project, existing below grade pipelines that traverse publicly-owned sections of the bluffs in Tar Pits Park and the adjacent sandy beach areas, would be abandoned in place and/or removed; thereby resulting in a net benefit to public recreational areas by reducing potential future exposure to hazards.

Objective OSC-16. *Preserve Carpinteria's cultural resources.*

Policy OSC-16a. *Carefully review any development that may disturb important archaeological or historically valuable sites.*

The Project Site is in an area considered sensitive for archaeological resources and therefore there is a potential for the Project to impact onshore archaeological resources. The Applicant has proposed a number of measures to minimize potential impacts including a cultural resources management plan, a worker cultural resources awareness Program, cultural resources monitoring, exclusion zones, the use of an on-call forensic anthropologist, curation of discovered materials, and Phase III data recovery excavations if necessary. (Mitigation Measures Cul.1a through Cul.2b.) No known shipwrecks or sites occur in the offshore Project area.

With the measures noted above to protect potential archaeological, paleontological, and cultural resources, the Project would be consistent with Open Space, Recreation & Conservation Element Objective OSC-16 and Policy OSC-16a.

Safety Element

Policy S-2b. *Building improvements and other development including any irrigated landscape areas shall be setback sufficiently to protect the development and all associated improvements from bluff failure and bluff retreat over a 100-year term.*

The Project does not involve any building improvements or other permanent infrastructure development. No landscape irrigation is proposed for the Project. Restoration in the bluff area(s) would be completed pursuant to a restoration plan approved by the City; the restoration plan would address bluff issues and bluff retreat. (Mitigation Measures Geo.4a, 4b, and 4c.) Therefore, the Project would be consistent with Safety Element Policy S-2b. Removal of pipeline segments that cross the coastal bluff and sandy beach in several locations would reduce potential future hazards associated with exposure of these facilities as a result of ongoing erosional processes of the sandy beach and/or coastal bluff face.

Policy S-6b. *City policies concerning the use, storage, transportation and disposal of hazardous materials, and regarding underground or above-ground storage tanks shall reflect the County of Santa Barbara and the State Regional Water Quality Control Board policies and requirements and shall ensure that the use, storage, transportation and disposal of hazardous materials does not result in hazardous discharge or runoff.*

The Project does not involve the use, storage, or distribution of hazardous materials and removes an industrial source that included the use of such materials. The Project would remove an AST and other infrastructure associated with the use and storage of hazardous materials.

The Project would include permitting and oversight by the City and the RWQCB and would thus be consistent with those agencies and Santa Barbara County policies on hazardous materials. The Project would include an OSCRP to minimize the impact of any spills and a SWPPP to prevent hazardous material discharge or runoff. (Mitigation Measure Haz.2 and Mitigation Measure WR.1.) Therefore, the Project would be consistent with agency polices and requirements of hazardous materials and Safety Element Policy S-6b.

Noise Element

Objective N-4. *Minimize noise spillover from industrial operations into adjacent residential neighborhoods and other sensitive uses.*

The Project does not involve the development of an industrial operation; therefore, the Project would be consistent with Noise Element Objective N-4.

Policy N-5b. *The City will require that construction activities adjacent to sensitive noise receptors be limited as necessary to prevent adverse noise impacts.*

The Applicant provided a noise management plan that included a noise assessment with the application submittal materials. The assessment modeled construction noise and determined noise from construction equipment would not exceed the City's 75 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) construction noise standard. In addition, the study calculated that the increase over existing ambient noise levels from the Project construction activities would be less than 2 dBA and thus would not exceed City thresholds for temporary construction noise. Nighttime construction activities may be necessary in the surf zone due to tidal access issues; however, these activities would be temporary and short term. Therefore, the Project would be consistent with Noise Element Policy N-5b.

Policy N-5c: *The City will require that construction activities employ techniques that minimize the noise impacts on adjacent uses.*

Noise from construction activities is not expected to exceed City thresholds for construction noise; therefore, the Project would be consistent with Noise Element Policy N-5c. However, the Project would result in the generation of a temporary increase in hourly average ambient noise levels in the vicinity of the Project. As a result, mitigation measures N.2a, Noise Barriers, and N.2b, Nighttime Activities, would serve to reduce any impact to less than significant.

The City's standard conditions relating to construction timing and noise attenuation have been included in the attached Conditions of Approval.

VI. DEVELOPMENT IMPACT FEES

No new structures are proposed as part of the described decommissioning project. Accordingly, the project would not be subject to payment of any City Development Impact Fees (DIFs). The project may, however, be subject to payment of permit or mitigation fees from other special districts and agencies with permitting or regulatory authority over portions of the project.

VII. ACTION OPTIONS

1. Adopt Resolution PC-25-001, thereby accepting and certifying the EIR for the Chevron Carpinteria Oil and Gas Facility Decommissioning Project as having satisfied the procedural and statutory requirements of CEQA; selecting the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" as the preferred Project; and approving Project 21-2128-DP/CDP to allow the Chevron Carpinteria Oil and Gas Facility Decommissioning Project

and adopt the Findings in Attachment A, Exhibit 1 and Conditions of Approval as proposed in Attachment A, Exhibit 3. (staff's recommendation)

2. Direct the applicant to prepare project revisions and return to the next Commission meeting.

3. Conceptually deny the project as proposed. Direct staff to return with findings for denial to the Planning Commission's next meeting.

VIII. ATTACHMENTS

Attachment A Resolution PC-25-001
Exhibit 1 – Findings for Approval
Exhibit 2 – Figures
Exhibit 3 – Recommended Conditions of Approval

Attachment B Proposed Final EIR

Attachment A.

Planning Commission Resolution No. PC-25-001

Chevron Decommissioning and Remediation of the
Carpinteria Oil and Gas Processing Facilities Project

Project 21-2128-DP/CDP

May 5, 2025 Planning Commission Meeting

RESOLUTION NO. PC-25-001

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARPINTERIA APPROVING DEVELOPMENT PLAN AND COASTAL DEVELOPMENT PERMIT NO. 21-2128-DP/CDP FOR THE CHEVRON CARPINTERIA OIL AND GAS FACILITY DECOMMISSIONING PROJECT LOCATED AT 5619, 5663, 5675 AND 5731 CARPINTERIA AVENUE, CARPINTERIA, CALIFORNIA 93013. APNs: 001-170-003, 004, 014, 020, 021, 022, 023

REQUESTED BY CHEVRON WEST COAST DECOMMISSIONING PROGRAM

WHEREAS, the Planning Commission of the City of Carpinteria has considered an application for a Development Plan and Coastal Development Permit filed by Chevron West Coast Decommissioning Program on October 25, 2021; and

WHEREAS, the application was subsequently deemed complete and accepted by the City as being consistent with the applicable submittal requirements on March 8, 2022; and

WHEREAS, the Planning Commission has conducted a noticed public hearing and received evidence regarding the application for the Development Plan and Coastal Development Permit; and

WHEREAS, in accordance with the California Environmental Quality Act, an Environmental Impact Report (EIR) dated April 2025 has been prepared for the project and has been noticed and subject to public review as required under CEQA; and

WHEREAS, the Planning Commission has reviewed the policies of the General Plan/Coastal Plan and the Zoning Code standards that are relevant to the project.

NOW, THEREFORE, THE PLANNING COMMISSION HEREBY RESOLVES AS FOLLOWS:

1. The Environmental Impact Report (EIR) dated April 2025 prepared for the Project has been reviewed by the City, reflects the City's independent judgment and analysis, and is certified as having satisfied the procedural and statutory requirements of the California Environmental Quality Act (CEQA).

2. The Development Plan/Coastal Development Permit is approved for the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative Project making the findings outlined in Exhibit 1.

3. The Development Plan and Coastal Development Permit is approved for the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative Project consistent with the plans

shown in Exhibit 2 and subject to the project conditions of approval set forth in Exhibit 3.

PASSED, APPROVED AND ADOPTED this 5th day of May 2025, by the following vote:

AYES: COMMISSIONERS:

NOES: COMMISSIONER(S):

ABSENT: COMMISSIONER(S):

ABSTAIN: COMMISSIONER(S):

_____
John Moyer, Vice-Chair

ATTEST:

_____
Nick Bobroff, Secretary

I hereby certify that the foregoing Resolution was duly and regularly introduced and adopted at a regular meeting of the Planning Commission of the City of Carpinteria held the 5th day of May 2025.

Attachment A.

Planning Commission Resolution No. PC-25-001

Exhibit 1. Findings for Approval

Chevron Decommissioning and Remediation of the
Carpinteria Oil and Gas Processing Facilities Project

Project 21-2128-DP/CDP

May 5, 2025 Planning Commission Meeting

EXHIBIT 1: FINDINGS FOR APPROVAL

PLANNING COMMISSION HEARING
PROJECT NO. 21-2128-DP/CDP
May 5, 2025

Chevron Carpinteria Oil and Gas Decommissioning Project

FINDINGS PURSUANT TO GOVERNMENT CODE, LOCAL COASTAL PLAN, GENERAL PLAN, AND TITLE 14 OF THE CARPINTERIA MUNICIPAL CODE

1.0 Administrative Findings

The Planning Commission hereby incorporates by reference as though set forth in full all Community Development Department staff reports and attachments thereto presented to the Planning Commission and all comments made or received either orally or in writing at the public hearings on this project and the associated Environmental Impact Report.

1.1 Procedures

Pursuant to the California Coastal Act, the Administrative Regulations of the California Coastal Commission and the City of Carpinteria's ("City") Local Coastal Program, it has been found that the process for public review of the subject Local Coastal Development Permit has been properly conducted as follows:

a. An application for a Development Plan and Coastal Development Permit was submitted on October 25, 2021, and deemed complete and accepted by the City as being consistent with the applicable submittal requirements on March 8, 2022. Said application and all related material have been available for public review at City offices since the date of submittal.

b. The application has been evaluated and found to conform to the applicable zone districts and to be consistent with the City's Coastal Land Use Plan, the Interpretive Guidelines of the California Coastal Commission and the California Coastal Act.

c. The project has been reviewed by the City's Planning Commission at a duly noticed public hearing which included, but is not limited to, mailed notice to all property owners within 300 feet of the subject property, residents within 100 feet of the property and publication in the local newspaper, the Coastal View News.

2.0 California Environmental Quality Act

2.1 Introduction

The Planning Commission for the City of Carpinteria (City) considers and relies on the Final Environmental Impact Report (EIR; State Clearinghouse Number 022080025) for the Chevron Carpinteria Oil and Gas Decommissioning Project in determining whether to carry out the project. The Final EIR consists of the Draft EIR, responses to comments on the Draft EIR, a list of persons and agencies commenting on the Draft EIR, a Mitigation Monitoring and Reporting Program, and technical appendices. The City has received, reviewed, considered, and relied on the information contained in the Final EIR, as well as information provided at hearings and submissions of testimony from official participating agencies, the public, and other agencies and organizations. Furthermore, the Final EIR reflects the lead agency's independent judgment and analysis.

Section 15091 of the State California Environmental Quality Act (CEQA) Guidelines (14 California Code of Regulations [CCR]) and Section 21081 of the Public Resources Code (PRC) require a lead agency to adopt findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must find that:

- *Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;*
- *Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or*
- *Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.*

Title 14 CCR Section 15091(b) requires that the City's findings be supported by substantial evidence in the record. Accordingly, the lead agency's record consists of, but is not limited to the following, which are located at the City of Carpinteria Community Development Department, Carpinteria, California:

- *Documentary and oral evidence, testimony and staff comments and responses received and reviewed by the Lead Agency during public review and the public hearings on the Chevron Carpinteria Oil and Gas Decommissioning Project.*
- *The Chevron Carpinteria Oil and Gas Decommissioning Project Final Environmental Impact Report (April 2025).*

In addition to making a finding for each significant impact, if the lead agency approves a project without mitigating all of the significant impacts, it must prepare a statement of overriding considerations, in which it balances the benefits of the project against the unavoidable environmental risks. The statement of overriding considerations must explain the social, economic, or other reasons for approving the project despite its environmental impacts (14 CCR

15093, PRC 21081).

2.2 Procedures

This document contains the findings and statement of overriding considerations for the approval of the Project and expressly reflects the City's independent review and judgment (refer to Section 9). This document incorporates by reference the Final EIR. The Planning Commission hereby incorporates by reference as though set forth in full all Community Development Department staff reports and attachments thereto presented to the Planning Commission and all comments made or received either orally or in writing at the public hearings on this project.

The EIR, Project, and other portions of the administrative record constitute the record of proceedings in compliance with PRC Section 21081.6(a)(2) and State CEQA Guidelines Section 15091(e) and are available for review at:

City of Carpinteria, Community Development Department
5775 Carpinteria Avenue
Carpinteria, California 93013
Contact: Nick Bobroff

Having received, reviewed and considered the foregoing information, as well as any and all information in the record, the Planning Commission of the City of Carpinteria hereby makes these Findings pursuant to, and in accordance with, PRC Section 21081.

The Final EIR was prepared in compliance with CEQA and State CEQA Guidelines. In accordance with Section 15121 of the State CEQA Guidelines, the purpose of the Final EIR is to serve as an informational document for the public and City decision makers. The Final EIR contains a project-level environmental review that fulfills the requirement of a project-level EIR. As defined in State CEQA Guidelines Section 15161, a project-level EIR:

> *…examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.*

On August 1, 2022, the City, as the Lead Agency, issued a Notice of Preparation (NOP) to inform the general public and agencies that an EIR would be prepared for the Project and to solicit comments on environmental issues to be addressed in the document. The public scoping comment period was extended by 30 days and closed on September 30, 2022. Comments received in response to the NOP were used to further refine the scope of the analysis and the technical studies in this EIR. Written comments received in response to the NOP are provided in Appendix D with an indication of specific EIR sections where topics related to individual comments are addressed.

The NOP was also submitted to the California Office of Planning and Research (State Clearinghouse) to officially solicit participation in determining the scope of the EIR. Information requested and input provided during the NOP comment period regarding the scope of the EIR are included in the EIR.

The City of Carpinteria issued a Draft EIR on November 30, 2023. The public comment period on the Draft EIR ran through January 31, 2024. The City of Carpinteria held a public comment meeting on December 18, 2023.

The public comments received on the Draft EIR were reviewed and responded to as required by CEQA and the CEQA Guidelines. This Final EIR has been prepared, incorporating all of the comments received, written responses to received comments, and the Draft EIR, along with any changes to the Draft EIR that resulted from the comments received.

The document and the Notice of Completion (NOC) were distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A Notice of Availability (NOA) was distributed to agencies, community stakeholders, and individuals. The NOA informed them of where they could view the document and how to comment. An electronic copy of the document was also posted online, and hard copies were made available by request. The NOA was filed with the County Clerk.

Responses to each written and verbal comment that the City received during the comment period on the Draft EIR are included in the Responses to Comments section of the Final EIR. The Draft EIR and Responses to Comments collectively comprise the Final EIR for the project.

The EIR has been reviewed by the City's Planning Commission at a duly noticed public hearing which included, but is not limited to, mailed notice to all property owners within 300 feet of the subject property, residents within 100 feet of the property and publication in the local newspaper, the Coastal View.

2.3 California Environmental Quality Act Findings

1. The Final EIR dated April 2025 was presented to the Planning Commission and all voting members of the Commission have reviewed and considered the EIR prior to approving this project. The EIR reflects the independent judgment of the Planning Commission and is adequate for this proposed project.

2. The Planning Commission finds and certifies that the Final EIR dated April, 2025 constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA. The Planning Commission further finds and certifies that the Final EIR has been completed in compliance with CEQA.

3. The documents and other materials which constitute the record of proceeding upon which this decision is based are in the custody of the Planning Commission Secretary located at 5775 Carpinteria Ave, Carpinteria, CA.

4. Findings That Certain Impacts Are Less Than Significant. (see discussion below)

The City determined, based upon the threshold criteria for significance, the environmental analysis presented in the Final EIR, and the comments received by the public on the Draft EIR, no substantial evidence was submitted to or identified by the City which indicated that the project would have a significant impact on the following environmental areas. For details on the specific impacts, please see the respective Final EIR sections.

LESS THAN SIGNIFICANT (CLASS III) ENVIRONMENTAL EFFECTS OF THE PROJECT

Issue Area and Impact	Impact Number	Description	Project Impact Class	Location in Final EIR
Aesthetics	AE.1	Scenic Vistas	III	Final EIR Section 4.1
	AE.2	Scenic Resources	III	
	AE.3	Visual Quality and Character	III	
Air Quality	AQ.1	Standards	III	Final EIR Section 4.2
	AQ.3	Toxic Air Emissions	III	
Biological Resources	BIO.4	Movement of Wildlife	III	Final EIR Section 4.3
	BIO.6	Conservation Plan Conflicts	III	
Geology and Soils	GEO.1	Earthquake Fault	III	Final EIR Section 4.5
	GEO.5	Expansive Soils	III	
	GEO.6	Septic Tanks	III	
Hazards and Hazardous Materials	HAZ.3	Hazards Proximate to Schools	III	Final EIR Section 4.7
	HAZ.4	Site Contamination	III	
	HAZ.5	Proximity to Airport	III	
	HAZ.6	Impair Emergency Response	III	
Hydrology and Water Quality	WR.2	Groundwater Supply	III	Final EIR Section 4.8
	WR.3	Drainage Patterns	III	
	WR.4	Pollutants	III	
	WR.5	Control Plans	III	
Land Use and Planning	LUP.1	Divide a Community	III	Final EIR Section 4.9
	LUP.2	Policy Conflict	III	
Noise	N.1	12-Hour CNEL	III	Final EIR Section 4.10
	N.3	Vibration	III	
	N.4	Airport Noise Conflicts	III	
	REC.2	Rec Facilities	III	

LESS THAN SIGNIFICANT (CLASS III) ENVIRONMENTAL EFFECTS OF THE PROJECT

Issue Area and Impact	Impact Number	Description	Project Impact Class	Location in Final EIR
Transportation	T.1	Policy Conflicts	III	Final EIR Section 4.11
	T.2	VMT	III	
	T.3	Traffic Hazards	III	
	T.4	Emergency Access	III	
Other	All	Ag, Energy, Mineral, Housing, Public Services, Recreation, Utilities, Wildfire	III	Final EIR Section 4.13
			III	

5. Findings that Certain Impacts are Mitigated to Insignificance by Conditions of Approval. (See discussion below)

Class II impacts are significant but can be mitigated to a level of insignificance by measures identified in the EIR. When approving a project with Class II impacts, the decision-makers must make findings that changes or alterations to the project have been incorporated that reduce the impacts to a less than significant level.

This section presents the project's significant environmental impacts and feasible mitigation measures. State CEQA Guidelines Section 15091 (14 CCR) and PRC Section 21081 require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must make the following Finding:

1. Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
3. Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

Each of these findings must be supported by substantial evidence in the administrative record. The City determined and makes the finding, based upon the environmental analysis presented in the Final EIR and the comments received by the public on the Draft EIR, that the following impacts can be fully avoided or reduced to a less-than-significant level through the incorporation of feasible mitigation measures into the project, as identified in the Final EIR. For each of these identified impacts, changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR. For details on the specific impacts, please see the respective Final EIR sections.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Aesthetics	A.4	Night Lighting	II	A.4: Beach/Nearshore Night Lighting Minimization	Final EIR Section 4.1	The Project would create a temporary new source of substantial light or glare which would adversely affect day or nighttime views in the area. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure A.4 which requires that light be shielded and directed inward. By adhering to these measures, the night lighting impacts would be reduced to a less than significant level.
Air Quality	AQ.2	Odors	II	AQ.2: Odor control and Purging Plan	Final EIR Section 4.2	The Project may result in potentially significant odor emission impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure AQ.2 which requires use of degassing systems and other odor control tactics. By adhering to these measures, the odor impacts would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Biological Resources	BIO.1	Listed Species	II	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys Bio.1d: Fencing Bio.1e: Worker Education & Awareness Plan Bio.1f: Marine Wildlife Contingency & Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring & Protection Bio.1h: Wildlife Relocation Monitoring	Final EIR Section 4.3	The Project may result in potentially significant impacts to special status species. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.1(a)-(h) which implement various measures including retaining qualified biologists, adopting management plans, utilizing constructive boundaries, and providing awareness programs. By adhering to these measures, the impacts to these species would be reduced to a less than significant level.
	BIO.2	ESHA	II	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance		The Project could have a potentially significant impact on riparian habitat as a result of the temporary decommissioning activities. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.2(a)-(c) which implement various measures including avoiding impact areas, onsite mitigation, and preparation of a pre-decommissioning survey. By adhering to these measures, the impacts to these riparian areas would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	BIO.3	Wetlands	II	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Requirements Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Program		The Project could have a potentially significant impact on protected wetlands as a result of the temporary decommissioning activities. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.3(a)-(c) which implement various measures including permit compliance, preparation of a coastal wetlands mitigation and monitoring plan, and preparation of a pre-decommissioning survey. By adhering to these measures, the impacts to these wetlands would be reduced to a less than significant level.
	BIO.5	Policy Conflicts	II	Bio.5: Tree Removal Mitigation		The Project could have a potentially significant impact due to the removal of 62 non-native trees. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.5 which requires trees be replaced. By implementing this requirement, the impacts to these riparian areas would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Cultural and Tribal Cultural Resources	CUL.1	Known Resource CA-SBA-6	II	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials	Final EIR Section 4.4	The Project could have a potentially significant impact on archaeological resources due to grading and excavation work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a)-(f) which implement various measures including implementation of an awareness plan, cultural resource monitoring, avoidance of exclusion zones, curation of project materials, and preparation of a resource management plan. By adhering to these measures, the impacts to these archaeological resources would be reduced to a less than significant level.
	CUL.2	Human Remains	II	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery		The Project could potentially disturb human remains due to grading and excavation work. To mitigate against this potentially significant impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.2(a) and (b) which require the applicant to retain an on-call forensic anthropologist and follow specified procedures if human remains are discovered. By adhering to these measures, these impacts would be reduced to a less than significant level.
Geology and Soils	GEO.2	Erosion	II	Geo.2: Erosion Control Best Management Practices	Final EIR Section 4.5	The Project could result in substantial soil erosion due to the removal of contaminated soil. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.2 which requires that erosion control best management practices be followed. By adhering to these measures, this impact would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	GEO.3	Sedimentation	II	Geo.2: Erosion Control Best Management Practices		The Project could result in potentially significant siltation impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.2 which requires that erosion control best management practices be followed. By adhering to these measures, this impact would be reduced to a less than significant level.
	GEO.4	Unstable Bluffs	II	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removal Geo.4c: Bluff Stabilization Following Pipeline Removal		The Project's proposal to remove pipelines located in Carpinteria Bluffs could result in potentially significant erosion impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.4(a)-(c) which require that adoption of a stabilization plan, adherence to various measures to stabilize the bluff during pipeline removal, and adherence to various measures to stabilize the bluff following pipeline removal. By adhering to these measures, this erosion impact would be reduced to a less than significant level.
	GEO.7	Paleontological/Geologic Feature	II	Measures Cul.1a-f		The Project could have a potentially significant impact on paleontological resources due to grading and excavation work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a)-(f) which implement various measures including implementation of an awareness plan, cultural resource monitoring, avoidance of exclusion zones, curation of project materials, and preparation of a resource management plan. By adhering to these measures, the impacts to these resources would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Climate Change and GHG	GHG.1	GHG Emissions	II	GHG.1: GHG Emissions Reductions	Final EIR Section 4.6	The Project could have a potentially significant greenhouse gas emissions associated with the decommissioning activities. To mitigate against these impacts, changes or alterations have been required for the Project—specifically mitigation measure GHG.1 which requires reductions and/or offsets for emissions and preparation of a GHG reduction and reporting plan to track and enforce these. By adhering to these measures, these impacts would be reduced to a less than significant level.
	GHG.2	Plans	II	GHG.1: GHG Emissions Reductions		The Project could result in an exceedance of County GHG emission thresholds and thus conflict with an applicable plan regulating emissions. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure GHG.1 which requires reductions and/or offsets for emissions and preparation of a GHG reduction and reporting plan to track and enforce these. By adhering to these measures, this impact would be reduced to a less than significant level.
Hazards and Hazardous Materials	HAZ.1	Routine Operations	II	Haz.1: Contaminated Soil Handling	Final EIR Section 4.7	The Project could have a potentially significant impact associated with handling of contaminated soils. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.1 which requires preparation of and adherence to a contaminated soil handling management plan. By adhering to these measures, these impacts would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	HAZ.7	Wildland Fires	II	HAZ.7: Fire Response Planning		The Project could have a potentially significant impact associated with fire risk during the demolition or remediation phase of the Project. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.7 which requires implementation of various fire response planning measures including hydrant access, water inventories, availability of response equipment and equipment requirements. By adhering to these measures, these impacts would be reduced to a less than significant level.
Noise	N.2	Hourly Average Ambient Noise	II	N.2a: Construction Noise Control Measures N.2b: Nighttime Activities	Final EIR Section 4.10	The Project could have a potentially significant noise impact associated with temporary noise from decommissioning activities. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measures N.2(a) and (b) which require implementation of construction noise reduction measures such as installation of noise barriers, and prohibition of nighttime onshore activities. By adhering to these measures, these noise impacts would be reduced to a less than significant level.
Tribal Cultural Resources	TCR.1	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b	Final EIR Section 4.12	The Project could have a potentially significant impact on tribal-cultural resources due to decommissioning work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a) and (b) described above. By adhering to these measures, the impacts to these tribal-cultural resources would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	TCR.2	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b		The Project could have a potentially significant impact on tribal-cultural resources due to decommissioning work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a) and (b) described above. By adhering to these measures, the impacts to these tribal-cultural resources would be reduced to a less than significant level.

6. Findings that Certain Unavoidable Impacts are Mitigated to the Maximum Extent Feasible. (See discussion below).

Class I impacts are significant and unavoidable. To approve a project resulting in Class I impacts, the CEQA Guidelines require decision makers to make findings of overriding consideration that "...specific legal, technological, economic, social, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR...".

This section presents the project's significant environmental impacts and feasible mitigation measures. State CEQA Guidelines Section 15091 (14 CCR) and PRC Section 21081 require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must find that:

1. Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
3. Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

Each of these findings must be supported by substantial evidence in the administrative record. This section identifies impacts that can be reduced, but not to a less-than-significant level, through the incorporation of feasible mitigation measures into the project, and which therefore, remain significant and unavoidable, as identified in the Final EIR. Where adoption of feasible mitigation measures is not effective in avoiding an impact or reducing it to a less than significant

level, the feasibility of adopting alternatives to the project is considered below. For details on the specific impacts, please see the respective Final EIR sections.

Significant and unavoidable Class I impacts would occur related to biological resources, hazardous materials and risk of upset, and hydrology and water resources.

SIGNIFICANT UNAVOIDABLE (CLASS I) ENVIRONMENTAL EFFECTS OF THE PROJECT FOR WHICH SUFFICIENT MITIGATION IS NOT AVAILABLE

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Findings Analysis
Biological Resources	BIO.7	Accidental Oil Spills	I	Bio.7: Oil Spill Contingency Plan	Final EIR Section 4.3	The Project could have a potentially significant impact on biological resources if an accidental oil spill were to occur. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Bio.7 was adopted which requires preparation of an oil spill contingency plan that includes, among other things, measures to minimize impacts to special status species and riparian habitat. Even with adherence to these measures, the potential impacts to these riparian areas would remain significant and unavoidable.
Hazardous Materials & Risk of Upset	HAZ.2	Accidental Releases	I	Haz.2a: Spill Response Planning Haz.2b: Asbestos and Lead Planning	Final EIR Section 4.7	The Project could have a potentially significant impact associated with accidental release of hazardous materials. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.2(a) and (b) which require various measures to address spill response planning and asbestos and lead exposure minimization planning. Even with adherence to these measures, these impacts would remain significant and unavoidable.
Hydrology & Water Resources	WR.1	Surface Water Quality Standards	I	WR.1: Stormwater Pollution Prevention Plan	Final EIR Section 4.8	The Project could have a potentially significant impact to water quality associated with accidental release of petroleum hydrocarbons into marine water. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure WR.1 which requires preparation of and adherence to a stormwater pollution prevention plan. Even with adherence to these measures, these impacts would remain significant and unavoidable.

7. Findings Regarding Significant Irreversible Environmental Changes and Findings Regarding Growth-Inducing Impacts. (See discussion below)

State CEQA Guidelines §15126.2(c) requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Such significant irreversible environmental changes may include the following:

- *Use of non-renewable resources during the initial and continued phases of the project that would be irreversible because a large commitment of such resources makes removal or non-use unlikely;*
- *Primary impacts and, particularly secondary impacts (such as highway improvement that provides access to a previously inaccessible area) that generally commit future generations to similar uses; or*
- *Irreversible damage which may result from environmental accidents associated with the project.*

As discussed in Section 6 of the Final EIR, there are no significant irreversible environmental changes/effects.

State CEQA Guidelines Section 15126.2(d) requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth. Generally speaking, a project may be considered growth inducing if it results in one or more of the five conditions identified below:

1. *Induces population growth;*
2. *Induces economic expansion;*
3. *Establishes a precedent setting action (e.g., an innovation, a radical change in zoning or general plan designation);*
4. *Results in development or encroachment in an isolated or adjacent area of open space (i.e., being distinct from "infill" development); or*
5. *Removes an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).*

As per Section 6 of the Final EIR, there are no growth inducing impacts associated with the Project.

8. Findings that Identified Project Mitigations/Alternatives are not Feasible. (See discussion below).

Because the project will result in significant and unavoidable environmental impacts as identified above, the City must consider the feasibility of any environmentally superior alternatives to the

project, as proposed. The City must evaluate whether one or more of these alternatives could substantially lessen or avoid the unavoidable significant environmental effects.

Specifically, where significant impacts are identified, State CEQA Guidelines Section 15126.6(a) requires EIRs to consider and discuss alternatives to the proposed actions:

> (a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

State CEQA Guidelines Section 15126.6(b) states the purpose of the alternatives analysis:

> (b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

State CEQA Guidelines Section 15126.6(c) describes the selection process for a range of reasonable alternatives:

> (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a "rule of reason" that requires the EIR to set

forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

As such, the environmental superiority and feasibility of each alternative to the project is considered in this section. Specifically, this section evaluates the effectiveness of these alternatives in reducing the significant and unavoidable impacts of the project.

As required by State CEQA Guidelines Section 15126.6(c), the selection of alternatives for this EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The following alternatives were considered but eliminated from further analysis by the City due to one or more of these factors:

- Removal of Offshore Facilities only Alternative;
- Removal of Onshore Facilities only Alternative; and
- Limitations on Trucking Destinations Alternative.

The following alternatives were carried forward for in depth analysis:

- No Project Alternative;
- Full Removal of Facilities Alternative

In addition, in response to comments made on the Draft EIR, an additional alternative, the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative, has been added to the Final EIR and is found to be the environmentally preferred alternative. The analysis for each alternative is provided below.

No Project Alternative

CEQA requires an evaluation of the No Project Alternative so that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project.

According to CEQA Guidelines §15126.6(3)(B), for a development project the No Project Alternative is the circumstances under which the Project does not proceed. If disapproval of the Project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. CEQA defines the "no project" as:

[W]hat would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services (15126.6).

Under the No Project Alternative, the Project as proposed would not occur and the Applicant would not conduct the Site demolition and remediation activities proposed by the Project. The CPF would remain at the Site in a shut-down status and facilities would not be decommissioned. This would include onshore facilities, and offshore pipelines. It should be noted that remediation activities may still be required to proceed since the U.S. EPA and SBCEHS would likely continue to require that these facilities be cleaned up of contaminated materials and appropriately remediated. However, without the removal of above-ground equipment and tanks, it would be difficult to fully access all areas targeted for excavation and remediation.

Ability to Achieve Project Objectives: This Alternative would fail to meet all project objectives.

Feasibility: This alternative may not be feasible because there are regulatory requirements for clean up of the site which may be difficult to obtain if the infrastructure is not removed as under the Project.

Finding: As the removal of the contaminated soil would be a regulatory requirement, and leaving the aboveground infrastructure would make this difficult and potentially infeasible, this alternative would not achieve most of the Project objectives related to removing aboveground facilities and subsequently achieving soil remediation.

Full Removal of Facilities Alternative

The Project as proposed by the Applicant excludes a number of facilities that are not slated for decommissioning for a variety of reasons described below. Under this alternative all oil and gas facilities within the property and all related offshore facilities that can be addressed would be fully decommissioned. Those facilities would include the plugging and abandonment of the seven wells that exist within the Project Site; removal and remediation of naturally occurring petroleum hydrocarbons which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area; and removal of former Platforms Hazel and Hilda pipeline bundle, which include two, 8-inch diameter and one, 6-inch diameter abandoned pipelines that come from offshore, across the beach near the western extent of the Project area and a 36-inch diameter corrugated metal vault located at the edge of the bluffs.

Plugging and abandonment of the wells has not been required by CalGEM at this point. Removal of the pipelines from Platforms Hazel and Hilda was not required by the State Lands Commission, who was the Lead Agency for the removal of the Platforms in 1997.

Ability to Achieve Project Objectives: This Alternative could meet all project objectives.

Feasibility: Comments from the Applicant and others pointed out that the hydrocarbon seeps and historic wells are not required to be intervened by any regulatory agency and are not feasible under the existing Project. The California Coastal Commission has stated that the seeps are a chronic natural occurrence that is part of the environmental setting and would not be considered an impact. The seeps, which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area, are natural environmental features resulting from geological conditions. The California Coastal Commission commented that leaving the seeps undisturbed in their natural state would not be inconsistent with the Coastal Act. (California Coastal Commission letter, 1/31/2024). Previous attempts to cement over seeps in southern California have resulted in seeps moving around the cement cap. (Chevron letter, 1/31/2024). Abandonment of the historic wells on the property that were installed and operated by others are not proposed to be affected by the Proposed Project decommissioning activities and as such, are not considered the Applicant's responsibility. The California Geologic Energy Management Division (CalGEM) advised that the property owner would be responsible for well reabandonment if the property owner proposed construction that would prevent or impede well access, but the Proposed Project is not projected to build over or impede access to the historic wells. (CalGEM letter, 2/1/2024). CalGEM has determined that there is no regulatory requirement for Chevron to plug or abandon the wells as part of the Proposed Project.

Finding: This alternative was found infeasible due to issues discussed above.

Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative

The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative consists of all the components of the Proposed Project together with removal of the onshore and nearshore portion of the former Platforms Hazel and Hilda pipeline bundle, which was abandoned in place as approved by the State Lands Commission during the platform removal project in 1997. This alternative is a revised version of the Full Removal of Facilities Alternative described above but does not include removal and remediation of naturally occurring hydrocarbon seeps, plugging and abandonment of seven existing wells within the Project Site, or removal of the former Platforms Hazel and Hilda pipeline bundle further from shore, beyond a depth of 30 feet of water.

Ability to Achieve Project Objectives: The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would achieve the basic objectives of the Project by accomplishing the components of the original Proposed Project. In addition, removing the former Platforms Hazel and Hilda pipeline bundle through the bluffs would prevent future erosion and avoid the

pipelines becoming a burden on the public if removal is necessary in the future.

Feasibility: This alternative is feasible and there are no impediments for this alternative to move forward

Finding: Although the various alternatives have similar levels of impacts, the reduction of long-term geological impacts to the bluffs from elimination of the additional pipelines under the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative results in this alternative being the environmentally superior alternative.

9. Although the approval of this project allows the occurrence of significant effects identified in the final EIR, which effects are not substantially mitigated, the benefits of the project outweigh such effects and a Statement of Overriding Considerations is adopted pursuant to Sections 15091 through 15093 of Title 14 of the California Code of Regulations, as follows:

Pursuant to CEQA Section 21081(b) and State CEQA Guidelines Section 15093, the City has balanced the benefits of the proposed project against the unavoidable adverse impacts associated with the proposed project and has adopted all feasible mitigation measures. The City has also examined alternatives and has determined that adoption and implementation of the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative, is the most desirable, feasible, and appropriate action.

The Final EIR for the project identifies the following significant and unavoidable impacts of the project:

- Bio.7. Accidental Oil Spills. This is related to the potential for oil spills to occur during the execution of the project and affecting biological resources.
- Haz.2. Accidental Releases. This is related to the potential for oil spills to occur during the execution of the project.
- WR.1. Water Quality Standards. This impact is related to the potential of an oil spill in reaching or affecting water resources.

For projects which would result in significant environmental impacts that cannot be avoided, CEQA requires that the lead agency balance the benefits of these projects against the unavoidable environmental risks in determining whether to approve the projects. If the benefits of these projects outweigh the unavoidable impacts, those impacts may be considered acceptable (State CEQA Guidelines Section 15093[a]). CEQA requires that, before adopting such projects, the public agency adopt a Statement of Overriding Considerations setting forth the reasons why the agency finds that the benefits of the project outweigh the significant environmental effects caused by the project. This statement is provided below.

Statement of Overriding Considerations. The Planning Commission has identified the following overriding economic, social, and other public benefits of the project, which are additional reasons that the significant and unavoidable impacts identified in the Final EIR can be found acceptable, and hereby adopts them as a statement of overriding considerations:

a. The Project provides for a number of short and long-term beneficial effects to the area as a result of cleaning up an old, defunct oil and gas facility and offshore appurtenances.
b. The Project involves removal of a coastal-dependent industrial facility and associated infrastructure and site restoration to natural topography and vegetation. The Project would result in additional open space, natural habitat, and coastal recreation opportunities in the Project area. The Project would remove pipelines from the Project Site, bluff area, beach, nearshore and offshore areas out to three miles. No permanent development or structures are proposed in connection with the Project.
c. Although the Project would have some short-term impacts, its long-term beneficial effects are also discussed in the Final EIR Section 5.5 and summarized below:

    - Air Quality: operational criteria pollutant emissions, toxic emissions and odors would be reduced in the long term with removal of facilities and contamination, but would occur in the short term as a result of the decommissioning activities;
    - Hazardous Materials: Due to an elimination of contaminated soils and elimination of potential sources of an oil spill in the future by removal of facilities and upset hazards hazardous materials would be reduced in the long term but would occur in the short term related to decommissioning activities;
    - Aesthetics: The Project would include aesthetic benefits by having old and dilapidated structures removed from the coastal zone.
    - Biological Resources: Biological resources would be left undisturbed after the temporary impact from decommissioning activities.
    - Land Use: Land Use impacts are beneficial in the long term due to the elimination of an industrial land use on the Carpinteria Bluffs.
    - Geological Impacts: Geological impacts would be reduced in the long term by removing pipelines from the bluffs that could cause long term erosion, but would occur in the short term related to decommissioning activities;
    - Transportation: Traffic would be reduced in the long term due to the elimination of truck trips from the facility, but would occur in the short term related to decommissioning activities;

Accordingly, the City finds that the project's adverse, unavoidable environmental impacts are outweighed by these considerable benefits.

10. Adoption of Environmental Reporting and Monitoring Program. The project description, and

conditions of approval, with their corresponding permit monitoring requirements, are hereby adopted as the monitoring program for this project to ensure compliance during project implementation.

Pursuant to State CEQA Guidelines Section 15091(a)(1), the City finds that implementation of the mitigation measures specified in the Final EIR would substantially lessen the significant environmental effects resulting from the implementation of the project. These mitigation measures have been required in or incorporated into the project. In accordance with State CEQA Guidelines Sections 15091(d) and 15097, which require a public agency to adopt a program for reporting or monitoring required changes or conditions of approval to substantially lessen significant environmental effects, the Mitigation Monitoring and Reporting Program provided in the Final EIR is hereby adopted as the mitigation monitoring and reporting program for this preferred project.

3.0 Development Plan Findings

Pursuant to Carpinteria Municipal Code §14.68.030(9), prior to approving or approving with conditions a development plan, the planning commission or city council shall determine that all of the following criteria have been met:

1. *The proposed development is in conformance with the provisions of the applicable zoning district, Local Coastal Plan and implementation programs, and General Plan*.

   The Project involves removal of a defunct coastal-dependent industrial facility and associated infrastructure and site restoration to natural topography and vegetation. The Project would result in additional open space, natural habitat, and coastal recreation opportunities in the Project area. Decommissioning of inoperable oil and gas facilities and improvements is consistent with the types of uses anticipated in the coastal-dependent industrial land use designation and corresponding zone district. Expansion of open space, habitat, and public recreation opportunities on the bluffs are also generally consistent with the City's vision for the Carpinteria Bluffs area.

2. *The proposed development is sited and designed to avoid risks to life and property due to geologic, flood, or fire hazards and that the proposed density of development is consistent with these objectives.*

   The Project is a decommissioning of an existing facility and as such it cannot occur anywhere else. Compliance with required project mitigation measures and required regulatory agency permits will help to ensure decommissioning and remediation work is completed in the safest manner possible. As such, the proposed development is sited, designed and conditioned to avoid risks to life and property due to geologic, flood, or fire hazards.

3. *The proposed development will not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.*

   The Project includes the demolition of oil and gas processing equipment, tanks, pipelines, and other structures onsite, remediation of contaminated soils, and restoration with native vegetation. The Project will have some temporary impacts, and have the potential for oil spills to occur; however, the long term beneficial effects of the Project outweigh the temporary impacts by removing an industrial unsightly facility from the coastal Carpinteria bluffs. Compliance with required project mitigation measures and required regulatory agency permits will help to ensure decommissioning and remediation work is completed in a manner that is most protective of the environment and surrounding sensitive resources.

4. *The proposed development will not conflict with any recorded easements acquired by the public at large for access through the property or use of the property or any easements granted to any public agency or required as a condition of approval.*

   The proposed decommissioning Project will not conflict with any recorded easements acquired by the public at large for access through the property or use of the property or any easements granted to any public agency. While the Project may have some impacts on public use of nearby trails, these impacts would be temporary and not significant as discussed in the FEIR. No new easements are required as a project condition of approval.

5. *The proposed development will not adversely affect necessary community services and values including but not limited to traffic circulation, sewage disposal, fire protection, water supply, and police protection.*

   The proposed Project will not adversely affect community services and values including but not limited to traffic circulation, sewage disposal, fire protection, water supply, and police protection. The Project is temporary in nature and will not result in adverse impacts to, or additional demands placed upon these community services.

6. *The proposed development will not be detrimental to the peace, health, safety, comfort, convenience, property values, or general welfare of the neighborhood.*

   The proposed Project will have some temporary effects during the decommissioning activities; however, those impacts are temporary in nature and once the project is completed, neighbors and surrounding land users will be able to enjoy the absence of a dilapidated industrial facility within the coastal bluffs. Appropriate mitigation measures developed as part of the Project EIR have been incorporated into the adopted conditions of approval, and would further the reduce the severity of these temporary impacts to the maximum extent feasible.

4.0 Coastal Development Permit Findings

Pursuant to the California Coastal Act, the Administrative Regulations of the California Coastal Commission and the City's Local Coastal Program, it has been found that the permit requested may be issued based on the following findings:

1. *The proposed development is in conformity with the City's certified Local Coastal Program.*

   The Project Site is currently designated Coastal Dependent Industry (CDI) and Recreation (REC) by the General Plan/Coastal Land Use Plan. The CDI land use category identifies areas for industrial uses that are coastal dependent, such as aquaculture and pipeline/gas processing facilities which support offshore oil industries. Under the Carpinteria Municipal Code (CMC), the Project Site is zoned to the corresponding Coastal Industry District (M-CD). The onshore Project Site is currently developed with the Carpinteria Processing Facility, open space, a former marketing terminal, and Marine Spill Response Corporation (MSRC) yard/offices north of the Union Pacific Railroad (UPRR) right-of-way (ROW). The onshore Project area south of the UPRR ROW is currently utilized for the Casitas Pier parking lot and offshore pipeline landings/bluff crossings. The Project includes demolition of all existing structures onsite and subsurface remediation of soils. The Project Site will be backfilled, final graded, and planted with native vegetation to match existing contours. No additional structures will be constructed as part of the Project. The proposed decommissioning Project is consistent with the City's certified Local Coastal Program. The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Attachment A.

Planning Commission Resolution No. PC-25-001

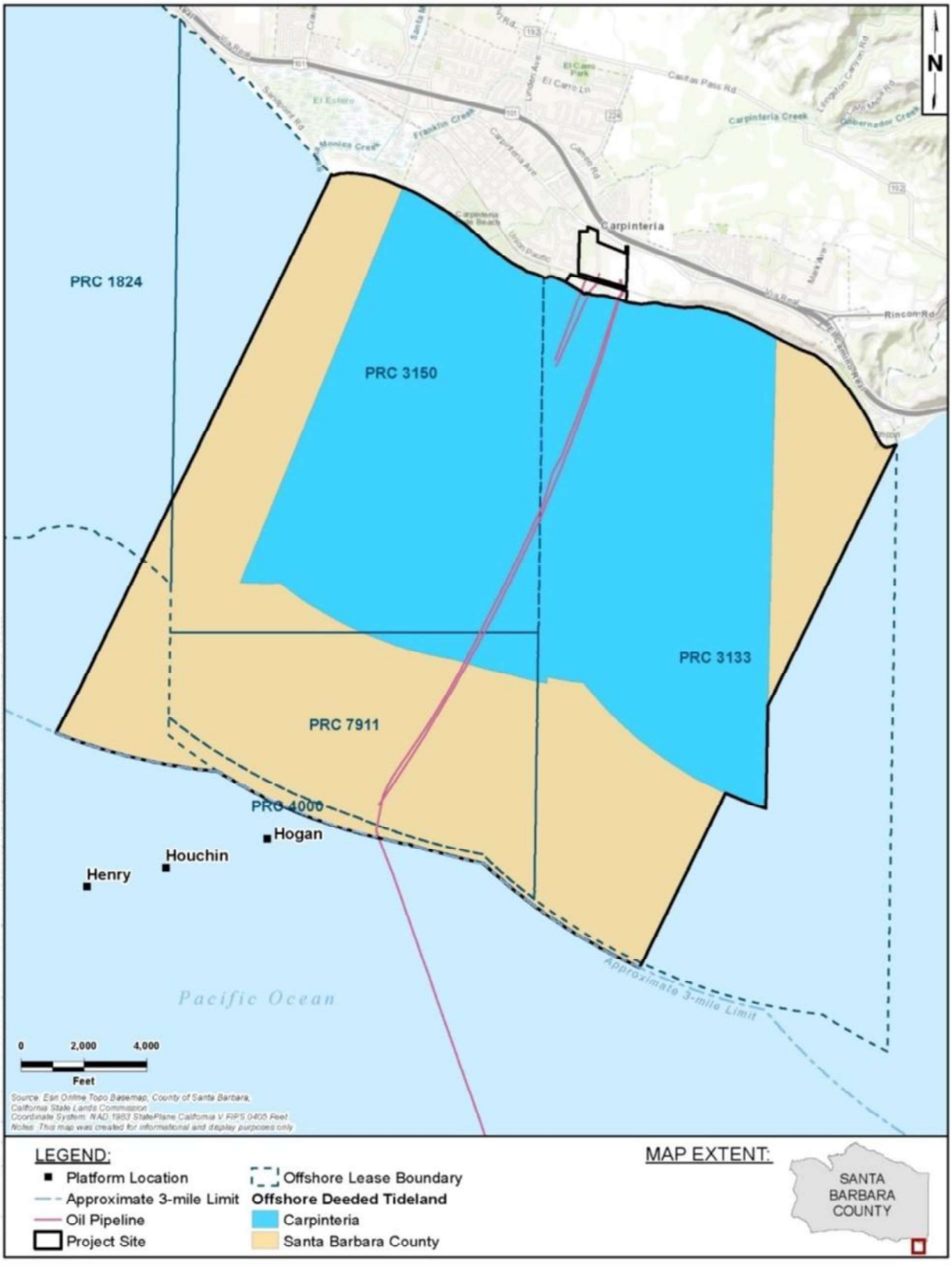
Exhibit 2. Project Figures

Chevron Decommissioning and Remediation of the
Carpinteria Oil and Gas Processing Facilities Project

Project 21-2128-DP/CDP

May 5, 2025 Planning Commission Meeting

Figure 1 Project Site location Map



Source: Applicant Project Description, 2021.

Figure 2 Facility Overview



Source: Applicant Project Description, 2021.

Figure 3 **Site Area Assessor's Parcels and Land Use Zoning**



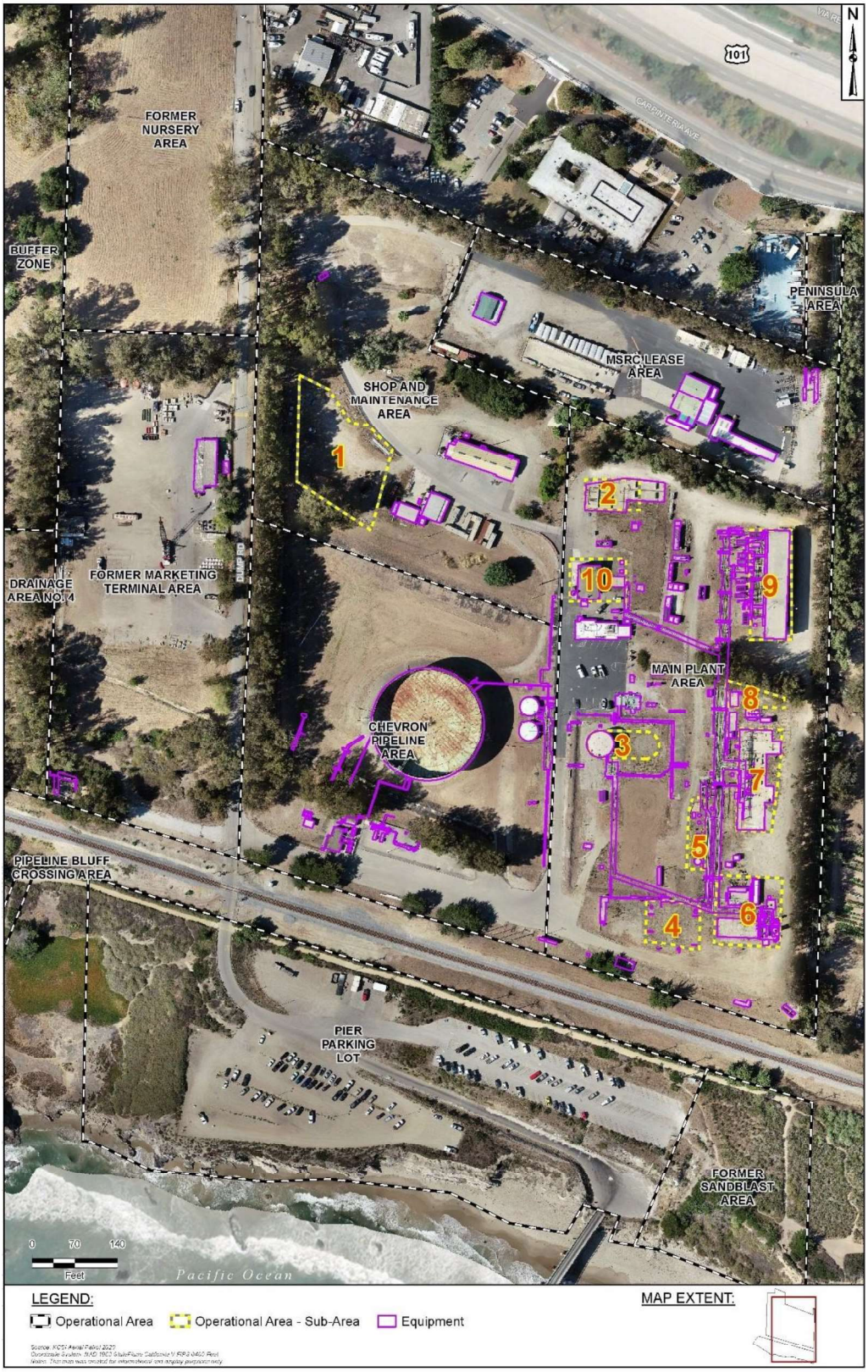
Source: Applicant Project Description, 2021.

Figure 4 Primary Operational Areas



Source: Applicant Project Description, 2021.

Figure 5 Onshore Facility Equipment Removal Areas



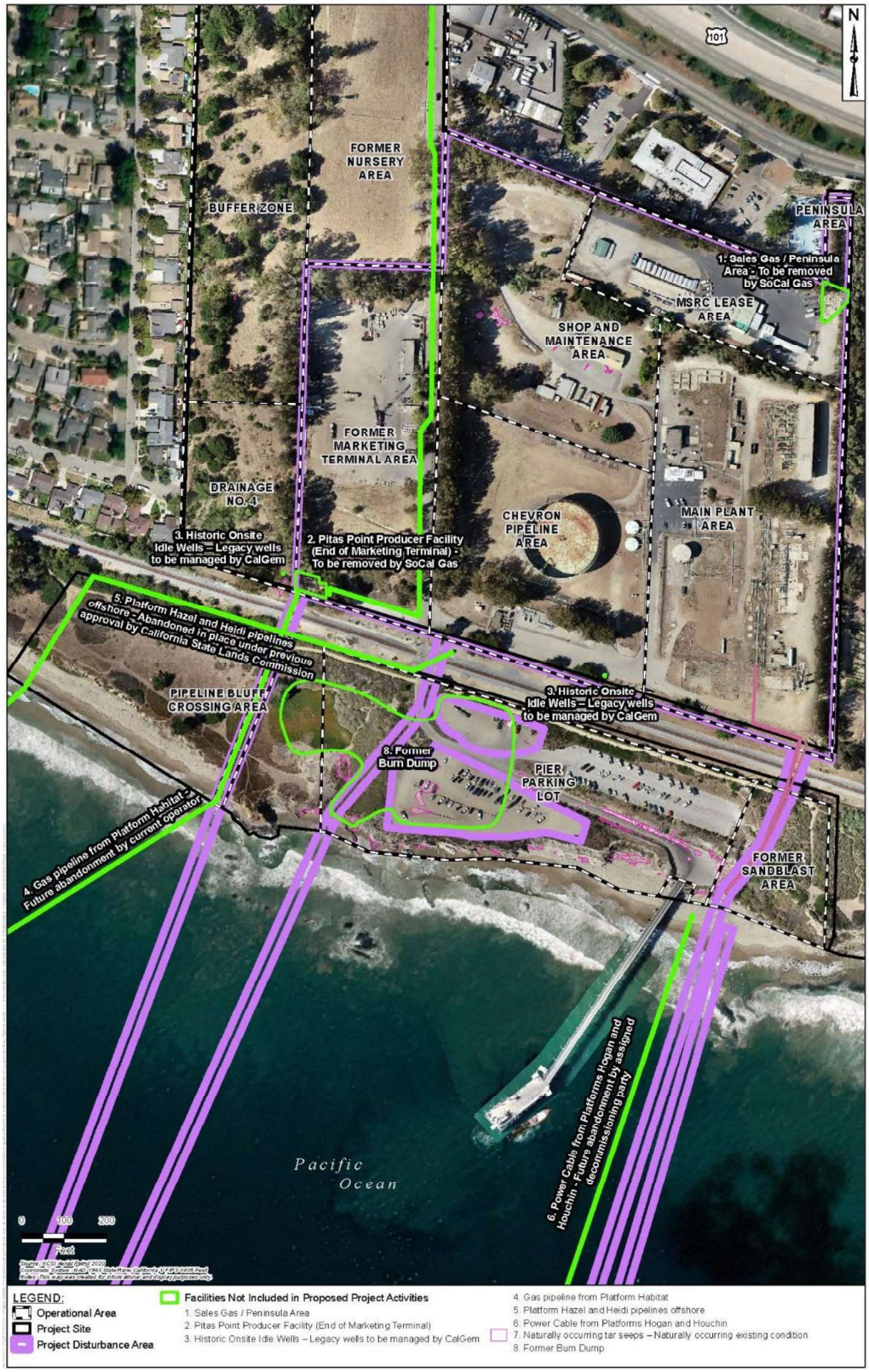
Source: Applicant Project Description, 2021.

Figure 6 Offshore Facility Equipment Removal Areas



Source: Applicant Project Description, 2021.

Figure 7 Facilities Not Proposed as Part of the Project



Source: Applicant Project Description, 2021.

Attachment A.

Planning Commission Resolution No. PC-25-001

Exhibit 3. Project Conditions of Approval

Chevron Decommissioning and Remediation of the
Carpinteria Oil and Gas Processing Facilities Project

Project 21-2128-DP/CDP

May 5, 2025 Planning Commission Meeting

PLANNING COMMISSION HEARING

PROJECT 21-2128-DP/CDP

MAY 5, 2025

EXHIBIT 3: CONDITIONS OF APPROVAL

CHEVRON CARPINTERIA OIL AND GAS FACILITY DECOMMISSIONING PROJECT

The Conditions set forth in this permit affect the title and possession of the real property that is the subject of this permit and shall run with the real property or any portion thereof. All the terms, covenants, conditions and restrictions herein imposed shall be binding upon and inure to the benefit of the owner (applicant, developer), his or her heirs, administrators, executors, successors and assigns. Upon any sale, division or lease of real property, all the conditions of this permit shall apply separately to each portion of the real property and the owner (applicant, developer) and/or possessor of any such portion shall succeed to and be bound by the obligations imposed on the owner (applicant, developer) by this permit.

PROJECT DESCRIPTION

1. This Development Plan and Coastal Development Permit is based upon and limited to compliance with the project description, the hearing exhibits (Attachment A, Exhibit 2 to the staff report dated May 5, 2025) and conditions of approval set forth below. Any deviations from the project description, exhibits or conditions must be reviewed and approved by the City for conformity with this approval. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above-described approval will constitute a violation of permit approval.

   The project description is as follows:

   The Project proposes to demolish and remove the Carpinteria Processing Facility (CPF) including but not limited to the onshore portions of the CPF (Onshore Facility), and State Waters Offshore Pipelines and complete remediation of impacted soils and groundwater at the Facility. Remediation is proposed to comply with levels established in a Remedial Action Plan (RAP) that will be reviewed by the Santa Barbara County Public Health Department, Environmental Health Services (SBCEHS), Regional Water Quality Control Board (RWQCB), and United States Environmental Protection Agency (U.S. EPA). The Project proposal assumes the most stringent clean up levels for the purpose of determining soil excavation and truck trip estimates and therefore a maximum amount of remediation activities (e.g., truck trips, Site activities). The Applicant states remediation efforts will be performed along with preservation of existing Site resources, including mature trees and bluffs, and in coordination with Site constraints including buffer zones adjacent to the Union Pacific Railroad (UPRR) right-of-way (ROW). The most stringent clean up levels would also

result in greater flexibility for development on the Site meeting the most rigorous standards (e.g., unrestricted land use).

Decommissioning and remediation of the Facility will include the following activities:

Onshore Facility

- *Idling and removal of all existing surface and subsurface equipment, piping, and structures within the Facility;*
- *Removal of concrete foundations, asphalt, oil spray, and road base within the Facility;*
- *Excavation/remediation of any impacted soils underlying the Facility in accordance with the Facility's Remedial Action Plan (RAP) and RAP Addendums, and appropriate regulatory guidance (once approved);*
- *Recycling/disposal of all materials removed from the Project Site(s); and*
- *Restoration of the portions of the Site in accordance with the Site Restoration Plan (once approved).*

Beach Crossing and State Waters Offshore Pipelines

- *Pig and flush State Waters Offshore Pipelines in preparation for removal;*
- *Removal of State Waters Offshore Pipeline segments out to 3-nmi state waters limit;*
- *Removal of nearshore beach crossing pipeline segments;*
- *Recycling/disposal of all materials removed from the Project Site(s); and*
- *Onshore restoration in accordance with the Site Restoration Plan (once approved).*

The Project Site includes the Facility, as well as the State Waters Offshore Pipelines and utilities leading into the Project Site from state waters, as further described below. Within the onshore portion of the Project Site, a number of operational areas/plant areas have been identified that contain idle structures, vessels, and piping proposed for demolition and remediation. The state waters offshore portion of the Project Site contains two primary pipeline and utility bundles that come to shore and lead into the Onshore Facility. Proposed activities within each area are listed below.

Onshore Facilities and Proposed Activities

- *Main Plant Area (MPA) – Surface and subsurface facilities demolition, and soil remediation;*
- *Chevron Pipeline Area (CPA) - Surface and subsurface facilities demolition, and soil remediation;*
- *Former Marketing Terminal Area (FMTA) – Surface facilities demolition and soil remediation;*
- *Former Nursery Area (FNA) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels;*
- *Shop and Maintenance Area – Surface and subsurface facilities demolition and soil remediation;*
- *MSRC Lease Area – Surface facilities demolition and soil remediation;*

- *Peninsula Area - Soil remediation in coordination with SoCalGas facility demolition and City of Carpinteria skate park development;*
- *Buffer Zone Area (BZA)/Drainage Area No. 4 (DA4) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels; and*
- *Gravel Portion of Pier Parking Lot/Former Sand Blast Area (FSBA) – Surface and subsurface facilities demolition, and soil remediation/subsurface pipeline removal/abandonment in place.*

State Waters Offshore Pipelines and Proposed Activities

- *Platform Gail and Grace Pipeline Bundle and 10-inch Oil Pipeline – Removal from top of bluff to 3-nmi state waters limit; and*
- *Marketing and Marine Terminal Pipeline Bundles – Removal offshore through top of bluff. Onshore pipelines will be abandoned in-place.*
- *Removal of the onshore and nearshore portion of the former Platforms Hazel and Hilda pipeline bundle.*

MITIGATION MEASURES FROM THE CERTIFIED PROJECT ENVIRONMENTAL IMPACT REPORT (EIR)

2. **Aesthetics. Mitigation Measure A-4. Beach/Nearshore Night-Lighting Minimization.** No unobstructed or unshielded beam of exterior lighting shall be directed towards any area outside the exterior boundaries of the property. Project lighting in beach/nearshore work areas shall be as low an intensity as allowed by safety requirements and located, designed, and equipped to provide shielding and minimize lighting visible from residential areas. **Plan Requirements/Timing**: A beach/nearshore lighting plan shall be submitted to the City and approved prior to initiation of any beach or nearshore Project activities. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City.

3. **Air Quality Mitigation Measure AQ.2. Odor Control and Purging Plan.** The Applicant shall submit an Odor Control and Purging Plan that includes the use of degassing systems for equipment and pipeline purging operations that may be required and includes proactive measures to eliminate or reduce objectionable odors emanating from construction and decommissioning activities, and an action plan if odor issues or complaints arise.

4. **Biology. Mitigation Measure Bio.1a. Agency Approvals.** Prior to commencement of any construction or decommissioning activities, the Applicant shall obtain compliance with the USFWS, NOAA Fisheries, and CDFW for components of the Project that have the potential to directly or indirectly impact federal or state-listed terrestrial or marine plant and animal species in the form of take permits/authorizations or written documentation from the USFWS, NOAA Fisheries, and CDFW that the proposed Project would not result in take of these species, or would not otherwise adversely affect these species. Should a take permit/authorization be required, or conditions imposed by the USFWS, NOAA Fisheries,

and CDFW to ensure that no take would result from the proposed Project or impacts are avoided and minimized, the Applicant shall implement all the terms and conditions of the USFWS/NOAA Fisheries/CDFW permits, authorizations, or recommendations to the satisfaction of these agencies. This EIR does not authorize, approve, or otherwise support a "take" of any listed species as defined under the federal or California Endangered Species Acts. The Applicant shall notify the City staff immediately of any potential violation of the federal and/or California Endangered Species Act.

5. **Mitigation Measure Bio.1b Habitat Restoration/Revegetation Plan.** The Preliminary Restoration/Revegetation Plan (Padre 2021e) indicates each Operational Area will be restored or, at a minimum, revegetated for erosion control, to the extent required to support future land use designations. The current plan shall be revised, or specific restoration plans (including restoration of topography and substrates in unvegetated areas) shall be developed for various Project components, including restoration and mitigation of special status species habitat (including trees, coastal wetlands shoreline/sandy beach habitat, and offshore habitat). The final plan(s) approved by the City shall be fully implemented to address adverse impacts to sensitive species habitats. Plans for restoration and revegetation shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. The Final Restoration/Revegetation Plan(s) shall identify the assumptions used to develop the proposed restoration strategy, timing for plan implementation, and performance standards to ensure special status species habitat has been restored. The Plan(s) shall include at a minimum:

    1. Ground Disturbance. Construction activities shall avoid or minimize impacts to special status species habitats, where feasible. All temporary disturbances including parking areas, lay down, storage areas, and other sites of surface disturbance shall be located in previously disturbed areas or in annual grassland and shall be mowed, versus graded, where feasible to keep root structures in place; thereby, facilitating future revegetation.
    2. Quantification of disturbance acreage and final restoration and mitigation requirements, including restoration of habitat for special status species such as shoreline/sandy beach foraging habitat for snowy plover and habitat for marine plant species. The Applicant shall conduct post-construction surveys of the entire Project Site in coordination with the City and/or City's representative to quantify actual acres of disturbance to special status species habitat. At a minimum, a 1:1 mitigation ratio will be required to restore areas temporarily disturbed to pre-construction conditions and replace habitats permanently affected by the Project (final mitigation ratio will be determined during Project permit and approval process).
    3. Description and map of location of restoration/revegetation and compensatory mitigation sites and assessment of appropriate reference areas to help guide restoration and mitigation efforts.
    4. Soils within any disturbed area shall be stabilized through use of soil coating mulch, dust palliatives, compaction, reseeding, or other approved methods.
    5. List of plant species to be used, sources of local seed, cuttings, container sizes, and seeding rates, and planting schedule. On-site seed collection should be initiated in the

near future to accumulate sufficient propagule material for subsequent use in future years. On-site vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes (CDFW 2022).

6. Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include (for example) retention of woody material, logs, snags, rocks and brush piles (CDFW 2022).
7. A description of the irrigation methodology.
8. Measures to control non-native vegetation on site.
    a. Weed control treatments shall include legally permitted manual, mechanical, and/or chemical (e.g., herbicide) methods approved for application. Manual and mechanical are the preferred control methods, with the application of herbicides only under extreme circumstances and with the approval of regulatory agencies. The timing of the weed control treatment would be determined for each plant species with the goal of controlling populations before they start producing seeds. Consultation with a City-approved, qualified wildlife biologist or botanist would be required prior to implementing weed control treatments in order to develop strategies that avoid adverse effects on plants and wildlife.
    b. Where manual or mechanical weed control methods are used, plant debris would be disposed of at an appropriate off-site location.
    c. Herbicide application would comply with state and federal laws and regulations under the prescription of a Pest Control Advisor and would be implemented by a Licensed Qualified Applicator.
    d. All seed stock and straw materials used during Project construction and restoration phases shall be guaranteed weed-free. All imported fill used for site surface restoration will undergo standard weed control treatments prior to collection and import of soil to the Project Site. Upon completion of final contouring, follow-up weed control treatments described above in Mitigation Measure Bio 1b, 8(a) will be implemented to ensure the post-project control of non-native vegetation establishment.
9. A detailed qualitative monitoring program including specific, measurable success criteria and suitable monitoring periods to ensure the successful establishment of all plant communities and trees. Monitoring of restoration areas shall extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought (minimum five years). Monitoring shall demonstrate a positive trend for native species cover, diversity, and abundance, and a negative trend for non-native species cover with no further manipulation of the Project Site occurring during this period. If manipulation of the Project Site is still occurring (replacing dead plants, irrigation, weeding) then this is still considered the installation period and shall not be used as monitoring data to determine success. The monitoring period shall start after the installation period has been completed and the Project Site is not being actively manipulated, as manipulation of the Project Site skews any data collection toward prematurely meeting success criteria that might not have been met had the Project Site been left alone (CDFW 2022).

10. And identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

Plan Requirements/Timing: The Final Restoration/Revegetation Plan(s) shall be approved by the City, and other permitting agencies if required, prior to issuance of Project permits, and implemented on schedule in accordance with the approved Plan including hydroseeding exposed soils prior to each rainy season. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

6. **Mitigation Measure Bio.1c Pre-construction Wildlife Surveys and Protection.**
    1. Monarch butterflies:
        a. Monarch butterfly habitat assessment: A qualified biologist shall be retained to conduct a habitat assessment a minimum of 60 days prior to Project implementation, including tree trimming activities. The qualified biologist shall assess habitat following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (Xerces 2017) or other protocols with prior approval by CDFW. The habitat assessment shall be conducted in consultation with site monitors with knowledge of the history of the grove to determine primary roosting trees and other structural components or flora integral to maintaining microclimate conditions. These plants shall be marked and avoided during project activities.
        b. Monarch Butterfly Management Plan: A Monarch Habitat Management Plan shall be developed, in consultation with CDFW, prior to Project implementation. The information gathered during the monarch habitat assessment shall be used to develop the plan following the guidance in the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (Xerces 2017) or other protocols with prior approval by CDFW. The plan shall be adaptive, with specific goals and objectives, continued monitoring, and refinement over time. The plan shall include as an objective that the baseline population/individual occurrence numbers shall not decrease over three years due to Project activities and shall include adaptive and contingent measures to ensure this objective is met. The plan shall consider removal or trimming of hazard trees, removal or trimming of trees to create appropriate solar radiation patterns, a long-term tree planting strategy, and shrub and forb management. Trees within core overwintering habitat shall not be cut or trimmed except for specific grove management directed by the plan. Management activities in groves shall only be conducted between March 16 and September 14, in coordination with the qualified biologist (Marcum & Darst 2021). If construction, tree removal, or tree trimming needs to occur within 500 feet of monarchs, the plan needs to include prohibition of activities that create excessive dust, vibration, or physical disturbance; and suitable setbacks from the edge of the groves to preserve habitat quality.
        c. Monarch butterfly Take Avoidance: If monarch butterflies are detected within the Project area, monarch overwintering habitat shall be avoided by

delineating and observing a no-disturbance buffer of at least ½ mile from the outer edge of the habitat (Marcum & Darst 2021). If buffers cannot be maintained, then consultation with CDFW and the USFWS will occur to determine how to implement ground and tree-disturbing activities and avoid take.

Plan Requirements/Timing: The Monarch Butterfly Management Plan shall be submitted to the City and CDFW and approved prior to the initiation of work and implemented for all work between September 14 and March 15. The applicant will consult with CDFW and USFWS prior to removal of trees or shrubs within ½ mile of overwintering Monarch groves. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

2. Raptors: A City-approved wildlife biologist shall conduct a pre-construction survey of the entire Project Site to determine the presence of nesting raptors in trees surrounding the proposed Project Site. The City-approved wildlife biologist shall conduct a survey of all trees within 1,000 feet of all tree trimming or tree removal activities to determine the presence of nesting raptors in trees surrounding the proposed work areas. The biologist shall then, in coordination with the City, determine suitable buffer areas between the nests and construction or tree trimming activities if activities are scheduled to begin during the typical raptor nesting season (February 15 through August 1).
3. Nesting Bird Survey. If Project activities are scheduled between February 1 and August 31 (general nesting bird season), nesting bird surveys shall be completed by a qualified biologist no more than seven days prior to the start of work. The survey area shall include a minimum of 500 feet from all planned ground disturbance and vegetation removal including tree trimming or removals. If any active nests are discovered within or adjacent to work limits, an buffer of 500 feet for raptors and 250 feet for other birds shall be established to protect the nest until a qualified biologist has determined that the nest is no longer active and/or the young have fledged.

   Plan Requirements/Timing: A compliance plan shall be submitted to the City and approved prior to the initiation of work and issuance of grading permits, and implemented for all work between February 1 and August 31. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

4. Pre-Decommissioning Marine Biological Dive Surveys. No more than 60 days prior to commencement of offshore activities, a City-approved, qualified marine biologist shall conduct a pre-decommissioning marine biological survey of the sensitive habitat areas adjacent to the nearshore pipeline corridors. If sensitive habitats such as seagrass, surfgrass, hard substrate, or kelp beds are identified, anchor locations shall be relocated to avoid impacts to these protected habitats. If seagrass is identified, post-decommissioning surveys will be conducted to verify seagrass beds had not been impacted by Project related activities. If seagrass beds have been impacted, Chevron shall be required to prepare and implement eelgrass restoration as part of the Habitat

Restoration and Revegetation Plan under Bio.1b that shall be approved by City. All eelgrass surveys and mitigation shall adhere to California Eelgrass Mitigation Policy. Adjustments to decommissioning methodologies in sensitive habitats may be made to the greatest extent feasible to reduce impacts to these areas. In addition, remote operated vehicle or multi-beam geophysical surveys shall be conducted at each anchor location to confirm the absence of hard-bottom habitat.

Plan Requirements/Timing: The results of the pre-decommissioning marine biological dive surveys shall be submitted to the City, the CDFW, and NOAA Fisheries for review and fully implemented prior to the issuance of grading permits. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

7. **Mitigation Measure Bio.1d Fencing.** To minimize the amount of disturbance to wildlife habitat and important or sensitive biological resources, construction boundaries will be fenced with highly visibly fence and staked. Wildlife safe highly visible construction fencing shall be installed to identify the limits of grading/disturbance, which would reduce potential human trampling outside of the construction limits and minimize the potential spread of non-native weeds or invasive plant species. Wildlife-safe construction fencing and flagging shall remain in place during construction and maintained and replaced as needed. The City-approved qualified biological monitor shall ensure environmentally sensitive areas within or near the construction zones are clearly marked for avoidance in the field. These areas include, but are not limited to, occurrences of special-status plants, trees to be avoided, sensitive vegetation communities or wildlife species adjacent to work areas, and jurisdictional resources. Project boundaries shall be clearly marked with fencing or staking that shall be replaced as needed and removed upon Project completion. Vehicles and equipment access shall follow marked routes. Indiscriminate vehicle travel shall not be allowed.
   Plan Requirements/Timing: The detailed fencing plan, showing the location of required fencing installation, and timing of fencing removal, shall be submitted to the City for review and approval prior to the issuance of grading permits and depicted on all final Project plans. The fence shall be installed prior to the start of ground disturbance activities. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

8. **Mitigation Measure Bio.1e Worker Education and Awareness Plan.** Qualified City approved biologists shall provide an educational program for all personnel prior to initiation of any construction activities, including, but not limited to, facility demolition and remediation, tree trimming and tree removals, bluff pipeline removal, and offshore pipeline removal. The natural history, including sensitive species and habitats, shall be described as well as the current status, reasons for decline, and protection measures relevant to the species and habitat. The plan shall include the following:
   1. Point of contact information shall be provided for workers to report sightings of sensitive biological resources in the vicinity as described in the WEAP.

2. Photographs of sensitive biological resources, general provisions and protections of the federal and state Endangered Species Act, and review of measures to be implemented during the construction activities to avoid and minimize adverse effects to sensitive species.
3. Identification of Project activities that require biological surveys and monitoring for resource protection, as described in Project permits.
4. Description of the markers for active bird nests, areas or trees marked for avoidance, or other mitigation areas, so that they shall know these are not to be disturbed without a biological monitor present.
5. Workers shall be informed not to litter. All trash shall be contained during the day, picked up, and removed from the construction sites at the end of each day. During Project activities, all trash that may attract predators shall be properly contained, removed from the Project Site, and disposed of regularly. Following construction, all trash and construction debris would be removed from work areas.

Plan Requirements/Timing: The Worker Education and Awareness Plan shall be submitted to the City and approved prior to the issuance of grading permits. All workers, contractors, and visitors shall receive training prior to entering the Project area and performing any work. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor. The Applicant shall provide copies of the training attendance sheets to the City as a record of compliance with this measure on a monthly basis.

9. **Mitigation Measure Bio.1f. Marine Wildlife Contingency and Training Plan Implementation.** A Marine Wildlife Contingency and Training Plan shall be developed and implemented during all offshore Project activities to reduce or eliminate potential impacts of the proposed decommissioning activities on marine mammals and birds (marine wildlife). The Plan shall include monitoring vessel transit, anchoring, underwater surveys and pipe removal operations by a City-approved, designated monitor trained to detect marine wildlife. The monitor shall have the authority to halt marine operations that may adversely affect marine wildlife or marine habitat.
   Prevent Introduction of Non-Native Aquatic Species (NAS). All Project vessels shall be in compliance with California's state ballast management regulations.
   Plan Requirements/Timing: The Marine Wildlife Contingency and Training Plan shall be submitted to the City and approved prior to the issuance of grading permits. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated third party marine wildlife monitor.

10. **Mitigation Measure. Bio.1g Harbor Seal Rookery Monitoring and Protection.** The Carpinteria Harbor Seal Rookery Monitoring and Protection Plan (Padre 2021d; Appendix C-6) approved by the City shall be fully implemented during all Project-related activities within 1,000 feet of the haulout/rookery. A summary of the avoidance and protection measures included in the Carpinteria Harbor Seal Rookery Monitoring and Protection Plan are presented below (see Appendix C-6 for full text).

1. The bluff and onshore pipeline removal shall be scheduled to occur between June 1 and November 30 to avoid pupping season. Project decommissioning activities within 1,000 feet of the rookery (except for areas within the 1,000 feet north of the railroad tracks) shall be scheduled to avoid pupping season (December 1 through May 31). Project activities shall be scheduled during low tide windows and limited to daylight hours only to maximize visibility and ensure safety during repair work.
2. The size of the work zone shall be minimized and placement of visual screen barriers between the work area and seal rookery. In addition, noise minimization measures shall also be employed including low volume radio transmissions, timing concrete demolition to be performed outside of the pupping season and using noise dampening shields.
3. Prior to the initiation of the Project, personnel shall be given marine wildlife sensitivity training. This training shall include specifics regarding Project restrictions, operational limits, and ingress/egress methodology. The crews shall be instructed to wear neutral colored clothing, and to move slowly during ingress/egress as well as minimize hand gestures or signals during work activities to avoid startling the harbor seals.
4. The number of on-beach personnel and the amount of equipment shall be minimized and completely removed every day, and stored on the paved parking lot above the beach and away from the bluff edge.
5. The Project shall employ Best Management Practices (BMPs), including removal of trash and debris.
6. An approved Marine Wildlife Monitor (MWM) shall be employed and shall be responsible for briefing all Project personnel on the protective measures prior to initiating work each day and shall delineate the equipment and personnel ingress/egress corridors. The MWM shall remain onsite during all work to ensure that activities are limited to the immediate work area and shall have the authority to stop all operations to avoid harassment of seals. Harassment is defined by the sudden flushing of seals into the water, potentially separating nursing cow and pup pairs, or any abnormal or aggressive behaviors. The monitor shall record, photograph, and report compliance. The MWMs shall work directly with Seal Watch volunteers present at the overlook to coordinate direct observation of harbor seal activities during Project related activities. The MWM shall ensure that the Project is in compliance with all necessary permits, communication with appropriate agencies and Carpinteria Seal Watch Coordination, and that BMPs are followed.
7. The MWM shall count and record the number and species of all marine mammals that are within the Project area (within visual range along the beach) and take photographs of the Project Site and access route. At regular intervals during the day, the monitor shall record the number and location of harbor seals and document the decommissioning activities. Changes in the behavior or number of individuals and/or their proximity to the Project Site prior to, during, and immediately following noise-producing activities shall be recorded and photographed. The type of activity that promulgated changes in harbor seal abundance or behavior shall be recorded as well as notes on the weather, non-project human activities, and observations of avifauna and marine mammals outside the Project boundaries. Any activity that are considered

to be harassment of a marine mammal, that activity shall be stopped immediately, and the Chevron Project Manager and NOAA Fisheries representative shall be contacted immediately via cell phone.

8. Data and observations that were recorded during the removal activities shall be presented in tabular and text format in a technical report that shall also include copies of photographs. The report shall summarize the Project decommissioning activities as well as protective measures and their effectiveness. The technical report shall be provided to the regulatory agencies within 30 days of completion of the final beach or bluff decommissioning activities.

Plan Requirements/Timing: The Carpinteria Harbor Seal Rookery Monitoring and Protection Plan shall be approved by the City prior to the issuance of Grading permits, and implemented during periods when the haul-out/rookery is active (December 1 through May 31). Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

In addition to the above, noise mitigation measure N.2a will reduce noise impacts to wildlife species by requiring noise reduction with noise walls and temporary noise blankets, and implementation of mitigation measures WQ-1 would also protect biological resources from potential indirect impacts associated with degraded water quality.

11. **Mitigation Measure Bio.1h Wildlife Relocation Monitoring.** A City approved wildlife biologist shall conduct pre-disturbance surveys of the work area throughout each day of construction activities. The qualified biological monitor shall be on-site prior to and during all ground disturbing activities to move out of harm's way any special status species or other wildlife of low mobility that would be injured or killed by Project-related activities including any vegetation removal or tree trimming activities. The qualified biologist shall obtain all appropriate state and federal permits to handle any sensitive species potentially present in the Project area.
Plan Requirements/Timing: The name and qualifications of all wildlife biologists shall be provided to City and CDFW and approved prior to the initiation of any Project-related work. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated wildlife monitor.

12. **Mitigation Measure Bio.2a ESHA Impact Avoidance.** Impacts to ESHA areas shall be avoided and minimized. Areas that support ESHA or other Sensitive Natural Communities shall be marked on Project plans and identified on the ground using construction fencing, or other means, to identify them as exclusion zones to all personnel and equipment (mitigation measure Bio.1d).

13. **Mitigation Measure Bio.2b Scrub Mitigation.** Areas that support Menzie's golden bush scrub and lemonade berry scrub that are removed or damaged during construction shall be mitigated onsite at a minimum 2:1 ratio, which shall be incorporated into the Final Habitat Restoration/Revegetation Plan (MM Bio.1b).
Plan Requirements/Timing: The City shall review and approve the Final Habitat Revegetation/Restoration Plan to ensure compliance with compensatory mitigation

requirements, as needed. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

14. **Mitigation Measure Bio.2c Essential Fish Habitat Avoidance.** No more than 60 days prior to commencement of offshore activities, a pre-decommissioning marine biological survey of nearshore pipeline corridors shall be conducted. All eelgrass surveys shall adhere to the California Eelgrass Mitigation Policy. Anchor pre-plots shall be developed and implemented to avoid kelp beds, rocky habitats, surfgrass, and seagrass beds. Anchors shall be lowered vertically to the bottom and retrieved using a crown line as needed to avoid kelp beds, rocky reefs, surfgrass, and seagrass beds.
Plan Requirements/Timing: The results of the pre-decommissioning marine biological survey and anchor pre-plots shall be submitted to the City, CDFW, and NOAA Fisheries for review and fully implemented prior to pipeline removal. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

15. **Mitigation Measure Bio.3a Permitting Compliance with USACE, RWQCB, and CDFW Regulations.** The Applicant shall provide the City a copy of the Clean Water Act Section 401 and 404 permits and CDFW Streambed Alteration Agreement, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary. The Applicant shall implement all mitigation measures and conditions contained within Project permits for impacts upon determination of jurisdiction and permit issuance by agencies.
Plan Requirements/Timing: The Applicant shall submit copies of the CWA Section 401 and 404 permits, CDFW Streambed Alteration Agreement, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary to the City prior to initiation of Project activities. City staff will review permit requirements and ensure compliance, as appropriate.

16. **Mitigation Measure Bio.3b Wetlands Pre-construction Survey.** A City-approved wetlands biologist shall conduct a pre-construction survey of the Project Site to determine the potential for sediments or potential pollutants to flow off-site through surface water drainage ditches and determine the need for setbacks from open drainage ditches in Project areas. If the drainage ditches support wetland vegetation at the time of the survey as determined by the City-approved wetlands biologist, a 100-foot minimum setback shall be required.

17. **Mitigation Measure Bio.3c Coastal Wetlands Mitigation and Monitoring Plan.** A Coastal Wetlands Mitigation and Monitoring Plan shall be prepared by the Applicant and approved by the City and other resource agencies, as applicable, and fully implemented within 120 days of the completion of soil remediation and shall include the following:
    1. The permanent loss of 0.17 acre associated Wetland W-1 shall be replaced on a minimum 4:1 basis by expansion of existing wetlands in the Drainage No. 4 Area.
    2. The temporary loss of 0.1 acre within W-5 shall be mitigated at a minimum 4:1 ratio that shall include periodic monitoring to ensure the wetland naturally revegetates to pre-disturbance conditions, identification of contingency measure should natural

revegetation not proceed as expected, as well as establishment or enhancement of wetland habitat elsewhere on the Project Site.

Compensatory wetland replacement shall not occur in any area (e.g., the buffer zone) that will be revegetated with other vegetation under MM Bio.1.b.9. A monitoring program that extends for a sufficient amount of time to ensure that new habitat is established, self-sustaining, and capable of surviving drought (minimum five years). Restoration Monitoring reports shall be submitted on a quarterly basis, or as needed, describing the methods and materials used for implementation of restoration. Annual reports will be submitted describing the status of the restoration efforts identifying whether plants are becoming established or if there are any problem areas, including where additional erosion control, weed control, or reseeding/replanting efforts may be needed. The monitoring report shall also note whether restoration sites appear to be developing sufficiently that performance criteria would be met within the projected time frame. Recommendations for additional monitoring and/or restoration treatments shall be provided if it appears that success criteria would not be met in any restoration or mitigation areas. The Annual monitoring report shall be submitted to the City and other oversight agencies for review.

Plan Requirements/Timing: A coastal wetlands mitigation plan shall be prepared by the Applicant, approved by the City, and fully implemented within 120 days of the completion of soil remediation. Monitoring: The coastal wetlands mitigation plan shall include methodology to assess the success of wetlands mitigation. Monitoring and reporting shall be conducted on an annual basis to ensure the success of wetlands mitigation.

18. **Mitigation Measure Bio.5 Tree Removal Mitigation.** The Applicant shall implement mitigation for all identified decommissioning-related tree impacts per current City of Carpinteria requirements for tree mitigation and replacement. Trees shall be required to be replaced at a ratio appropriate to ensure infill of any gap created in the windrow and with a tree type and size to be approved by the City. Replacement trees that fail to survive within the first five years after planting shall be replaced. Planting of native trees is required as are programs for phased removal and replacement of tamarisk windrows in favor of native tree windrows. The replacement trees must be monitored for seven years after planting.

19. **Mitigation Measure Bio.7 Oil Spill Contingency Plan.** An Oil Spill Contingency Plan (OSCP) shall be prepared that addresses protection of sensitive biological resources and revegetation of any areas disturbed during an oil spill or cleanup activities. The OSCP shall, at a minimum, include:
    1. Close coordination with CDFW's Office of Spill Prevention and Response (CDFW-OSPR). In the event of an oil spill, CDFW-OSPR and the U.S. Coast Guard or the U.S. EPA will form a unified command.
    2. The California Office of Emergency Response (CAL-OES) and National Response Center (NRC) shall be notified if a spill occurs (Cal-OES: 1-800-852-7550 and NRC: 1-800-424-8802).
    3. A list of Oil Spill Response Organizations (OSROs), including Marine Spill Response Corporation (MSRC) and Patriot Environmental.
    4. Measures to prevent spilled oil from reaching the harbor seal rookery.

5. Measures to minimize impacts on native vegetation and wildlife habitats, plant and animal species, and environmentally sensitive habitat areas during response and cleanup operations, including integration of a biologist on the initial response team to assist with identification of sensitive resources within areas affected by the oil spill and response, and to quantify impacts resulting from oil spill control and cleanup.
6. Low-impact site-specific techniques such as hand-cutting contaminated vegetation and using low-pressure water flushing from boats shall be specified in the OSHMP to remove spilled material from particularly sensitive wildlife habitats, such as coastal estuaries (i.e., Carpinteria Salt Marsh, Carpinteria Creek mouth), because procedures such as shoveling, bulldozing, raking, and drag-lining can cause more damage to a sensitive habitat than the oil spill itself. The OSCP shall evaluate the non-clean up option for ecologically vulnerable habitats such as coastal estuaries.
7. Spill response personnel shall be adequately trained for response in terrestrial environments, and spill containment and recovery equipment shall be maintained in full readiness. Inspection of equipment and periodic drills shall be conducted at least annually and the results evaluated so that spill response personnel are familiar with the equipment and with the Project area including sensitive onshore biological resources.
8. Stipulations for development and implementation of site-specific habitat restoration plans and other site-specific and species-specific measures appropriate for mitigating impacts on local populations of sensitive wildlife species and to restore native plant and animal communities to pre-spill conditions. Ingress and egress points, staging areas, and material stockpile areas that avoid sensitive habitat areas shall be identified. The OSCP shall include species- and site-specific procedures for collection, transportation and treatment of oiled wildlife, particularly for sensitive species.
9. Procedures for timely re-establishment of vegetation that replicates the habitats disturbed (or, in the case of disturbed habitats dominated by non-native species, replaces them with suitable native species) including: measures preventing invasion and/or spread of invasive or undesired plant species; restoration of wildlife habitat; restoration of native communities and native plant species propagated from local genetic sources including any sensitive plant species; and replacement of trees at the appropriate rate.
10. Monitoring procedures and minimum success criteria to be satisfied for restoration areas shall be determined. The success criteria shall consider the level of disturbance and condition of the adjacent habitats. Monitoring shall continue for three to five years, depending on habitat, or until success criteria are met. Appropriate remedial measures, such as replanting, erosion control or control of invasive plant species, shall be identified and implemented if it is determined that success criteria are not being met.

20. **Cultural Resources. Mitigation Measure Cul.1a Cultural Resources Management Plan.** Prior to ground disturbance, the Cultural Resources Management Plan (CRMP) shall be submitted to the City for review and approval. The CRMP shall be prepared by an archaeologist retained by Chevron that meets the minimum professional qualifications

standards (PQS) set forth by the Secretary of the Interior (SOI). Native American representatives will review and comment on the CRMP. The purpose of the CRMP is to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b).The CRMP shall include, at a minimum:

1. A description of the roles and responsibilities of cultural resources personnel (including Native American representatives), and the reporting relationships with Project construction management, including lines of communication and notification procedures. The CRMP should also include a "contact list" providing the names of important Project personnel, the agency they represent and/or their role, and their contact information;
2. Description of how the monitoring shall occur;
3. Description of frequency of monitoring (e.g., full-time, part time, spot checking);
4. High-resolution maps for use by cultural resource monitors to identify locations of intact cultural deposits;
5. Description of what resources are expected to be encountered;
6. Description of circumstances that would result in the halting of work;
7. Description of procedures for halting work on the site and notification procedures;
8. Procedures for the appropriate treatment of human remains;
9. Confidentiality of cultural information including location and data;
10. Description of artifact collection, retention/disposal, and curation policies, including a statement that all cultural materials retained will be curated in accordance with the requirements of an identified, qualified curatorial facility, and that Chevron shall be responsible for all expenses associated with the curation of the materials at the qualified curatorial facility. If cultural materials are found within "contaminated" soil, and those materials are collected, then will have to be cleaned before they can be curated. The CRMP should describe the process to clean any materials from "contaminated" soil; and
11. A description of monitoring reporting procedures including the requirement that reports resulting from the Project be filed with the Central Coast Information Center (CCIC) within one year of Project completion.

21. **Mitigation Measure Cul.1b Worker Cultural Resources Awareness Program**. A worker cultural resources awareness program shall be implemented for the Project. Prior to any ground-disturbing activity, Chevron shall provide an initial sensitivity training session to all Project employees, contractors, subcontractors, and other workers prior to their involvement in any ground-disturbing activities, with subsequent training sessions to accommodate new personnel becoming involved in the Project. The program may be conducted together with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to cultural resources are provided by a qualified archaeologist and Native American representative.

The awareness program shall address:

1. The cultural sensitivity of the Project Site and how to identify these types of resources;
2. The awareness program shall address the CRMP and roles and responsibilities of Project personnel.
3. Specific procedures to be followed in the event of an inadvertent discovery;
4. Safety procedures when working with monitors; and
5. Consequences in the event of noncompliance.

22. **Mitigation Measure Cul.1c Cultural Resources Monitoring.** Cultural resources monitoring shall be conducted during Project-related ground-disturbing activities for the purpose of identifying and avoiding impacts to cultural resources, consistent with the monitoring plan detailed in the CRMP. Monitoring shall be required for all ground disturbances, even ground disturbances in areas outside the CA-SBA-6 boundary. The monitoring shall be conducted under the supervision of a County-approved archaeologist and a Native American representative with minimum PQS set forth by the SOI. In the event of any inadvertent discovery of prehistoric or historic period archaeological resources during construction, all work within 50 feet of the discovery shall immediately cease (or greater or lesser distance as needed to protect the discovery as determined in the field by the Project archaeologist or Native American representative). The Applicant shall immediately notify the City of Carpinteria if there is any inadvertent discovery of prehistoric or historic period archaeological resources during construction. The Project archaeologist in consultation with the City and Native American representative shall evaluate the significance of the discovery prior to resuming any activities that could impact the site/discovery. If the discovery is prehistoric in nature, the Native American representative shall provide input as part of the evaluation. If the Project archaeologist, following consultation with the City and Native American representative, determines that the find may qualify for listing in the CRHR, the site and sufficient buffer area shall be avoided until data recovery excavation, is prepared, implemented, and funded by the Applicant. The program shall include reasonable efforts to preserve (avoid) unique cultural resources; the capping of identified unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources which the preferred option being preservation (avoidance). Work shall not resume until authorization is received from the City.

23. **Mitigation Measure Cul.1d Exclusion Zones.** Prior to the issuance of the construction Notice to Proceed, Chevron shall, to the extent feasible, ensure that all intact portions of CA-SBA-6 shall be avoided during ground disturbance. Once the high-resolution map is created (consistent with mitigation measure Cul.1a.1), an exclusion zone shall be placed around each intact portion of CA-SBA-6. An exclusion zone is a fenced area where construction equipment and personnel are not permitted. The exclusion zone fencing shall be installed (and later removed) under the direction of a County-approved archaeologist and a Native American representative and shall be placed 10 feet beyond the boundary of the defined area to avoid inadvertent damage during installation.

24. **Mitigation Measure Cul.1e Phase III Data Recovery Excavations.** Any potentially intact portions of CA-SBA-6 that will be impacted by the Project should first be mitigated with Phase III data recovery excavations prior to ground disturbance. The Phase III data recovery excavations shall be conducted under the direction of a research design and testing plan prepared by an archaeologist in coordination with a Native American representative that meets the PQS set forth by the SOI and may consist of a combination of Data Recovery Excavation Units (DREUs) and Shovel Test Probes (STPs).

25. **Mitigation Measure Cul.1f Curation of Project Materials.** Prior to the issuance of the construction Notice to Proceed, Chevron in consultation with the City and Native American representative shall choose a single accredited repository at which to curate all archaeological materials recovered from the Project Site. If materials are recovered from "contaminated" soils it should be mentioned that those materials will have to be cleaned prior to curation. The repository shall be located in southern California so that the materials are available locally to Tribal members and researchers and shall meet the standards provided in the California State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections. The preferred repositories should be in Santa Barbara, which are located at UCSB and the Santa Barbara Museum of Natural History. Chevron shall work with the identified local curatorial facility and the Native American representative to transfer curation of materials currently in their possession or currently housed at a non-local facility, to the agreed-upon accredited local repository such that the materials can be accessioned as a unified collection. Subsequently, materials transferred from a non-local facility may require evaluation using current analytic methods to re-analyze artifacts and faunal remains that were recovered from CA-SBA-6 during previous excavations. If it is determined that there is no southern California curation facility that can accommodate the entire CA-SBA-6 collection, other accredited facilities in the State of California may be considered, if agreed upon by the Native American representative.

26. **Mitigation Measure Cul.2a On-Call Forensic Anthropologist.** Previous cultural resources studies have documented the disturbed context of CA-SBA-6 within the Project Site; however, human remains and burials have been encountered. Thus prior to the issuance of the construction Notice to Proceed, Chevron shall retain a forensic anthropologist (or similar expert) to examine and positively identify bone fragments that are potentially human. The forensic anthropologist (or similar expert) may be able to positively identify bone fragments after reviewing photographs; however, a site visit may be necessary so the forensic anthropologist (or similar expert) can examine the bone fragments in-person and make a positive identification. The forensic anthropologist can be available in an on-call capacity and would not need to be present during all ground disturbance. Additionally, if numerous bone fragments are encountered during ground-disturbing activities, arrangements can be made for the forensic anthropologist to make regularly scheduled visits. Additionally, the following actions shall be taken:
    1. No further disturbance shall occur in the area of any found human remains until the City has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative.

2. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by Chevron or their representative in order to determine proper treatment and disposition of the remains.
3. Chevron or their representative shall notify the Native American representative of the identification of human remains.
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
5. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered.

27. **Mitigation Measure Cul.2b Human Remains Discovery.** If human remains are discovered, the following actions shall be taken:
    1. Chevron or their representative shall contact the City and County Coroner.
    2. No further disturbance shall occur in the area of the find until the County Coroner has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative.
    3. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by Chevron or their representative in order to determine proper treatment and disposition of the remains.
    4. Chevron or their representative shall notify the Native American representative of the identification of human remains.
    5. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
    6. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered.

28. **Geology. Mitigation Measure Geo.2 Erosion Control Best Management Practices.** Erosion Control Best Management Practices (BMPs), including temporary berms and sedimentation traps, silt fencing, straw bales (rice straw bales are preferrable), and sandbags shall be installed adjacent to excavations and other ground disturbance areas prior to work involving ground disturbance. The BMPs shall include regular maintenance and inspection of the berms and sedimentation traps. Soil should be kept damp during grading activities to reduce the effects of dust generation. All exposed graded surfaces shall be reseeded with native ground cover to minimize erosion.
    Plan Requirements/Timing: An Erosion Control Plan shall be submitted to the City and approved prior to any ground disturbance. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by a geologist.

29. **Mitigation Measure Geo.4a Bluff Stabilization Plan.** Areas immediately adjacent to the bluff face disturbed by removal of pipelines and related components shall be stabilized to avoid or minimize the potential for the Project to cause accelerated bluff retreat. As part of the Bluff Stabilization Plan, engineering studies shall be conducted to identify heavy equipment location and procedures for pipeline removal. Stabilization shall include backfill and compaction using suitable fill material, and revegetation with native species, and all other measures identified by a geotechnical engineer.
Plan Requirements/Timing: A bluff stabilization plan prepared by a geotechnical engineer including erosion controls, best management practices, maintenance, annual reporting, and City staff review of staging and construction plans, shall be submitted to the City and approved prior to any ground disturbance within 100 feet of the bluff face. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City.

30. **Mitigation Measure Geo.4b Bluff Stabilization During Pipeline Removals.** During the removal of over bluff pipeline, the following measures shall be implemented to reduce the potential bluff stability loss:
    - Equipment and personnel will maintain a safe distance from the bluff edge to ensure no excessive loading at the crest of the bluff topsoil.
    - Where applicable, removal of current bluff stabilization materials (i.e., concrete and rock riprap) shall be completed in a manner that avoids disturbance to adjacent undisturbed slopes.
    - Excavation of bluff top pipelines shall be conducted at a distance of 5 to 10 feet from the bluff edge, and the pipelines pulled in-line with the pipeline's existing alignment so as to avoid additional disturbance to adjacent undisturbed slopes.
    - All excavations and removals shall be monitored by a geotechnical engineer or geologist.

    Plan Requirements/Timing: Bluff stabilization measures shall be implemented during any ground disturbance within 100 feet of the bluff face. Monitoring: Implementation of this measure shall be monitored by the City and a geologist or geotechnical engineer.

31. **Mitigation Measure Geo.4c Bluff Stabilization Following Pipeline Removal.** Areas immediately adjacent to the bluff face disturbed by the removal of pipelines and related components shall be stabilized to avoid or minimize the potential for the proposed Project to cause accelerated bluff retreat. Stabilization may include:
    - Removal of all non-native materials following pipeline removal.
    - To the extent feasible, recontouring of the disturbed slopes to reflect the contours of adjacent undisturbed slopes.
    - Backfill and compaction of bluff top excavations using suitable fill material.
    - Redirection and management of bluff top surface drainage away from disturbance areas to minimize over the bluff top surface flows.
    - Revegetation of all bluff top disturbance areas.

Plan Requirements/Timing: A bluff stabilization shall be implemented immediately following the removal of all over the bluff pipeline segments. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City, and a geologist or geotechnical engineer immediately following pipeline removal.

32. **Greenhouse Gases. Mitigation Measure GHG.1 GHG Emissions Reductions.** The Permittee shall reduce or offset annual incremental greenhouse gas (GHG) emissions from Project-related sources. The incremental GHG emissions are those GHG emissions resulting from Project construction, operations, and related sources minus the County threshold of 1,000 metric tons per year CO2e (MTCO2e).

    The Permittee shall prepare and implement a GHG Reduction and Reporting Plan that describes how annual GHG emissions could be reduced or offset. The Plan shall include provisions for, and the outline of an annual report to the County that summarizes the emission reduction measures implemented, quantifies the Project-related estimated GHG emissions for the year, and demonstrates the quantity of credits surrendered. Each annual report shall reconcile the actual emissions of the previous year with the mitigation quantity, in terms of MTCO2e. The standard of performance for this mitigation is a reduction or offset of GHG emissions from Project-related sources at a one-to-one (1:1) ratio.

    On-site GHG reductions should be exhausted to the extent feasible prior to providing credits or offsets from off-site projects. If credits are derived from off-site mitigation, preference should be given to those generated in Santa Barbara County. Implementing the required amount of any of the following types of emission reductions shall be an acceptable means of mitigation (order by local to national in preference):

    - Onsite: GHG emission reduction onsite, including measures to electrify equipment, such as electrification of power supply instead of generators or lighting or other equivalent measures;
    - Countywide: GHG reductions generated within the County by implementing a GHG reduction project consistent with any methodology approved by either the Santa Barbara County Board of Supervisors or the Santa Barbara County Air Pollution Control District (SBCAPCD) for the purpose of providing CEQA mitigation;
    - Statewide: GHG reductions represented by registry offset credits listed with and verified by a CARB approved Offset Project Registry pursuant to Section 95980.1 of Title 17, Public Health Code (17 CCR 95980.1); or If applicable, GHG reductions created as a result of complying with Cap-and-Trade Program requirements related to stationary source emissions, as evidenced by the Permittee making auction purchases of State-owned Cap-and-Trade Program Allowances or CARB offset credits issued pursuant to Section 95981.1 of Title 17, Public Health Code (17 CCR 95981.1). Note that reductions to any on-site GHG reductions (such as reduced use of combustion equipment) will go towards reducing the stationary source's Cap-and-Trade obligation, and therefore are not applicable to mobile source GHG reduction credit. Or, freely allocated allowances held by the Applicant and allowances purchased by the Applicant from entities other than the State of California shall not be used as mitigation under this measure because they are tradable

compliance instruments for the Cap-and-Trade Program. Or if applicable, if the Permittee has made auction purchases of State-owned Cap-and-Trade Program allowances to comply with Cap-and-Trade Program requirements and it has transferred funds to the State (e.g., for deposit into the Greenhouse Gas Reduction Fund (GGRF) for statewide GHG reductions), the levels of GHG offsets needed for mitigation under this measure may be reduced by the quantity of previously State-owned allowances purchased by the Permittee. The Permittee's demonstration of making auction purchases to fund acceptable mitigation shall occur in the GHG Reduction and Reporting Plan annual report after the applicable Cap-and-Trade compliance period, and the demonstration may rely on publicly available reports.

- Nationally: GHG reductions represented by registry offset credits listed with and verified by American Carbon Registry (ACR); Climate Action Reserve (CAR); or Verified Carbon Standard (VCS);

General criteria for acceptable credits include:

- Real: emission reduction must have actually occurred, as the result of a project yielding quantifiable and verifiable reductions or removals;
- Additional or Surplus: an emission reduction cannot be required by a law, rule, or other requirement;
- Quantifiable: reductions must be quantifiable through tools or tests that are reliable, based on applicable methodologies, and recorded with adequate documentation;
- Verifiable: the action taken to produce credits can be audited and there is sufficient evidence to show that the reduction occurred and was quantified correctly;
- Enforceable: an enforcement mechanism must exist to ensure that the reduction project is implemented correctly; and
- Permanent: emission reductions or removals must continue to occur for the expected life of the reduction requirement.

Plan Requirements/Timing: The GHG reductions achieved, credits surrendered provided, or any GHG offset project sponsored by the Permittee, must be supported by a demonstration to the City that the GHG reduction is real, additional, quantifiable, permanent, verifiable, and enforceable. The GHG Reduction and Reporting Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. The necessary annual quantity of verified credits under this plan shall be surrendered prior to April 15 of each calendar year following the year of initiating construction. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the GHG Reduction and Reporting Plan and any proposed GHG reduction credits prior to their use as mitigation. Subsequent annual reporting of GHG emissions and reduction/offset measures implemented will be reviewed and approved by the City in consultation with the SBCAPCD.

33. **Hazards. Mitigation Measure Haz.1 Contaminated Soil Handling.** The Project Applicant shall prepare and follow a contaminated soil handling management plan that addresses the following issues: Soil samples that exceed reactive organic compound (ROC) concentrations of 50 parts per million (ppm) require special soil handling procedures to be implemented under the plan. Those special soil handling procedures would include: (1) assuring sufficient

moisture content of the soil to prevent dust during soil movement; (2) covering excavated soil with tarps/impermeable coverings to minimize the generation of wind-blown dust as well as minimize ROC emissions; (3) conduct ROC monitoring every 15 minutes during excavation activities; and (4) removal of soils from the Project Site within 24 hours.

Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the Plan prior to its use as mitigation.

34. **Mitigation Measure Haz.2a Spill Response Planning.** Before the commencement of construction activities, the Applicant shall prepare a plan detailing the following performance measures to reduce the potential for releases to the environment, and to ensure that the shortest scheduling associated with the Project in the marine environment is achieved. An engineering study shall be conducted prior to construction, which shall address at least 1) offshore equipment barge configuration and optimization with regards to tides and scheduling, including the use of supply boats and additional barges if needed and the use of offloading of equipment (including pumps, tanks, materials, etc.) to reduce the barge draft, which will allow for removal of the barge at lower high tides, and thereby reduce the potential for an extended schedule. This analysis shall be coordinated with the bathymetric survey to determine barge scheduling under different scenarios, including an extended schedule due to pipeline abandonment complications; 2) equipment needs for the barge; 3) fluids containment and handling, onshore re-fueling of equipment within contained areas utilizing best management practices, such as those defined by Caltrans, barge containment of spilled construction materials through the use of a barge sump and barge-edge spill containment walls, with the containment volume being greater than the largest tank on the barge; 4) barge weight and draft fully loaded as well as the capacity for fluids handling and storage, and a determination along with the bathymetric study, of the scheduling for tides; 5) equipment arrangement on the barge to allow for equipment movement and use between tasks; 6) refueling procedures and spill containment measures and equipment to prevent spills of fuel from reaching the marine environment; and 7) Emergency Response Equipment Availability - During the pipeline removal activities, a tender boat with sufficient boom shall be placed immediately offshore of the operations to ensure that any spills which occur and enter the marine environment are immediately contained. Contracting with Clean Seas, or another equivalent organization experienced in on-sea oil spill containment and recovery operations, shall be established before construction commences. In addition, the barge shall be equipped with sufficient sorbent pads and booms to provide immediate containment of oil released. These would be in addition to a response trailer located immediately onshore at the pier area.

    Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the Fire Department, prior to initiation of the Project. Monitoring: The City, in consultation with the Fire District, will review and approve the Plan prior to its use as mitigation.

35. **Mitigation Measure Haz.2b Asbestos and Lead Planning.** An asbestos and lead exposure minimization plan shall be developed to limit the potential exposure of the public to asbestos and lead-containing materials. The plan shall include the following: 1) measures to prevent exposure, such as wetting of surfaces, prompt cleanup, and exhaust ventilation; and 2) prohibitions on dust-generating activities such as high-speed saws, compressed air, and dry sweeping of materials.

    Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the Plan prior to its use as mitigation.

36. **Mitigation Measure Haz.7 Fire Response Planning.** The Applicant shall ensure that fire response capabilities are in place during the entire Project, including the following: 1) hydrant access and capabilities; 2) fire water inventories, including hydrant flow testing to fire departments standards; 3) coordination and planning with the fire department to ensure proposer response equipment, training, communication, facilities access and capabilities are in place at all times; 4) the Applicant shall ensure that appropriate response equipment is located at all construction sites, including the availability of water trucks full of water and hot work requirements implementing a fire watch designated at all times; 5) all construction equipment used for any vegetation clearing shall be equipped with spark arrestors, and monitoring and training to prevent vehicle traffic off roadways to ensure activities do not impact dry brush and lead to fire; and 6) requirements shall be posted at all construction areas and placed on construction plans.
    Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the Fire District, prior to initiation of the Project. Monitoring: The City, in consultation with the Fire District, will review and approve the Plan prior to its use as mitigation.

37. **Hydrology. Mitigation Measure WR.1 Stormwater Pollution Prevention Plan.** The construction contractor shall prepare a Stormwater Pollution Prevention Plan (SWPPP) that includes Best Management Practices (BMPs) to be implemented and monitored prior to and during decommissioning. The following BMPs shall be incorporated into the SWPPP to minimize potential decommissioning-related water quality impacts:
    1. Disturbed areas shall be stabilized or re-vegetated prior to the start of the rainy season. The work area shall be flagged to identify its limits. Vegetation shall not be removed or intentionally damaged beyond these limits.
    2. Construction materials shall be placed in designated areas where they could not enter water bodies or storm drains due to spillage or erosion.
    3. Waste and debris generated during decommissioning shall be stored in designated waste collection areas and containers away from watercourses and shall be disposed of regularly.
    4. During decommissioning, washing of trucks, paint, equipment, or similar activities shall occur only in areas where polluted water and materials can be contained for subsequent removal from the Project Site. Wash water shall not be discharged to the

storm drains, street, drainage ditches, creeks, or wetlands. The washout area shall be isolated from water bodies, and wash water and waste shall be removed from the Project Site. The location of the washout area shall be clearly noted at the construction site with signs.

5. All fueling of heavy equipment shall occur in a designated area removed from water bodies and other drainages, such that any spillage would not enter surface waters. The designated refueling area shall include a drain pan or drop cloth and absorbent materials to clean up spills. The location of the fueling area shall be clearly noted at the construction site with signs.
6. Vehicles and equipment shall be maintained properly to prevent leakage of hydrocarbons and coolant and shall be examined for leaks on a daily basis. All maintenance shall occur in a designated off-site area. The designated area shall include a drain pan or drop cloth and absorbent materials to clean up spills.
7. Any accidental spill of hydrocarbons or coolant that may occur on the construction site shall be cleaned up immediately. Absorbent materials shall be maintained on the construction site for this purpose.
8. Special considerations for work during the rainy season: stockpiled soils should be covered at the end of the workday.

Plan Requirements: A SWPPP shall be prepared and implemented prior to construction and shall include the above elements. The SWPPP shall be submitted to City Public Works for review and approval prior to the issuance of grading permits for the Project. Timing: The stormwater features and BMPs shall be installed and operational prior to initiation of grading. Monitoring: City Public Works staff shall site inspect for installation and maintenance in accordance with the approved plan and periodically thereafter to ensure proper maintenance over the duration of construction activities.

38. **Noise. Mitigation Measure N.2a Construction Noise Control.** During decommissioning activities, the Applicant shall implement the following measures to manage and reduce noise levels if necessary:
Inform residents and other noise sensitive receptors within 2,000 feet of Project work areas of anticipated noise disturbances two to four weeks prior to construction, including a contact telephone number to register noise complaints. The Project Applicant shall ensure that a noise liaison is assigned to respond to all public construction noise complaints in a timely manner, and either a) the telephone number is staffed by the noise liaison during construction hours; or b) the phone number is connected to an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. Noise complaints shall be forwarded to the City within 24 hours, along with the Operator/Applicant's initial response to the complaint. The noise complaint telephone number shall be posted in a manner visible to passersby and provided individually to potentially affected residences as part of the notification efforts.
Should complaints be received and verified and considered to be a disturbance issue (more than 3 complaints), as determined by the City, the Applicant shall implement the following to reduce noise:

- Schedule construction activities to avoid operating construction spreads in the same location or the same distance from the same receptor simultaneously;
- Noise monitoring shall be conducted at the closest residences to ensure that noise levels are acceptable. A noise monitoring schedule and description shall be submitted to the City prior to construction activities;
- Limits on noisy activities, including back-up beepers, shall be implemented, and smart back-up alarms shall be used with mobile construction equipment that automatically adjust the sound level of the alarm in response to ambient noise levels or back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction shall be utilized instead;
- Noise barriers shall be installed to reduce the potential impact of noise on the area residences during the peak hour. Noise barriers shall be composed of temporary, movable K-rails with a noise blanket wall on top at least 16 feet high or other equivalent method.

Plan Requirements/Timing: The proposed arrangement shall be reviewed and approved by the City prior to initiation of the Project. Monitoring: The City will review and approve the arrangement and schedule and description prior to its use as mitigation.

39. **Mitigation Measure N.2b Nighttime Activities.** Noise activities, including construction equipment and truck movements, during the nighttime shall be prohibited for onshore activities in order to reduce the potential for impacts to areas residences, and Zoning Ordinance 15.16.170 time limits shall be strictly complied with.
Plan Requirements/Timing: The construction documents shall reflect the limitation on construction activities and shall be reviewed and approved by the City prior to initiation of the Project. Monitoring: The City will review and approve the schedule and description prior to its use as mitigation.

PROJECT SPECIFIC CONDITIONS

40. **Mitigation Compliance, Monitoring and Reporting Requirement.** Owner/Applicant shall submit to the Community Development Department a draft monitoring program for the mitigation measures identified in the Certified EIR, approved Project Description and Conditions of Approval for review and comment. A City-approved biologist and mitigation monitors responsible for permit compliance monitoring shall be retained by the City and paid for by the applicant. The mitigation monitoring program shall include, but not be limited to the following elements for the entirety of the project:
    - Mitigation Measures. A list of the project's mitigation measures.
    - Implementation of Mitigation. Timing and party responsible for implementation of each mitigation measure.
    - Mitigation Monitoring. Timing and party responsible for monitoring of each mitigation measure and a list of mitigation monitors to be retained.
    - Mitigation Reporting. Procedures, timing and responsible party for reporting to the City on project mitigation compliance and monitoring.

41. **Maintenance.** The applicant shall be responsible for maintaining the premises in a clean and orderly condition at all times. This includes, but is not limited to the following:

    a. Parking lots and equipment staging/storage areas shall be cleaned on a regular basis. Cleaning activities shall include the removal of litter; spot cleaning of oil, fuel and other automotive leaks; vacuum sweeping and pressure washing when necessary;

    b. All trash/recycling shall be properly disposed of in the appropriate receptacles provided on site. The applicant shall regularly inspect the perimeter of the site to ensure that trash is not leaving the premises via wind or runoff;

    c. All structures and improvements, including but not limited to, fencing, on site shall maintain a tidy appearance and be kept in good working order; and

    Plan Requirements: This requirement shall be included in the approved conditions of approval signed by the landowner prior to approval of any Building Permit for physical development. Timing: CDD shall monitor in the field as required. Monitoring: CDD staff shall periodically inspect the site to ensure compliance with this condition. If it is found that the site is not being maintained in a manner consistent with this condition, the matter shall be referred to the City's Code Compliance staff for resolution.

42. **Lighting.** All exterior construction safety night lighting set up on the project site shall be of low intensity, low glare design, minimum height, and shall be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels. Monitoring: Building and/or Engineering Inspector shall inspect construction site to ensure that temporary exterior construction lighting fixtures have been installed consistent with this condition and any required mitigation measures.

43. **Dust Control.** Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site by following the dust control measures listed below. During clearing, grading, earth moving, excavation or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.

    a. 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 shall include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency shall be required whenever the winds speed exceeds 15 miles per hour. Reclaimed water should be used whenever possible.

    b. Minimize amount of disturbed area.

    c. 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 form the point of origin.

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

Plan Requirements: All requirements shall be shown on the building plans. Timing: Condition shall be adhered to throughout all construction activities. Monitoring: CDD shall ensure measures are on plans. Building Inspector shall spot check and ensure compliance onsite. APCD inspectors shall respond to nuisance complaints.

44. **Dust Monitoring.** 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. Plan Requirements: The name and telephone number of such persons shall be provided to the APCD. Timing: The dust monitor shall be designated prior to issuance of a Grading or Building Permit. Monitoring: CDD shall contact the designated monitor as necessary to ensure compliance with dust control measures.

45. **Construction Equipment Standards.** The following Diesel Exhaust Control Measures should be implemented during construction activities:

    a. Diesel construction equipment meeting the California Air Resources Board's current emission standards for off-road heavy-duty diesel engines shall be used.

    b. The engine size of construction equipment shall be the minimum practical size.

    c. The number of construction equipment operation simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

    d. Construction equipment shall be maintained in tune per the manufacturer's specifications.

    e. Construction equipment operating onsite shall be equipped with two to four degree engine timing retard or pre-combustion chamber engines.

    f. Catalytic converters shall be installed on gasoline-powered equipment, if feasible.

    g. Catalytic converters, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California shall be installed on equipment operating onsite.

    h. Diesel powered equipment should be replaced by electric equipment whenever feasible.

    i. State law requires that idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units should be used whenever possible.

Plan Requirements: All requirements shall be shown on grading and building plans. Timing: Condition shall be adhered to throughout all grading and construction activities.

Monitoring: CDD shall ensure measures are on plans. Grading and Building Inspectors shall spot check and ensure compliance onsite.

46. **City Environmental Monitor:** Prior to submittal of any demolition permits or initiation of site activities, the Applicant shall provide the funding for a City Environmental Monitor to oversee and monitor compliance with City Conditions of Approval and EIR mitigation measures. The Environmental Monitor shall assist the City in condition compliance and mitigation monitoring for all applicable demolition construction, soil remediation, and site restoration stages of the Project.

    The Applicant will prepare a working monitoring plan that reflects the City-approved environmental mitigation measures/conditions of approval.

    1. goals, responsibilities, authorities, and procedures for verifying compliance with environmental conditions of approval/mitigation measures;
    2. lines of communication and reporting methods;
    3. tracking construction crew training regarding environmental sensitivities;
    4. daily and weekly reporting of compliance;
    5. authority to stop work; and
    6. action to be taken in the event of non-compliance.

    The Environmental Monitor shall be a City employee or under contract to the City, and the entire expense of retaining and supervising the Environmental Monitor, including the City's administrative and overhead fees, shall be paid by the Applicant.

    The Applicant shall also be responsible for funding inspection and monitoring work as needed for mitigation measures requiring use of individuals with special expertise (e.g., marine biologist). The County's Environmental Monitor will retain and coordinate with specialists as necessary to ensure their availability at appropriate times (i.e., prior to issuance of construction permits, during construction or post-approval, etc.). The Environmental Monitor will coordinate with the Applicant's construction site monitors and permitting and responsible agencies during construction.

    Monitoring/compliance: Prior to submittal of a construction permit, the Applicant shall provide a detailed Project description, detailed technical work related to any of the Conditions of Approval, and the construction work schedule, including any additional technical work/oversight conducted by the Applicant. This information will be used to obtain the monitor's work scope. Once the consultant is selected and costs are obtained, a trust account will be established to deposit the required funds. Prior to ground disturbance, all construction workers shall be informed about the monitor and their role at the work site. This may be included as a part of any preconstruction meeting. During construction, all approved protection measures, if any, shall be kept in good working order by the Applicant and any necessary corrective measures addressed promptly by the Applicant upon discovery. The monitor shall be present as specified in the approved work scope. Prior to final inspection of the construction permit**,** the Environmental Monitor shall submit to the City a final post-

construction compliance report. Any outstanding items identified shall be addressed to the satisfaction of the City Environmental Coordinator.

47. **Traffic Management Plan.** Provide a detailed Traffic Management Plan for review by Public Works, Community Development, Carpinteria-Summerland Fire Protection District and the Santa Barbara County Sheriff's Office, and obtain approval from the Public Works Director in consultation with the Community Development Director. The plan shall identify:
    - Construction Phases. Project construction stage exhibits including work descriptions.
    - Staging and Parking Areas. Equipment staging, materials storage and construction worker parking areas.
    - Truck Routes. Construction truck routes to minimize noise and traffic effects to residential neighborhoods.
    - City Street Closures and Detours. Any proposed closures of City streets and/or detours, by construction stage.
    - Signs and Traffic Control Measures. Signage and other planned temporary traffic control measures, by construction stage.
    - Public Awareness. A program for public awareness and outreach to commuters, property owners, businesses, residents and agencies affected by project construction.
    - Maintenance of Access. Plans for providing access to businesses, coastal dependent uses and recreational uses during construction.
    - Coordination and Reporting. A program for ongoing reporting and coordination with the City and other affected agencies throughout construction.

48. **Pre-Construction Conference**. Prior to commencement of construction, a preconstruction conference shall be held by the Resident Engineer to include construction processes and environmental mitigation and monitoring. The conference shall include representatives from Public Works, Community Development, Project Engineer, Contractor and Subcontractor(s), Biologist, and Mitigation Monitors.

DEVELOPMENT PLAN CONDITIONS

49. Approval of the Final Development Plan shall expire two years after the final local action by the City or the CA Coastal Commission on appeal, unless prior to the expiration date, substantial physical construction has been completed on the development or a time extension has been applied for by the applicant. The decisionmaker with jurisdiction over the project may, upon good cause shown, grant a time extension.

50. No permits for development, including grading, shall be issued except in conformance with an approved Final Development Plan. The size, shape, arrangement, use and location of buildings, walkways, parking areas and landscaped areas shall be developed in conformity with the approved Development Plan marked Exhibit 2, dated May 5, 2025. Substantial conformity shall be determined by the Community Development Department Director.

51. On the date a subsequent Development Plan is approved for this site, any previously approved but unbuilt plans shall become null and void.

52. If the applicant requests a time extension for this permit, the permit may be revised to include updated language to standard conditions and/or mitigation measures and additional conditions and/or mitigation measures which reflect changed circumstances or additional identified project impacts. Mitigation fees shall be those in effect at the time of issuance of a Building Permit.

53. An approval granted by the Planning Commission/City Council does not constitute a Building Permit, Demolition Permit, Engineering Permit, or authorization to begin any construction. Appropriate permits issued by the Building Division and Public Works Department must be obtained prior to constructing, enlarging, moving, converting, or demolishing any building or structure within the City, or undertaking any excavation or earthwork activities.

APPEALABLE CDP CONDITIONS

54. If the City determines at a noticed public hearing that the permittee is not in compliance with any conditions of this permit pursuant to the provisions of the Carpinteria Municipal Code, the City may, in addition to revoking the permit pursuant to said section, amend, alter, delete or add conditions to this permit.

55. The applicant's acceptance of this permit and/or commencement of construction and/or operations under this permit shall be deemed acceptance of all conditions of this permit by the permittee.

56. The approval of this Appealable CDP shall expire two years from the date of the final local action or, if appealed, the date of action by the California Coastal Commission on the appeal, if the permit for use, building or structure has not been issued.

57. The use and/or decommissioning and remediation activities, authorized by this approval cannot commence until the Coastal Development Permit and necessary Building Permits have been issued. Prior to the issuance of the Coastal Development Permit, all of the project conditions that are required to be satisfied prior to issuance of the Coastal Development Permit must be satisfied.

CITY RULES & REGULATIONS/LEGAL REQUIREMENTS

58. Before using any land or structure, or commencing any work pertaining to the erection, moving, alteration, enlarging, or rebuilding of any building, structure, or improvement, the applicant shall obtain a Building Permit. These Permits are required by ordinance and are necessary to ensure implementation of the conditions required by the Planning Commission. Before any Permit will be issued by Community Development, the applicant must obtain

written clearance from all departments having conditions; such clearance shall indicate that the applicant has satisfied all pre-construction conditions. A form for such clearance is available from Community Development.

59. Prior to Building Permit issuance, the applicant shall sign an Agreement to Allow Zoning Compliance Inspections. The Agreement will allow CDD staff to conduct zoning inspections for the purpose of ensuring compliance with the City's Municipal Code requirements.

60. If, at any time, the City or Planning Commission determines that there has been, or may be, a violation of the findings or conditions of this Development Plan and Coastal Development Plan, or of the Municipal Code regulations, a public hearing may be held before the Planning Commission to review this permit. At said hearing, the Planning Commission may add additional conditions, or recommend enforcement actions, or revoke the permit entirely, as necessary to ensure compliance with the Municipal Code, and to provide for the health, safety, and general welfare of the City. The applicant shall reimburse the City for all costs associated with gaining compliance with the original conditions of approval.

61. Any minor changes may be approved by the City Manager and/or Community Development Director. Any major changes will require the filing of a revision application to be considered by the Planning Commission.

62. All requirements of the City of Carpinteria (including but not limited to public improvements as defined in the City of Carpinteria Municipal Code (CMC), Section 15.16.110) and any other applicable requirements of any law or agency of the State and/or any government entity or District shall be met.

63. Any and all damage or injury to public property resulting from this development, including without limitation, City streets, shall be corrected or result in being repaired and restored to its original or better condition.

64. No building permits shall be issued for this project prior to meeting all required terms and conditions listed herein. When not specified herein, all conditions shall be satisfied prior to issuance of a building permit or prior to occupancy when allowed by the Community Development Director.

65. To allow time for the utility companies to locate and mark their facilities for the contractor, the applicant shall telephone Underground Service Alert (USA) toll free at 1-800-227-2600 a minimum of 48 hours prior to the start of construction. For best response, provide as much notice as possible, up to 10 working days.

66. Prior to initiation of any decommissioning or remediation activities, applicant shall consult with the Carpinteria Sanitary District and Carpinteria Valley Water District to appropriately locate and protect in place any service laterals and mains located within the Project Site that are not proposed to be abandoned as part of the approved project. Authorization from the

respective districts will be required before any Building, Demolition or Engineering Permits are issued.

67. Applicant shall first obtain a permit from the Carpinteria Sanitary District in the event the applicant seeks to discharge any wastewater from the decommissioning or remediation activities into Carpinteria Sanitary District-owned facilities. Applicant shall implement standard Best Management Practices to prevent unauthorized or accidental discharges to the sanitary sewer system.

68. Compliance with the attached Departmental and District letters is required as follows:
    a. City of Carpinteria Public Works Department/Engineering dated April 29, 2025
    b. Santa Barbara County Air Pollution Control District dated April 25, 2025

69. All applicable final conditions of approval shall be printed in their entirety on applicable pages of grading/construction or building plans submitted to CDD. These shall be graphically illustrated where feasible. The approved set of plans shall be retained at the construction site for review by the Building Inspector during the course of construction.

70. Applicant shall ensure that the project complies with all approved plans and all project conditions including those which must be monitored after the project is built and occupied. To accomplish this, applicant agrees to contact CDD at least two weeks prior to commencement of construction activities to schedule an onsite pre-construction meeting with the owner, other agency personnel and with key construction personnel.

71. Prior to issuance of a Building Permit, the applicant shall provide a signed copy of the Conditions of Approval.

72. This approval is not valid until a Building Permit for the development has been obtained. Failure to obtain said Building Permit shall render this approval null and void. Prior to the approval of the Building Permit, all of the conditions listed in this approval are required to be satisfied. Upon issuance of the Building Permit, the approval shall be valid. The effective date of this Permit shall be the date of expiration of the appeal period, or if appealed, the date of action by the Planning Commission.

73. The owner/applicant/developer ("Owner") hereby agrees to defend, indemnify and hold harmless the City, its officers, employees, agents, consultants and independent contractors ("City's Agents") from any claim, action or proceeding ("Claims") against the City and the City's Agents to attack, review, set aside, void or annul, in whole or in part, the City's approval of the Chevron Carpinteria Oil and Gas Facility Decommissioning Project (the "Project"), or any condition attached thereto, or any proceedings, acts or determinations taken, done or made prior to the approval that were part of the approval process. Owner further agrees to indemnify and hold harmless the City and the City's Agents from any award of attorneys' fees or court costs made in connection with any Claim. Owner further agrees to

pay any and all City costs, permit fees, attorneys' fees, engineering fees, license fees and taxes arising out of or concerning the Project, whether incurred prior to or subsequent to the date of approval and that the City's costs shall be reimbursed prior to this approval becoming valid. These commitments of defense and indemnification are material conditions of the approval of the Project. Nothing contained in this condition shall prevent the City or the City's Agents from independently defending any Claim. If the City or the City's Agents decide to independently defend a Claim, the City and the City's Agents shall bear their own attorneys' fees, expenses and costs of that independent defense.

74. In the event that any Condition of Approval imposing a fee, exaction, dedication or other mitigation measure is challenged by Applicant/Owner/Developer/Permittee in an action filed in a court of law or threatened to be filed therein which action is brought within the time period provided by law, this approval shall be suspended pending dismissal of such action, the expiration of the limitation period applicable to such action, or final resolution of such action. If any Condition of Approval is invalidated by a court of law, the entire project shall be reviewed by the City and substitute Conditions of Approval may be imposed.

75. Any change of use in the proposed building or structure shall be subject to environmental analysis and appropriate review by the City including Building Code compliance.

76. Written authorization to proceed and consent to conditions of approval by the legal owner of the property shall be provided to the City prior to building permit issuance.

Approved by the Planning Commission on May 5, 2025

I HAVE READ AND UNDERSTOOD, AND I WILL COMPLY

WITH ALL ABOVE STATED CONDITIONS OF THIS PERMIT.

_____

Applicant/Property Owner Date

CITY OF CARPINTERIA, CALIFORNIA

Public Works Department
Memorandum

To: Nick Bobroff, Community Development Director
Community Development Department

From: John L. Ilasin, Public Works Director/City Engineer /s/

Date: April 29, 2025

Subject: 5675 Carpinteria Avenue, Project No. 21-2128-DP/CDP

The Public Works Department has reviewed the project submittal dated October 21, 2021, and has the following conditions of approval:

CONDITIONS OF APPROVAL

1. An Engineering Permit shall be obtained from the City Engineer for any improvements or other encroachment work within the City of Carpinteria public right-of-way and/or public property.

2. All improvements within the City of Carpinteria public right-of-way and/or public property shall be completed to the satisfaction of the City Engineer prior to the issuance of a Certificate of Occupancy.

3. An Engineering Permit shall be obtained from the City Engineer for earthwork excavation or fill that exceeds three feet in vertical depth at its deepest point, measured from the natural ground slope, and/or thirty cubic yards of material moved in any twelve-month period.

4. Record drawings or as-built plans shall be submitted to the City Engineer at time of final inspection for all work covered by an Engineering Permit. The record drawings or as-built plans shall be the original construction tracings or permanent mylar copies of a quality acceptable by the City Engineer.

5. A Transportation Permit shall be obtained from the City Engineer for operating or moving any vehicle or combination of vehicles or special mobile equipment in any of the acts as listed in Carpinteria Municipal Code Section 12.12.010.

6. All existing private property encroachments shall be removed from the City of Carpinteria public right-of-way and/or public property.

7. All new and existing utility services shall be installed underground from the closest point of connection or utility pole and completed prior to any paving required for the project. No new utility poles shall be installed.

8. Stormwater control plans shall be in conformance with the County of Santa Barbara Technical Guide for Low Impact Development.

9. A Maintenance Agreement for permanent stormwater quality best management practices shall be submitted to the City Engineer for review and approval. The Maintenance Agreement shall include, at minimum, the following elements: (1) Operations and Maintenance Plan; (2) Legal description and plat of property; (3) Site plan of all permanent stormwater quality best management practices; (4) Property owner's printed name, signature, and date of signing; and (5) Notary public acknowledgement.

10. Improvements in areas of special flood hazards as shown in the latest effective flood insurance rate map shall be constructed in conformance with the City floodplain management regulations (Carpinteria Municipal Code Chapter 15.50).

11. Construction and demolition debris generated shall be reported in conformance with the Construction and Demolition Debris Recycling Program. Sixty-five percent (65%) or more of all construction and demolition debris shall be diverted from the landfill. The Construction and Demolition Debris Recycling Program forms shall be completed and submitted to the City Engineer prior to the issuance of a Certificate of Occupancy.

12. Construction and demolition debris shall be separated on site into reuse, recycling, or disposal. Separate bins or containers for recycling of construction and demolition debris shall be provided on site.

13. Self-hauled disposal receipts from transfer stations shall be submitted to the City Engineer prior to the issuance of a Certificate of Occupancy.

14. Any self-hauled construction and demolition debris shall be reported in writing to the City Engineer. A contract waste hauler may be allowed for disposal of construction and demolition debris subject to the approval of the City Engineer.

End of Comments

April 25, 2025

Nick Bobroff
City of Carpinteria
Community Development Department
5775 Carpinteria Avenue
Carpinteria, CA 93013

Sent Via Email: nickb@carpinteriaca.gov

Re: Santa Barbara County Air Pollution Control District Suggested Conditions for the Chevron Carpinteria Oil and Gas Facility Decommissioning Project, Project No. 21-2128-DP/CDP

Dear Mr. Bobroff:

The Santa Barbara County Air Pollution Control District (District) has reviewed the project that consists of the decommissioning and remediation of the Oil and Gas Processing Facilities owned and operated by Chevron. The proposed project-related activities include the removal of nearshore/offshore pipelines out to three nautical miles (the state waters limit) and the complete remediation of impacted soils and groundwater at the onshore facility. The subject property, a 64-acre parcel zoned Coastal Industry District (M-CD) and Recreation (REC) and identified in the Assessor Parcel Map Book as APN 001-170-003, 004, 021, 022, 023, is located at 5675 and 5663 Carpinteria Avenue in the City of Carpinteria.

The proposed project is subject to the following **regulatory requirements and advisories** that should be included as conditions of approval in the applicable land use permit:

1. **District Permit**: The proposed project includes operations (including contaminated soil remediation) subject to District permitting requirements, rules, and regulations, therefore the project will be required to obtain an Authority to Construct (ATC) and/or Permit to Operate permits from the District prior to the start of construction/demolition activities. Proof of receipt of the required District permits shall be submitted by the applicant to planning staff. The District permit process can take several months. To avoid delay, the applicant is encouraged to submit their permit application to the District as soon as possible, see www.ourair.org/permit-applications/ to download the necessary application(s). See www.ourair.org/csc-projects for information on contaminated soil clean-up.

2. **Diesel Engines**: All portable diesel-fired construction engines rated at 50 brake horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or District permits. Generally, construction engines with PERP certificates are exempt from the District permit, provided they will be on-site for less than 12 months. In some situations, portable and/or temporary engines, require a District permit irrespective of PERP-registration status. See www.ourair.org/wp-content/uploads/PERPfaq.pdf for more information on the operation of PERP-registered engines at stationary sources.

3. **Asbestos**: The applicant is required to complete and submit an Asbestos Demolition/Renovation Notification (District Form ENF-28, available at www.ourair.org/compliance-forms) for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed notification should be

presented or mailed to the District with a minimum of 10 working days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. For additional information, see www.ourair.org/asbestos/ or contact the District's Compliance Division at (805) 979-8050.

4. **Marine Vessels**: Prior to the start of demolition activities, a written permit exemption or Authority to Construct/Permit to Operate permits must be obtained for the operation of marine vessel engines. The District will evaluate the duration and emissions from the project to determine if the project is subject to Regulation VIII, *New Source Review*, and if so, which requirements will apply. Pursuant to District Rule 202.F.8., the project may qualify for a written permit exemption if the duration of the activities do not exceed 12 consecutive months and the potential to emit of such engines is less than 10 tons per stationary source of oxides of nitrogen (NOx), oxides of sulfur (SOx), reactive organic compounds (ROC), or particulate matter (PM). To qualify for this exemption, the owner or operator of the stationary source shall submit a written request for exemption to the District. The District will make a determination in writing approving or denying the request. The request shall identify the marine vessels, project activities, duration, and shall include the emission calculations and assumptions demonstrating that the engines meet the exemption criteria. Alternatively, an owner or operator of the stationary source may qualify for an exemption by obtaining an Authority to Construct and Permit to Operate which limits the potential to emit of such equipment to less than 10 tons per year. Such Authority to Construct/Permit to Operate shall be exempt from Regulation VIII.

5. **Onsite Storage**: If there is any planned or potential storage of Reactive Organic Compound (ROC) containing liquids or solids (e.g. ROC-impacted soils), the applicant must obtain a District permit or written exemption from permit.

6. **Pipeline Purging.** Pipeline purging operations have the potential for odor generation. In order to prevent odors from causing a violation of District Rule 303, *Nuisance*, the District recommends that carbon canisters or a thermal oxidizer be employed to control vapors released during pipeline decommissioning activities. Some companies already have permits with the District for thermal oxidizer units. The applicant should consider using an already permitted unit through a company, or could contact the District to obtain a permit or written permit exemption.

7. **Prohibitory Dust Rules**: Construction/demolition activities are subject to District Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*. This rule establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites, includes measures for minimizing fugitive dust from on-site activities, and from trucks moving on- and off-site. Please see www.ourair.org/wp-content/uploads/rule345.pdf. Activities subject to Rule 345 are also subject to Rule 302 (*Visible Emissions*) and Rule 303 (*Nuisance*).

8. **Idling**: Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation. See https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling.

9. **Fugitive Dust Measures**: To reduce the potential for violations of District Rule 345 *(Control of Fugitive Dust from Construction and Demolition Activities)*, Rule 302 *(Visible Emissions)*, and Rule 303 *(Nuisance)*, standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities.

10. **Diesel Exhaust Measures**: The State of California considers particulate matter emitted by diesel engines carcinogenic. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of particulate matter (as well as of ozone precursors) from diesel equipment. Recommended measures should be implemented to the maximum extent feasible.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8337 or via email at BarhamC@sbcapcd.org.

Sincerely,

Carly Barham

Carly Barham,
Planning Division

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

cc: Planning Chron File
Permitted Sources File SSID 00027 FID 00027

apcd air pollution control district
SANTA BARBARA COUNTY

ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

Projects involving earthmoving activities are expected to manage fugitive dust emissions such that emissions do not exceed APCD's visible emissions limit (APCD Rule 302), create a public nuisance (APCD Rule 303), and are in compliance with the APCD's requirements and standards for visible dust (APCD Rule 345). The following measures should be implemented to reduce fugitive dust emissions and impacts.

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained 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.
- Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces.
- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.
- If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than one day 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. The amount of excavated material or waste materials stored at the site should be minimized.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, or if previously graded areas remain inactive for more than 10 calendar days, treat the disturbed area by watering, OR using roll-compaction, OR revegetating or hydroseeding, OR by applying non-toxic soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks etc. proposed to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress.

All measures required by the Lead Agency shall be shown on grading and building plans and/or as a separate information sheet listing the conditions of approval to be recorded with the map prior to grading/building permit issuance and/or map recordation. Conditions shall be adhered to throughout all grading and construction periods. The name and telephone number of a dust control contact shall be provided to the APCD prior to grading/building permit issuance and/or map clearance. The Lead Agency shall ensure measures are on project plans and/or recorded with maps. The Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

apcd air pollution control district
SANTA BARBARA COUNTY

ATTACHMENT B

CONSTRUCTION DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

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

The following measures are required by state law:

- **Portable Engines**: All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program (PERP)[1] OR shall obtain an APCD permit.
- **Off-Road Equipment**: Fleet owners of diesel-fueled mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation[2]. All off-road vehicles subject to this regulation must use renewable diesel fuel, with some limited exceptions.
- **Diesel Trucks**: Fleet owners of on-road diesel-fueled heavy-duty trucks and buses are subject to CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), the Statewide Truck and Bus Regulation, and the Advanced Clean Fleets Regulation to reduce emissions from trucks and buses.[3]
- **Idling:** Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.[4] Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation.

The following measures are recommended:

- At a minimum, off-road diesel equipment should be equipped with engines compliant with, or certified to meet or exceed, CARB Tier 4 emission standards. Where available, off-road construction equipment should be zero-emission. Alternative/renewable fuels such as compressed natural gas (CNG), liquefied natural gas (LNG), or propane should be utilized to the maximum extent feasible when zero-emission is not available. Electric auxiliary power units should be used. The Lead Agency should require commitments to Tier 4 and/or zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- On-road heavy-duty equipment with model year 2014 or newer engines, or powered by zero- or near zero-emission technology, should be used whenever feasible.
- All portable generators should be powered by a source other than diesel or gasoline (i.e., battery, natural gas, propane, etc.)
- All construction equipment should be maintained in tune per the manufacturer's specifications.
- The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Proposed truck routes should minimize impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows. Construction activity schedules and hours should be planned and adjusted as feasible to maximize distance from existing sensitive receptors and minimize exposure to air pollution.

Prior to grading/building permit issuance and/or map recordation, all measures required by the Lead Agency shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout grading and construction periods. The contractor shall retain onsite the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles and have it available for inspection. The Lead Agency shall ensure measures are on project plans and/or recorded with maps and ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

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1 https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp
2 https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation
3 https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/truckstop
4 https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about

Attachment B.

Proposed Final Environmental Impact Report

Chevron Decommissioning and Remediation of the
Carpinteria Oil and Gas Processing Facilities Project

Project 21-2128-DP/CDP

May 5, 2025 Planning Commission Meeting

Attachment B-1.

Proposed Final Environmental Impact Report (FEIR) for the Chevron Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities Project

The FEIR includes the following: Executive Summary; FEIR; and Technical Appendices A- J.

Comments received on the Draft EIR and responses to those comments are included in Appendix I.

The full document is available at this link:
https://carpinteriaca.gov/city-hall/community-development/oil-gas-information/oil-processing-facility-decommissioning/

Attachment B-2.

Executive Summary of
Proposed Final Environmental Impact Report

Chevron Decommissioning and Remediation of the
Carpinteria Oil and Gas Processing Facilities Project

Project 21-2128-DP/CDP

May 5, 2025 Planning Commission Meeting

Final
Environmental Impact Report

Decommissioning and Remediation of the Chevron Carpinteria Oil & Gas Processing Facility Project

Executive Summary

State Clearinghouse No. 2022080026



April 2025

Prepared by:

City of Carpinteria
Community Development
5775 Carpinteria Avenue
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Prepared with assistance from:
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1306 Santa Barbara Street
Santa Barbara, CA 93101

Executive Summary

This Final Environmental Impact Report (EIR) has been prepared to address the environmental impacts associated with the Decommissioning and Remediation of the Chevron Oil and Gas Processing Facility (Project). Chevron USA (Chevron, or "the Applicant") is currently planning to decommission and remediate the Carpinteria Oil and Gas Processing Facilities (Project Site). The proposed Project-related activities would also include the removal of nearshore/offshore pipelines out to three nautical miles (nmi) (state waters limit) (State Waters Offshore Pipelines). In support of this activity, an application for a Coastal Development Permit (CDP) is being filed with the City of Carpinteria (City).

The Project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City of Carpinteria is the Lead Agency with principal responsibility for considering the Project for approval (14 California Code of Regulations [CCR] 15000 et seq.).

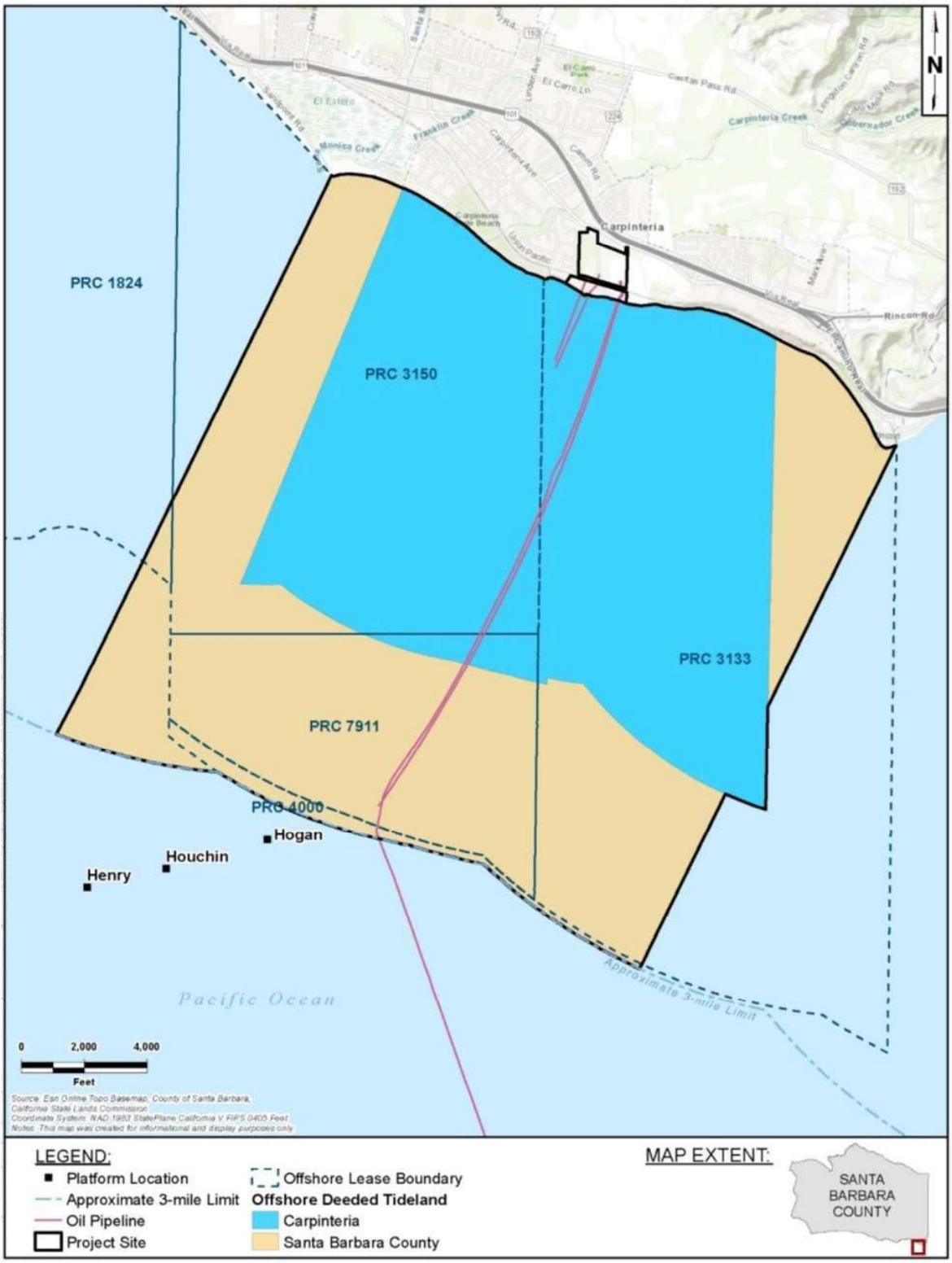
This EIR is an informational document that is being used by the general public and governmental agencies to review and evaluate the Project. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Project. Specifically, the EIR should be consulted for information about the environmental effects associated with the Project and potential mitigation measures to address or minimize those effects.

The remainder of the Executive Summary consists of the following sections:

- An introduction, which discusses the regulatory oversight in the preparation of the EIR and public scoping process, and agency use of the EIR;
- A brief description of the Project and the Project objectives;
- A discussion of the background environmental setting;
- A brief description of the alternatives evaluated in detail in the EIR;
- A summary of key impacts of the Project, alternatives, and cumulative impacts; and
- A discussion of the Environmentally Superior Alternative.

Tables ES.4 through ES.6, located at the end of this Executive Summary, summarize the impacts and mitigation measures for the Project. The impacts and mitigation measures for the Project are discussed in detail in Sections 4.1 through 4.13 of this EIR.

Figure ES-1 Project Site Location Map



Source: Applicant Project Description, 2021.

ES.1 Introduction

The City, as Lead Agency under CEQA, determined that an EIR would be required as part of the permitting process for the Project. The City's decision to prepare an EIR is documented in an Initial Study included in Appendix D of this EIR. The Initial Study, which consists of a checklist of possible effects on a range of environmental topics, found that the Project may have significant environmental impacts related to:

- Aesthetics;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Climate Change and Greenhouse Gas Emissions;
- Hazardous Materials and Risk of Upset;
- Hydrology and Water Resources;
- Land Use and Planning;
- Noise and Vibration;
- Transportation and Circulation; and
- Tribal Cultural Resources.

A detailed analysis associated with an EIR is needed to further assess potential effects. While these issue areas are the main topics of focus in this EIR, other issue areas are included in Section 4.13 which provides a discussion of issue areas that were found not to have the potential for significant impacts.

On August 1, 2022, the City, as the Lead Agency, issued a Notice of Preparation (NOP) to inform the general public and agencies that an EIR would be prepared for the Project and to solicit comments on environmental issues to be addressed in the document. The public scoping comment period was extended by 30 days and closed on September 30, 2022. Comments received in response to the NOP were used to further refine the scope of the analysis and the technical studies in this EIR. Written comments received in response to the NOP are provided in Appendix D with an indication of specific EIR sections where topics related to individual comments are addressed.

The City of Carpinteria is the Lead Agency per CEQA Guidelines Section 15051. In addition, a number of public agencies with discretionary authority over this Project have been identified as Responsible Agencies which may rely on this EIR, once certified, as part of the deliberative review in deciding whether to approve or disapprove a particular activity. Table 1.2 provides a listing of these Responsible Agencies and their applicability to the Project. The City, as the CEQA Lead Agency, will act first on the Project before any of the Responsible Agencies act on the Project. City decision-makers (Planning Commission and City Council) will use the EIR for decision-making regarding the Project. If the Project is approved by all required permitting agencies, the City would be responsible for reviewing and approving all pre-construction compliance plans and ensuring that the Project modifications and operations are conducted in accordance with the permit conditions.

The City of Carpinteria issued a Draft EIR on November 30, 2023. The public comment period on the Draft EIR ran through January 31, 2024. The City of Carpinteria held a public comment meeting on December 18, 2023.

The public comments received on the Draft EIR were reviewed and responded to as required by CEQA and the CEQA Guidelines. This Final EIR has been prepared, incorporating all of the comments received, written responses to received comments, and the Draft EIR, along with any changes to the Draft EIR that resulted from the comments received.

The Draft EIR (paper copy form) as well as the Final EIR will be available to the general public for review at these locations:

City of Carpinteria Community Development Department
City of Carpinteria Public Library

CD and paper copies of the Draft EIR and the Final EIR may be obtained (free of charge) at the City of Carpinteria Community Development Department.

The Draft EIR and the Final EIR are also available on the City of Carpinteria's website at: https://carpinteriaca.gov/city-hall/community-development/oil-gas-information/oil-processing-facility-decommissioning/

Revision marks showing the changes from the Draft EIR are shown in the Final EIR where changes are shown as lines in the margins, and added text is shown underlined. Deleted text is not shown due to formatting issues. A full revision version is available by request that shows deletions also.

ES.2 Project Description

The Project proposes to demolish and remove the Facility including, but not limited to the onshore portions of the Facility (Onshore Facility), and State Waters Offshore Pipelines and complete remediation of impacted soils and groundwater at the Facility. Remediation is proposed to comply with levels established in a Remedial Action Plan (RAP) that will be reviewed by the Santa Barbara County Public Health Department, Environmental Health Services (SBCEHS), Regional Water Quality Control Board (RWQCB), and United States Environmental Protection Agency (U.S. EPA). The Project proposal assumes the most stringent clean up levels for the purpose of determining soil excavation and truck trip estimates and therefore a maximum amount of remediation activities (e.g., truck trips, site activities). The Applicant states remediation efforts will be performed along with preservation of existing site resources, including mature trees and bluffs, and in coordination with site constraints including buffer zones adjacent to the Union Pacific Railroad (UPRR) right-of-way (ROW). The most stringent clean up levels would also result in greater flexibility for development on the site meeting the most rigorous standards (e.g., unrestricted land use).

ES.3 Objectives of the Project

Pursuant to Section 15124(b) of the CEQA Guidelines, the description of the Project is to contain "a clearly written statement of objectives" that would aid the Lead Agency in developing a reasonable range of alternatives to evaluate in the EIR and would aid decision makers in preparing findings and, if necessary, a statement of overriding considerations. The City is the CEQA Lead Agency responsible for preparing the EIR. The City decision-makers will consider the EIR for certification and the Project for approval.

The underlying purpose of the Project is to remediate the environmental impacts of the legacy oil and gas facilities on the Project site.[1] More specifically, the Project's purpose is to demolish and remove surface and subsurface facilities and subsequent remediation of any impacted soils connected to activities from the Onshore Facility to accommodate the site's potential future redevelopment. Any residually impacted soils at the Onshore Facility will be remediated to an unrestricted land use standard consistent with the approvals from the SBCEHS, RWQCB, and U.S. EPA to facilitate reuse of the property for land use acceptable under the City's current Draft General Plan/Local Coastal Plan (General Plan) Update (anticipated to be Planned Unit Development and Open Space/Recreation). The State Waters Offshore Pipelines will also be removed. The Project objectives as provided by the Applicant are summarized as follows:

- Idling and removal of existing surface and subsurface equipment, piping, pipeline segments and structures associated with the Facility including removal of concrete foundations, asphalt, oil spray, and road base within the Facility;
- Pig and flush pipelines in preparation for removal and removal of State Waters Offshore Pipelines out to the 3-nmi state waters limit;
- Excavation/remediation of any impacted soils within the Facility and restoration of the affected portions of the Project Site in accordance with the agency approved Remedial Action Plan;
- Complete removal of State Waters Offshore Pipelines; and
- Recycling/disposal of all materials removed from the Project Sites.

ES.4 Background and Historic Operations

The Project Site is located within an area that has been historically utilized for agricultural production and more recently for oil and gas development support activities. Historical agricultural production activities documented at the Project Site from the 1920s through 1959 included dry farming, row crop production, orchards (fruit trees and nuts), and commercial flower production (plant nursery).

Oil and gas processing equipment was initially constructed onsite in the 1950s to support production from the offshore Summerland field developed by the Standard, Humble, and Summerland State (SHSS) joint venture. Oil and gas first flowed through Project Site in 1959 after the commissioning of offshore Platform Hazel. The processed oil was metered and transferred to Tank 861, a 217,000-barrel (bbl) capacity above-ground storage tank (AST) with a floating top roof operated by Standard Oil's Pipeline Department (now Chevron Pipeline & Power). Produced gas that flowed to the Project Site from Platform Hazel and later other offshore platforms was processed onsite and then sold to Southern California Gas Company (SoCalGas) via the Sales Gas Area (pipes, valves, meters, and equipment), which was also constructed in the late 1950s.

Historically, processing levels at the Facility have been as high as 20,000 barrels per day of crude oil and 20 million standard cubic feet (MMSCF) per day of natural gas. The Facility consisted of offices, production pipelines from offshore platforms, a connected system of product separation, processing, and storage facilities. Processed natural gas from the Facility was fed into the SoCalGas network. Processed crude oil and natural gasoline were blended and shipped from the Facility by way of pipeline to Ventura, from where it was piped to refineries in the Los Angeles area.

[1] 14 Cal Code Regs §15124(b); See *Golden Door Props., LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 546; *Bay Area Citizens v. Association of Bay Area Gov'ts* (2016) 248 Cal.App.4th 966, 1013.

Historically, refined products and crude oil were also transferred from the Facility via marine tanker. However, the marine terminal, formerly accessed by an offshore mooring, is no longer operational. From 1960 to 1989, the Facility received oil and gas from Platform Hazel as well as several other offshore platforms constructed in the Santa Barbara Channel, including Hilda, Hope, and Heidi (Carpinteria Field), and Gail and Grace (Santa Clara Field and Sockeye Field). Upgrades and additions to the Facility were completed to accommodate the varied quality of the additional oil and gas volume. Abandonment of the wells and decommissioning/removal of offshore Platforms Hazel, Hilda, Hope, and Heidi (4H Platforms) from the Santa Barbara Channel were completed in 1996.

The Applicant sold its Santa Barbara Channel assets to Venoco, Inc. in 1998. Platform Grace ceased operations in 1998 and Platform Gail in 2017. Chevron purchased the property as part of Venoco bankruptcy proceedings and is the Operator of record and Applicant for the decommissioning Project.

ES.5 Description of Alternatives

Alternatives to the Project were developed per CEQA Guidelines Section 15126.6. Section 5.0, Environmental Analysis and Comparison of Alternatives, provides a complete description of all alternatives considered, including an explanation for rejecting potential alternatives for further analysis. In addition, in response to comments made on the Draft EIR, an additional alternative, the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative, has been added to this EIR, which is described below and included in the comparative analysis. The following were the alternatives evaluated and carried forward to the Environmentally Superior Alternative Discussion.

ES.5.1 No Project Alternative

CEQA requires an evaluation of the No Project Alternative so that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project. According to CEQA Guidelines §15126.6(3)(B), for a development project the No Project Alternative is the circumstances under which the Project does not proceed. If disapproval of the Project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed.

Under the No Project Alternative, the Project as proposed would not occur and the Applicant would not conduct the site demolition and remediation activities proposed by the Project. The CPF would remain at the site in a shut-down status and facilities would not be decommissioned. This would include onshore facilities, and offshore pipelines. It should be noted that remediation activities may still be required to proceed since the U.S. EPA and SBCEHS would likely continue to require that these facilities be cleaned up of contaminated materials and appropriately remediated. However, without the removal of above-ground equipment and tanks, it would be difficult to fully access all areas targeted for excavation and remediation.

ES.5.2 Full Removal of Facilities Alternative

The Project as proposed excludes a number of facilities that are not slated for decommissioning for a variety of reasons. Under this alternative all oil and gas facilities within the property and all related offshore facilities that can be addressed would be fully decommissioned. Those facilities would include the plugging and abandonment of the seven wells that exist within the Project Site; removal and remediation of naturally occurring petroleum hydrocarbons which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area; and removal of former Platforms Hazel and Hilda pipeline bundle, which include two, 8-inch diameter and one, 6-inch diameter

abandoned pipelines that come from offshore, across the beach near the western extent of the Project area and a 36-inch diameter corrugated metal vault located at the edge of the bluffs.

This alternative would potentially eliminate potential long term oil spill impacts related to oil well blowouts and would eliminate the impacts associated with ongoing oil seeps. In addition, removal of pipelines through the bluffs would prevent future erosion impacts and would address pipelines that were not previously removed and would not become a burden on the public for addressing future removal.

ES.5.3 Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative

The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative consists of all the components of the Proposed Project together with removal of the onshore and nearshore portion of the former Platforms Hazel and Hilda pipeline bundle, which was abandoned in place as approved by the State Lands Commission during the platform removal project in 1997. This alternative is a revised version of the Full Removal of Facilities Alternative described in Section 5.3.2 but does not include removal and remediation of naturally occurring hydrocarbon seeps, plugging and abandonment of seven existing wells within the Project Site, or removal of the former Platforms Hazel and Hilda pipeline bundle further from shore, beyond a depth of 30 feet of water.

Comments from the Applicant and others pointed out that the hydrocarbon seeps and historic wells are not required to be intervened by any regulatory agency and are not feasible under the existing Project. The California Coastal Commission has stated that the seeps are a chronic natural occurrence that is part of the environmental setting and would not be considered an impact. The seeps, which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area, are natural environmental features resulting from geological conditions. The California Coastal Commission commented that leaving the seeps undisturbed in their natural state would not be inconsistent with the Coastal Act. (California Coastal Commission letter, 1/31/2024). Previous attempts to cement over seeps in southern California have resulted in seeps moving around the cement cap. (Chevron letter, 1/31/2024). Abandonment of the historic wells on the property that were installed and operated by others are not proposed to be affected by the Proposed Project decommissioning activities and as such, are not considered the Applicant's responsibility. The California Geologic Energy Management Division (CalGEM) advised that the property owner would be responsible for well reabandonment if the property owner proposed construction that would prevent or impede well access, but the Proposed Project is not projected to build over or impede access to the historic wells. (CalGEM letter, 2/1/2024). CalGEM has determined that there is no regulatory requirement for Chevron to plug or abandon the wells as part of the Proposed Project.

In response, the City has requested and the Applicant has agreed to propose and, if approved, carry out the revised Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative which consists of the original Proposed Project together with partial removal of the former Platforms Hazel and Hilda pipeline bundle, but does not disturb the naturally occurring seeps or historic wells. Under this alternative, in addition to the Proposed Project, the Applicant would remove a portion of the former Platforms Hazel and Hilda pipeline bundle, onshore from the base of the bluff and offshore for approximately 1,400 feet, to a depth of 30 feet of water. The rest of the offshore pipeline bundle would remain abandoned in place, with the ends sealed by mechanical plugs. The 30-foot water depth was selected to ensure that the work barge has sufficient water depth to work safely and in accordance with the proposed removal procedures for the adjacent marine terminal pipelines. In addition, the related 36-inch diameter corrugated metal vault located on the bluff would be fully removed.

The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would achieve the basic objectives of the Project by accomplishing the components of the original Proposed Project. In addition, removing the former Platforms Hazel and Hilda pipeline bundle through the bluffs would prevent future erosion and avoid the pipelines becoming a burden on the public if removal is necessary in the future, as noted by the California Coastal Commission. (California Coastal Commission letter, 1/31/2024).

ES.5.4 Other Alternatives Examined

Other alternatives were examined and eliminated from detailed consideration, including:

- Removal of Offshore Facilities only Alternative;
- Removal of Onshore Facilities only Alternative; and
- Limitations on Trucking Destinations Alternative.

These are discussed in Section 5.3, Alternatives Description.

ES.6 Impacts of Project, Alternatives, and Cumulative Development

In the Impact Summary Tables (ES.1 through ES.6) in this Executive Summary and throughout this EIR, the impacts of the Project and alternatives have been classified using the categories Class I, II, III, and IV as described below:

Class I – Significant and Unavoidable: Significant unavoidable adverse impacts for which the decisionmaker must adopt a statement of Overriding Considerations: these are significant adverse impacts that cannot be effectively avoided or mitigated. No measures could be taken to avoid or reduce these adverse effects to insignificant or negligible levels. Even after application of feasible mitigation measures, the residual impact would be significant;

Class II – Less Than Significant with Mitigation: Significant environmental impacts that can be feasibly mitigated or avoided for which the decision maker must adopt Findings and recommended mitigation measures: these impacts are potentially similar in significance to those of Class I but can be reduced or avoided by the implementation of feasible mitigation measures. After application of feasible mitigation measures, the residual impact would not be significant;

Class III – Less than Significant: Adverse impacts found not to be significant for which the decision maker does not have to adopt Findings under CEQA: these impacts do not meet or exceed the identified thresholds for significance. Generally, no mitigation measures are required for such impacts; and

Class IV – Beneficial: Impacts beneficial to the environment.

The term “significance” is used in these tables and throughout this EIR to characterize the magnitude of the projected impact. For the purposes of this EIR, a significant impact is a substantial or potentially substantial change to resources in the local Project area or the area adjacent to the Project in comparison to the threshold of significance established for the issue area. Within each issue area an analysis of potential impacts compared to the appropriate significance criteria is presented.

The remainder of this section provides a brief discussion of the significant and unavoidable Class I impacts identified for the Project, the alternatives, and cumulative development. A detailed listing of the impacts associated with the Project can be found in the Impact Summary Tables at the end of this section. Sections 4.1 through 4.13 provide a comprehensive discussion of impacts of the Project and discussions of the impacts associated with the cumulative development. Section 5.0, Alternatives, provides an analysis of

the impacts of each selected alternative, compares the impacts of each alternative relative to the Project, and identifies the Environmentally Superior Alternative.

ES.6.1 Impacts Associated with the Project

Table ES.1 summarizes the Project impacts and mitigation measures.

Table ES.1 Summary of Project Impacts and Mitigation Measures

Issue Area	Impact	Description	Class*	Mitigation Measures
Aesthetics	A.1	Scenic Vistas	III	-
	A.2	Scenic Resources	III	-
	A.3	Visual Character/Quality	III	-
	A.4	Night Lighting	II	A.4: Beach/Nearshore Night Lighting Minimization
Air Quality	AQ.1	Standards	III	-
	AQ.2	Odors	II	AQ.2. Odor Control and Purging Plan
	AQ.3	Toxic Air Emissions	III	-
Biological Resources	Bio.1	Listed Species	II	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys Bio.1d: Fencing Bio.1e: Worker Education & Awareness Plan Bio.1f: Marine Wildlife Contingency & Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring & Protection Bio.1h: Wildlife Relocation Monitoring
	Bio.2	ESHA	II	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance
	Bio.3	Wetlands	II	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Requirements Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Program
	Bio.4	Movement of Wildlife	III	-
	Bio.5	Policy Conflicts	II	Bio.5: Tree Removal Mitigation
	Bio.6	Conservation Plan Conflicts	III	-
	Bio.7	**Accidental Oil Spills**	**I**	**Bio.7: Oil Spill Contingency Plan**
Cultural Resources	Cul.1	Known Resource CA-SBA-6	II	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
	Cul.2	Human Remains	II	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery

Table ES.1 Summary of Project Impacts and Mitigation Measures

Issue Area	Impact	Description	Class*	Mitigation Measures
Geology & Soils	Geo.1	Earthquake Fault	III	-
	Geo.2	Erosion	II	Geo.2: Erosion Control Best Management Practices
	Geo.3	Sedimentation	II	Measure Geo.2
	Geo.4	Unstable Bluffs	II	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removal Geo.4c: Bluff Stabilization Following Pipeline Removal
	Geo.5	Expansive Soils	III	-
	Geo.6	Septic Tanks	III	-
	Geo.7	Paleontological/Geologic Feature	II	Measures Cul.1a-f
Climate Change & GHG	GHG.1	GHG Emissions	II	GHG.1: GHG Emissions Reductions
	GHG.2	Plans	II	Measure GHG.1
Hazardous Materials & Risk of Upset	Haz.1	Routine Operations	II	Haz.1: Contaminated Soil Handling
	Haz.2	**Accidental Releases**	**I**	**Haz.2a: Spill Response Planning** **Haz.2b: Asbestos and Lead Planning**
	Haz.3	Schools	III	-
	Haz.4	Site Contamination	III	-
	Haz.5	Airports	III	-
	Haz.6	Emergency Response	III	-
	Haz.7	Wildland Fires	II	Haz.7: Fire Response Planning
Hydrology & Water Resources	**WR.1**	**Standards**	**I**	**WR.1: Stormwater Pollution Prevention Plan**
	WR.2	Groundwater Supplies	III	-
	WR.3	Drainage Patterns	III	-
	WR.4	Pollutants	III	-
	WR.5	Control Plans	III	-
Land Use & Planning	LU.1	Create Divisions	III	-
	LU.2	Policy Conflict	III	-
Noise & Vibration	N.1	12-hour CNEL	III	
	N.2	Hourly Average Ambient Noise	II	N.2a: Noise Barriers N.2b: Nighttime Activities
	N.3	Vibration	III	-
	N.4	Airport Noise Conflicts	III	-
Transportation & Circulation	T.1	Policy Conflicts	III	-
	T.2	VMT	III	-
	T.3	Traffic Hazards	III	-
	T.4	Emergency Access	III	-
Tribal Cultural Resources	TCR.1	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b
	TCR.2	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b
Other	All	Ag, Energy, Mineral, Housing, Public Services, Recreation, Utilities, Wildfire	III	-

*Class I = Significant and Unavoidable; Class II = Less than Significant with Mitigation; Class III = Less than Significant; Class IV = Beneficial.

ES.6.1.1 Significant and Unavoidable Class I Impacts

Significant and unavoidable Class I impacts would occur related to biological resources, hazardous materials and risk of upset, and hydrology and water resources. See Table ES.4 for a description of the Project Class I impacts and the required mitigation measures for each respective impact.

ES.6.1.2 Beneficial Class IV Impacts

No beneficial impacts are associated with the Project.

ES.6.2 Impacts Associated with the Alternatives

As discussed in Section ES.5, several alternatives to the Project were evaluated that had the potential to reduce significant impacts. The relative impacts of each of these alternatives to the Project are summarized below.

ES.6.2.1 No Project Alternative

As described above, under the No Project Alternative the Project as applied for would not occur and the Facility would remain in place and not be decommissioned. This assumes that the Project would not move forward and that no facilities are removed, some accessible contaminated materials could still be removed and remediated in accordance with agency requirements. The No Project Alternative does not meet the purpose of the Project and fails to meet most of the Project objectives.

Equally, the offshore facilities scheduled for decommissioning would not occur and pipelines would remain in place. However, regulatory agencies are likely to still require that remediation activities take place and the contaminated soil excavated and removed from the site. The Applicant would have to fulfill the obligations under their existing regulatory requirements for remediation under the U.S. EPA and the SBCEHS. It is possible that the Applicant would still be required to remediate the Project Site as ordered by the various agencies.

If the Project does not move forward, facilities such as Tank 861 would remain in place and would remain visible from the seal area and public trails; however, because the facility is well screened from surrounding neighbors, and the dominant views from the trail are towards the ocean and the seal rookery, this would not constitute a significant impact. However, it should be noted that elimination of visible industrial equipment in a scenic area would be beneficial and leaving them in place as part of the No Project Alternative would continue to expose passersby to an industrial facility. The No Project Alternative would fail to meet most of the objectives of the Project since it would not remove onshore and offshore facilities and it would not ensure the excavation and remediation of all impacted soils within the Facility.

Under the No Project Alternative, no impacts to air quality would occur since no equipment would be used for decommissioning and no trucks would be used to transport decommissioned materials. Trucks would still be used to transport contaminated materials although it might be significantly less since above ground facilities would remain and excavation could not be completed under Tank 861 and other facilities. It is likely that additional remediation would have to occur at a later date once a landowner proposes some other development at the site and effectuates the removal of the facilities onsite. Air impacts of the proposed Project were considered less than significant and impacts of the reduced activities under the No Project Alternative would be less than those for the proposed Project. Impacts to greenhouse gases (GHG) from trucking of contaminated materials would be less than those for the proposed Project since fewer activities would occur, and fewer emissions of GHGs would be generated. Mitigation measure GHG.1 would still be applicable. Trees and other vegetation would not be removed to facilitate remediation

activities and no impacts to biological resources would occur. However, if facilities are not removed, then some contaminated soils under existing facilities would remain in place and could potentially leach into underground water resources or the contaminated soils erode as part of storm cycles and be drained into the ocean, causing potential impacts.

Hazards impacts are likely to be significant since facilities would not be removed and could continue to deteriorate and result in potential spills of material left in pipelines or in other facilities. The No Project Alternative also would not address the seven idle wells within the property and those wells could potentially leak in the future and result in impacts to biological resources and water resources as with the proposed Project.

Cultural resources impacts would still occur since it is likely that regulatory agencies would still require excavation and remediation of contaminated materials. Some of the contaminated materials are within sensitive cultural resources sites and impacts would still occur. Mitigation measures under the cultural resources section would still be applicable (mitigation measures Cul.1a through Cul.1f, Cul.2a, and Cul.2b) to mitigate some of the impacts including the preparation of a Cultural Resources Management Plan and requirements for the presence of Native American monitors. Impacts would be similar to those identified under the proposed Project.

Impacts to geological resources and soils would be similar to those for the proposed Project since excavation of contaminated soils is likely to be required. Requirements for an Erosion Control Plan and best management practices would still occur and would mitigate impacts to less than significant. Pipelines would not be removed through the bluff area and erosion impacts in that area could continue to occur with those facilities being left in place.

Impacts to land use would be considered significant but mitigable since the facility would not be decommissioned and future land uses would be hampered by the existence of these obsolete industrial facilities. Also, environmental impacts could occur as a result of leaving facilities behind, such as oil seeps and idle wells that could leak in the future and cause impacts to biological and water resources.

Impacts from noise under the No Project Alternative would be substantially less than the proposed Project since only the remediation activities would occur, but there would be no impacts associated with offshore or onshore decommissioning activities.

ES.6.2.2 Full Removal of Facilities Alternative

This alternative would have similar aesthetic impacts as the proposed Project since the site is well screened from public viewing areas. However, the public trail and seal viewing area have good views of the equipment and removal of all facilities would be beneficial to those passersby. It should be noted that the dominant attractions for the passersby on the trail are the Pacific Ocean and seal rookery. The addition of a rig to plug and abandon the seven wells within the site would have some added temporary aesthetic impacts beyond those from the proposed Project; however, those impacts would be temporary. Additional mitigation could include temporary screening barriers, which could also help diminish noise impacts, if needed.

This alternative would result in more emissions than the proposed Project since it would include additional work efforts to plug and abandon wells and remove additional pipelines, which would require more equipment. It would also result in additional GHG emissions for the same reasons stated above. Impacts associated with GHGs from trucking of contaminated materials would be slightly more than those for the proposed Project since more activities would occur, and higher emissions of GHGs would be generated. The intensity of work would most likely be the same as the proposed Project, but the duration would

increase, which would increase emissions. The same GHG mitigation measure, GHG.1, for the proposed Project would apply for this alternative.

Trees and other vegetation would be removed to facilitate remediation activities and impacts to biological resources would be similar to those from the proposed Project.

Hazards impacts are likely to be similar to those of the proposed Project since facilities would be removed and there could be accidental releases during the decommissioning process and result in potential spills of material left in pipelines or in other facilities. This alternative would address the seven idle wells within the property and those wells could potentially leak during the plugging and abandonment process but would permanently remove any potential risk of future oil spills. In the event of a leak, impacts would occur to biological and water resources similar to the proposed Project and require the same mitigation measures. Under this alternative, the seeps would also be addressed, and this would prevent future releases of oil that could occur from the seeps during storm events if left in place.

Cultural resources impacts would still occur since the Project would still require excavation and remediation of contaminated materials. Some of the contaminated materials are within sensitive cultural resources sites and impacts would still occur. Mitigation measures under the cultural resources section would still be applicable (mitigation measures Cul.1a through Cul.1f, Cul.2a, and Cul.2b) to mitigate some of the impacts including the preparation of a Cultural Resources Management Plan and requirements for the presence of Native American monitors. Impacts would be similar to those identified under the proposed Project.

Impacts to geological resources and soils would be similar to those for the proposed Project since excavation of additional pipelines on the bluff could have erosional impacts. Requirements for an Erosion Control Plan and best management practices would still be required and would mitigate impacts to less than significant. Mitigation measures Geo.4a, 4b, and 4c would still be required to mitigate any potential impacts to the bluff area similar to the proposed Project.

Land use impacts would be beneficial since the facility would be completely cleaned up and wells properly plugged and abandoned, resulting in a site ready for development.

Impacts from noise under this alternative would be more than the proposed Project since additional activities would occur as part of the added well abandonment and the added pipeline removal, with the added impacts associated with offshore or onshore decommissioning activities. Peak noise is probably the same, but the duration of the impact would likely increase. Mitigation measures N.2a and N.2b would still apply.

Traffic impacts would be slightly higher than those of the proposed Project. Duration would be longer, meaning more vehicle miles traveled, but peak impacts would probably be the same. Impacts would still be considered to be less than significant under this alternative. Finally, and as detailed above, the Full Removal Alternative with all its components is not considered feasible or viable at this point since plugging and abandonment of the historic wells are not Chevron's responsibility and since the Coastal Commission considers the seeps to be part of the existing, natural environment and do not require intervention.

ES.6.2.3 Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative

Since the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative is a subset of the Full Removal of Facilities Alternative, it would not result in any impacts not previously identified for the Full Removal of Facilities Alternative. Like the Full Removal Alternative, the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would have additional impacts compared to the Proposed Project due

to the additional decommissioning activities and equipment involved, but at a reduced magnitude since the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative does not include all of the additional components and activities of the Full Removal Alternative. Since the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would not affect the natural seeps and historic wells, it would not alter the potential for future oil releases from those existing conditions. The Platform Hilda and Hazel pipelines were cleaned by flushing and running a "pig" through the lines to remove all hydrocarbons, and filled with grout to a distance of 800 feet offshore from the bluff, prior to abandonment in place in the platform removal project. (State Lands Commission, Mitigated Negative Declaration for the Abandonment and Removal of Four Offshore Oil Platforms, Santa Barbara County, 8/3/1994). As a result, the pipelines do not pose a risk of future oil releases in their existing condition.

This alternative would have similar aesthetic impacts as the Proposed Project since the Site is well screened from public viewing areas. However, the public trail and seal viewing area have good views of the bluffs and will be temporarily affected by the removal of all facilities. It should be noted that the dominant attractions for the passersby on the trail are the Pacific Ocean and seal rookery. The additional removal of pipelines on the bluff area would have some added temporary aesthetic impacts beyond those from the Proposed Project; however, those impacts would be temporary. Additional mitigation could include temporary screening barriers, which could also help diminish noise impacts, if needed.

This alternative would result in slightly more emissions than the Proposed Project since it would include additional work efforts to remove additional pipelines, which would require slightly more equipment. It would also result in additional GHG emissions for the same reasons stated above. Impacts associated with GHGs from trucking would be slightly more than those for the Proposed Project since more activities would occur, and higher emissions of GHGs would be generated. The intensity of work would most likely be the same as the Proposed Project, but the duration would slightly increase, which would increase emissions. The same GHG mitigation measure, GHG.1, for the Proposed Project would apply for this alternative.

Impacts to biological resources would be similar to those from the Proposed Project since the added pipeline removal is unlikely to affect any additional biological resources.

Hazards impacts are similar to those of the Proposed Project since facilities would be removed and there could be accidental releases during the decommissioning process and result in potential spills by onshore and offshore equipment during decommissioning activities. However, there would be no added reduction of significant impacts related to oil spills from the added pipeline removal since those pipelines are empty of hydrocarbons and would not be a potential source of spills. Mitigation measures Haz.1, Haz.2a, Haz.2b and Haz.7 will still be applicable under this alternative.

Cultural resources impacts would still occur since the Project would still require excavation and remediation of contaminated materials. Some of the contaminated materials are within sensitive cultural resources sites and impacts would still occur. Mitigation measures under the Cultural Resources Section would still be applicable (mitigation measures Cul.1a through Cul.1f, Cul.2a, and Cul.2b) to mitigate some of the impacts including the preparation of a Cultural Resources Management Plan and requirements for the presence of Native American monitors. Impacts would be similar to those identified under the Proposed Project.

Impacts to geological resources and soils would be similar to those for the Proposed Project since excavation of additional pipelines on the bluff could have erosional impacts. Requirements for an Erosion Control Plan and best management practices would still be required and would mitigate impacts to less than significant. Mitigation measures Geo.4a, 4b, and 4c would still be required to mitigate any potential

impacts to the bluff area similar to the Proposed Project. Long term impacts to the bluffs would be reduced since elimination of the additional pipelines would result in a reduction of potential paths for erosion.

Land use impacts under this alternative would be similar to those of the Proposed Project. However, it is worth noting that this alternative would result in fewer impediments to achieving a fully cleaned up Site by removing more pipelines from the Site.

Impacts from noise under this alternative would be more than the Proposed Project since additional activities would occur as part of the added pipeline removal, with the added impacts associated with offshore or onshore decommissioning activities. The duration of the decommissioning activities would likely last slightly longer and thus the duration of noise impacts would increase; however, peak noise would be the same since it would involve the same types of activities as the Proposed Project. Mitigation measures N.2a and N.2b would still apply.

Traffic impacts would be slightly higher than those of the Proposed Project. The duration of the vehicular traffic associated with the decommissioning activities would likely be longer, and thus would result in more vehicle miles traveled (VMT). However, peak impacts would probably be the same as the Proposed Project since truck trips per day would be the same with added work days to account for the additional work. Impacts would still be less than significant under this alternative.

ES.6.3 Impacts Associated with the Cumulative Development

Section 15130(a)(1) of the CEQA Guidelines (14 California Code of Regulations [CCR], Div. 6, Ch. 3) states that a "cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." CEQA requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable" (14 CCR §15130(a)). Section 3.0 of this EIR provides a list of past, present, and probable future projects that could have cumulative effects with the Project. Table ES.2 provides a summary of the Project's cumulative effects.

Table ES.2 Cumulative Impacts

Issue Area	Proposed Project Cumulative Impacts	Cumulative Impacts Additional Mitigation Measures
Aesthetics	Class III	None
Air Quality	Class III	None
Biological Resources	Class I	None
Cultural Resources	Class II	None
Geology & Soils	Class III	None
Climate Change & GHG	Class II	None
Hazardous Materials & Risk of Upset	Class III	None
Hydrology & Water Resources	Class III	None
Land Use & Planning	Class III	None
Noise & Vibration	Class III	None
Transportation & Circulation	Class III	None
Tribal Cultural Resources	Class II	None

Significant and unavoidable Class I cumulative impacts to biological resources would be realized in the event of an accidental oil spill from the Project Site or the offshore pipelines.

ES.7 Environmentally Superior Alternative

Section 5.0, Alternatives, provides an analysis of the impacts of each selected alternative, compares the impacts of each alternative to the Project, and identifies the Environmentally Superior Alternative. Table ES.3 provides a relative comparison of the Class I, Class II, and Class III impacts of each alternative to the Project by issue area and impact.

Table ES.3 Alternatives Comparison

Issue Area	Proposed Project	No Project	Full Removal	Project plus Hilda and Hazel Pipelines
Aesthetics	Class III	Class III	Class II	Class III
Air Quality	Class II	Class III↓	Class II	Class III↑
Biological Resources	Class I	Class I	Class I	Class I
Cultural Resources	Class II	Class II	Class II	Class II
Geology & Soils	Class II	Class II	Class II↑	Class II↓
Climate Change & GHG	Class II	Class II↓	Class II↑	Class II↑
Hazardous Materials & Risk of Upset	Class I	Class I	Class I	Class I
Hydrology & Water Resources	Class I	Class I	Class I	Class I
Land Use & Planning	Class III	Class II	Class IV	Class III
Noise & Vibration	Class II	Class II↓	Class II↑	Class II↑
Transportation & Circulation	Class III	Class III↓	Class III↑	Class III↑
Tribal Cultural Resources	Class II	Class II	Class II	Class II
Other	Class III	Class III	Class II	Class III

Notes: ↓ = decrease in severity, ↑ = increase in severity

As the discussion above indicates, impacts from the various alternatives and the proposed Project are similar in classification for those impacts that are significant and mitigable. There are also some slight differences in severity as indicated above for those impacts that are significant and mitigable and for those impacts that are less than significant. However, because the Full Removal Alternative is not considered feasible and there are no regulatory requirements for this alternative, this alternative is not considered environmentally superior. Finally, although the various alternatives have similar levels of impacts, the reduction of long-term geological impacts to the bluffs from elimination of the additional pipelines under the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative results in this alternative being the environmentally superior alternative.

Table ES.4 Proposed Project Class I Impacts
Impacts That Are Significant and Unavoidable Levels

(Impacts that must be addressed in a "statement of overriding consideration" if the Project is approved in accordance with Sections 15091 and 15093 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measures
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.7	Any accidental oil spill and subsequent clean-up efforts have the potential to directly affect any part of the population of a threatened, endangered, or candidate species or result in the loss or disturbance to its habitat, specifically, species that inhabit Carpinteria Salt Marsh, Carpinteria Creek, or forage along the coast along the CPF.	Construction	Bio.7: Oil Spill Contingency Plan
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.2	The Project may 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.	Construction	Haz.2a: Spill Response Planning Haz.2b: Asbestos and Lead Planning
HYDROLOGY AND WATER RESOURCES (Section 4.8)			
WR.1	Surface water quality may be impaired during Project decommissioning. As a result, the Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Accidental discharge of petroleum hydrocarbons into marine waters could adversely affect water quality.	Construction	WR.1: Stormwater Pollution Prevention Plan

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Sections 15091 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measure
AESTHETICS (Section 4.1)			
A.4	The Project would create a temporary new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Construction	A.4: Beach/Nearshore Night-Lighting Minimization
AIR QUALITY (Section 4.2)			
AQ.2	There is a potential for hydrocarbon-related odors from the decommissioning and demolition of pipelines, tanks, contaminated soils, and other oil and gas processing infrastructure.	Construction	AQ.2: Odor Control and Purging Plan
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.1	The proposed Project could potentially affect federal or state-listed threatened, endangered, or rare plant and animal species, other special status species, or habitat that supports these species, including nesting birds and marine species.	Construction	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys and Protection Bio.1d: Fencing Bio.1e: Worker Education and Awareness Plan Bio.1f: Marine Wildlife Contingency and Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring and Protection Bio.1h: Wildlife Relocation Monitoring
Bio.2	The proposed Project could have an adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, including City of Carpinteria and Coastal Commission defined ESHA ,or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries. .	Construction	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance
Bio.3	Project activities would have an adverse effect on state or federally protected wetlands and/or Waters of the US/State (including riparian areas) as defined by Sections 401 and 404 of the Clean Water Act, or other state and local agencies.	Construction	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Regulations Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Plan

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Sections 15091 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measure
Bio.5	The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Construction	Bio.5: Tree Removal Mitigation
CULTURAL RESOURCES (Section 4.4)			
Cul.1	Grading and excavation associated with decommissioning would potentially result in a substantial adverse change in the significance of an archaeological resource. Specifically, the Project would cause disturbance to known and unknown CA-SBA-6 deposits. Equally, in the event of an oil spill, the spill and cleanup efforts would potentially result in disturbance to cultural resources.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
Cul.2	The Project would disturb human remains, including those interred outside of dedicated cemeteries.	Construction	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery
CLIMATE CHANGE AND GREENHOUSE GASES (Section 4.6)			
GHG.1	Construction GHG emissions (including mobile sources) would exceed the Santa Barbara County threshold of significance and therefore GHG emissions, either directly or indirectly, may have a significant impact on the environment.	Construction	GHG.1: GHG Emissions Reductions
GHG.2	The Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Construction	GHG.1: GHG Emissions Reductions
GEOLOGY AND SOILS (Section 4.5)			
Geo.2	The Project could result in substantial soil erosion or the loss of topsoil.	Construction	Geo.2: Erosion Control Best Management Practices
Geo.3	Ground-disturbing activities would potentially result in erosion-induced siltation of nearby drainages and the Pacific Ocean.	Construction	Geo.2: Erosion Control Best Management Practices
Geo.4	Part of the Project location incudes the Carpinteria Bluffs, a geologic unit that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site erosion.	Construction	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removals Geo.4c: Bluff Stabilization Following Pipeline Removal

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Sections 15091 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measure
Geo.7	The Project would potentially impact a unique paleontological resource or site or unique geologic feature.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.1	The Project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.		Haz.1: Contaminated Soil Handling
Haz.7	The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Construction	Haz.7: Fire Response Planning
NOISE AND VIBRATION (Section 4.10)			
N.2	The Project would result in the generation of a temporary increase in hourly average ambient noise levels in the vicinity of the Project.	Construction	N.2a: Construction Noise Control N.2b: Nighttime Activities
TRIBAL CULTURAL RESOURCES (Section 4.12)			
TCR.1	The proposed decommissioning and remediation Project activities would directly affect known or suspected tribal cultural resources.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery
TCR.2	The Project would/cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and	Construction	Same as above: Cul.1a through Cul.2b

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Sections 15091 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measure
	scope of the landscape, sacred place, or object with cultural value to a California Native American tribe.		

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
AESTHETICS (Section 4.1)			
A.1	The Project would not have a substantial adverse effect on a scenic vista.	Construction	None required.
A.2	The Project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	Construction	None required.
A.3	The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, nor would the Project conflict with applicable zoning and other regulations governing scenic quality.	Construction	None required.
AIR QUALITY (Section 4.2)			
AQ.1	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.	Construction	None required.
AQ.3	Expose sensitive receptors to substantial pollutant concentrations.	Construction	None required.
AQ.4	Conflict with or obstruct implementation of the applicable air quality plan.	Construction	None required.
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.4	The Project could interfere substantially with the movement of wildlife or any resident or migratory fish species.	Construction	None required.
Bio.6	The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	Construction	None required.
GEOLOGY & SOILS (Section 4.5)			
Geo.1	The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.	Construction	None required.
Geo.5	The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994); therefore,	Construction	None required.

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
	there would be no substantial direct or indirect risks to life or property.		
Geo.6	The Project Site does not 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.	Construction	None required.
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.3	The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Construction	None required.
Haz.4	The Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would not create a significant hazard to the public or the environment.	Construction	None required.
Haz.5	The Project is not located with an airport land use plan nor within two miles of a public or public use airport.	Construction	None required.
Haz.6	The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Construction	None required.
HYDROLOGY AND WATER RESOURCES (Section 4.8)			
WR.2	The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.	Construction	None required.
WR.3	The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces.	Construction	None required.
WR.4	The Project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation.	Construction	None required.
WR.5	The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Construction	None required.

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
LAND USE AND PLANNING (Section 4.9)			
LU.1	The Project would not physically divide an established community.	Construction	None required.
LU.2	The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Construction	None required.
NOISE AND VIBRATION (Section 4.10)			
N.1	The Project would result in the generation of a temporary increase in CNEL average ambient noise levels in the vicinity of the Project.	Construction	None required.
N.3	The Project could result in the generation of excessive ground borne vibration or ground borne noise levels during construction/demolition activities.	Construction	None required.
N.4	The Project would not result in excessive noise for people residing or working within two miles of a public, or public use, airport.	Construction	None required.
TRANSPORTATION AND CIRCULATION (Section 4.11)			
T.1	The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Construction	None required.
T.2	The Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).	Construction	None required.
T.3	The Project would not substantially increase hazards.	Construction	None required.
T.4	The Project would not result in inadequate emergency access.	Construction	None required.

Attachment C.

Planning Commission Action Letter and Adopted Resolution

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

CITY of CARPINTERIA, CALIFORNIA

May 8, 2025

Walid Masri, Program Director
Chevron USA, West Coast Decommissioning Program
3961 State Street, Suite 2114
Santa Barbara, CA 93105

Re: Notification of Planning Commission Action
Chevron Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities Project; 21-2128-DP/CDP
5619, 5663, 5675, and 5731 Carpinteria Avenue (APNs 001-170-003, -004, -014, -020, -021, -022, -023)

Dear Mr. Masri:

On May 5, 2025, the Planning Commission took action on the following item:

Request from Chevron West Coast Decommissioning Program to accept and certify the Environmental Impact Report (State Clearing House No. 2022080026), and to grant a Development Plan and Coastal Development Permit for onshore oil and gas facilities removals and remediation; and approval of Facility Decommissioning Plan within City Deeded Tidelands and Issuance of a Lease Quit Claim.

The Planning Commission voted 4-0-1 (Allen recused) to:

- Accept and certify the Environmental Impact Report prepared for the project as having satisfied the procedural and statutory requirements of CEQA, including acceptance of minor non-substantive corrections thereto;
- Select the "Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative" as the preferred Project;
- Adopt Resolution PC-25-001, approving the Development Plan and Coastal Development Permit for the Project; and
- Amend the adopted Project Conditions of Approval as follows:
    - Revise Condition No. 10 (Mitigation Measure Bio.1g, Harbor Seal Rookery Monitoring and Protection), in part, to read: **Plan Requirements/Timing:** The Carpinteria Harbor Seal Rookery Monitoring and Protection Plan shall be approved by the City prior to the issuance of Grading permits, and <u>fully</u> implemented during <u>all Project-related activities within 1,000 feet of</u> ~~periods when~~ the haul-out/rookery ~~is active (December 1 through May 31)~~…
    - Revise Condition No. 40 (Mitigation Compliance, Monitoring and Reporting Requirement), in part, to read: The mitigation monitoring

program shall include, but not be limited to the following elements for the entirety of the project:

- Copies of all required regulatory agency permits and approvals, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary, shall be submitted to the City prior to initiation of Project activities.

This decision to approve the Project is appealable to the City Council. The local appeal period is ten calendar days commencing on Tuesday, May 6, 2025 and ending on Thursday, May 15, 2025 at 5:00 p.m. Any appeal must be filed in writing by an aggrieved person. If an appeal is filed, the matter will be scheduled for consideration by the City Council at a future meeting date.

The Project is located within the Coastal Appeals (CA) Overlay District due to its location between the first public road and the sea. Following the Final Local Action by the City (either Planning Commission action or City Council on appeal), the Project will be subject to a 10-working day California Coastal Commission (CCC) appeal period, during which time the City's Final Local Action could be appealed to the CCC. No appeal fee is required for projects located within the CA Overlay.

The project is not subject to the payment of the City's Development Impact Fees as the project does not involve the addition of any new commercial/industrial square footage or residential units. The project may however be subject to mitigation fees from other agencies including the Carpinteria Unified School District, the Carpinteria-Summerland Fire Protection District, the Carpinteria Sanitary District and the Carpinteria Valley Water District.

The adopted revised Conditions of Approval for the project are attached to this letter for your records. A separate copy of the last page of the Conditions of Approval is also attached. Please sign and return this page to the Community Development Department. Should you have any questions or need further information regarding this action letter or the project, please feel free to contact me.

Sincerely,

Nick Bobroff, Director
Community Development Department
NickB@carpinteriaca.gov / (805) 755-4407

Attachment: Adopted Planning Commission Resolution with Attachments

cc: Ryan Jones, Chevron
Luis Perez, MRS Environmental, Inc.
IDAG members
Project file, 21-2128-DP/CDP

RESOLUTION NO. PC-25-001

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CARPINTERIA APPROVING DEVELOPMENT PLAN AND COASTAL DEVELOPMENT PERMIT NO. 21-2128-DP/CDP FOR THE CHEVRON CARPINTERIA OIL AND GAS FACILITY DECOMMISSIONING PROJECT LOCATED AT 5619, 5663, 5675 AND 5731 CARPINTERIA AVENUE, CARPINTERIA, CALIFORNIA 93013. APNs: 001-170-003, 004, 014, 020, 021, 022, 023

REQUESTED BY CHEVRON WEST COAST DECOMMISSIONING PROGRAM

WHEREAS, the Planning Commission of the City of Carpinteria has considered an application for a Development Plan and Coastal Development Permit filed by Chevron West Coast Decommissioning Program on October 25, 2021; and

WHEREAS, the application was subsequently deemed complete and accepted by the City as being consistent with the applicable submittal requirements on March 8, 2022; and

WHEREAS, the Planning Commission has conducted a noticed public hearing and received evidence regarding the application for the Development Plan and Coastal Development Permit; and

WHEREAS, in accordance with the California Environmental Quality Act, an Environmental Impact Report (EIR) dated April 2025 has been prepared for the project and has been noticed and subject to public review as required under CEQA; and

WHEREAS, the Planning Commission has reviewed the policies of the General Plan/Coastal Plan and the Zoning Code standards that are relevant to the project.

NOW, THEREFORE, THE PLANNING COMMISSION HEREBY RESOLVES AS FOLLOWS:

1. The Environmental Impact Report (EIR) dated April 2025 prepared for the Project, as amended (tables 5.2 and ES.3), has been reviewed by the City, reflects the City's independent judgment and analysis, and is certified as having satisfied the procedural and statutory requirements of the California Environmental Quality Act (CEQA).

2. The Development Plan/Coastal Development Permit is approved for the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative Project making the findings outlined in Exhibit 1.

3. The Development Plan and Coastal Development Permit is approved for the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative Project consistent with the plans

shown in Exhibit 2 and subject to the project conditions of approval set forth in Exhibit 3.

PASSED, APPROVED AND ADOPTED this 5th day of May 2025, by the following vote:

AYES: **COMMISSIONERS:** Benefield, La Fevers, Moyer, VanAntwerp

NOES: **COMMISSIONER(S):**

ABSENT: **COMMISSIONER(S):**

ABSTAIN: **COMMISSIONER(S):** Allen

John Moyer, Vice-Chair

ATTEST:

Nick Bobroff, Secretary

I hereby certify that the foregoing Resolution was duly and regularly introduced and adopted at a regular meeting of the Planning Commission of the City of Carpinteria held the 5th day of May 2025.

EXHIBIT 1: FINDINGS FOR APPROVAL

PLANNING COMMISSION HEARING
PROJECT NO. 21-2128-DP/CDP
May 5, 2025

Chevron Carpinteria Oil and Gas Decommissioning Project

FINDINGS PURSUANT TO GOVERNMENT CODE, LOCAL COASTAL PLAN, GENERAL PLAN, AND TITLE 14 OF THE CARPINTERIA MUNICIPAL CODE

1.0 Administrative Findings

The Planning Commission hereby incorporates by reference as though set forth in full all Community Development Department staff reports and attachments thereto presented to the Planning Commission and all comments made or received either orally or in writing at the public hearings on this project and the associated Environmental Impact Report.

1.1 Procedures

Pursuant to the California Coastal Act, the Administrative Regulations of the California Coastal Commission and the City of Carpinteria's ("City") Local Coastal Program, it has been found that the process for public review of the subject Local Coastal Development Permit has been properly conducted as follows:

a. An application for a Development Plan and Coastal Development Permit was submitted on October 25, 2021, and deemed complete and accepted by the City as being consistent with the applicable submittal requirements on March 8, 2022. Said application and all related material have been available for public review at City offices since the date of submittal.

b. The application has been evaluated and found to conform to the applicable zone districts and to be consistent with the City's Coastal Land Use Plan, the Interpretive Guidelines of the California Coastal Commission and the California Coastal Act.

c. The project has been reviewed by the City's Planning Commission at a duly noticed public hearing which included, but is not limited to, mailed notice to all property owners within 300 feet of the subject property, residents within 100 feet of the property and publication in the local newspaper, the Coastal View News.

2.0 California Environmental Quality Act

2.1 Introduction

The Planning Commission for the City of Carpinteria (City) considers and relies on the Final Environmental Impact Report (EIR; State Clearinghouse Number 022080025) for the Chevron Carpinteria Oil and Gas Decommissioning Project in determining whether to carry out the project. The Final EIR consists of the Draft EIR, responses to comments on the Draft EIR, a list of persons and agencies commenting on the Draft EIR, a Mitigation Monitoring and Reporting Program, and technical appendices. The City has received, reviewed, considered, and relied on the information contained in the Final EIR, as well as information provided at hearings and submissions of testimony from official participating agencies, the public, and other agencies and organizations. Furthermore, the Final EIR reflects the lead agency's independent judgment and analysis.

Section 15091 of the State California Environmental Quality Act (CEQA) Guidelines (14 California Code of Regulations [CCR]) and Section 21081 of the Public Resources Code (PRC) require a lead agency to adopt findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must find that:

- *Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;*
- *Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or*
- *Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.*

Title 14 CCR Section 15091(b) requires that the City's findings be supported by substantial evidence in the record. Accordingly, the lead agency's record consists of, but is not limited to the following, which are located at the City of Carpinteria Community Development Department, Carpinteria, California:

- *Documentary and oral evidence, testimony and staff comments and responses received and reviewed by the Lead Agency during public review and the public hearings on the Chevron Carpinteria Oil and Gas Decommissioning Project.*
- *The Chevron Carpinteria Oil and Gas Decommissioning Project Final Environmental Impact Report (April 2025).*

In addition to making a finding for each significant impact, if the lead agency approves a project without mitigating all of the significant impacts, it must prepare a statement of overriding considerations, in which it balances the benefits of the project against the unavoidable environmental risks. The statement of overriding considerations must explain the social, economic, or other reasons for approving the project despite its environmental impacts (14 CCR

15093, PRC 21081).

2.2 Procedures

This document contains the findings and statement of overriding considerations for the approval of the Project and expressly reflects the City's independent review and judgment (refer to Section 9). This document incorporates by reference the Final EIR. The Planning Commission hereby incorporates by reference as though set forth in full all Community Development Department staff reports and attachments thereto presented to the Planning Commission and all comments made or received either orally or in writing at the public hearings on this project.

The EIR, Project, and other portions of the administrative record constitute the record of proceedings in compliance with PRC Section 21081.6(a)(2) and State CEQA Guidelines Section 15091(e) and are available for review at:

City of Carpinteria, Community Development Department
5775 Carpinteria Avenue
Carpinteria, California 93013
Contact: Nick Bobroff

Having received, reviewed and considered the foregoing information, as well as any and all information in the record, the Planning Commission of the City of Carpinteria hereby makes these Findings pursuant to, and in accordance with, PRC Section 21081.

The Final EIR was prepared in compliance with CEQA and State CEQA Guidelines. In accordance with Section 15121 of the State CEQA Guidelines, the purpose of the Final EIR is to serve as an informational document for the public and City decision makers. The Final EIR contains a project-level environmental review that fulfills the requirement of a project-level EIR. As defined in State CEQA Guidelines Section 15161, a project-level EIR:

> *…examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation.*

On August 1, 2022, the City, as the Lead Agency, issued a Notice of Preparation (NOP) to inform the general public and agencies that an EIR would be prepared for the Project and to solicit comments on environmental issues to be addressed in the document. The public scoping comment period was extended by 30 days and closed on September 30, 2022. Comments received in response to the NOP were used to further refine the scope of the analysis and the technical studies in this EIR. Written comments received in response to the NOP are provided in Appendix D with an indication of specific EIR sections where topics related to individual comments are addressed.

The NOP was also submitted to the California Office of Planning and Research (State Clearinghouse) to officially solicit participation in determining the scope of the EIR. Information requested and input provided during the NOP comment period regarding the scope of the EIR are included in the EIR.

The City of Carpinteria issued a Draft EIR on November 30, 2023. The public comment period on the Draft EIR ran through January 31, 2024. The City of Carpinteria held a public comment meeting on December 18, 2023.

The public comments received on the Draft EIR were reviewed and responded to as required by CEQA and the CEQA Guidelines. This Final EIR has been prepared, incorporating all of the comments received, written responses to received comments, and the Draft EIR, along with any changes to the Draft EIR that resulted from the comments received.

The document and the Notice of Completion (NOC) were distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A Notice of Availability (NOA) was distributed to agencies, community stakeholders, and individuals. The NOA informed them of where they could view the document and how to comment. An electronic copy of the document was also posted online, and hard copies were made available by request. The NOA was filed with the County Clerk.

Responses to each written and verbal comment that the City received during the comment period on the Draft EIR are included in the Responses to Comments section of the Final EIR. The Draft EIR and Responses to Comments collectively comprise the Final EIR for the project.

The EIR has been reviewed by the City's Planning Commission at a duly noticed public hearing which included, but is not limited to, mailed notice to all property owners within 300 feet of the subject property, residents within 100 feet of the property and publication in the local newspaper, the Coastal View.

2.3 California Environmental Quality Act Findings

1. The Final EIR dated April 2025 was presented to the Planning Commission and all voting members of the Commission have reviewed and considered the EIR prior to approving this project. The EIR reflects the independent judgment of the Planning Commission and is adequate for this proposed project.

2. The Planning Commission finds and certifies that the Final EIR dated April, 2025 constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA. The Planning Commission further finds and certifies that the Final EIR has been completed in compliance with CEQA.

3. The documents and other materials which constitute the record of proceeding upon which this decision is based are in the custody of the Planning Commission Secretary located at 5775 Carpinteria Ave, Carpinteria, CA.

4. Findings That Certain Impacts Are Less Than Significant. (see discussion below)

The City determined, based upon the threshold criteria for significance, the environmental analysis presented in the Final EIR, and the comments received by the public on the Draft EIR, no substantial evidence was submitted to or identified by the City which indicated that the project would have a significant impact on the following environmental areas. For details on the specific impacts, please see the respective Final EIR sections.

LESS THAN SIGNIFICANT (CLASS III) ENVIRONMENTAL EFFECTS OF THE PROJECT

Issue Area and Impact	Impact Number	Description	Project Impact Class	Location in Final EIR
Aesthetics	AE.1	Scenic Vistas	III	Final EIR Section 4.1
	AE.2	Scenic Resources	III	
	AE.3	Visual Quality and Character	III	
Air Quality	AQ.1	Standards	III	Final EIR Section 4.2
	AQ.3	Toxic Air Emissions	III	
Biological Resources	BIO.4	Movement of Wildlife	III	Final EIR Section 4.3
	BIO.6	Conservation Plan Conflicts	III	
Geology and Soils	GEO.1	Earthquake Fault	III	Final EIR Section 4.5
	GEO.5	Expansive Soils	III	
	GEO.6	Septic Tanks	III	
Hazards and Hazardous Materials	HAZ.3	Hazards Proximate to Schools	III	Final EIR Section 4.7
	HAZ.4	Site Contamination	III	
	HAZ.5	Proximity to Airport	III	
	HAZ.6	Impair Emergency Response	III	
Hydrology and Water Quality	WR.2	Groundwater Supply	III	Final EIR Section 4.8
	WR.3	Drainage Patterns	III	
	WR.4	Pollutants	III	
	WR.5	Control Plans	III	
Land Use and Planning	LUP.1	Divide a Community	III	Final EIR Section 4.9
	LUP.2	Policy Conflict	III	
Noise	N.1	12-Hour CNEL	III	Final EIR Section 4.10
	N.3	Vibration	III	
	N.4	Airport Noise Conflicts	III	
	REC.2	Rec Facilities	III	

LESS THAN SIGNIFICANT (CLASS III) ENVIRONMENTAL EFFECTS OF THE PROJECT

Issue Area and Impact	Impact Number	Description	Project Impact Class	Location in Final EIR
Transportation	T.1	Policy Conflicts	III	Final EIR Section 4.11
	T.2	VMT	III	
	T.3	Traffic Hazards	III	
	T.4	Emergency Access	III	
Other	All	Ag, Energy, Mineral, Housing, Public Services, Recreation, Utilities, Wildfire	III	Final EIR Section 4.13
			III	

5. Findings that Certain Impacts are Mitigated to Insignificance by Conditions of Approval. (See discussion below)

Class II impacts are significant but can be mitigated to a level of insignificance by measures identified in the EIR. When approving a project with Class II impacts, the decision-makers must make findings that changes or alterations to the project have been incorporated that reduce the impacts to a less than significant level.

This section presents the project's significant environmental impacts and feasible mitigation measures. State CEQA Guidelines Section 15091 (14 CCR) and PRC Section 21081 require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must make the following Finding:

1. Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
3. Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

Each of these findings must be supported by substantial evidence in the administrative record. The City determined and makes the finding, based upon the environmental analysis presented in the Final EIR and the comments received by the public on the Draft EIR, that the following impacts can be fully avoided or reduced to a less-than-significant level through the incorporation of feasible mitigation measures into the project, as identified in the Final EIR. For each of these identified impacts, changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR. For details on the specific impacts, please see the respective Final EIR sections.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Aesthetics	A.4	Night Lighting	II	A.4: Beach/Nearshore Night Lighting Minimization	Final EIR Section 4.1	The Project would create a temporary new source of substantial light or glare which would adversely affect day or nighttime views in the area. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure A.4 which requires that light be shielded and directed inward. By adhering to these measures, the night lighting impacts would be reduced to a less than significant level.
Air Quality	AQ.2	Odors	II	AQ.2: Odor control and Purging Plan	Final EIR Section 4.2	The Project may result in potentially significant odor emission impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure AQ.2 which requires use of degassing systems and other odor control tactics. By adhering to these measures, the odor impacts would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Biological Resources	BIO.1	Listed Species	II	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys Bio.1d: Fencing Bio.1e: Worker Education & Awareness Plan Bio.1f: Marine Wildlife Contingency & Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring & Protection Bio.1h: Wildlife Relocation Monitoring	Final EIR Section 4.3	The Project may result in potentially significant impacts to special status species. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.1(a)-(h) which implement various measures including retaining qualified biologists, adopting management plans, utilizing constructive boundaries, and providing awareness programs. By adhering to these measures, the impacts to these species would be reduced to a less than significant level.
	BIO.2	ESHA	II	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance		The Project could have a potentially significant impact on riparian habitat as a result of the temporary decommissioning activities. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.2(a)-(c) which implement various measures including avoiding impact areas, onsite mitigation, and preparation of a pre-decommissioning survey. By adhering to these measures, the impacts to these riparian areas would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	BIO.3	Wetlands	II	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Requirements Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Program		The Project could have a potentially significant impact on protected wetlands as a result of the temporary decommissioning activities. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.3(a)-(c) which implement various measures including permit compliance, preparation of a coastal wetlands mitigation and monitoring plan, and preparation of a pre-decommissioning survey. By adhering to these measures, the impacts to these wetlands would be reduced to a less than significant level.
	BIO.5	Policy Conflicts	II	Bio.5: Tree Removal Mitigation		The Project could have a potentially significant impact due to the removal of 62 non-native trees. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Bio.5 which requires trees be replaced. By implementing this requirement, the impacts to these riparian areas would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Cultural and Tribal Cultural Resources	CUL.1	Known Resource CA-SBA-6	II	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials	Final EIR Section 4.4	The Project could have a potentially significant impact on archaeological resources due to grading and excavation work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a)-(f) which implement various measures including implementation of an awareness plan, cultural resource monitoring, avoidance of exclusion zones, curation of project materials, and preparation of a resource management plan. By adhering to these measures, the impacts to these archaeological resources would be reduced to a less than significant level.
	CUL.2	Human Remains	II	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery		The Project could potentially disturb human remains due to grading and excavation work. To mitigate against this potentially significant impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.2(a) and (b) which require the applicant to retain an on-call forensic anthropologist and follow specified procedures if human remains are discovered. By adhering to these measures, these impacts would be reduced to a less than significant level.
Geology and Soils	GEO.2	Erosion	II	Geo.2: Erosion Control Best Management Practices	Final EIR Section 4.5	The Project could result in substantial soil erosion due to the removal of contaminated soil. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.2 which requires that erosion control best management practices be followed. By adhering to these measures, this impact would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	GEO.3	Sedimentation	II	Geo.2: Erosion Control Best Management Practices		The Project could result in potentially significant siltation impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.2 which requires that erosion control best management practices be followed. By adhering to these measures, this impact would be reduced to a less than significant level.
	GEO.4	Unstable Bluffs	II	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removal Geo.4c: Bluff Stabilization Following Pipeline Removal		The Project's proposal to remove pipelines located in Carpinteria Bluffs could result in potentially significant erosion impacts. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Geo.4(a)-(c) which require that adoption of a stabilization plan, adherence to various measures to stabilize the bluff during pipeline removal, and adherence to various measures to stabilize the bluff following pipeline removal. By adhering to these measures, this erosion impact would be reduced to a less than significant level.
	GEO.7	Paleontological/Geologic Feature	II	Measures Cul.1a-f		The Project could have a potentially significant impact on paleontological resources due to grading and excavation work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a)-(f) which implement various measures including implementation of an awareness plan, cultural resource monitoring, avoidance of exclusion zones, curation of project materials, and preparation of a resource management plan. By adhering to these measures, the impacts to these resources would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
Climate Change and GHG	GHG.1	GHG Emissions	II	GHG.1: GHG Emissions Reductions	Final EIR Section 4.6	The Project could have a potentially significant greenhouse gas emissions associated with the decommissioning activities. To mitigate against these impacts, changes or alterations have been required for the Project—specifically mitigation measure GHG.1 which requires reductions and/or offsets for emissions and preparation of a GHG reduction and reporting plan to track and enforce these. By adhering to these measures, these impacts would be reduced to a less than significant level.
	GHG.2	Plans	II	GHG.1: GHG Emissions Reductions		The Project could result in an exceedance of County GHG emission thresholds and thus conflict with an applicable plan regulating emissions. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure GHG.1 which requires reductions and/or offsets for emissions and preparation of a GHG reduction and reporting plan to track and enforce these. By adhering to these measures, this impact would be reduced to a less than significant level.
Hazards and Hazardous Materials	HAZ.1	Routine Operations	II	Haz.1: Contaminated Soil Handling	Final EIR Section 4.7	The Project could have a potentially significant impact associated with handling of contaminated soils. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.1 which requires preparation of and adherence to a contaminated soil handling management plan. By adhering to these measures, these impacts would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	HAZ.7	Wildland Fires	II	HAZ.7: Fire Response Planning		The Project could have a potentially significant impact associated with fire risk during the demolition or remediation phase of the Project. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.7 which requires implementation of various fire response planning measures including hydrant access, water inventories, availability of response equipment and equipment requirements. By adhering to these measures, these impacts would be reduced to a less than significant level.
Noise	N.2	Hourly Average Ambient Noise	II	N.2a: Construction Noise Control Measures N.2b: Nighttime Activities	Final EIR Section 4.10	The Project could have a potentially significant noise impact associated with temporary noise from decommissioning activities. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measures N.2(a) and (b) which require implementation of construction noise reduction measures such as installation of noise barriers, and prohibition of nighttime onshore activities. By adhering to these measures, these noise impacts would be reduced to a less than significant level.
Tribal Cultural Resources	TCR.1	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b	Final EIR Section 4.12	The Project could have a potentially significant impact on tribal-cultural resources due to decommissioning work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a) and (b) described above. By adhering to these measures, the impacts to these tribal-cultural resources would be reduced to a less than significant level.

ENVIRONMENTAL EFFECTS OF THE PROJECT THAT HAVE BEEN MITIGATED TO A LESS THAN SIGNIFICANT LEVEL (CLASS II)

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Finding Analysis
	TCR.2	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b		The Project could have a potentially significant impact on tribal-cultural resources due to decommissioning work. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measures Cul.1(a) and (b) described above. By adhering to these measures, the impacts to these tribal-cultural resources would be reduced to a less than significant level.

6. Findings that Certain Unavoidable Impacts are Mitigated to the Maximum Extent Feasible. (See discussion below).

Class I impacts are significant and unavoidable. To approve a project resulting in Class I impacts, the CEQA Guidelines require decision makers to make findings of overriding consideration that "...specific legal, technological, economic, social, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR...".

This section presents the project's significant environmental impacts and feasible mitigation measures. State CEQA Guidelines Section 15091 (14 CCR) and PRC Section 21081 require a lead agency to make findings for each significant environmental impact disclosed in an EIR. Specifically, for each significant impact, the lead agency must find that:

1. Changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effects identified in the Final EIR;
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by that agency; or
3. Specific economic, social, legal, technological, or other considerations, including provision of employment opportunities for highly trained workers, make the mitigation measures or project alternatives identified in the Final EIR infeasible.

Each of these findings must be supported by substantial evidence in the administrative record. This section identifies impacts that can be reduced, but not to a less-than-significant level, through the incorporation of feasible mitigation measures into the project, and which therefore, remain significant and unavoidable, as identified in the Final EIR. Where adoption of feasible mitigation measures is not effective in avoiding an impact or reducing it to a less than significant

level, the feasibility of adopting alternatives to the project is considered below. For details on the specific impacts, please see the respective Final EIR sections.

Significant and unavoidable Class I impacts would occur related to biological resources, hazardous materials and risk of upset, and hydrology and water resources.

SIGNIFICANT UNAVOIDABLE (CLASS I) ENVIRONMENTAL EFFECTS OF THE PROJECT FOR WHICH SUFFICIENT MITIGATION IS NOT AVAILABLE

Issue Area	Impact Number	Description	Project Impact Class	Mitigation Measures	Location in Final EIR	Findings Analysis
Biological Resources	BIO.7	Accidental Oil Spills	I	Bio.7: Oil Spill Contingency Plan	Final EIR Section 4.3	The Project could have a potentially significant impact on biological resources if an accidental oil spill were to occur. To mitigate against this impact, changes or alterations have been required for the Project—specifically mitigation measure Bio.7 was adopted which requires preparation of an oil spill contingency plan that includes, among other things, measures to minimize impacts to special status species and riparian habitat. Even with adherence to these measures, the potential impacts to these riparian areas would remain significant and unavoidable.
Hazardous Materials & Risk of Upset	HAZ.2	Accidental Releases	I	Haz.2a: Spill Response Planning Haz.2b: Asbestos and Lead Planning	Final EIR Section 4.7	The Project could have a potentially significant impact associated with accidental release of hazardous materials. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure Haz.2(a) and (b) which require various measures to address spill response planning and asbestos and lead exposure minimization planning. Even with adherence to these measures, these impacts would remain significant and unavoidable.
Hydrology & Water Resources	WR.1	Surface Water Quality Standards	I	WR.1: Stormwater Pollution Prevention Plan	Final EIR Section 4.8	The Project could have a potentially significant impact to water quality associated with accidental release of petroleum hydrocarbons into marine water. To mitigate against this risk, changes or alterations have been required for the Project—specifically mitigation measure WR.1 which requires preparation of and adherence to a stormwater pollution prevention plan. Even with adherence to these measures, these impacts would remain significant and unavoidable.

7. Findings Regarding Significant Irreversible Environmental Changes and Findings Regarding Growth-Inducing Impacts. (See discussion below)

State CEQA Guidelines §15126.2(c) requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Such significant irreversible environmental changes may include the following:

- *Use of non-renewable resources during the initial and continued phases of the project that would be irreversible because a large commitment of such resources makes removal or non-use unlikely;*
- *Primary impacts and, particularly secondary impacts (such as highway improvement that provides access to a previously inaccessible area) that generally commit future generations to similar uses; or*
- *Irreversible damage which may result from environmental accidents associated with the project.*

As discussed in Section 6 of the Final EIR, there are no significant irreversible environmental changes/effects.

State CEQA Guidelines Section 15126.2(d) requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth. Generally speaking, a project may be considered growth inducing if it results in one or more of the five conditions identified below:

1. *Induces population growth;*
2. *Induces economic expansion;*
3. *Establishes a precedent setting action (e.g., an innovation, a radical change in zoning or general plan designation);*
4. *Results in development or encroachment in an isolated or adjacent area of open space (i.e., being distinct from "infill" development); or*
5. *Removes an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).*

As per Section 6 of the Final EIR, there are no growth inducing impacts associated with the Project.

8. Findings that Identified Project Mitigations/Alternatives are not Feasible. (See discussion below).

Because the project will result in significant and unavoidable environmental impacts as identified above, the City must consider the feasibility of any environmentally superior alternatives to the

project, as proposed. The City must evaluate whether one or more of these alternatives could substantially lessen or avoid the unavoidable significant environmental effects.

Specifically, where significant impacts are identified, State CEQA Guidelines Section 15126.6(a) requires EIRs to consider and discuss alternatives to the proposed actions:

> (a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

State CEQA Guidelines Section 15126.6(b) states the purpose of the alternatives analysis:

> (b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

State CEQA Guidelines Section 15126.6(c) describes the selection process for a range of reasonable alternatives:

> (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a "rule of reason" that requires the EIR to set

forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

As such, the environmental superiority and feasibility of each alternative to the project is considered in this section. Specifically, this section evaluates the effectiveness of these alternatives in reducing the significant and unavoidable impacts of the project.

As required by State CEQA Guidelines Section 15126.6(c), the selection of alternatives for this EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The following alternatives were considered but eliminated from further analysis by the City due to one or more of these factors:

- Removal of Offshore Facilities only Alternative;
- Removal of Onshore Facilities only Alternative; and
- Limitations on Trucking Destinations Alternative.

The following alternatives were carried forward for in depth analysis:

- No Project Alternative;
- Full Removal of Facilities Alternative

In addition, in response to comments made on the Draft EIR, an additional alternative, the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative, has been added to the Final EIR and is found to be the environmentally preferred alternative. The analysis for each alternative is provided below.

No Project Alternative

CEQA requires an evaluation of the No Project Alternative so that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project.

According to CEQA Guidelines §15126.6(3)(B), for a development project the No Project Alternative is the circumstances under which the Project does not proceed. If disapproval of the Project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. CEQA defines the "no project" as:

[W]hat would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services (15126.6).

Under the No Project Alternative, the Project as proposed would not occur and the Applicant would not conduct the Site demolition and remediation activities proposed by the Project. The CPF would remain at the Site in a shut-down status and facilities would not be decommissioned. This would include onshore facilities, and offshore pipelines. It should be noted that remediation activities may still be required to proceed since the U.S. EPA and SBCEHS would likely continue to require that these facilities be cleaned up of contaminated materials and appropriately remediated. However, without the removal of above-ground equipment and tanks, it would be difficult to fully access all areas targeted for excavation and remediation.

Ability to Achieve Project Objectives: This Alternative would fail to meet all project objectives.

Feasibility: This alternative may not be feasible because there are regulatory requirements for clean up of the site which may be difficult to obtain if the infrastructure is not removed as under the Project.

Finding: As the removal of the contaminated soil would be a regulatory requirement, and leaving the aboveground infrastructure would make this difficult and potentially infeasible, this alternative would not achieve most of the Project objectives related to removing aboveground facilities and subsequently achieving soil remediation.

Full Removal of Facilities Alternative

The Project as proposed by the Applicant excludes a number of facilities that are not slated for decommissioning for a variety of reasons described below. Under this alternative all oil and gas facilities within the property and all related offshore facilities that can be addressed would be fully decommissioned. Those facilities would include the plugging and abandonment of the seven wells that exist within the Project Site; removal and remediation of naturally occurring petroleum hydrocarbons which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area; and removal of former Platforms Hazel and Hilda pipeline bundle, which include two, 8-inch diameter and one, 6-inch diameter abandoned pipelines that come from offshore, across the beach near the western extent of the Project area and a 36-inch diameter corrugated metal vault located at the edge of the bluffs.

Plugging and abandonment of the wells has not been required by CalGEM at this point. Removal of the pipelines from Platforms Hazel and Hilda was not required by the State Lands Commission, who was the Lead Agency for the removal of the Platforms in 1997.

Ability to Achieve Project Objectives: This Alternative could meet all project objectives.

Feasibility: Comments from the Applicant and others pointed out that the hydrocarbon seeps and historic wells are not required to be intervened by any regulatory agency and are not feasible under the existing Project. The California Coastal Commission has stated that the seeps are a chronic natural occurrence that is part of the environmental setting and would not be considered an impact. The seeps, which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area, are natural environmental features resulting from geological conditions. The California Coastal Commission commented that leaving the seeps undisturbed in their natural state would not be inconsistent with the Coastal Act. (California Coastal Commission letter, 1/31/2024). Previous attempts to cement over seeps in southern California have resulted in seeps moving around the cement cap. (Chevron letter, 1/31/2024). Abandonment of the historic wells on the property that were installed and operated by others are not proposed to be affected by the Proposed Project decommissioning activities and as such, are not considered the Applicant's responsibility. The California Geologic Energy Management Division (CalGEM) advised that the property owner would be responsible for well reabandonment if the property owner proposed construction that would prevent or impede well access, but the Proposed Project is not projected to build over or impede access to the historic wells. (CalGEM letter, 2/1/2024). CalGEM has determined that there is no regulatory requirement for Chevron to plug or abandon the wells as part of the Proposed Project.

Finding: This alternative was found infeasible due to issues discussed above.

Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative

The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative consists of all the components of the Proposed Project together with removal of the onshore and nearshore portion of the former Platforms Hazel and Hilda pipeline bundle, which was abandoned in place as approved by the State Lands Commission during the platform removal project in 1997. This alternative is a revised version of the Full Removal of Facilities Alternative described above but does not include removal and remediation of naturally occurring hydrocarbon seeps, plugging and abandonment of seven existing wells within the Project Site, or removal of the former Platforms Hazel and Hilda pipeline bundle further from shore, beyond a depth of 30 feet of water.

Ability to Achieve Project Objectives: The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would achieve the basic objectives of the Project by accomplishing the components of the original Proposed Project. In addition, removing the former Platforms Hazel and Hilda pipeline bundle through the bluffs would prevent future erosion and avoid the

pipelines becoming a burden on the public if removal is necessary in the future.

Feasibility: This alternative is feasible and there are no impediments for this alternative to move forward

Finding: Although the various alternatives have similar levels of impacts, the reduction of long-term geological impacts to the bluffs from elimination of the additional pipelines under the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative results in this alternative being the environmentally superior alternative.

9. Although the approval of this project allows the occurrence of significant effects identified in the final EIR, which effects are not substantially mitigated, the benefits of the project outweigh such effects and a Statement of Overriding Considerations is adopted pursuant to Sections 15091 through 15093 of Title 14 of the California Code of Regulations, as follows:

Pursuant to CEQA Section 21081(b) and State CEQA Guidelines Section 15093, the City has balanced the benefits of the proposed project against the unavoidable adverse impacts associated with the proposed project and has adopted all feasible mitigation measures. The City has also examined alternatives and has determined that adoption and implementation of the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative, is the most desirable, feasible, and appropriate action.

The Final EIR for the project identifies the following significant and unavoidable impacts of the project:

- Bio.7. Accidental Oil Spills. This is related to the potential for oil spills to occur during the execution of the project and affecting biological resources.
- Haz.2. Accidental Releases. This is related to the potential for oil spills to occur during the execution of the project.
- WR.1. Water Quality Standards. This impact is related to the potential of an oil spill in reaching or affecting water resources.

For projects which would result in significant environmental impacts that cannot be avoided, CEQA requires that the lead agency balance the benefits of these projects against the unavoidable environmental risks in determining whether to approve the projects. If the benefits of these projects outweigh the unavoidable impacts, those impacts may be considered acceptable (State CEQA Guidelines Section 15093[a]). CEQA requires that, before adopting such projects, the public agency adopt a Statement of Overriding Considerations setting forth the reasons why the agency finds that the benefits of the project outweigh the significant environmental effects caused by the project. This statement is provided below.

Statement of Overriding Considerations. The Planning Commission has identified the following overriding economic, social, and other public benefits of the project, which are additional reasons that the significant and unavoidable impacts identified in the Final EIR can be found acceptable, and hereby adopts them as a statement of overriding considerations:

a. The Project provides for a number of short and long-term beneficial effects to the area as a result of cleaning up an old, defunct oil and gas facility and offshore appurtenances.
b. The Project involves removal of a coastal-dependent industrial facility and associated infrastructure and site restoration to natural topography and vegetation. The Project would result in additional open space, natural habitat, and coastal recreation opportunities in the Project area. The Project would remove pipelines from the Project Site, bluff area, beach, nearshore and offshore areas out to three miles. No permanent development or structures are proposed in connection with the Project.
c. Although the Project would have some short-term impacts, its long-term beneficial effects are also discussed in the Final EIR Section 5.5 and summarized below:

    - Air Quality: operational criteria pollutant emissions, toxic emissions and odors would be reduced in the long term with removal of facilities and contamination, but would occur in the short term as a result of the decommissioning activities;
    - Hazardous Materials: Due to an elimination of contaminated soils and elimination of potential sources of an oil spill in the future by removal of facilities and upset hazards hazardous materials would be reduced in the long term but would occur in the short term related to decommissioning activities;
    - Aesthetics: The Project would include aesthetic benefits by having old and dilapidated structures removed from the coastal zone.
    - Biological Resources: Biological resources would be left undisturbed after the temporary impact from decommissioning activities.
    - Land Use: Land Use impacts are beneficial in the long term due to the elimination of an industrial land use on the Carpinteria Bluffs.
    - Geological Impacts: Geological impacts would be reduced in the long term by removing pipelines from the bluffs that could cause long term erosion, but would occur in the short term related to decommissioning activities;
    - Transportation: Traffic would be reduced in the long term due to the elimination of truck trips from the facility, but would occur in the short term related to decommissioning activities;

Accordingly, the City finds that the project's adverse, unavoidable environmental impacts are outweighed by these considerable benefits.

10. Adoption of Environmental Reporting and Monitoring Program. The project description, and

conditions of approval, with their corresponding permit monitoring requirements, are hereby adopted as the monitoring program for this project to ensure compliance during project implementation.

Pursuant to State CEQA Guidelines Section 15091(a)(1), the City finds that implementation of the mitigation measures specified in the Final EIR would substantially lessen the significant environmental effects resulting from the implementation of the project. These mitigation measures have been required in or incorporated into the project. In accordance with State CEQA Guidelines Sections 15091(d) and 15097, which require a public agency to adopt a program for reporting or monitoring required changes or conditions of approval to substantially lessen significant environmental effects, the Mitigation Monitoring and Reporting Program provided in the Final EIR is hereby adopted as the mitigation monitoring and reporting program for this preferred project.

3.0 Development Plan Findings

Pursuant to Carpinteria Municipal Code §14.68.030(9), prior to approving or approving with conditions a development plan, the planning commission or city council shall determine that all of the following criteria have been met:

1. *The proposed development is in conformance with the provisions of the applicable zoning district, Local Coastal Plan and implementation programs, and General Plan*.

   The Project involves removal of a defunct coastal-dependent industrial facility and associated infrastructure and site restoration to natural topography and vegetation. The Project would result in additional open space, natural habitat, and coastal recreation opportunities in the Project area. Decommissioning of inoperable oil and gas facilities and improvements is consistent with the types of uses anticipated in the coastal-dependent industrial land use designation and corresponding zone district. Expansion of open space, habitat, and public recreation opportunities on the bluffs are also generally consistent with the City's vision for the Carpinteria Bluffs area.

2. *The proposed development is sited and designed to avoid risks to life and property due to geologic, flood, or fire hazards and that the proposed density of development is consistent with these objectives.*

   The Project is a decommissioning of an existing facility and as such it cannot occur anywhere else. Compliance with required project mitigation measures and required regulatory agency permits will help to ensure decommissioning and remediation work is completed in the safest manner possible. As such, the proposed development is sited, designed and conditioned to avoid risks to life and property due to geologic, flood, or fire hazards.

3. *The proposed development will not cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.*

   The Project includes the demolition of oil and gas processing equipment, tanks, pipelines, and other structures onsite, remediation of contaminated soils, and restoration with native vegetation. The Project will have some temporary impacts, and have the potential for oil spills to occur; however, the long term beneficial effects of the Project outweigh the temporary impacts by removing an industrial unsightly facility from the coastal Carpinteria bluffs. Compliance with required project mitigation measures and required regulatory agency permits will help to ensure decommissioning and remediation work is completed in a manner that is most protective of the environment and surrounding sensitive resources.

4. *The proposed development will not conflict with any recorded easements acquired by the public at large for access through the property or use of the property or any easements granted to any public agency or required as a condition of approval.*

   The proposed decommissioning Project will not conflict with any recorded easements acquired by the public at large for access through the property or use of the property or any easements granted to any public agency. While the Project may have some impacts on public use of nearby trails, these impacts would be temporary and not significant as discussed in the FEIR. No new easements are required as a project condition of approval.

5. *The proposed development will not adversely affect necessary community services and values including but not limited to traffic circulation, sewage disposal, fire protection, water supply, and police protection.*

   The proposed Project will not adversely affect community services and values including but not limited to traffic circulation, sewage disposal, fire protection, water supply, and police protection. The Project is temporary in nature and will not result in adverse impacts to, or additional demands placed upon these community services.

6. *The proposed development will not be detrimental to the peace, health, safety, comfort, convenience, property values, or general welfare of the neighborhood.*

   The proposed Project will have some temporary effects during the decommissioning activities; however, those impacts are temporary in nature and once the project is completed, neighbors and surrounding land users will be able to enjoy the absence of a dilapidated industrial facility within the coastal bluffs. Appropriate mitigation measures developed as part of the Project EIR have been incorporated into the adopted conditions of approval, and would further the reduce the severity of these temporary impacts to the maximum extent feasible.

4.0 Coastal Development Permit Findings

Pursuant to the California Coastal Act, the Administrative Regulations of the California Coastal Commission and the City's Local Coastal Program, it has been found that the permit requested may be issued based on the following findings:

1. *The proposed development is in conformity with the City's certified Local Coastal Program.*

   The Project Site is currently designated Coastal Dependent Industry (CDI) and Recreation (REC) by the General Plan/Coastal Land Use Plan. The CDI land use category identifies areas for industrial uses that are coastal dependent, such as aquaculture and pipeline/gas processing facilities which support offshore oil industries. Under the Carpinteria Municipal Code (CMC), the Project Site is zoned to the corresponding Coastal Industry District (M-CD). The onshore Project Site is currently developed with the Carpinteria Processing Facility, open space, a former marketing terminal, and Marine Spill Response Corporation (MSRC) yard/offices north of the Union Pacific Railroad (UPRR) right-of-way (ROW). The onshore Project area south of the UPRR ROW is currently utilized for the Casitas Pier parking lot and offshore pipeline landings/bluff crossings. The Project includes demolition of all existing structures onsite and subsurface remediation of soils. The Project Site will be backfilled, final graded, and planted with native vegetation to match existing contours. No additional structures will be constructed as part of the Project. The proposed decommissioning Project is consistent with the City's certified Local Coastal Program. The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

PLANNING COMMISSION HEARING

PROJECT 21-2128-DP/CDP

MAY 5, 2025

EXHIBIT 3: CONDITIONS OF APPROVAL

CHEVRON CARPINTERIA OIL AND GAS FACILITY DECOMMISSIONING PROJECT

The Conditions set forth in this permit affect the title and possession of the real property that is the subject of this permit and shall run with the real property or any portion thereof. All the terms, covenants, conditions and restrictions herein imposed shall be binding upon and inure to the benefit of the owner (applicant, developer), his or her heirs, administrators, executors, successors and assigns. Upon any sale, division or lease of real property, all the conditions of this permit shall apply separately to each portion of the real property and the owner (applicant, developer) and/or possessor of any such portion shall succeed to and be bound by the obligations imposed on the owner (applicant, developer) by this permit.

PROJECT DESCRIPTION

1. This Development Plan and Coastal Development Permit is based upon and limited to compliance with the project description, the hearing exhibits (Attachment A, Exhibit 2 to the staff report dated May 5, 2025) and conditions of approval set forth below. Any deviations from the project description, exhibits or conditions must be reviewed and approved by the City for conformity with this approval. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above-described approval will constitute a violation of permit approval.

   The project description is as follows:

   The Project proposes to demolish and remove the Carpinteria Processing Facility (CPF) including but not limited to the onshore portions of the CPF (Onshore Facility), and State Waters Offshore Pipelines and complete remediation of impacted soils and groundwater at the Facility. Remediation is proposed to comply with levels established in a Remedial Action Plan (RAP) that will be reviewed by the Santa Barbara County Public Health Department, Environmental Health Services (SBCEHS), Regional Water Quality Control Board (RWQCB), and United States Environmental Protection Agency (U.S. EPA). The Project proposal assumes the most stringent clean up levels for the purpose of determining soil excavation and truck trip estimates and therefore a maximum amount of remediation activities (e.g., truck trips, Site activities). The Applicant states remediation efforts will be performed along with preservation of existing Site resources, including mature trees and bluffs, and in coordination with Site constraints including buffer zones adjacent to the Union Pacific Railroad (UPRR) right-of-way (ROW). The most stringent clean up levels would also

result in greater flexibility for development on the Site meeting the most rigorous standards (e.g., unrestricted land use).

Decommissioning and remediation of the Facility will include the following activities:

Onshore Facility

- *Idling and removal of all existing surface and subsurface equipment, piping, and structures within the Facility;*
- *Removal of concrete foundations, asphalt, oil spray, and road base within the Facility;*
- *Excavation/remediation of any impacted soils underlying the Facility in accordance with the Facility's Remedial Action Plan (RAP) and RAP Addendums, and appropriate regulatory guidance (once approved);*
- *Recycling/disposal of all materials removed from the Project Site(s); and*
- *Restoration of the portions of the Site in accordance with the Site Restoration Plan (once approved).*

Beach Crossing and State Waters Offshore Pipelines

- *Pig and flush State Waters Offshore Pipelines in preparation for removal;*
- *Removal of State Waters Offshore Pipeline segments out to 3-nmi state waters limit;*
- *Removal of nearshore beach crossing pipeline segments;*
- *Recycling/disposal of all materials removed from the Project Site(s); and*
- *Onshore restoration in accordance with the Site Restoration Plan (once approved).*

The Project Site includes the Facility, as well as the State Waters Offshore Pipelines and utilities leading into the Project Site from state waters, as further described below. Within the onshore portion of the Project Site, a number of operational areas/plant areas have been identified that contain idle structures, vessels, and piping proposed for demolition and remediation. The state waters offshore portion of the Project Site contains two primary pipeline and utility bundles that come to shore and lead into the Onshore Facility. Proposed activities within each area are listed below.

Onshore Facilities and Proposed Activities

- *Main Plant Area (MPA) – Surface and subsurface facilities demolition, and soil remediation;*
- *Chevron Pipeline Area (CPA) - Surface and subsurface facilities demolition, and soil remediation;*
- *Former Marketing Terminal Area (FMTA) – Surface facilities demolition and soil remediation;*
- *Former Nursery Area (FNA) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels;*
- *Shop and Maintenance Area – Surface and subsurface facilities demolition and soil remediation;*
- *MSRC Lease Area – Surface facilities demolition and soil remediation;*

- *Peninsula Area - Soil remediation in coordination with SoCalGas facility demolition and City of Carpinteria skate park development;*
- *Buffer Zone Area (BZA)/Drainage Area No. 4 (DA4) – Vacant. No activities proposed. Previously remediated to acceptable cleanup levels; and*
- *Gravel Portion of Pier Parking Lot/Former Sand Blast Area (FSBA) – Surface and subsurface facilities demolition, and soil remediation/subsurface pipeline removal/abandonment in place.*

State Waters Offshore Pipelines and Proposed Activities

- *Platform Gail and Grace Pipeline Bundle and 10-inch Oil Pipeline – Removal from top of bluff to 3-nmi state waters limit; and*
- *Marketing and Marine Terminal Pipeline Bundles – Removal offshore through top of bluff. Onshore pipelines will be abandoned in-place.*
- *Removal of the onshore and nearshore portion of the former Platforms Hazel and Hilda pipeline bundle.*

MITIGATION MEASURES FROM THE CERTIFIED PROJECT ENVIRONMENTAL IMPACT REPORT (EIR)

2. **Aesthetics. Mitigation Measure A-4. Beach/Nearshore Night-Lighting Minimization.** No unobstructed or unshielded beam of exterior lighting shall be directed towards any area outside the exterior boundaries of the property. Project lighting in beach/nearshore work areas shall be as low an intensity as allowed by safety requirements and located, designed, and equipped to provide shielding and minimize lighting visible from residential areas. **Plan Requirements/Timing**: A beach/nearshore lighting plan shall be submitted to the City and approved prior to initiation of any beach or nearshore Project activities. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City.

3. **Air Quality Mitigation Measure AQ.2. Odor Control and Purging Plan.** The Applicant shall submit an Odor Control and Purging Plan that includes the use of degassing systems for equipment and pipeline purging operations that may be required and includes proactive measures to eliminate or reduce objectionable odors emanating from construction and decommissioning activities, and an action plan if odor issues or complaints arise.

4. **Biology. Mitigation Measure Bio.1a. Agency Approvals.** Prior to commencement of any construction or decommissioning activities, the Applicant shall obtain compliance with the USFWS, NOAA Fisheries, and CDFW for components of the Project that have the potential to directly or indirectly impact federal or state-listed terrestrial or marine plant and animal species in the form of take permits/authorizations or written documentation from the USFWS, NOAA Fisheries, and CDFW that the proposed Project would not result in take of these species, or would not otherwise adversely affect these species. Should a take permit/authorization be required, or conditions imposed by the USFWS, NOAA Fisheries,

and CDFW to ensure that no take would result from the proposed Project or impacts are avoided and minimized, the Applicant shall implement all the terms and conditions of the USFWS/NOAA Fisheries/CDFW permits, authorizations, or recommendations to the satisfaction of these agencies. This EIR does not authorize, approve, or otherwise support a "take" of any listed species as defined under the federal or California Endangered Species Acts. The Applicant shall notify the City staff immediately of any potential violation of the federal and/or California Endangered Species Act.

5. **Mitigation Measure Bio.1b Habitat Restoration/Revegetation Plan.** The Preliminary Restoration/Revegetation Plan (Padre 2021e) indicates each Operational Area will be restored or, at a minimum, revegetated for erosion control, to the extent required to support future land use designations. The current plan shall be revised, or specific restoration plans (including restoration of topography and substrates in unvegetated areas) shall be developed for various Project components, including restoration and mitigation of special status species habitat (including trees, coastal wetlands shoreline/sandy beach habitat, and offshore habitat). The final plan(s) approved by the City shall be fully implemented to address adverse impacts to sensitive species habitats. Plans for restoration and revegetation shall be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. The Final Restoration/Revegetation Plan(s) shall identify the assumptions used to develop the proposed restoration strategy, timing for plan implementation, and performance standards to ensure special status species habitat has been restored. The Plan(s) shall include at a minimum:

    1. Ground Disturbance. Construction activities shall avoid or minimize impacts to special status species habitats, where feasible. All temporary disturbances including parking areas, lay down, storage areas, and other sites of surface disturbance shall be located in previously disturbed areas or in annual grassland and shall be mowed, versus graded, where feasible to keep root structures in place; thereby, facilitating future revegetation.
    2. Quantification of disturbance acreage and final restoration and mitigation requirements, including restoration of habitat for special status species such as shoreline/sandy beach foraging habitat for snowy plover and habitat for marine plant species. The Applicant shall conduct post-construction surveys of the entire Project Site in coordination with the City and/or City's representative to quantify actual acres of disturbance to special status species habitat. At a minimum, a 1:1 mitigation ratio will be required to restore areas temporarily disturbed to pre-construction conditions and replace habitats permanently affected by the Project (final mitigation ratio will be determined during Project permit and approval process).
    3. Description and map of location of restoration/revegetation and compensatory mitigation sites and assessment of appropriate reference areas to help guide restoration and mitigation efforts.
    4. Soils within any disturbed area shall be stabilized through use of soil coating mulch, dust palliatives, compaction, reseeding, or other approved methods.
    5. List of plant species to be used, sources of local seed, cuttings, container sizes, and seeding rates, and planting schedule. On-site seed collection should be initiated in the

near future to accumulate sufficient propagule material for subsequent use in future years. On-site vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes (CDFW 2022).

6. Restoration objectives should include providing special habitat elements where feasible to benefit key wildlife species. These physical and biological features can include (for example) retention of woody material, logs, snags, rocks and brush piles (CDFW 2022).
7. A description of the irrigation methodology.
8. Measures to control non-native vegetation on site.
    a. Weed control treatments shall include legally permitted manual, mechanical, and/or chemical (e.g., herbicide) methods approved for application. Manual and mechanical are the preferred control methods, with the application of herbicides only under extreme circumstances and with the approval of regulatory agencies. The timing of the weed control treatment would be determined for each plant species with the goal of controlling populations before they start producing seeds. Consultation with a City-approved, qualified wildlife biologist or botanist would be required prior to implementing weed control treatments in order to develop strategies that avoid adverse effects on plants and wildlife.
    b. Where manual or mechanical weed control methods are used, plant debris would be disposed of at an appropriate off-site location.
    c. Herbicide application would comply with state and federal laws and regulations under the prescription of a Pest Control Advisor and would be implemented by a Licensed Qualified Applicator.
    d. All seed stock and straw materials used during Project construction and restoration phases shall be guaranteed weed-free. All imported fill used for site surface restoration will undergo standard weed control treatments prior to collection and import of soil to the Project Site. Upon completion of final contouring, follow-up weed control treatments described above in Mitigation Measure Bio 1b, 8(a) will be implemented to ensure the post-project control of non-native vegetation establishment.
9. A detailed qualitative monitoring program including specific, measurable success criteria and suitable monitoring periods to ensure the successful establishment of all plant communities and trees. Monitoring of restoration areas shall extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought (minimum five years). Monitoring shall demonstrate a positive trend for native species cover, diversity, and abundance, and a negative trend for non-native species cover with no further manipulation of the Project Site occurring during this period. If manipulation of the Project Site is still occurring (replacing dead plants, irrigation, weeding) then this is still considered the installation period and shall not be used as monitoring data to determine success. The monitoring period shall start after the installation period has been completed and the Project Site is not being actively manipulated, as manipulation of the Project Site skews any data collection toward prematurely meeting success criteria that might not have been met had the Project Site been left alone (CDFW 2022).

10. And identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

Plan Requirements/Timing: The Final Restoration/Revegetation Plan(s) shall be approved by the City, and other permitting agencies if required, prior to issuance of Project permits, and implemented on schedule in accordance with the approved Plan including hydroseeding exposed soils prior to each rainy season. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

6. **Mitigation Measure Bio.1c Pre-construction Wildlife Surveys and Protection.**
    1. Monarch butterflies:
        a. Monarch butterfly habitat assessment: A qualified biologist shall be retained to conduct a habitat assessment a minimum of 60 days prior to Project implementation, including tree trimming activities. The qualified biologist shall assess habitat following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (Xerces 2017) or other protocols with prior approval by CDFW. The habitat assessment shall be conducted in consultation with site monitors with knowledge of the history of the grove to determine primary roosting trees and other structural components or flora integral to maintaining microclimate conditions. These plants shall be marked and avoided during project activities.
        b. Monarch Butterfly Management Plan: A Monarch Habitat Management Plan shall be developed, in consultation with CDFW, prior to Project implementation. The information gathered during the monarch habitat assessment shall be used to develop the plan following the guidance in the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (Xerces 2017) or other protocols with prior approval by CDFW. The plan shall be adaptive, with specific goals and objectives, continued monitoring, and refinement over time. The plan shall include as an objective that the baseline population/individual occurrence numbers shall not decrease over three years due to Project activities and shall include adaptive and contingent measures to ensure this objective is met. The plan shall consider removal or trimming of hazard trees, removal or trimming of trees to create appropriate solar radiation patterns, a long-term tree planting strategy, and shrub and forb management. Trees within core overwintering habitat shall not be cut or trimmed except for specific grove management directed by the plan. Management activities in groves shall only be conducted between March 16 and September 14, in coordination with the qualified biologist (Marcum & Darst 2021). If construction, tree removal, or tree trimming needs to occur within 500 feet of monarchs, the plan needs to include prohibition of activities that create excessive dust, vibration, or physical disturbance; and suitable setbacks from the edge of the groves to preserve habitat quality.
        c. Monarch butterfly Take Avoidance: If monarch butterflies are detected within the Project area, monarch overwintering habitat shall be avoided by

delineating and observing a no-disturbance buffer of at least ½ mile from the outer edge of the habitat (Marcum & Darst 2021). If buffers cannot be maintained, then consultation with CDFW and the USFWS will occur to determine how to implement ground and tree-disturbing activities and avoid take.

Plan Requirements/Timing: The Monarch Butterfly Management Plan shall be submitted to the City and CDFW and approved prior to the initiation of work and implemented for all work between September 14 and March 15. The applicant will consult with CDFW and USFWS prior to removal of trees or shrubs within ½ mile of overwintering Monarch groves. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

2. Raptors: A City-approved wildlife biologist shall conduct a pre-construction survey of the entire Project Site to determine the presence of nesting raptors in trees surrounding the proposed Project Site. The City-approved wildlife biologist shall conduct a survey of all trees within 1,000 feet of all tree trimming or tree removal activities to determine the presence of nesting raptors in trees surrounding the proposed work areas. The biologist shall then, in coordination with the City, determine suitable buffer areas between the nests and construction or tree trimming activities if activities are scheduled to begin during the typical raptor nesting season (February 15 through August 1).
3. Nesting Bird Survey. If Project activities are scheduled between February 1 and August 31 (general nesting bird season), nesting bird surveys shall be completed by a qualified biologist no more than seven days prior to the start of work. The survey area shall include a minimum of 500 feet from all planned ground disturbance and vegetation removal including tree trimming or removals. If any active nests are discovered within or adjacent to work limits, an buffer of 500 feet for raptors and 250 feet for other birds shall be established to protect the nest until a qualified biologist has determined that the nest is no longer active and/or the young have fledged.

   Plan Requirements/Timing: A compliance plan shall be submitted to the City and approved prior to the initiation of work and issuance of grading permits, and implemented for all work between February 1 and August 31. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

4. Pre-Decommissioning Marine Biological Dive Surveys. No more than 60 days prior to commencement of offshore activities, a City-approved, qualified marine biologist shall conduct a pre-decommissioning marine biological survey of the sensitive habitat areas adjacent to the nearshore pipeline corridors. If sensitive habitats such as seagrass, surfgrass, hard substrate, or kelp beds are identified, anchor locations shall be relocated to avoid impacts to these protected habitats. If seagrass is identified, post-decommissioning surveys will be conducted to verify seagrass beds had not been impacted by Project related activities. If seagrass beds have been impacted, Chevron shall be required to prepare and implement eelgrass restoration as part of the Habitat

Restoration and Revegetation Plan under Bio.1b that shall be approved by City. All eelgrass surveys and mitigation shall adhere to California Eelgrass Mitigation Policy. Adjustments to decommissioning methodologies in sensitive habitats may be made to the greatest extent feasible to reduce impacts to these areas. In addition, remote operated vehicle or multi-beam geophysical surveys shall be conducted at each anchor location to confirm the absence of hard-bottom habitat.

Plan Requirements/Timing: The results of the pre-decommissioning marine biological dive surveys shall be submitted to the City, the CDFW, and NOAA Fisheries for review and fully implemented prior to the issuance of grading permits. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

7. **Mitigation Measure Bio.1d Fencing.** To minimize the amount of disturbance to wildlife habitat and important or sensitive biological resources, construction boundaries will be fenced with highly visibly fence and staked. Wildlife safe highly visible construction fencing shall be installed to identify the limits of grading/disturbance, which would reduce potential human trampling outside of the construction limits and minimize the potential spread of non-native weeds or invasive plant species. Wildlife-safe construction fencing and flagging shall remain in place during construction and maintained and replaced as needed. The City-approved qualified biological monitor shall ensure environmentally sensitive areas within or near the construction zones are clearly marked for avoidance in the field. These areas include, but are not limited to, occurrences of special-status plants, trees to be avoided, sensitive vegetation communities or wildlife species adjacent to work areas, and jurisdictional resources. Project boundaries shall be clearly marked with fencing or staking that shall be replaced as needed and removed upon Project completion. Vehicles and equipment access shall follow marked routes. Indiscriminate vehicle travel shall not be allowed.
   Plan Requirements/Timing: The detailed fencing plan, showing the location of required fencing installation, and timing of fencing removal, shall be submitted to the City for review and approval prior to the issuance of grading permits and depicted on all final Project plans. The fence shall be installed prior to the start of ground disturbance activities. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

8. **Mitigation Measure Bio.1e Worker Education and Awareness Plan.** Qualified City approved biologists shall provide an educational program for all personnel prior to initiation of any construction activities, including, but not limited to, facility demolition and remediation, tree trimming and tree removals, bluff pipeline removal, and offshore pipeline removal. The natural history, including sensitive species and habitats, shall be described as well as the current status, reasons for decline, and protection measures relevant to the species and habitat. The plan shall include the following:
   1. Point of contact information shall be provided for workers to report sightings of sensitive biological resources in the vicinity as described in the WEAP.

2. Photographs of sensitive biological resources, general provisions and protections of the federal and state Endangered Species Act, and review of measures to be implemented during the construction activities to avoid and minimize adverse effects to sensitive species.
3. Identification of Project activities that require biological surveys and monitoring for resource protection, as described in Project permits.
4. Description of the markers for active bird nests, areas or trees marked for avoidance, or other mitigation areas, so that they shall know these are not to be disturbed without a biological monitor present.
5. Workers shall be informed not to litter. All trash shall be contained during the day, picked up, and removed from the construction sites at the end of each day. During Project activities, all trash that may attract predators shall be properly contained, removed from the Project Site, and disposed of regularly. Following construction, all trash and construction debris would be removed from work areas.

Plan Requirements/Timing: The Worker Education and Awareness Plan shall be submitted to the City and approved prior to the issuance of grading permits. All workers, contractors, and visitors shall receive training prior to entering the Project area and performing any work. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor. The Applicant shall provide copies of the training attendance sheets to the City as a record of compliance with this measure on a monthly basis.

9. **Mitigation Measure Bio.1f. Marine Wildlife Contingency and Training Plan Implementation.** A Marine Wildlife Contingency and Training Plan shall be developed and implemented during all offshore Project activities to reduce or eliminate potential impacts of the proposed decommissioning activities on marine mammals and birds (marine wildlife). The Plan shall include monitoring vessel transit, anchoring, underwater surveys and pipe removal operations by a City-approved, designated monitor trained to detect marine wildlife. The monitor shall have the authority to halt marine operations that may adversely affect marine wildlife or marine habitat.
   Prevent Introduction of Non-Native Aquatic Species (NAS). All Project vessels shall be in compliance with California's state ballast management regulations.
   Plan Requirements/Timing: The Marine Wildlife Contingency and Training Plan shall be submitted to the City and approved prior to the issuance of grading permits. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated third party marine wildlife monitor.

10. **Mitigation Measure. Bio.1g Harbor Seal Rookery Monitoring and Protection.** The Carpinteria Harbor Seal Rookery Monitoring and Protection Plan (Padre 2021d; Appendix C-6) approved by the City shall be fully implemented during all Project-related activities within 1,000 feet of the haulout/rookery. A summary of the avoidance and protection measures included in the Carpinteria Harbor Seal Rookery Monitoring and Protection Plan are presented below (see Appendix C-6 for full text).

1. The bluff and onshore pipeline removal shall be scheduled to occur between June 1 and November 30 to avoid pupping season. Project decommissioning activities within 1,000 feet of the rookery (except for areas within the 1,000 feet north of the railroad tracks) shall be scheduled to avoid pupping season (December 1 through May 31). Project activities shall be scheduled during low tide windows and limited to daylight hours only to maximize visibility and ensure safety during repair work.
2. The size of the work zone shall be minimized and placement of visual screen barriers between the work area and seal rookery. In addition, noise minimization measures shall also be employed including low volume radio transmissions, timing concrete demolition to be performed outside of the pupping season and using noise dampening shields.
3. Prior to the initiation of the Project, personnel shall be given marine wildlife sensitivity training. This training shall include specifics regarding Project restrictions, operational limits, and ingress/egress methodology. The crews shall be instructed to wear neutral colored clothing, and to move slowly during ingress/egress as well as minimize hand gestures or signals during work activities to avoid startling the harbor seals.
4. The number of on-beach personnel and the amount of equipment shall be minimized and completely removed every day, and stored on the paved parking lot above the beach and away from the bluff edge.
5. The Project shall employ Best Management Practices (BMPs), including removal of trash and debris.
6. An approved Marine Wildlife Monitor (MWM) shall be employed and shall be responsible for briefing all Project personnel on the protective measures prior to initiating work each day and shall delineate the equipment and personnel ingress/egress corridors. The MWM shall remain onsite during all work to ensure that activities are limited to the immediate work area and shall have the authority to stop all operations to avoid harassment of seals. Harassment is defined by the sudden flushing of seals into the water, potentially separating nursing cow and pup pairs, or any abnormal or aggressive behaviors. The monitor shall record, photograph, and report compliance. The MWMs shall work directly with Seal Watch volunteers present at the overlook to coordinate direct observation of harbor seal activities during Project related activities. The MWM shall ensure that the Project is in compliance with all necessary permits, communication with appropriate agencies and Carpinteria Seal Watch Coordination, and that BMPs are followed.
7. The MWM shall count and record the number and species of all marine mammals that are within the Project area (within visual range along the beach) and take photographs of the Project Site and access route. At regular intervals during the day, the monitor shall record the number and location of harbor seals and document the decommissioning activities. Changes in the behavior or number of individuals and/or their proximity to the Project Site prior to, during, and immediately following noise-producing activities shall be recorded and photographed. The type of activity that promulgated changes in harbor seal abundance or behavior shall be recorded as well as notes on the weather, non-project human activities, and observations of avifauna and marine mammals outside the Project boundaries. Any activity that are considered

to be harassment of a marine mammal, that activity shall be stopped immediately, and the Chevron Project Manager and NOAA Fisheries representative shall be contacted immediately via cell phone.

8. Data and observations that were recorded during the removal activities shall be presented in tabular and text format in a technical report that shall also include copies of photographs. The report shall summarize the Project decommissioning activities as well as protective measures and their effectiveness. The technical report shall be provided to the regulatory agencies within 30 days of completion of the final beach or bluff decommissioning activities.

Plan Requirements/Timing: The Carpinteria Harbor Seal Rookery Monitoring and Protection Plan shall be approved by the City prior to the issuance of Grading permits, and fully implemented during all Project-related activities within 1,000 feet of the haulout/rookery. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

In addition to the above, noise mitigation measure N.2a will reduce noise impacts to wildlife species by requiring noise reduction with noise walls and temporary noise blankets, and implementation of mitigation measures WQ-1 would also protect biological resources from potential indirect impacts associated with degraded water quality.

11. **Mitigation Measure Bio.1h Wildlife Relocation Monitoring.** A City approved wildlife biologist shall conduct pre-disturbance surveys of the work area throughout each day of construction activities. The qualified biological monitor shall be on-site prior to and during all ground disturbing activities to move out of harm's way any special status species or other wildlife of low mobility that would be injured or killed by Project-related activities including any vegetation removal or tree trimming activities. The qualified biologist shall obtain all appropriate state and federal permits to handle any sensitive species potentially present in the Project area.
Plan Requirements/Timing: The name and qualifications of all wildlife biologists shall be provided to City and CDFW and approved prior to the initiation of any Project-related work. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated wildlife monitor.

12. **Mitigation Measure Bio.2a ESHA Impact Avoidance.** Impacts to ESHA areas shall be avoided and minimized. Areas that support ESHA or other Sensitive Natural Communities shall be marked on Project plans and identified on the ground using construction fencing, or other means, to identify them as exclusion zones to all personnel and equipment (mitigation measure Bio.1d).

13. **Mitigation Measure Bio.2b Scrub Mitigation.** Areas that support Menzie's golden bush scrub and lemonade berry scrub that are removed or damaged during construction shall be mitigated onsite at a minimum 2:1 ratio, which shall be incorporated into the Final Habitat Restoration/Revegetation Plan (MM Bio.1b).
Plan Requirements/Timing: The City shall review and approve the Final Habitat Revegetation/Restoration Plan to ensure compliance with compensatory mitigation

requirements, as needed. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated biological monitor.

14. **Mitigation Measure Bio.2c Essential Fish Habitat Avoidance.** No more than 60 days prior to commencement of offshore activities, a pre-decommissioning marine biological survey of nearshore pipeline corridors shall be conducted. All eelgrass surveys shall adhere to the California Eelgrass Mitigation Policy. Anchor pre-plots shall be developed and implemented to avoid kelp beds, rocky habitats, surfgrass, and seagrass beds. Anchors shall be lowered vertically to the bottom and retrieved using a crown line as needed to avoid kelp beds, rocky reefs, surfgrass, and seagrass beds.
Plan Requirements/Timing: The results of the pre-decommissioning marine biological survey and anchor pre-plots shall be submitted to the City, CDFW, and NOAA Fisheries for review and fully implemented prior to pipeline removal. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the designated marine wildlife monitor.

15. **Mitigation Measure Bio.3a Permitting Compliance with USACE, RWQCB, and CDFW Regulations.** The Applicant shall provide the City a copy of the Clean Water Act Section 401 and 404 permits and CDFW Streambed Alteration Agreement, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary. The Applicant shall implement all mitigation measures and conditions contained within Project permits for impacts upon determination of jurisdiction and permit issuance by agencies.
Plan Requirements/Timing: The Applicant shall submit copies of the CWA Section 401 and 404 permits, CDFW Streambed Alteration Agreement, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary to the City prior to initiation of Project activities. City staff will review permit requirements and ensure compliance, as appropriate.

16. **Mitigation Measure Bio.3b Wetlands Pre-construction Survey.** A City-approved wetlands biologist shall conduct a pre-construction survey of the Project Site to determine the potential for sediments or potential pollutants to flow off-site through surface water drainage ditches and determine the need for setbacks from open drainage ditches in Project areas. If the drainage ditches support wetland vegetation at the time of the survey as determined by the City-approved wetlands biologist, a 100-foot minimum setback shall be required.

17. **Mitigation Measure Bio.3c Coastal Wetlands Mitigation and Monitoring Plan.** A Coastal Wetlands Mitigation and Monitoring Plan shall be prepared by the Applicant and approved by the City and other resource agencies, as applicable, and fully implemented within 120 days of the completion of soil remediation and shall include the following:
    1. The permanent loss of 0.17 acre associated Wetland W-1 shall be replaced on a minimum 4:1 basis by expansion of existing wetlands in the Drainage No. 4 Area.
    2. The temporary loss of 0.1 acre within W-5 shall be mitigated at a minimum 4:1 ratio that shall include periodic monitoring to ensure the wetland naturally revegetates to pre-disturbance conditions, identification of contingency measure should natural

revegetation not proceed as expected, as well as establishment or enhancement of wetland habitat elsewhere on the Project Site.

Compensatory wetland replacement shall not occur in any area (e.g., the buffer zone) that will be revegetated with other vegetation under MM Bio.1.b.9. A monitoring program that extends for a sufficient amount of time to ensure that new habitat is established, self-sustaining, and capable of surviving drought (minimum five years). Restoration Monitoring reports shall be submitted on a quarterly basis, or as needed, describing the methods and materials used for implementation of restoration. Annual reports will be submitted describing the status of the restoration efforts identifying whether plants are becoming established or if there are any problem areas, including where additional erosion control, weed control, or reseeding/replanting efforts may be needed. The monitoring report shall also note whether restoration sites appear to be developing sufficiently that performance criteria would be met within the projected time frame. Recommendations for additional monitoring and/or restoration treatments shall be provided if it appears that success criteria would not be met in any restoration or mitigation areas. The Annual monitoring report shall be submitted to the City and other oversight agencies for review.

Plan Requirements/Timing: A coastal wetlands mitigation plan shall be prepared by the Applicant, approved by the City, and fully implemented within 120 days of the completion of soil remediation. Monitoring: The coastal wetlands mitigation plan shall include methodology to assess the success of wetlands mitigation. Monitoring and reporting shall be conducted on an annual basis to ensure the success of wetlands mitigation.

18. **Mitigation Measure Bio.5 Tree Removal Mitigation.** The Applicant shall implement mitigation for all identified decommissioning-related tree impacts per current City of Carpinteria requirements for tree mitigation and replacement. Trees shall be required to be replaced at a ratio appropriate to ensure infill of any gap created in the windrow and with a tree type and size to be approved by the City. Replacement trees that fail to survive within the first five years after planting shall be replaced. Planting of native trees is required as are programs for phased removal and replacement of tamarisk windrows in favor of native tree windrows. The replacement trees must be monitored for seven years after planting.

19. **Mitigation Measure Bio.7 Oil Spill Contingency Plan.** An Oil Spill Contingency Plan (OSCP) shall be prepared that addresses protection of sensitive biological resources and revegetation of any areas disturbed during an oil spill or cleanup activities. The OSCP shall, at a minimum, include:
    1. Close coordination with CDFW's Office of Spill Prevention and Response (CDFW-OSPR). In the event of an oil spill, CDFW-OSPR and the U.S. Coast Guard or the U.S. EPA will form a unified command.
    2. The California Office of Emergency Response (CAL-OES) and National Response Center (NRC) shall be notified if a spill occurs (Cal-OES: 1-800-852-7550 and NRC: 1-800-424-8802).
    3. A list of Oil Spill Response Organizations (OSROs), including Marine Spill Response Corporation (MSRC) and Patriot Environmental.
    4. Measures to prevent spilled oil from reaching the harbor seal rookery.

5. Measures to minimize impacts on native vegetation and wildlife habitats, plant and animal species, and environmentally sensitive habitat areas during response and cleanup operations, including integration of a biologist on the initial response team to assist with identification of sensitive resources within areas affected by the oil spill and response, and to quantify impacts resulting from oil spill control and cleanup.
6. Low-impact site-specific techniques such as hand-cutting contaminated vegetation and using low-pressure water flushing from boats shall be specified in the OSHMP to remove spilled material from particularly sensitive wildlife habitats, such as coastal estuaries (i.e., Carpinteria Salt Marsh, Carpinteria Creek mouth), because procedures such as shoveling, bulldozing, raking, and drag-lining can cause more damage to a sensitive habitat than the oil spill itself. The OSCP shall evaluate the non-clean up option for ecologically vulnerable habitats such as coastal estuaries.
7. Spill response personnel shall be adequately trained for response in terrestrial environments, and spill containment and recovery equipment shall be maintained in full readiness. Inspection of equipment and periodic drills shall be conducted at least annually and the results evaluated so that spill response personnel are familiar with the equipment and with the Project area including sensitive onshore biological resources.
8. Stipulations for development and implementation of site-specific habitat restoration plans and other site-specific and species-specific measures appropriate for mitigating impacts on local populations of sensitive wildlife species and to restore native plant and animal communities to pre-spill conditions. Ingress and egress points, staging areas, and material stockpile areas that avoid sensitive habitat areas shall be identified. The OSCP shall include species- and site-specific procedures for collection, transportation and treatment of oiled wildlife, particularly for sensitive species.
9. Procedures for timely re-establishment of vegetation that replicates the habitats disturbed (or, in the case of disturbed habitats dominated by non-native species, replaces them with suitable native species) including: measures preventing invasion and/or spread of invasive or undesired plant species; restoration of wildlife habitat; restoration of native communities and native plant species propagated from local genetic sources including any sensitive plant species; and replacement of trees at the appropriate rate.
10. Monitoring procedures and minimum success criteria to be satisfied for restoration areas shall be determined. The success criteria shall consider the level of disturbance and condition of the adjacent habitats. Monitoring shall continue for three to five years, depending on habitat, or until success criteria are met. Appropriate remedial measures, such as replanting, erosion control or control of invasive plant species, shall be identified and implemented if it is determined that success criteria are not being met.

20. **Cultural Resources. Mitigation Measure Cul.1a Cultural Resources Management Plan.** Prior to ground disturbance, the Cultural Resources Management Plan (CRMP) shall be submitted to the City for review and approval. The CRMP shall be prepared by an archaeologist retained by Chevron that meets the minimum professional qualifications

standards (PQS) set forth by the Secretary of the Interior (SOI). Native American representatives will review and comment on the CRMP. The purpose of the CRMP is to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b).The CRMP shall include, at a minimum:

1. A description of the roles and responsibilities of cultural resources personnel (including Native American representatives), and the reporting relationships with Project construction management, including lines of communication and notification procedures. The CRMP should also include a "contact list" providing the names of important Project personnel, the agency they represent and/or their role, and their contact information;
2. Description of how the monitoring shall occur;
3. Description of frequency of monitoring (e.g., full-time, part time, spot checking);
4. High-resolution maps for use by cultural resource monitors to identify locations of intact cultural deposits;
5. Description of what resources are expected to be encountered;
6. Description of circumstances that would result in the halting of work;
7. Description of procedures for halting work on the site and notification procedures;
8. Procedures for the appropriate treatment of human remains;
9. Confidentiality of cultural information including location and data;
10. Description of artifact collection, retention/disposal, and curation policies, including a statement that all cultural materials retained will be curated in accordance with the requirements of an identified, qualified curatorial facility, and that Chevron shall be responsible for all expenses associated with the curation of the materials at the qualified curatorial facility. If cultural materials are found within "contaminated" soil, and those materials are collected, then will have to be cleaned before they can be curated. The CRMP should describe the process to clean any materials from "contaminated" soil; and
11. A description of monitoring reporting procedures including the requirement that reports resulting from the Project be filed with the Central Coast Information Center (CCIC) within one year of Project completion.

21. **Mitigation Measure Cul.1b Worker Cultural Resources Awareness Program**. A worker cultural resources awareness program shall be implemented for the Project. Prior to any ground-disturbing activity, Chevron shall provide an initial sensitivity training session to all Project employees, contractors, subcontractors, and other workers prior to their involvement in any ground-disturbing activities, with subsequent training sessions to accommodate new personnel becoming involved in the Project. The program may be conducted together with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to cultural resources are provided by a qualified archaeologist and Native American representative.

The awareness program shall address:

1. The cultural sensitivity of the Project Site and how to identify these types of resources;
2. The awareness program shall address the CRMP and roles and responsibilities of Project personnel.
3. Specific procedures to be followed in the event of an inadvertent discovery;
4. Safety procedures when working with monitors; and
5. Consequences in the event of noncompliance.

22. **Mitigation Measure Cul.1c Cultural Resources Monitoring.** Cultural resources monitoring shall be conducted during Project-related ground-disturbing activities for the purpose of identifying and avoiding impacts to cultural resources, consistent with the monitoring plan detailed in the CRMP. Monitoring shall be required for all ground disturbances, even ground disturbances in areas outside the CA-SBA-6 boundary. The monitoring shall be conducted under the supervision of a County-approved archaeologist and a Native American representative with minimum PQS set forth by the SOI. In the event of any inadvertent discovery of prehistoric or historic period archaeological resources during construction, all work within 50 feet of the discovery shall immediately cease (or greater or lesser distance as needed to protect the discovery as determined in the field by the Project archaeologist or Native American representative). The Applicant shall immediately notify the City of Carpinteria if there is any inadvertent discovery of prehistoric or historic period archaeological resources during construction. The Project archaeologist in consultation with the City and Native American representative shall evaluate the significance of the discovery prior to resuming any activities that could impact the site/discovery. If the discovery is prehistoric in nature, the Native American representative shall provide input as part of the evaluation. If the Project archaeologist, following consultation with the City and Native American representative, determines that the find may qualify for listing in the CRHR, the site and sufficient buffer area shall be avoided until data recovery excavation, is prepared, implemented, and funded by the Applicant. The program shall include reasonable efforts to preserve (avoid) unique cultural resources; the capping of identified unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources which the preferred option being preservation (avoidance). Work shall not resume until authorization is received from the City.

23. **Mitigation Measure Cul.1d Exclusion Zones.** Prior to the issuance of the construction Notice to Proceed, Chevron shall, to the extent feasible, ensure that all intact portions of CA-SBA-6 shall be avoided during ground disturbance. Once the high-resolution map is created (consistent with mitigation measure Cul.1a.1), an exclusion zone shall be placed around each intact portion of CA-SBA-6. An exclusion zone is a fenced area where construction equipment and personnel are not permitted. The exclusion zone fencing shall be installed (and later removed) under the direction of a County-approved archaeologist and a Native American representative and shall be placed 10 feet beyond the boundary of the defined area to avoid inadvertent damage during installation.

24. **Mitigation Measure Cul.1e Phase III Data Recovery Excavations.** Any potentially intact portions of CA-SBA-6 that will be impacted by the Project should first be mitigated with Phase III data recovery excavations prior to ground disturbance. The Phase III data recovery excavations shall be conducted under the direction of a research design and testing plan prepared by an archaeologist in coordination with a Native American representative that meets the PQS set forth by the SOI and may consist of a combination of Data Recovery Excavation Units (DREUs) and Shovel Test Probes (STPs).

25. **Mitigation Measure Cul.1f Curation of Project Materials.** Prior to the issuance of the construction Notice to Proceed, Chevron in consultation with the City and Native American representative shall choose a single accredited repository at which to curate all archaeological materials recovered from the Project Site. If materials are recovered from "contaminated" soils it should be mentioned that those materials will have to be cleaned prior to curation. The repository shall be located in southern California so that the materials are available locally to Tribal members and researchers and shall meet the standards provided in the California State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections. The preferred repositories should be in Santa Barbara, which are located at UCSB and the Santa Barbara Museum of Natural History. Chevron shall work with the identified local curatorial facility and the Native American representative to transfer curation of materials currently in their possession or currently housed at a non-local facility, to the agreed-upon accredited local repository such that the materials can be accessioned as a unified collection. Subsequently, materials transferred from a non-local facility may require evaluation using current analytic methods to re-analyze artifacts and faunal remains that were recovered from CA-SBA-6 during previous excavations. If it is determined that there is no southern California curation facility that can accommodate the entire CA-SBA-6 collection, other accredited facilities in the State of California may be considered, if agreed upon by the Native American representative.

26. **Mitigation Measure Cul.2a On-Call Forensic Anthropologist.** Previous cultural resources studies have documented the disturbed context of CA-SBA-6 within the Project Site; however, human remains and burials have been encountered. Thus prior to the issuance of the construction Notice to Proceed, Chevron shall retain a forensic anthropologist (or similar expert) to examine and positively identify bone fragments that are potentially human. The forensic anthropologist (or similar expert) may be able to positively identify bone fragments after reviewing photographs; however, a site visit may be necessary so the forensic anthropologist (or similar expert) can examine the bone fragments in-person and make a positive identification. The forensic anthropologist can be available in an on-call capacity and would not need to be present during all ground disturbance. Additionally, if numerous bone fragments are encountered during ground-disturbing activities, arrangements can be made for the forensic anthropologist to make regularly scheduled visits. Additionally, the following actions shall be taken:
    1. No further disturbance shall occur in the area of any found human remains until the City has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative.

2. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by Chevron or their representative in order to determine proper treatment and disposition of the remains.
3. Chevron or their representative shall notify the Native American representative of the identification of human remains.
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
5. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered.

27. **Mitigation Measure Cul.2b Human Remains Discovery.** If human remains are discovered, the following actions shall be taken:
    1. Chevron or their representative shall contact the City and County Coroner.
    2. No further disturbance shall occur in the area of the find until the County Coroner has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative.
    3. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by Chevron or their representative in order to determine proper treatment and disposition of the remains.
    4. Chevron or their representative shall notify the Native American representative of the identification of human remains.
    5. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
    6. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered.

28. **Geology. Mitigation Measure Geo.2 Erosion Control Best Management Practices.** Erosion Control Best Management Practices (BMPs), including temporary berms and sedimentation traps, silt fencing, straw bales (rice straw bales are preferrable), and sandbags shall be installed adjacent to excavations and other ground disturbance areas prior to work involving ground disturbance. The BMPs shall include regular maintenance and inspection of the berms and sedimentation traps. Soil should be kept damp during grading activities to reduce the effects of dust generation. All exposed graded surfaces shall be reseeded with native ground cover to minimize erosion.
    Plan Requirements/Timing: An Erosion Control Plan shall be submitted to the City and approved prior to any ground disturbance. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by a geologist.

29. **Mitigation Measure Geo.4a Bluff Stabilization Plan.** Areas immediately adjacent to the bluff face disturbed by removal of pipelines and related components shall be stabilized to avoid or minimize the potential for the Project to cause accelerated bluff retreat. As part of the Bluff Stabilization Plan, engineering studies shall be conducted to identify heavy equipment location and procedures for pipeline removal. Stabilization shall include backfill and compaction using suitable fill material, and revegetation with native species, and all other measures identified by a geotechnical engineer.
Plan Requirements/Timing: A bluff stabilization plan prepared by a geotechnical engineer including erosion controls, best management practices, maintenance, annual reporting, and City staff review of staging and construction plans, shall be submitted to the City and approved prior to any ground disturbance within 100 feet of the bluff face. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City.

30. **Mitigation Measure Geo.4b Bluff Stabilization During Pipeline Removals.** During the removal of over bluff pipeline, the following measures shall be implemented to reduce the potential bluff stability loss:
    - Equipment and personnel will maintain a safe distance from the bluff edge to ensure no excessive loading at the crest of the bluff topsoil.
    - Where applicable, removal of current bluff stabilization materials (i.e., concrete and rock riprap) shall be completed in a manner that avoids disturbance to adjacent undisturbed slopes.
    - Excavation of bluff top pipelines shall be conducted at a distance of 5 to 10 feet from the bluff edge, and the pipelines pulled in-line with the pipeline's existing alignment so as to avoid additional disturbance to adjacent undisturbed slopes.
    - All excavations and removals shall be monitored by a geotechnical engineer or geologist.

    Plan Requirements/Timing: Bluff stabilization measures shall be implemented during any ground disturbance within 100 feet of the bluff face. Monitoring: Implementation of this measure shall be monitored by the City and a geologist or geotechnical engineer.

31. **Mitigation Measure Geo.4c Bluff Stabilization Following Pipeline Removal.** Areas immediately adjacent to the bluff face disturbed by the removal of pipelines and related components shall be stabilized to avoid or minimize the potential for the proposed Project to cause accelerated bluff retreat. Stabilization may include:
    - Removal of all non-native materials following pipeline removal.
    - To the extent feasible, recontouring of the disturbed slopes to reflect the contours of adjacent undisturbed slopes.
    - Backfill and compaction of bluff top excavations using suitable fill material.
    - Redirection and management of bluff top surface drainage away from disturbance areas to minimize over the bluff top surface flows.
    - Revegetation of all bluff top disturbance areas.

Plan Requirements/Timing: A bluff stabilization shall be implemented immediately following the removal of all over the bluff pipeline segments. Monitoring: Implementation of this measure shall be initiated by the Applicant Project manager and monitored by the City, and a geologist or geotechnical engineer immediately following pipeline removal.

32. **Greenhouse Gases. Mitigation Measure GHG.1 GHG Emissions Reductions.** The Permittee shall reduce or offset annual incremental greenhouse gas (GHG) emissions from Project-related sources. The incremental GHG emissions are those GHG emissions resulting from Project construction, operations, and related sources minus the County threshold of 1,000 metric tons per year CO2e (MTCO2e).

    The Permittee shall prepare and implement a GHG Reduction and Reporting Plan that describes how annual GHG emissions could be reduced or offset. The Plan shall include provisions for, and the outline of an annual report to the County that summarizes the emission reduction measures implemented, quantifies the Project-related estimated GHG emissions for the year, and demonstrates the quantity of credits surrendered. Each annual report shall reconcile the actual emissions of the previous year with the mitigation quantity, in terms of MTCO2e. The standard of performance for this mitigation is a reduction or offset of GHG emissions from Project-related sources at a one-to-one (1:1) ratio.

    On-site GHG reductions should be exhausted to the extent feasible prior to providing credits or offsets from off-site projects. If credits are derived from off-site mitigation, preference should be given to those generated in Santa Barbara County. Implementing the required amount of any of the following types of emission reductions shall be an acceptable means of mitigation (order by local to national in preference):

    - Onsite: GHG emission reduction onsite, including measures to electrify equipment, such as electrification of power supply instead of generators or lighting or other equivalent measures;
    - Countywide: GHG reductions generated within the County by implementing a GHG reduction project consistent with any methodology approved by either the Santa Barbara County Board of Supervisors or the Santa Barbara County Air Pollution Control District (SBCAPCD) for the purpose of providing CEQA mitigation;
    - Statewide: GHG reductions represented by registry offset credits listed with and verified by a CARB approved Offset Project Registry pursuant to Section 95980.1 of Title 17, Public Health Code (17 CCR 95980.1); or If applicable, GHG reductions created as a result of complying with Cap-and-Trade Program requirements related to stationary source emissions, as evidenced by the Permittee making auction purchases of State-owned Cap-and-Trade Program Allowances or CARB offset credits issued pursuant to Section 95981.1 of Title 17, Public Health Code (17 CCR 95981.1). Note that reductions to any on-site GHG reductions (such as reduced use of combustion equipment) will go towards reducing the stationary source's Cap-and-Trade obligation, and therefore are not applicable to mobile source GHG reduction credit. Or, freely allocated allowances held by the Applicant and allowances purchased by the Applicant from entities other than the State of California shall not be used as mitigation under this measure because they are tradable

compliance instruments for the Cap-and-Trade Program. Or if applicable, if the Permittee has made auction purchases of State-owned Cap-and-Trade Program allowances to comply with Cap-and-Trade Program requirements and it has transferred funds to the State (e.g., for deposit into the Greenhouse Gas Reduction Fund (GGRF) for statewide GHG reductions), the levels of GHG offsets needed for mitigation under this measure may be reduced by the quantity of previously State-owned allowances purchased by the Permittee. The Permittee's demonstration of making auction purchases to fund acceptable mitigation shall occur in the GHG Reduction and Reporting Plan annual report after the applicable Cap-and-Trade compliance period, and the demonstration may rely on publicly available reports.

- Nationally: GHG reductions represented by registry offset credits listed with and verified by American Carbon Registry (ACR); Climate Action Reserve (CAR); or Verified Carbon Standard (VCS);

General criteria for acceptable credits include:

- Real: emission reduction must have actually occurred, as the result of a project yielding quantifiable and verifiable reductions or removals;
- Additional or Surplus: an emission reduction cannot be required by a law, rule, or other requirement;
- Quantifiable: reductions must be quantifiable through tools or tests that are reliable, based on applicable methodologies, and recorded with adequate documentation;
- Verifiable: the action taken to produce credits can be audited and there is sufficient evidence to show that the reduction occurred and was quantified correctly;
- Enforceable: an enforcement mechanism must exist to ensure that the reduction project is implemented correctly; and
- Permanent: emission reductions or removals must continue to occur for the expected life of the reduction requirement.

Plan Requirements/Timing: The GHG reductions achieved, credits surrendered provided, or any GHG offset project sponsored by the Permittee, must be supported by a demonstration to the City that the GHG reduction is real, additional, quantifiable, permanent, verifiable, and enforceable. The GHG Reduction and Reporting Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. The necessary annual quantity of verified credits under this plan shall be surrendered prior to April 15 of each calendar year following the year of initiating construction. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the GHG Reduction and Reporting Plan and any proposed GHG reduction credits prior to their use as mitigation. Subsequent annual reporting of GHG emissions and reduction/offset measures implemented will be reviewed and approved by the City in consultation with the SBCAPCD.

33. **Hazards. Mitigation Measure Haz.1 Contaminated Soil Handling.** The Project Applicant shall prepare and follow a contaminated soil handling management plan that addresses the following issues: Soil samples that exceed reactive organic compound (ROC) concentrations of 50 parts per million (ppm) require special soil handling procedures to be implemented under the plan. Those special soil handling procedures would include: (1) assuring sufficient

moisture content of the soil to prevent dust during soil movement; (2) covering excavated soil with tarps/impermeable coverings to minimize the generation of wind-blown dust as well as minimize ROC emissions; (3) conduct ROC monitoring every 15 minutes during excavation activities; and (4) removal of soils from the Project Site within 24 hours.

Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the Plan prior to its use as mitigation.

34. **Mitigation Measure Haz.2a Spill Response Planning.** Before the commencement of construction activities, the Applicant shall prepare a plan detailing the following performance measures to reduce the potential for releases to the environment, and to ensure that the shortest scheduling associated with the Project in the marine environment is achieved. An engineering study shall be conducted prior to construction, which shall address at least 1) offshore equipment barge configuration and optimization with regards to tides and scheduling, including the use of supply boats and additional barges if needed and the use of offloading of equipment (including pumps, tanks, materials, etc.) to reduce the barge draft, which will allow for removal of the barge at lower high tides, and thereby reduce the potential for an extended schedule. This analysis shall be coordinated with the bathymetric survey to determine barge scheduling under different scenarios, including an extended schedule due to pipeline abandonment complications; 2) equipment needs for the barge; 3) fluids containment and handling, onshore re-fueling of equipment within contained areas utilizing best management practices, such as those defined by Caltrans, barge containment of spilled construction materials through the use of a barge sump and barge-edge spill containment walls, with the containment volume being greater than the largest tank on the barge; 4) barge weight and draft fully loaded as well as the capacity for fluids handling and storage, and a determination along with the bathymetric study, of the scheduling for tides; 5) equipment arrangement on the barge to allow for equipment movement and use between tasks; 6) refueling procedures and spill containment measures and equipment to prevent spills of fuel from reaching the marine environment; and 7) Emergency Response Equipment Availability - During the pipeline removal activities, a tender boat with sufficient boom shall be placed immediately offshore of the operations to ensure that any spills which occur and enter the marine environment are immediately contained. Contracting with Clean Seas, or another equivalent organization experienced in on-sea oil spill containment and recovery operations, shall be established before construction commences. In addition, the barge shall be equipped with sufficient sorbent pads and booms to provide immediate containment of oil released. These would be in addition to a response trailer located immediately onshore at the pier area.

    Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the Fire Department, prior to initiation of the Project. Monitoring: The City, in consultation with the Fire District, will review and approve the Plan prior to its use as mitigation.

35. **Mitigation Measure Haz.2b Asbestos and Lead Planning.** An asbestos and lead exposure minimization plan shall be developed to limit the potential exposure of the public to asbestos and lead-containing materials. The plan shall include the following: 1) measures to prevent exposure, such as wetting of surfaces, prompt cleanup, and exhaust ventilation; and 2) prohibitions on dust-generating activities such as high-speed saws, compressed air, and dry sweeping of materials.

    Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the SBCAPCD, prior to initiation of the Project. Monitoring: The City, in consultation with the SBCAPCD, will review and approve the Plan prior to its use as mitigation.

36. **Mitigation Measure Haz.7 Fire Response Planning.** The Applicant shall ensure that fire response capabilities are in place during the entire Project, including the following: 1) hydrant access and capabilities; 2) fire water inventories, including hydrant flow testing to fire departments standards; 3) coordination and planning with the fire department to ensure proposer response equipment, training, communication, facilities access and capabilities are in place at all times; 4) the Applicant shall ensure that appropriate response equipment is located at all construction sites, including the availability of water trucks full of water and hot work requirements implementing a fire watch designated at all times; 5) all construction equipment used for any vegetation clearing shall be equipped with spark arrestors, and monitoring and training to prevent vehicle traffic off roadways to ensure activities do not impact dry brush and lead to fire; and 6) requirements shall be posted at all construction areas and placed on construction plans.
    Plan Requirements/Timing: The Plan shall be reviewed and approved by the City, in consultation with the Fire District, prior to initiation of the Project. Monitoring: The City, in consultation with the Fire District, will review and approve the Plan prior to its use as mitigation.

37. **Hydrology. Mitigation Measure WR.1 Stormwater Pollution Prevention Plan.** The construction contractor shall prepare a Stormwater Pollution Prevention Plan (SWPPP) that includes Best Management Practices (BMPs) to be implemented and monitored prior to and during decommissioning. The following BMPs shall be incorporated into the SWPPP to minimize potential decommissioning-related water quality impacts:
    1. Disturbed areas shall be stabilized or re-vegetated prior to the start of the rainy season. The work area shall be flagged to identify its limits. Vegetation shall not be removed or intentionally damaged beyond these limits.
    2. Construction materials shall be placed in designated areas where they could not enter water bodies or storm drains due to spillage or erosion.
    3. Waste and debris generated during decommissioning shall be stored in designated waste collection areas and containers away from watercourses and shall be disposed of regularly.
    4. During decommissioning, washing of trucks, paint, equipment, or similar activities shall occur only in areas where polluted water and materials can be contained for subsequent removal from the Project Site. Wash water shall not be discharged to the

storm drains, street, drainage ditches, creeks, or wetlands. The washout area shall be isolated from water bodies, and wash water and waste shall be removed from the Project Site. The location of the washout area shall be clearly noted at the construction site with signs.

5. All fueling of heavy equipment shall occur in a designated area removed from water bodies and other drainages, such that any spillage would not enter surface waters. The designated refueling area shall include a drain pan or drop cloth and absorbent materials to clean up spills. The location of the fueling area shall be clearly noted at the construction site with signs.
6. Vehicles and equipment shall be maintained properly to prevent leakage of hydrocarbons and coolant and shall be examined for leaks on a daily basis. All maintenance shall occur in a designated off-site area. The designated area shall include a drain pan or drop cloth and absorbent materials to clean up spills.
7. Any accidental spill of hydrocarbons or coolant that may occur on the construction site shall be cleaned up immediately. Absorbent materials shall be maintained on the construction site for this purpose.
8. Special considerations for work during the rainy season: stockpiled soils should be covered at the end of the workday.

Plan Requirements: A SWPPP shall be prepared and implemented prior to construction and shall include the above elements. The SWPPP shall be submitted to City Public Works for review and approval prior to the issuance of grading permits for the Project. Timing: The stormwater features and BMPs shall be installed and operational prior to initiation of grading. Monitoring: City Public Works staff shall site inspect for installation and maintenance in accordance with the approved plan and periodically thereafter to ensure proper maintenance over the duration of construction activities.

38. **Noise. Mitigation Measure N.2a Construction Noise Control.** During decommissioning activities, the Applicant shall implement the following measures to manage and reduce noise levels if necessary:
Inform residents and other noise sensitive receptors within 2,000 feet of Project work areas of anticipated noise disturbances two to four weeks prior to construction, including a contact telephone number to register noise complaints. The Project Applicant shall ensure that a noise liaison is assigned to respond to all public construction noise complaints in a timely manner, and either a) the telephone number is staffed by the noise liaison during construction hours; or b) the phone number is connected to an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. Noise complaints shall be forwarded to the City within 24 hours, along with the Operator/Applicant's initial response to the complaint. The noise complaint telephone number shall be posted in a manner visible to passersby and provided individually to potentially affected residences as part of the notification efforts.
Should complaints be received and verified and considered to be a disturbance issue (more than 3 complaints), as determined by the City, the Applicant shall implement the following to reduce noise:

- Schedule construction activities to avoid operating construction spreads in the same location or the same distance from the same receptor simultaneously;
- Noise monitoring shall be conducted at the closest residences to ensure that noise levels are acceptable. A noise monitoring schedule and description shall be submitted to the City prior to construction activities;
- Limits on noisy activities, including back-up beepers, shall be implemented, and smart back-up alarms shall be used with mobile construction equipment that automatically adjust the sound level of the alarm in response to ambient noise levels or back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction shall be utilized instead;
- Noise barriers shall be installed to reduce the potential impact of noise on the area residences during the peak hour. Noise barriers shall be composed of temporary, movable K-rails with a noise blanket wall on top at least 16 feet high or other equivalent method.

Plan Requirements/Timing: The proposed arrangement shall be reviewed and approved by the City prior to initiation of the Project. Monitoring: The City will review and approve the arrangement and schedule and description prior to its use as mitigation.

39. **Mitigation Measure N.2b Nighttime Activities.** Noise activities, including construction equipment and truck movements, during the nighttime shall be prohibited for onshore activities in order to reduce the potential for impacts to areas residences, and Zoning Ordinance 15.16.170 time limits shall be strictly complied with.
Plan Requirements/Timing: The construction documents shall reflect the limitation on construction activities and shall be reviewed and approved by the City prior to initiation of the Project. Monitoring: The City will review and approve the schedule and description prior to its use as mitigation.

PROJECT SPECIFIC CONDITIONS

40. **Mitigation Compliance, Monitoring and Reporting Requirement.** Owner/Applicant shall submit to the Community Development Department a draft monitoring program for the mitigation measures identified in the Certified EIR, approved Project Description and Conditions of Approval for review and comment. A City-approved biologist and mitigation monitors responsible for permit compliance monitoring shall be retained by the City and paid for by the applicant. The mitigation monitoring program shall include, but not be limited to the following elements for the entirety of the project:
    - Mitigation Measures. A list of the project's mitigation measures.
    - Implementation of Mitigation. Timing and party responsible for implementation of each mitigation measure.
    - Mitigation Monitoring. Timing and party responsible for monitoring of each mitigation measure and a list of mitigation monitors to be retained.
    - Mitigation Reporting. Procedures, timing and responsible party for reporting to the City on project mitigation compliance and monitoring.

- Copies of all required regulatory agency permits and approvals, or a written determination from the applicable regulatory agencies that such permit(s) are not necessary, shall be submitted to the City prior to initiation of Project activities.

41. **Maintenance.** The applicant shall be responsible for maintaining the premises in a clean and orderly condition at all times. This includes, but is not limited to the following:

    a. Parking lots and equipment staging/storage areas shall be cleaned on a regular basis. Cleaning activities shall include the removal of litter; spot cleaning of oil, fuel and other automotive leaks; vacuum sweeping and pressure washing when necessary;

    b. All trash/recycling shall be properly disposed of in the appropriate receptacles provided on site. The applicant shall regularly inspect the perimeter of the site to ensure that trash is not leaving the premises via wind or runoff;

    c. All structures and improvements, including but not limited to, fencing, on site shall maintain a tidy appearance and be kept in good working order; and

    Plan Requirements: This requirement shall be included in the approved conditions of approval signed by the landowner prior to approval of any Building Permit for physical development. Timing: CDD shall monitor in the field as required. Monitoring: CDD staff shall periodically inspect the site to ensure compliance with this condition. If it is found that the site is not being maintained in a manner consistent with this condition, the matter shall be referred to the City's Code Compliance staff for resolution.

42. **Lighting.** All exterior construction safety night lighting set up on the project site shall be of low intensity, low glare design, minimum height, and shall be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels. Monitoring: Building and/or Engineering Inspector shall inspect construction site to ensure that temporary exterior construction lighting fixtures have been installed consistent with this condition and any required mitigation measures.

43. **Dust Control.** Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site by following the dust control measures listed below. During clearing, grading, earth moving, excavation or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.

    a. 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 shall include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency shall be required whenever the winds speed exceeds 15 miles per hour. Reclaimed water should be used whenever possible.

    b. Minimize amount of disturbed area.

    c. 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 form the point of origin.

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

Plan Requirements: All requirements shall be shown on the building plans. Timing: Condition shall be adhered to throughout all construction activities. Monitoring: CDD shall ensure measures are on plans. Building Inspector shall spot check and ensure compliance onsite. APCD inspectors shall respond to nuisance complaints.

44. **Dust Monitoring.** 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. Plan Requirements: The name and telephone number of such persons shall be provided to the APCD. Timing: The dust monitor shall be designated prior to issuance of a Grading or Building Permit. Monitoring: CDD shall contact the designated monitor as necessary to ensure compliance with dust control measures.

45. **Construction Equipment Standards.** The following Diesel Exhaust Control Measures should be implemented during construction activities:

    a. Diesel construction equipment meeting the California Air Resources Board's current emission standards for off-road heavy-duty diesel engines shall be used.

    b. The engine size of construction equipment shall be the minimum practical size.

    c. The number of construction equipment operation simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

    d. Construction equipment shall be maintained in tune per the manufacturer's specifications.

    e. Construction equipment operating onsite shall be equipped with two to four degree engine timing retard or pre-combustion chamber engines.

    f. Catalytic converters shall be installed on gasoline-powered equipment, if feasible.

    g. Catalytic converters, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California shall be installed on equipment operating onsite.

    h. Diesel powered equipment should be replaced by electric equipment whenever feasible.

    i. State law requires that idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units should be used whenever possible.

Plan Requirements: All requirements shall be shown on grading and building plans. Timing: Condition shall be adhered to throughout all grading and construction activities. Monitoring: CDD shall ensure measures are on plans. Grading and Building Inspectors shall spot check and ensure compliance onsite.

46. **City Environmental Monitor:** Prior to submittal of any demolition permits or initiation of site activities, the Applicant shall provide the funding for a City Environmental Monitor to oversee and monitor compliance with City Conditions of Approval and EIR mitigation measures. The Environmental Monitor shall assist the City in condition compliance and mitigation monitoring for all applicable demolition construction, soil remediation, and site restoration stages of the Project.

    The Applicant will prepare a working monitoring plan that reflects the City-approved environmental mitigation measures/conditions of approval.

    1. goals, responsibilities, authorities, and procedures for verifying compliance with environmental conditions of approval/mitigation measures;
    2. lines of communication and reporting methods;
    3. tracking construction crew training regarding environmental sensitivities;
    4. daily and weekly reporting of compliance;
    5. authority to stop work; and
    6. action to be taken in the event of non-compliance.

    The Environmental Monitor shall be a City employee or under contract to the City, and the entire expense of retaining and supervising the Environmental Monitor, including the City's administrative and overhead fees, shall be paid by the Applicant.

    The Applicant shall also be responsible for funding inspection and monitoring work as needed for mitigation measures requiring use of individuals with special expertise (e.g., marine biologist). The County's Environmental Monitor will retain and coordinate with specialists as necessary to ensure their availability at appropriate times (i.e., prior to issuance of construction permits, during construction or post-approval, etc.). The Environmental Monitor will coordinate with the Applicant's construction site monitors and permitting and responsible agencies during construction.

    Monitoring/compliance: Prior to submittal of a construction permit, the Applicant shall provide a detailed Project description, detailed technical work related to any of the Conditions of Approval, and the construction work schedule, including any additional technical work/oversight conducted by the Applicant. This information will be used to obtain the monitor's work scope. Once the consultant is selected and costs are obtained, a trust account will be established to deposit the required funds. Prior to ground disturbance, all construction workers shall be informed about the monitor and their role at the work site. This may be included as a part of any preconstruction meeting. During construction, all approved protection measures, if any, shall be kept in good working order by the Applicant and any necessary corrective measures addressed promptly by the Applicant upon discovery. The

monitor shall be present as specified in the approved work scope. Prior to final inspection of the construction permit**,** the Environmental Monitor shall submit to the City a final post-construction compliance report. Any outstanding items identified shall be addressed to the satisfaction of the City Environmental Coordinator.

47. **Traffic Management Plan.** Provide a detailed Traffic Management Plan for review by Public Works, Community Development, Carpinteria-Summerland Fire Protection District and the Santa Barbara County Sheriff's Office, and obtain approval from the Public Works Director in consultation with the Community Development Director. The plan shall identify:
    - Construction Phases. Project construction stage exhibits including work descriptions.
    - Staging and Parking Areas. Equipment staging, materials storage and construction worker parking areas.
    - Truck Routes. Construction truck routes to minimize noise and traffic effects to residential neighborhoods.
    - City Street Closures and Detours. Any proposed closures of City streets and/or detours, by construction stage.
    - Signs and Traffic Control Measures. Signage and other planned temporary traffic control measures, by construction stage.
    - Public Awareness. A program for public awareness and outreach to commuters, property owners, businesses, residents and agencies affected by project construction.
    - Maintenance of Access. Plans for providing access to businesses, coastal dependent uses and recreational uses during construction.
    - Coordination and Reporting. A program for ongoing reporting and coordination with the City and other affected agencies throughout construction.

48. **Pre-Construction Conference**. Prior to commencement of construction, a preconstruction conference shall be held by the Resident Engineer to include construction processes and environmental mitigation and monitoring. The conference shall include representatives from Public Works, Community Development, Project Engineer, Contractor and Subcontractor(s), Biologist, and Mitigation Monitors.

DEVELOPMENT PLAN CONDITIONS

49. Approval of the Final Development Plan shall expire two years after the final local action by the City or the CA Coastal Commission on appeal, unless prior to the expiration date, substantial physical construction has been completed on the development or a time extension has been applied for by the applicant. The decisionmaker with jurisdiction over the project may, upon good cause shown, grant a time extension.

50. No permits for development, including grading, shall be issued except in conformance with an approved Final Development Plan. The size, shape, arrangement, use and location of buildings, walkways, parking areas and landscaped areas shall be developed in conformity with the approved Development Plan marked Exhibit 2, dated May 5, 2025. Substantial conformity shall be determined by the Community Development Department Director.

51. On the date a subsequent Development Plan is approved for this site, any previously approved but unbuilt plans shall become null and void.

52. If the applicant requests a time extension for this permit, the permit may be revised to include updated language to standard conditions and/or mitigation measures and additional conditions and/or mitigation measures which reflect changed circumstances or additional identified project impacts. Mitigation fees shall be those in effect at the time of issuance of a Building Permit.

53. An approval granted by the Planning Commission/City Council does not constitute a Building Permit, Demolition Permit, Engineering Permit, or authorization to begin any construction. Appropriate permits issued by the Building Division and Public Works Department must be obtained prior to constructing, enlarging, moving, converting, or demolishing any building or structure within the City, or undertaking any excavation or earthwork activities.

APPEALABLE CDP CONDITIONS

54. If the City determines at a noticed public hearing that the permittee is not in compliance with any conditions of this permit pursuant to the provisions of the Carpinteria Municipal Code, the City may, in addition to revoking the permit pursuant to said section, amend, alter, delete or add conditions to this permit.

55. The applicant's acceptance of this permit and/or commencement of construction and/or operations under this permit shall be deemed acceptance of all conditions of this permit by the permittee.

56. The approval of this Appealable CDP shall expire two years from the date of the final local action or, if appealed, the date of action by the California Coastal Commission on the appeal, if the permit for use, building or structure has not been issued.

57. The use and/or decommissioning and remediation activities, authorized by this approval cannot commence until the Coastal Development Permit and necessary Building Permits have been issued. Prior to the issuance of the Coastal Development Permit, all of the project conditions that are required to be satisfied prior to issuance of the Coastal Development Permit must be satisfied.

CITY RULES & REGULATIONS/LEGAL REQUIREMENTS

58. Before using any land or structure, or commencing any work pertaining to the erection, moving, alteration, enlarging, or rebuilding of any building, structure, or improvement, the applicant shall obtain a Building Permit. These Permits are required by ordinance and are necessary to ensure implementation of the conditions required by the Planning Commission.

Before any Permit will be issued by Community Development, the applicant must obtain written clearance from all departments having conditions; such clearance shall indicate that the applicant has satisfied all pre-construction conditions. A form for such clearance is available from Community Development.

59. Prior to Building Permit issuance, the applicant shall sign an Agreement to Allow Zoning Compliance Inspections. The Agreement will allow CDD staff to conduct zoning inspections for the purpose of ensuring compliance with the City's Municipal Code requirements.

60. If, at any time, the City or Planning Commission determines that there has been, or may be, a violation of the findings or conditions of this Development Plan and Coastal Development Plan, or of the Municipal Code regulations, a public hearing may be held before the Planning Commission to review this permit. At said hearing, the Planning Commission may add additional conditions, or recommend enforcement actions, or revoke the permit entirely, as necessary to ensure compliance with the Municipal Code, and to provide for the health, safety, and general welfare of the City. The applicant shall reimburse the City for all costs associated with gaining compliance with the original conditions of approval.

61. Any minor changes may be approved by the City Manager and/or Community Development Director. Any major changes will require the filing of a revision application to be considered by the Planning Commission.

62. All requirements of the City of Carpinteria (including but not limited to public improvements as defined in the City of Carpinteria Municipal Code (CMC), Section 15.16.110) and any other applicable requirements of any law or agency of the State and/or any government entity or District shall be met.

63. Any and all damage or injury to public property resulting from this development, including without limitation, City streets, shall be corrected or result in being repaired and restored to its original or better condition.

64. No building permits shall be issued for this project prior to meeting all required terms and conditions listed herein. When not specified herein, all conditions shall be satisfied prior to issuance of a building permit or prior to occupancy when allowed by the Community Development Director.

65. To allow time for the utility companies to locate and mark their facilities for the contractor, the applicant shall telephone Underground Service Alert (USA) toll free at 1-800-227-2600 a minimum of 48 hours prior to the start of construction. For best response, provide as much notice as possible, up to 10 working days.

66. Prior to initiation of any decommissioning or remediation activities, applicant shall consult with the Carpinteria Sanitary District and Carpinteria Valley Water District to appropriately locate and protect in place any service laterals and mains located within the Project Site that are not proposed to be abandoned as part of the approved project. Authorization from the

respective districts will be required before any Building, Demolition or Engineering Permits are issued.

67. Applicant shall first obtain a permit from the Carpinteria Sanitary District in the event the applicant seeks to discharge any wastewater from the decommissioning or remediation activities into Carpinteria Sanitary District-owned facilities. Applicant shall implement standard Best Management Practices to prevent unauthorized or accidental discharges to the sanitary sewer system.

68. Compliance with the attached Departmental and District letters is required as follows:
    a. City of Carpinteria Public Works Department/Engineering dated April 29, 2025
    b. Santa Barbara County Air Pollution Control District dated April 25, 2025

69. All applicable final conditions of approval shall be printed in their entirety on applicable pages of grading/construction or building plans submitted to CDD. These shall be graphically illustrated where feasible. The approved set of plans shall be retained at the construction site for review by the Building Inspector during the course of construction.

70. Applicant shall ensure that the project complies with all approved plans and all project conditions including those which must be monitored after the project is built and occupied. To accomplish this, applicant agrees to contact CDD at least two weeks prior to commencement of construction activities to schedule an onsite pre-construction meeting with the owner, other agency personnel and with key construction personnel.

71. Prior to issuance of a Building Permit, the applicant shall provide a signed copy of the Conditions of Approval.

72. This approval is not valid until a Building Permit for the development has been obtained. Failure to obtain said Building Permit shall render this approval null and void. Prior to the approval of the Building Permit, all of the conditions listed in this approval are required to be satisfied. Upon issuance of the Building Permit, the approval shall be valid. The effective date of this Permit shall be the date of expiration of the appeal period, or if appealed, the date of action by the Planning Commission.

73. The owner/applicant/developer ("Owner") hereby agrees to defend, indemnify and hold harmless the City, its officers, employees, agents, consultants and independent contractors ("City's Agents") from any claim, action or proceeding ("Claims") against the City and the City's Agents to attack, review, set aside, void or annul, in whole or in part, the City's approval of the Chevron Carpinteria Oil and Gas Facility Decommissioning Project (the "Project"), or any condition attached thereto, or any proceedings, acts or determinations taken, done or made prior to the approval that were part of the approval process. Owner further agrees to indemnify and hold harmless the City and the City's Agents from any award of attorneys' fees or court costs made in connection with any Claim. Owner further agrees to

pay any and all City costs, permit fees, attorneys' fees, engineering fees, license fees and taxes arising out of or concerning the Project, whether incurred prior to or subsequent to the date of approval and that the City's costs shall be reimbursed prior to this approval becoming valid. These commitments of defense and indemnification are material conditions of the approval of the Project. Nothing contained in this condition shall prevent the City or the City's Agents from independently defending any Claim. If the City or the City's Agents decide to independently defend a Claim, the City and the City's Agents shall bear their own attorneys' fees, expenses and costs of that independent defense.

74. In the event that any Condition of Approval imposing a fee, exaction, dedication or other mitigation measure is challenged by Applicant/Owner/Developer/Permittee in an action filed in a court of law or threatened to be filed therein which action is brought within the time period provided by law, this approval shall be suspended pending dismissal of such action, the expiration of the limitation period applicable to such action, or final resolution of such action. If any Condition of Approval is invalidated by a court of law, the entire project shall be reviewed by the City and substitute Conditions of Approval may be imposed.

75. Any change of use in the proposed building or structure shall be subject to environmental analysis and appropriate review by the City including Building Code compliance.

76. Written authorization to proceed and consent to conditions of approval by the legal owner of the property shall be provided to the City prior to building permit issuance.

Approved by the Planning Commission on May 5, 2025

I HAVE READ AND UNDERSTOOD, AND I WILL COMPLY

WITH ALL ABOVE STATED CONDITIONS OF THIS PERMIT.

_____

Applicant/Property Owner Date

CITY OF CARPINTERIA, CALIFORNIA

Public Works Department
Memorandum

To: Nick Bobroff, Community Development Director
Community Development Department

From: John L. Ilasin, Public Works Director/City Engineer /s/

Date: April 29, 2025

Subject: 5675 Carpinteria Avenue, Project No. 21-2128-DP/CDP

The Public Works Department has reviewed the project submittal dated October 21, 2021, and has the following conditions of approval:

CONDITIONS OF APPROVAL

1. An Engineering Permit shall be obtained from the City Engineer for any improvements or other encroachment work within the City of Carpinteria public right-of-way and/or public property.

2. All improvements within the City of Carpinteria public right-of-way and/or public property shall be completed to the satisfaction of the City Engineer prior to the issuance of a Certificate of Occupancy.

3. An Engineering Permit shall be obtained from the City Engineer for earthwork excavation or fill that exceeds three feet in vertical depth at its deepest point, measured from the natural ground slope, and/or thirty cubic yards of material moved in any twelve-month period.

4. Record drawings or as-built plans shall be submitted to the City Engineer at time of final inspection for all work covered by an Engineering Permit. The record drawings or as-built plans shall be the original construction tracings or permanent mylar copies of a quality acceptable by the City Engineer.

5. A Transportation Permit shall be obtained from the City Engineer for operating or moving any vehicle or combination of vehicles or special mobile equipment in any of the acts as listed in Carpinteria Municipal Code Section 12.12.010.

6. All existing private property encroachments shall be removed from the City of Carpinteria public right-of-way and/or public property.

7. All new and existing utility services shall be installed underground from the closest point of connection or utility pole and completed prior to any paving required for the project. No new utility poles shall be installed.

8. Stormwater control plans shall be in conformance with the County of Santa Barbara Technical Guide for Low Impact Development.

9. A Maintenance Agreement for permanent stormwater quality best management practices shall be submitted to the City Engineer for review and approval. The Maintenance Agreement shall include, at minimum, the following elements: (1) Operations and Maintenance Plan; (2) Legal description and plat of property; (3) Site plan of all permanent stormwater quality best management practices; (4) Property owner's printed name, signature, and date of signing; and (5) Notary public acknowledgement.

10. Improvements in areas of special flood hazards as shown in the latest effective flood insurance rate map shall be constructed in conformance with the City floodplain management regulations (Carpinteria Municipal Code Chapter 15.50).

11. Construction and demolition debris generated shall be reported in conformance with the Construction and Demolition Debris Recycling Program. Sixty-five percent (65%) or more of all construction and demolition debris shall be diverted from the landfill. The Construction and Demolition Debris Recycling Program forms shall be completed and submitted to the City Engineer prior to the issuance of a Certificate of Occupancy.

12. Construction and demolition debris shall be separated on site into reuse, recycling, or disposal. Separate bins or containers for recycling of construction and demolition debris shall be provided on site.

13. Self-hauled disposal receipts from transfer stations shall be submitted to the City Engineer prior to the issuance of a Certificate of Occupancy.

14. Any self-hauled construction and demolition debris shall be reported in writing to the City Engineer. A contract waste hauler may be allowed for disposal of construction and demolition debris subject to the approval of the City Engineer.

End of Comments

April 25, 2025

Nick Bobroff
City of Carpinteria
Community Development Department
5775 Carpinteria Avenue
Carpinteria, CA 93013

Sent Via Email: nickb@carpinteriaca.gov

Re: Santa Barbara County Air Pollution Control District Suggested Conditions for the Chevron Carpinteria Oil and Gas Facility Decommissioning Project, Project No. 21-2128-DP/CDP

Dear Mr. Bobroff:

The Santa Barbara County Air Pollution Control District (District) has reviewed the project that consists of the decommissioning and remediation of the Oil and Gas Processing Facilities owned and operated by Chevron. The proposed project-related activities include the removal of nearshore/offshore pipelines out to three nautical miles (the state waters limit) and the complete remediation of impacted soils and groundwater at the onshore facility. The subject property, a 64-acre parcel zoned Coastal Industry District (M-CD) and Recreation (REC) and identified in the Assessor Parcel Map Book as APN 001-170-003, 004, 021, 022, 023, is located at 5675 and 5663 Carpinteria Avenue in the City of Carpinteria.

The proposed project is subject to the following **regulatory requirements and advisories** that should be included as conditions of approval in the applicable land use permit:

1. **District Permit**: The proposed project includes operations (including contaminated soil remediation) subject to District permitting requirements, rules, and regulations, therefore the project will be required to obtain an Authority to Construct (ATC) and/or Permit to Operate permits from the District prior to the start of construction/demolition activities. Proof of receipt of the required District permits shall be submitted by the applicant to planning staff. The District permit process can take several months. To avoid delay, the applicant is encouraged to submit their permit application to the District as soon as possible, see www.ourair.org/permit-applications/ to download the necessary application(s). See www.ourair.org/csc-projects for information on contaminated soil clean-up.

2. **Diesel Engines**: All portable diesel-fired construction engines rated at 50 brake horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or District permits. Generally, construction engines with PERP certificates are exempt from the District permit, provided they will be on-site for less than 12 months. In some situations, portable and/or temporary engines, require a District permit irrespective of PERP-registration status. See www.ourair.org/wp-content/uploads/PERPfaq.pdf for more information on the operation of PERP-registered engines at stationary sources.

3. **Asbestos**: The applicant is required to complete and submit an Asbestos Demolition/Renovation Notification (District Form ENF-28, available at www.ourair.org/compliance-forms) for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed notification should be

presented or mailed to the District with a minimum of 10 working days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. For additional information, see www.ourair.org/asbestos/ or contact the District's Compliance Division at (805) 979-8050.

4. **Marine Vessels**: Prior to the start of demolition activities, a written permit exemption or Authority to Construct/Permit to Operate permits must be obtained for the operation of marine vessel engines. The District will evaluate the duration and emissions from the project to determine if the project is subject to Regulation VIII, *New Source Review*, and if so, which requirements will apply. Pursuant to District Rule 202.F.8., the project may qualify for a written permit exemption if the duration of the activities do not exceed 12 consecutive months and the potential to emit of such engines is less than 10 tons per stationary source of oxides of nitrogen (NOx), oxides of sulfur (SOx), reactive organic compounds (ROC), or particulate matter (PM). To qualify for this exemption, the owner or operator of the stationary source shall submit a written request for exemption to the District. The District will make a determination in writing approving or denying the request. The request shall identify the marine vessels, project activities, duration, and shall include the emission calculations and assumptions demonstrating that the engines meet the exemption criteria. Alternatively, an owner or operator of the stationary source may qualify for an exemption by obtaining an Authority to Construct and Permit to Operate which limits the potential to emit of such equipment to less than 10 tons per year. Such Authority to Construct/Permit to Operate shall be exempt from Regulation VIII.

5. **Onsite Storage**: If there is any planned or potential storage of Reactive Organic Compound (ROC) containing liquids or solids (e.g. ROC-impacted soils), the applicant must obtain a District permit or written exemption from permit.

6. **Pipeline Purging.** Pipeline purging operations have the potential for odor generation. In order to prevent odors from causing a violation of District Rule 303, *Nuisance*, the District recommends that carbon canisters or a thermal oxidizer be employed to control vapors released during pipeline decommissioning activities. Some companies already have permits with the District for thermal oxidizer units. The applicant should consider using an already permitted unit through a company, or could contact the District to obtain a permit or written permit exemption.

7. **Prohibitory Dust Rules**: Construction/demolition activities are subject to District Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*. This rule establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites, includes measures for minimizing fugitive dust from on-site activities, and from trucks moving on- and off-site. Please see www.ourair.org/wp-content/uploads/rule345.pdf. Activities subject to Rule 345 are also subject to Rule 302 (*Visible Emissions*) and Rule 303 (*Nuisance*).

8. **Idling**: Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation. See https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling.

9. **Fugitive Dust Measures**: To reduce the potential for violations of District Rule 345 *(Control of Fugitive Dust from Construction and Demolition Activities)*, Rule 302 *(Visible Emissions)*, and Rule 303 *(Nuisance)*, standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities.

10. **Diesel Exhaust Measures**: The State of California considers particulate matter emitted by diesel engines carcinogenic. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of particulate matter (as well as of ozone precursors) from diesel equipment. Recommended measures should be implemented to the maximum extent feasible.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8337 or via email at BarhamC@sbcapcd.org.

Sincerely,

Carly Barham

Carly Barham,
Planning Division

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

cc: Planning Chron File
Permitted Sources File SSID 00027 FID 00027

apcd air pollution control district
SANTA BARBARA COUNTY

ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

Projects involving earthmoving activities are expected to manage fugitive dust emissions such that emissions do not exceed APCD's visible emissions limit (APCD Rule 302), create a public nuisance (APCD Rule 303), and are in compliance with the APCD's requirements and standards for visible dust (APCD Rule 345). The following measures should be implemented to reduce fugitive dust emissions and impacts.

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained 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.
- Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces.
- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.
- If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than one day 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. The amount of excavated material or waste materials stored at the site should be minimized.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, or if previously graded areas remain inactive for more than 10 calendar days, treat the disturbed area by watering, OR using roll-compaction, OR revegetating or hydroseeding, OR by applying non-toxic soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks etc. proposed to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress.

All measures required by the Lead Agency shall be shown on grading and building plans and/or as a separate information sheet listing the conditions of approval to be recorded with the map prior to grading/building permit issuance and/or map recordation. Conditions shall be adhered to throughout all grading and construction periods. The name and telephone number of a dust control contact shall be provided to the APCD prior to grading/building permit issuance and/or map clearance. The Lead Agency shall ensure measures are on project plans and/or recorded with maps. The Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

apcd air pollution control district
SANTA BARBARA COUNTY

ATTACHMENT B

CONSTRUCTION DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

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

The following measures are required by state law:

- **Portable Engines**: All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program (PERP)[1] OR shall obtain an APCD permit.
- **Off-Road Equipment**: Fleet owners of diesel-fueled mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation[2]. All off-road vehicles subject to this regulation must use renewable diesel fuel, with some limited exceptions.
- **Diesel Trucks**: Fleet owners of on-road diesel-fueled heavy-duty trucks and buses are subject to CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), the Statewide Truck and Bus Regulation, and the Advanced Clean Fleets Regulation to reduce emissions from trucks and buses.[3]
- **Idling:** Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.[4] Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation.

The following measures are recommended:

- At a minimum, off-road diesel equipment should be equipped with engines compliant with, or certified to meet or exceed, CARB Tier 4 emission standards. Where available, off-road construction equipment should be zero-emission. Alternative/renewable fuels such as compressed natural gas (CNG), liquefied natural gas (LNG), or propane should be utilized to the maximum extent feasible when zero-emission is not available. Electric auxiliary power units should be used. The Lead Agency should require commitments to Tier 4 and/or zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- On-road heavy-duty equipment with model year 2014 or newer engines, or powered by zero- or near zero-emission technology, should be used whenever feasible.
- All portable generators should be powered by a source other than diesel or gasoline (i.e., battery, natural gas, propane, etc.)
- All construction equipment should be maintained in tune per the manufacturer's specifications.
- The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Proposed truck routes should minimize impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows. Construction activity schedules and hours should be planned and adjusted as feasible to maximize distance from existing sensitive receptors and minimize exposure to air pollution.

Prior to grading/building permit issuance and/or map recordation, all measures required by the Lead Agency shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout grading and construction periods. The contractor shall retain onsite the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles and have it available for inspection. The Lead Agency shall ensure measures are on project plans and/or recorded with maps and ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

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1 https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp
2 https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation
3 https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/truckstop
4 https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about

Attachment D.

Public Comment Letters Submitted to Planning Commission

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

From: Public Comment
To: Nick Bobroff
Subject: Fw: The SBCTAC supports certifying the draft FEIR for the Chevron Processing Facility
Date: Thursday, May 1, 2025 12:49:19 PM

From: [redacted]
Sent: Wednesday, April 30, 2025 9:49 AM
To: Public Comment
Cc: Mark Korte-Nahabedian
Subject: The SBCTAC supports certifying the draft FEIR for the Chevron Processing Facility

****EXTERNAL EMAIL****
CAUTION: This email originated from outside the City of Carpinteria. DO NOT OPEN attachments or CLICK on links unless you are sure they are safe. Remember, reputable vendors, banks, etc. will not ask you to disclose passwords or other sensitive information.

Santa Barbara County Taxpayer Advocacy Center
2151 S. College Dr., Suite 101
Santa Maria, CA 93455
(805) 708-9100
www.sbctac.org
[redacted]

"The SBCTAC...Fighting for the Taxpayer and Helping our Business Members Succeed!"

Honorable Members of the Carpinteria Planning Commission,

On behalf of the Santa Barbara County Taxpayer Advocacy Center (SBCTAC) and our over 300 members, we strongly support the Planning Commission certifying the Final Environmental Impact Report for the Decommissioning and Remediation of the Chevron Carpinteria Oil & Gas Processing Facility Project.

I have read and reviewed the entire Report. As a former Santa Barbara County Supervisor for 8 years and a Land Use attorney for over 30 years, I am very familiar with CEQA. There is no question that this document, pursuant to CEQA guidelines, should be certified so that the next step in the decommissioning and remediation can take place. To do otherwise will further delay finally remediating Chevron's Carpinteria Oil & Gas Processing Facility.

The SBCTAC urges your Commission to certify the proposed FEIR.

Sincerely,
Mike Stoker
President & CEO, SBCTAC

From: Marysol Smith
To: Lorena Esparza
Cc: Nick Bobroff
Subject: Public Comment for PC FW: New eComment for Planning Commission
Date: Friday, May 2, 2025 4:26:56 PM

From: noreply@granicusideas.com [mailto:noreply@granicusideas.com]
Sent: Thursday, May 1, 2025 11:43 AM
To: Marysol Smith <MarysolS@carpinteriaca.gov>
Subject: New eComment for Planning Commission

City of Carpinteria, CA

New eComment for Planning Commission

Guest User submitted a new eComment.

Meeting: Planning Commission

Item: PUBLIC COMMENT

eComment: INCOMPLETE EIR OF HARBOR SEALS: Summary: - Harbor seals are barely mentioned in the entire EIR, raising the question of whether this was a deliberate attempt to downplay the responsibility of Chevron. -Importantly harbor seals are biologically REQUIRED to spend 50% of their time on the beach for daily thermoregulation, digesting food, sleeping and other physiological processes. The harbor seals forage for food in the water. This dual habitat requirement means the EIR must account for protective measures both on land and in the water. At present the EIR makes no mention of harbor seals living in both aquatic and terrestrial environments. How can you protect the seals if you don€™t know where they live? Harbor seals exhibit site fidelity, which means that harbor seals stay where they are born.. This affects the plans for how to remove pipes that are immediately under the rookery, adjacent to the pier. Specifically, if pipes east of the pier are to be removed the work should performed when the maximal number of seals are feeding and are not on the beach. -The EIR states that acute injury of mammals is important to monitor and report and that cumulative effects are unlikely to be important. However, research on harbor seals is most consistent with the conclusion that cumulative stress promotes a general decline in health -Sound: Harbor seals are acutely sensitive to sounds aThus no explosives should be allowed for demolition of the oil infrastructure.

View and Analyze eComments

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From:	C Kathleen Lord
To:	Nick Bobroff
Subject:	Re: Proposed Final EIR for the Decommissioning and Remediation of the Chevron Carpinteria Oil & Gas Processing Facility Project
Date:	Friday, May 2, 2025 12:34:13 PM

****EXTERNAL EMAIL****

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Dear Nick ~

Thank you for your response to the comments I submitted.

Please share the following comments & the link to the supportive data to the Planning Commissioners.

In the Pinniped Haul-Outs section paragraph 4 states:
Since the beach is open to the public during the molting season, this rookery is largely abandoned in the summer and fall, which will correspond to when the proposed beach and offshore Project activities will occur.

However the EIR provides no data to support this conclusion.
This statement is not true and should be corrected.
This rookery is often temporarily abandoned during the daytime hours. Daily, often in the morning, the seals go into the water on their own volition or are disturbed by beach walkers, sonic booms, or assorted other reasons. However data collected every morning by trained Seal Watch volunteers shows the rookery is well used at night.

Please see link below:
https://docs.google.com/spreadsheets/d/1J2pJCrxFiqnRf1zhVA0WDxAAJqlp9WRRLPZ1K2Ycz0g/edit?usp=sharing
The June data was collected at various times of day.
The July through December data was collected at or near dawn.

The night time usage of this rookery June through December is vital to the health of the colony.

In the **HS Monitoring and Protection Plan**
https://carpinteriaca.gov/wp-content/uploads/2025/04/web-Appendix-A-all-C_Chevron-proposed-FEIR.pdf
6.0 AVOIDANCE AND MINIMIZATION MEASURES
AMM 4. Harbor Seal Monitoring and Protection Plan. The Project Harbor Seal Monitoring and Protection Plan (Appendix C5) will be implemented during decommissioning activities on the bluff/beach and surf zone areas to reduce disturbances to harbor seals in the area. The Plan will include scheduling bluff/beach and surf zone project activities outside of the harbor seal breeding season and beach closure period from December 1 through May 31.

The EIR must delineate or regulate the summer and fall work hours to allow the harbor seals to continue to use the rookery area at night under the conditions they are used to. They need

the dark night sky with minimal noise. Work hours should be limited to 7 am to 7 pm. The lights on the pier should continue to shine down only by the pier. No lights should shine on the remainder of the rookery area. The seals are accustomed to the existing pier lighting and workers walking quietly in and out to the boats at the end of the pier.

4.0 AVOIDANCE AND PROTECTION MEASURES

C-251

Place a Screen Between the Work Area and Seal Rookery Area: Due to its close proximity to the harbor seal rookery, Chevron would erect a temporary visual screen between the Gail and Grace pipeline bundle work area and seal rookery area to further reduce the potential for behavioral changes of nearby harbor seals. Installation of the **visual screen** would be considered if determined to be necessary during pupping season to mitigate visual impacts and conducted in coordination with Carpinteria Seal Watch and a qualified Marine Wildlife Observer. The screen would be approximately 8-feet high by 30-feet wide, would be maintained taut to avoid flapping or excessive movement due to wind or wave action, and would be positioned to screen the immediate Project area from view of the rookery area. The screen would be placed, maintained, and removed in a manner and at times that avoid disturbance to seal present on the beach; for example, placing it **before** first light on the first day of work and removing it after last light on the final day of work.

The visual screen is problematic all year long because of the changing dynamics of the waves, surge, sand levels & tides. Work should not be performed during pupping season.

There is another problem. The seals are in greatest abundance in the night hours June through December. They are accustomed to being disturbed after the "first light" of the day. For the health of the colony, screening related activities should be scheduled after "first light" and before dark.

Thank you,
Kathleen Lord

On Apr 21, 2025, at 5:31 PM, Nick Bobroff <nickb@carpinteriaca.gov> wrote:

Dear Interested Party:

This email is being provided to you in response to comments submitted by you or your agency on the City of Carpinteria Decommissioning and Remediation of the Chevron Carpinteria Oil & Gas Processing Facility

Project Draft Environmental Impact Report (EIR). Pursuant to Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, Community Development Department is providing you with the EIR Response to Comments which may be accessed, along with the proposed Final EIR, on our project website at: https://carpinteriaca.gov/city-hall/community-development/oil-gas-information/oil-processing-facility-decommissioning/

The Carpinteria Planning Commission will hold a hearing on Monday, May 5th at 5:30 PM to consider approval of Chevron Oil & Gas Processing Facility Decommissioning Project and certification of the Final EIR. Attached to this email is a copy of the public notice for the Planning Commission Hearing which will be published later this week and provides additional details on the purpose of the hearing, options for participation, and options for providing public comments.

Thank you and please let me know if you have any questions regarding this notification.


Nick Bobroff
Director, Community Development Department
City of Carpinteria
5775 Carpinteria Ave, Carpinteria, CA 93013
Direct Line: (805) 755-4407 | nickb@carpinteriaca.gov
CarpinteriaCA.gov

<05-05-25.pdf>

Walid Masri
Program Director
West Coast Decommissioning Program

May 1, 2025

RE: Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities: Proposed Final Environmental Impact Report

Dear City of Carpinteria Planning Commission,

On behalf of Chevron, I would like to thank the City of Carpinteria, the Planning Commission, dedicated staff at the City, and the many agencies, scientists, engineers, and members of our community for their contributions to the development of the Final Environmental Impact Report (EIR) for the Decommissioning and Remediation of the Carpinteria Oil & Gas Processing Facility. We support the certification of the Final EIR as proposed.

This collaborative effort, in process for more than four years, has been instrumental in ensuring the proposed project is implemented in a manner that minimizes and appropriately mitigates potential environmental impacts. We appreciate the time, expertise, and perspective that each participant has contributed to this significant endeavor, and we are grateful for the efforts to strengthen the EIR, develop effective mitigations, and respond to feedback to ensure the work is done responsibly.

Certifying the Final EIR on May 5th represents a significant milestone for the project, and for our community. Together, we can take a crucial step towards the responsible decommissioning and remediation of the Carpinteria Oil and Gas Processing Facilities, and we look forward to continuing to partner with our community in the safe execution of this important work.

Thank you once again for your support and partnership.

Sincerely,

Walid Masri

Chevron North America Exploration and Production Company
(a Chevron U.S.A. Inc. division)
3916 State Street, Suite 200, Santa Barbara, CA 93105
Tel 805 979 3507
wmsr@chevron.com

PUBLIC UTILITIES COMMISSION
320 West 4th Street, Suite 500, Los Angeles, CA 90013

May 5, 2025 ENVR 20250400007

Nick Bobroff
Director, Community Development Department
City of Carpinteria
5775 Carpinteria Ave.
Carpinteria, CA 93013

Re: Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities SCH 2022080026 – *Final Environmental Impact Report*

Dear Nick Bobroff,

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the Final Environmental Impact Report (FEIR) for the proposed Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities (Project). The City of Carpinteria (City) is the lead agency.

According to the FEIR, the Project's purpose is to demolish and remove surface and subsurface facilities and subsequent remediation of any impacted soils at the onshore Carpinteria Oil and Gas Processing Facility to accommodate the site's potential future redevelopment. The Project is adjacent to a private at-grade crossing, identified as Dump Road/Chevron U.S.A. with CPUC No. 001E-378.93-X and DOT No. 745634F, which provides north-south access to an employee parking lot. The Santa Barbara Subdivision railroad line, on which the private rail crossing is situated, is owned, maintained and operated on by Union Pacific Railroad (UPRR).

Upon review of the report, it was noted that portions of the pipeline will be removed under the railroad right-of-way (ROW). Additionally, pipelines along the bluffs south of the tracks are proposed to be decommissioned. Any construction activities within the railroad ROW and utilizing the private crossing needs to be coordinated with UPRR.

The Project mentions remediation of the site for possible future redevelopment but does not state what it would or could be. Section 4.1.9 of the FEIR mentions that the employee parking lot south of the private crossing to be maintained to support a future use of the existing pier, but does not specify public or private use. There is no discussion of what will be done with the private crossing, but based on possible use of the pier, at a minimum, the property owners should review and discuss the crossing agreement with UPRR and update any conditional uses to reflect what is planned for the area/crossing. In addition, there is a public trail on the south side of the tracks (Carpenteria Bluffs Trail). Should the parking lot become a future public parking lot that utilizes the private crossing, or if future development allows public access across the private crossing, it will need to be converted to a public crossing via a Formal Application with the CPUC. Additional improvements to the roadway and crossing warning system may be required.

RCEB staff is available to discuss any potential safety impacts or concerns at the crossings and address any questions from the City, and recommends the City communicate with RCEB during its planning process to help mitigate any safety concerns.

If you have any questions, please contact Oliver Garcia via email at oliver.garcia@cpuc.ca.gov.

Sincerely,

Anh Truong
Senior Utilities Engineer (Supervisor)
Rail Crossings Engineering Branch
Rail Safety Division

CC: State Clearinghouse, state.clearinghouse@opr.ca.gov
Kenneth Tom, Union Pacific Railroad, ktom@up.com

From: Public Comment
To: Nick Bobroff
Subject: Fw: May 6, 2025, Agenda Item 2
Date: Monday, May 5, 2025 11:03:34 AM

From: Amrita Salm [redacted]
Sent: Monday, May 5, 2025 10:33 AM
To: Public Comment
Subject: May 6, 2025, Agenda Item 2

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Public Comments, May 5, 2025, Agenda Item # 2

From: Amrita M. Salm

I have the following concerns regarding the Decommissioning of the Chevron Property:

1. Accidental Spills, which is a Class I impact.
2. Number of daily vehicle trips (62 listed in report) for how long, how many days, weeks, months or years. Needs to be specific.
3. There needs to be safe passage for people (residents or tourists) who use Dump Road to get to the seal rookery, beach, bluffs, etc.
4. Disturbances to the residential neighborhood: noise, pollution, road damage. Let's be good neighbors.
5. Describe what "most stringent cleanup" means?
6. Disturbances to the seals.
7. When will the project begin and when will the pipes be removed?

From: Public Comment
To: Nick Bobroff
Subject: Fw: To Planning Commission for Chevron Decommissioning EIR
Date: Monday, May 5, 2025 11:53:27 AM
Attachments: Comments for PC on Chevron EIR Decommissioning.docx

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From: Susan Mailheau [redacted]
Sent: Monday, May 5, 2025 11:30 AM
To: Public Comment
Subject: To Planning Commission for Chevron Decommissioning EIR

****EXTERNAL EMAIL****

CAUTION: This email originated from outside the City of Carpinteria. DO NOT OPEN attachments or CLICK on links unless you are sure they are safe. Remember, reputable vendors, banks, etc. will not ask you to disclose passwords or other sensitive information.

I am resubmitting a comment I submitted to City Council, 1/30/24. The current "Final EIR" is severely lacking in consideration for the ESH, notably harbor seals.
What is new:

- The oversight in the EIR is even greater than it was for the DEIR.
- To prepare my comments I have consulted with a group of marine mammal experts at The Marine Mammal Center (TMMC). This Center covers over 600 miles; it is among the largest centers for marine mammal rescue, rehabilitation, and research in the world; and was key to the identification of Domoic Acid (DA) toxicity plaguing marine mammals.
- Experts ar TMMC all agree that harbor seals are vastly different from other pinnipeds and cannot be managed with the same criteria.

- NOAA and its Marine Mammals Stranding Network has determined the harbor seal is greatly threatened throughout California, in large part due to climate change. To date, harbor seals have been spared DA and the rookery at Carpinteria is among the last strongholds for harbor seals up and down the coast of Carpinteria.
- To jeopardize this with premature and under-evaluated planning will be still another black mark against Chevron in the oil industry's reputation for environmental damage.

I ask that you consult with true harbor seal experts before you tinker in their home ground to remediate the harm done by the oil industry.

Susan Mailheau, DVM
Member, former Harbor Seal Advisory Committee
Volunteer, CIMWI
Volunteer Carpinteria Seal Watch

Comments for Chevron DEIR on Decommissioning
Susan Mailheau, DVM
Member, Harbor Seal Advisory Committee

These considerations are offered on behalf of a rare mainland rookery that is currently compromised. I offer these comments to demonstrate that the DEIR does not adequately understand and mitigate for the indigenous harbor seal colony – a species that is federally protected by the Marine Mammal Protection Act. My request is that Chevron fully decommissions its facilities **excluding** the area that is protected by the City for the harbor seals, and merely caps Gail and Grace Pipeline Bundles until such a time as the City and the Harbor Seal Advisory Committee can secure and stabilize this colony or make provision for establishing it as a Marine Protected Area.

The report states that:

- **Project Timing:** It will be a priority of the Project to schedule activities outside of the pupping season. However, there is the potential the proposed decommissioning Project activities will occur for a short period during the period that the beach is closed to the public. Project activities adjacent to the rookery during pupping season (December 1 through May 31)* will be minimized to the maximum extent feasible to conduct pipeline decommissioning activities.

- **Screen:** The screen will be placed, maintained, and removed in a manner and at times that avoid disturbance to seal present on the beach; for example, placing it before first light on the first day of work and removing it after last light on the final day of work.

Seals have an acute sense of smell, vision, and hearing. It is highly unlikely that this screen will avoid disturbing the seals.

Additionally, it was stated in the Padre report: During previous repair and construction work around the rookery, harbor seals have been exposed to disturbances including vehicle and boat sounds, machinery, hammering or grinding on the pier, vibratory pile driving and crane activities, and concrete demolition.

I made counts and observations during recent repair work that did show disturbances that were not documented.

Any presence or work during the pupping period will cause a Level B and possibly Level A disturbance. The seals will abandon their pups. Outside of the pupping season the work being done either on land or underwater will alarm them into abandoning their natal site temporarily if not permanently. In either case, the failure of Chevron to fully account for the rookery that predates them will not earn the goodwill of the public.

Seal facts and requirements that were not addressed in the DEIR (references available):

Sensory perception

- Hearing – the report focuses on the maximum decibels (loudness) but does not address pitch. Seals are sensitive to, and depend on, frequencies that are far above the upper threshold of humans. This means that sounds of machinery can mask those they need to hear (a pup's call or mating songs) or can even be harmful. (The proposed machinery for removal of the concrete armoring alone will require concrete saws and/or jack hammers.). Sound carries for miles underwater regardless of the loudness of the sound.
- Vision - Seals sink to the sea floor and wait for prey to pass during their foraging. Animals that evolved to see in very little light in the ocean's depth will be alerted to motion, reflection, shadows, and silhouettes of any predator's (workers) presence and will therefore leave the rookery area before its own presence is known.
- Touch – The hydrodynamic sense**. Their vibrissae can detect and follow hydrodynamic waves which they depend on for foraging, navigating, and predator evasion. Mechanical equipment will disrupt the wakes of fish which scientists speculate seals follow almost 200 yards.
- Smell – the scents left by seals provides them with a form of social media whereby each seal is aware of the species, sex, individual identity, reproductive status, age, stress level, and nutritional status of the others. Conversely, workers on land and in water will leave scents of predators.

Life History

- Mating – occurs after weaning of pups. If work underwater drives off the most dominant males and most experienced females the reproductive cycle for the entire next year is compromised.
- Pupping "season" is more variable in this colony than is indicated in the Padre report. Some recent years have had births through May. These pups are not likely to be weaned by the planned start of Chevron work.
- Molting – a process that takes place after mating and is often the time when the seals depend most heavily on the beach. Their blood supply is diverted to the surface and significant heat loss can occur.
- Storing nutrients to sustain gestation and prepare for the birth of pups the next season takes place from late summer through parturition. This requires mother seals to feed then haul-out to digest food. Failure to adequately prepare for the pup's development is thought to be one of the causes of mortality in pups (70% of mortality in pups is estimated to be due to undernourishment). Again, strong site fidelity in female harbor seals presents a survival threat to our population when beach disturbances are constant and severe.

Pups must survive to reproductive age (4-7 years old) to maintain the equilibrium of a stable population. But our colony is declining for reasons we (HSAC) are currently investigating. Every pup lost and every adult seal made to suffer chronic stress will challenge the population of one and all.

Please give these seals your utmost effort for the following reasons:

- They are a federally protected sentinel species for the Channel Islands ecosystem
- They serve as a draw for thousands of visitors, and add to our City's economic base
- They are among the species which have been adversely affected by the fossil fuel industry nation-wide and populations affected have in some cases never recovered.

Please modify your plans to take these oversights into account.

Dr. Susan Mailheau
1/30/24,
Edited 5/5/25

* I have logs dating over five years that prove the seals depend on this rookery year-round.

**Whiskers of harbor seals have an undulating surface to reduce the effect they have on the wake they follow. This evolutionary adaptation – unique to harbor seals - is evidence of their importance to the seals' mode of life and consequently, anthropogenic alterations of the targets' wakes will leave the seals greatly impaired in foraging, navigating, and predator evasion.

Ksen' SKu' Mu' Chumash

Ksen~Sku~Mu
Frank Arredondo ~Chumash MLD
[redacted]

May 5, 2025

Nick Bobroff
Director, Community Development Department
Planning Commission
City of Carpinteria
5775 Carpinteria Ave, Carpinteria, CA 93013

Re: Chevron Carpinteria Oil & Gas Facility Decommissioning Project FEIR

To Mr. Bobroff

I thank you for the opportunity to comment on the above referenced project. My name is Frank Arredondo. I am a lineal descendant to the Village of Tipu' and Shalawa'. Under Spanish territory designations this makes me Obispeno & Barbareneo Chumash. I am member of the Native American Heritage Commission (NAHC) Most Likely Descendants (MLD) List for the Chumash Territory and listed on the Native American Contact list for Santa Barbara County. I went to school for a Masters degree in Archaeology where I continued my career experience working as a field supervisor for multiple CRM projects with local tribes. I have worked in CRM industry since 2006 and been a member of the Chumash community throughout.

Being of Native American descendant, from the Chumash territory, and listed on the NAHC MLD contact list which under law requires me and a handful of others on the list to provide the recommend the disposition of Native American human remains when found during development projects. I take my inclusion to this small list with great responsibility and respect. To honor that responsibility, I actively participate in the prevention of disturbance to my ancestors through the thorough review of development projects. I have actively reviewed Planning and Development environmental documents for accuracy and completeness to preserve cultural resources, uphold the laws meant for the protection of Native American rights and authority.

I have worked with all the local Chumash communities at one point in my career. Today my comments are my own.

Carpinteria Air field

Historical Air field not represented or mentioned in the FEIR as part of the background history, it is notable and should be included.
MSRC AREA LOCATION appears to be the easterly runway of the airfield.

According to the text of a historic sign on the site of Carpinteria Airport photographed in 2016 by Charles Ctuart, "On this land owned by the Catlin, Franklin, and Higgins families, an airport established by Jack Chadbourne & Bob Donze became the largest on the South Coast, operating from 1928-35. Among notables who landed here were Wiley Post, Howard Hughes, Will Rogers, and Charles Lindbergh."
The earliest photo which has been located of Carpinteria Airport was a circa 1929 aerial view (courtesy of Charles Stuart).It depicted an arch-roof hangar on the corner of a grass airfield, with a large crowd of spectators in attendance, and at least 8 biplanes on the field.



(https://members.tripod.com/airfields_freeman/CA/Airfields_CA_Ventura.htm)

This should have been included in the History of this location.

Archaeological Resources

4.4.4.3 Impacts to Archaeological Resources
If potentially intact cultural remains were encountered during grading and excavation, the potential for destruction of these remains would be a potentially significant impact… implementation of the mitigation measures below would reduce the impact to a less than significant level. (pdf page 241/432)

California Code regulations title 14 § 15126.4 Consideration and discussion of mitigation Measures Proposed to Minimize Significant Effects provides the state regulation on the matter.

A Mitigation Measure al. Code Regs. Tit. 14, § 15126.4 (b)(3) & (b)(3), & (A)-(D).
(3) Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

(A) Preservation in place is the preferred manner of mitigating impacts to archaeological sites.

(B) Preservation in place may be accomplished by, but is not limited to, the following:

1. Planning construction to avoid archaeological sites;
2. Incorporation of sites within parks, greenspace, or other open space;
3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site.
4. Deeding the site into a permanent conservation easement.

(C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.

(D) Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.

The FEIR does not discuss or consider any of the factors in the FEIR for the project. What is offered is the CRMP as a mitigation measure. Preservation in Place (4 options) or Data recovery are Mitigation measures.

Cul.1a Cultural Resources Management Plan. Prior to ground disturbance, the Cultural Resources Management Plan (CRMP) shall be submitted to the City for review and approval. The CRMP shall include, at a minimum:

1. A description of the roles and responsibilities of cultural resources personnel (including Native American representatives), and the reporting relationships with Project construction management, including lines of communication and notification procedures. The CRMP should also include a "contact list" providing the names of important Project personnel, the agency they represent and/or their role, and their contact information; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

2. Description of how the monitoring shall occur; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

3. Description of frequency of monitoring (e.g., full-time, part time, spot checking); **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

4. High-resolution maps for use by cultural resource monitors to identify locations of intact cultural deposits; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

5. Description of what resources are expected to be encountered; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

6. Description of circumstances that would result in the halting of work; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

7. Description of procedures for halting work on the site and notification procedures; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

8. Procedures for the appropriate treatment of human remains; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

9. Confidentiality of cultural information including location and data; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

10. Description of artifact collection, retention/disposal, and curation policies, including a statement that all cultural materials retained will be curated in accordance with the requirements of an identified, qualified curatorial facility, and that Chevron shall be responsible for all expenses associated with the curation of the materials at the qualified curatorial facility. If cultural materials are found within "contaminated" soil, and those materials are collected, then will have to be cleaned before they can be curated.

The CRMP should describe the process to clean any materials from "contaminated" soil; and **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

11. A description of monitoring reporting procedures including the requirement that reports resulting from the Project be filed with the Central Coast Information Center (CCIC) within one year of Project completion. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**, The wording is off, A final monitoring report that discusses the results of the monitoring work resulting from the project be filed with the CCIC within one year of Project completion. A monitoring report could vaguely constitute as data recovery by way of collecting

scientifically consequential information from and about the resource by way of monitoring results.
10 of the 11 CRMP are procedures and actions used to Identify a resource. Responsibilities and Roles and activities of personnel is all it is. The use of Monitoring is for the professional identification and classification of a resource on site. Individuals that are professionally qualified to be able to identify a resource during construction activities. Once a resource is identified, it is then that the Mitigation Measure is to take effect.

The CRMP as it is presented is not a Mitigation Measure under and is not Consistent with CEQA Guidelines Section 15126.4(b).
(pg 243/432)

Cul.1b Worker Cultural Resources Awareness Program. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
Cul.1c Cultural Resources Monitoring. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
Cul.1d Exclusion Zones **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
This term "Exclusion zone" conflicts with Hazwoper terminology. In HAZWOPER (Hazardous Waste Operations and Emergency Response) 40 training, the Exclusion Zone (also known as the Hot Zone) is the area with actual or potential contamination, and is where cleanup work and other hazardous activities take place. It's the area with the highest potential for exposure and is typically marked by the "Hotline" boundary. Any item located in the Hazwoper Hot zone must have a process in place for removal of contaminated items from the exclusion zone.
Cul.1e Phase III Data Recovery Excavations; **Data Recovery is a Mitigation Measure.**
(pdf pg.244/432)

Cul.1f Curation of Project Materials. - ~~"all archaeological materials recovered from the Project Site"~~. All scientifically significant archaeological material recovered from the Project site shall be curated. Not all resources discovered are qualified to be sent to a curation facility. To tribal groups those resources are still of great concern. They are often requested to be re-buried on-site at end of the project. This activity should be discussed and presented under Tribal Cultural resources.
Cul.2a On-Call Forensic Anthropologist. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
Additionally, "if numerous bone fragments are encountered during"- DEFINE NUMEROURS, AND RELEVANCE?
(pg.244/432)

Cul.2b Human Remains Discovery. (No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION) This is a requirement as a law, Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered.

245/432--Cul.2a
Additionally, the following actions shall be taken:
1. ~~No further disturbance shall occur in the area of any found human remains until the City Coroner has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative~~. On-Call Forensic Anthropologist will be called on site to confirm Human remains and the County Coroner will be called to make the determination of prehistoric/historic based on available site location finds and confirmation from On-Call Forensic Anthropologist.

2. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by ~~Chevron~~ NAHC *or their representative in order to determine proper treatment and disposition of the remains.*
3. ~~Chevron or their representative shall notify the Native American representative of the identification of human remains.~~
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
5. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

Cul.2b Human Remains Discovery*. If human remains are discovered, the following actions shall be taken:*
~~1. Chevron or their representative shall contact the City and County Coroner.~~ The Archaeologist on site shall confer with the On-Call forensic Anthropologist as to the type of faunal remain recovered, Animal, or Human. If human, the County Coroner is to be called. Once that has been done City, Client can be notified.
~~2. No further disturbance shall occur in the area of the find until the County Coroner has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative~~. Never a need.
3. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be ***contacted by*** NAHC ~~**Chevron**~~ **or their representative in order to determine proper treatment and** disposition of the remains.
~~4. Chevron or their representative shall notify the Native American representative of the identification of human remains.~~

5. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98

has been conducted. (No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)

6. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered. (No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)

4.12 Tribal cultural resources (pdf pg 392/432)- "Additional consultation would occur as part of the development of the CRMP" Consultation was deemed completed as of Dec 2023. Any further activity that would suggest further consultation would negate the previous competition and this new activity is re-initiating consultation, AB52 does not have a mechanism for such action. Further activity would need to be defined as "meet and confer" as to not misrepresent how AB52 works.

Thank you for your time,

Best wishes, Frank Arredondo
Ksen~Sku~Mu
Chumash MLD
[redacted]
Email [redacted]

5 REASONS THE EIR IS UNACCEPTABLY INCOMPLETE: FOCUS ON HARBOR SEALS

1. Economics: For over 100 years (longer than the oil facility) there has been a harbor seal rookery in Carpinteria, one of the last remaining on the coast from San Luis Obispo to Mexico. **For several years the trend has been for a decline in the seal population, with most days well under 100-150. The rookery brings millions of dollars into the city from tourists from all over the world.**

2. Ignorance of habitat: The EIR doesn't even recognize that harbor seals are biologically REQUIRED to spend 50% of their time on the beach for daily thermoregulation, digesting food, sleeping and other physiological processes. The harbor seals forage for food in the water. **This dual habitat requirement means the EIR must account for protective measures both on land and in the water.** At present the EIR makes no mention of harbor seals living in both aquatic and terrestrial environments. **How can you protect the seals if you don't know where they live?**

3. Overlooking site fidelity: Harbor seals but not sea lions exhibit site fidelity, which means that harbor seals stay where they are born and do not go over a few miles beyond this. This means that relocating seals to a new beach will not work. As the harbor seals try to congregate in the rookery they would be directly threatened by any attempts to remove the pipes that are immediately under the rookery, adjacent to the pier. **To minimize catastrophic effects on the seals, it would vastly preferable to leave these pipes in place and to cap them.**

4. Overlooking chronic stress: Research on harbor seals is most consistent with the conclusion that cumulative stress promotes a general decline in the health of the population. The EIR should be revised to consider this recent research, which is supported by letters from experts in the field.

5. Sound: Harbor seals are acutely sensitive to sounds and virtually any explosion or human generated sound above or below the surface of the water leads to flushing. **Thus no explosives should be used for demolition of the oil infrastructure**.

Summary: This rookery is in danger of vanishing in response to human intervention and activities. Harbor seals can only be viewed in the wild in Carpinteria and one one other southern California rookery. They are a rare and treasured resource. Curiously, harbor seals are barely mentioned in the entire EIR, raising the question of whether this was a deliberate attempt to minimize the significance of the rookery. Finally, the EIR reveals a near total ignorance of harbor seal biology, hence the project should not be allowed to proceed until it adequately responds to these 5 concerns.

Randall T Moon. Ph.D.

Carpinteria

[redacted]

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Attachment E.

Appeal filed by Frank Arredondo

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

CITY OF CARPINTERIA
5775 CARPINTERIA AVENUE
CARPINTERIA, CA 93013
(805) 684-5405

APPEAL FORM

Name of Appellant: Frank Arredondo

Address: [redacted]

Telephone No.: [redacted]

If appeal is specifically related to a development project, please state the:

Assessor Parcel No. _____

Address/Location of property: 5675 & 5663 Carpinteria Ave

Case and/or Project No. SCH 2022080026
Pro No 21-2128 DP/CDP

Date of Action taken by Council/Commission/Board or Staff which is being appealed: 5-5-2025

Please attach a written description of the decision of the authorized individual or Commission/Board you are appealing and the grounds of your appeal. This description must be prepared pursuant to Chapter 14.78 (Appeals) of the Carpinteria Municipal Code

Frank Arredondo
Signature of Appellant

Date filed: _____

Amount of Fee Paid: _____

Received by: _____

Ksen~Sku~Mu - Chumash
Frank Arredondo ~ Chumash MLD-Tribal Chair
[redacted]

May 15, 2025

Nick Bobroff
Director, Community Development Department
City of Carpinteria
5775 Carpinteria Ave, Carpinteria, CA 93013

RE: Chevron Carpinteria Oil & Gas Facility Decommissioning Project
(SCH #2022080026) FEIR APPEAL

To Mr. Bobroff

I am formally appealing the above referenced project.

My name is Frank Arredondo. I am a lineal descendant to the Village of Tipu' and Shalawa'. Under Spanish territory designations this makes me Obispeno & Barbareneo Chumash. I am member of the Native American Heritage Commission (NAHC) Most Likely Descendants (MLD) List for the Chumash Territory and listed on the Native American Contact list for Santa Barbara County. I went to school for a Masters degree in Archaeology where I continued my career experience working as a field supervisor for multiple CRM projects with local tribes. I have worked in CRM industry since 2006 and been a member of the Chumash community throughout.

Being of Native American descendant, from the Chumash territory, and listed on the NAHC MLD contact list which under law requires me and a handful of others on the list to provide the recommend the disposition of Native American human remains when found during development projects. I take my inclusion to this small list with great responsibility and respect. To honor that responsibility, I actively participate in the prevention of disturbance to my ancestors through the thorough review of development projects. I have actively reviewed Planning and Development environmental documents for accuracy and completeness to preserve cultural resources, uphold the laws meant for the protection of Native American rights and authority.

The FEIR mis-identifies a procedure as a mitigation measure.

Lead agency's responsibility to approving a project bears the responsibility of complying with CEQA and ensuring proper environmental review. The lead agency has the authority to determine what constitutes a mitigation measure and what does not. Mitigation measures are defined as measures that could minimize significant adverse impacts. Lead agency is tasked with identifying and considering these measures. As part of the lead agency responsibility, they are to also adopt a program for monitoring and reporting on the mitigation measures it has imposed. The Mitigation Measures in the FEIR are listed incorrectly as a Mitigation measure when in-fact they are a part of the program of monitoring and reporting process in CEQA, or a "procedure." This is an error in and misuse of discretion because they are different things.
Submitted comment letter dated May 5th 2025 at Planning commission hearing included the numerous areas of the FEIR that have been misidentified or used incorrect procedures.

The FEIR identifies specific organizations to carry out Native American Monitoring work.

"The Tribe expressed a desire to be involved in the creation of a Cultural Resources Management Plan (CRMP) given the importance and delicacy of this work. The Tribe would also like the entire Project to be monitored by Chumash Tribal representatives during ground disturbance work." (FEIR 4.12-2 TRC)

CEQA Documents are to be focused on describing the project, its potential environmental impacts, and proposed mitigation measures. Not allow the specification of who should carry out the monitoring work. The statement used specifies which organization will do the work.
The only Federally Recognized Tribe is the Santa Ynez Chumash. Non federally groups identified under AB52 , NAHC are also organizations that share the designation as a "tribe" but not carry the Federal distinction. These are also defined as organizations and in order for a Native American monitor to do work they would be required to be a member of these organizations. There is a violation of fair working standards. In addition to cronyism, nepotism there is also "affinity Bias." When a member of an organization is given preference for a job due to their membership, it is referred to as "affinity bias." This type of bias can also manifest as "membership bias."

A FEIR (Environmental Impact Report) in California cannot include specific details about who will work a job at a proposed project. FEIRs focus on the environmental impacts of a project, not the employment details.

Work approval is carried out by the lead agency by way of issuing permits, licenses, and other authorizations for work and that is distinct from the CEQA process itself not included in the environmental document. The inclusion of that request by the Tribe does not fall within the umbrella of what is a Tribal Cultural resource or what is a Mitigation measure. It is the duty of the lead agency to keep work approval out of a environmental document. The decision to leave that in the document is an error in discretion.

We hope that in the interest of maintaining a well-written document to effectively communicate the potential environmental impacts of a project and ensure informed decision-making these suggested changes be adopted. A well-written EIR is clear, concise, organized, and accurately reflects the project's purpose and potential consequences. It will thoroughly evaluate the significant physical environmental impacts of a proposed project, including identifying mitigation measures for significant impacts and considering feasible alternatives.

Thank you, Frank

Best wishes, Frank Arredondo
Ksen~Sku~Mu
Chumash MLD
[redacted]
Email [redacted]

Ksen' SKu' Mu' Chumash

Ksen~Sku~Mu
Frank Arredondo ~Chumash MLD
[redacted]

May 5, 2025

Nick Bobroff
Director, Community Development Department
Planning Commission
City of Carpinteria
5775 Carpinteria Ave, Carpinteria, CA 93013

Re: Chevron Carpinteria Oil & Gas Facility Decommissioning Project FEIR

To Mr. Bobroff

I thank you for the opportunity to comment on the above referenced project. My name is Frank Arredondo. I am a lineal descendant to the Village of Tipu' and Shalawa'. Under Spanish territory designations this makes me Obispeno & Barbareneo Chumash. I am member of the Native American Heritage Commission (NAHC) Most Likely Descendants (MLD) List for the Chumash Territory and listed on the Native American Contact list for Santa Barbara County. I went to school for a Masters degree in Archaeology where I continued my career experience working as a field supervisor for multiple CRM projects with local tribes. I have worked in CRM industry since 2006 and been a member of the Chumash community throughout.

Being of Native American descendant, from the Chumash territory, and listed on the NAHC MLD contact list which under law requires me and a handful of others on the list to provide the recommend the disposition of Native American human remains when found during development projects. I take my inclusion to this small list with great responsibility and respect. To honor that responsibility, I actively participate in the prevention of disturbance to my ancestors through the thorough review of development projects. I have actively reviewed Planning and Development environmental documents for accuracy and completeness to preserve cultural resources, uphold the laws meant for the protection of Native American rights and authority.

I have worked with all the local Chumash communities at one point in my career. Today my comments are my own.

Carpinteria Air field

Historical Air field not represented or mentioned in the FEIR as part of the background history, it is notable and should be included.
MSRC AREA LOCATION appears to be the easterly runway of the airfield.

According to the text of a historic sign on the site of Carpinteria Airport photographed in 2016 by Charles Ctuart, "On this land owned by the Catlin, Franklin, and Higgins families, an airport established by Jack Chadbourne & Bob Donze became the largest on the South Coast, operating from 1928-35. Among notables who landed here were Wiley Post, Howard Hughes, Will Rogers, and Charles Lindbergh."
The earliest photo which has been located of Carpinteria Airport was a circa 1929 aerial view (courtesy of Charles Stuart).It depicted an arch-roof hangar on the corner of a grass airfield, with a large crowd of spectators in attendance, and at least 8 biplanes on the field.



(https://members.tripod.com/airfields_freeman/CA/Airfields_CA_Ventura.htm)

This should have been included in the History of this location.

Archaeological Resources

4.4.4.3 Impacts to Archaeological Resources
If potentially intact cultural remains were encountered during grading and excavation, the potential for destruction of these remains would be a potentially significant impact... implementation of the mitigation measures below would reduce the impact to a less than significant level. (pdf page 241/432)

California Code regulations title 14 § 15126.4 Consideration and discussion of mitigation Measures Proposed to Minimize Significant Effects provides the state regulation on the matter.

A Mitigation Measure al. Code Regs. Tit. 14, § 15126.4 (b)(3) & (b)(3), & (A)-(D).
(3) Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. The following factors shall be considered and discussed in an EIR for a project involving such an archaeological site:

(A) Preservation in place is the preferred manner of mitigating impacts to archaeological sites.

(B) Preservation in place may be accomplished by, but is not limited to, the following:

1. Planning construction to avoid archaeological sites;
2. Incorporation of sites within parks, greenspace, or other open space;
3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site.
4. Deeding the site into a permanent conservation easement.

(C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.

(D) Data recovery shall not be required for an historical resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.

The FEIR does not discuss or consider any of the factors in the FEIR for the project. What is offered is the CRMP as a mitigation measure. Preservation in Place (4 options) or Data recovery are Mitigation measures.

Cul.1a Cultural Resources Management Plan. Prior to ground disturbance, the Cultural Resources Management Plan (CRMP) shall be submitted to the City for review and approval. The CRMP shall include, at a minimum:
1. A description of the roles and responsibilities of cultural resources personnel (including Native American representatives), and the reporting relationships with Project construction management, including lines of communication and notification procedures. The CRMP should also include a "contact list" providing the names of important Project personnel, the agency they represent and/or their role, and their contact information; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
2. Description of how the monitoring shall occur; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
3. Description of frequency of monitoring (e.g., full-time, part time, spot checking); **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
4. High-resolution maps for use by cultural resource monitors to identify locations of intact cultural deposits; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
5. Description of what resources are expected to be encountered; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
6. Description of circumstances that would result in the halting of work; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
7. Description of procedures for halting work on the site and notification procedures; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
8. Procedures for the appropriate treatment of human remains; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
9. Confidentiality of cultural information including location and data; **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
10. Description of artifact collection, retention/disposal, and curation policies, including a statement that all cultural materials retained will be curated in accordance with the requirements of an identified, qualified curatorial facility, and that Chevron shall be responsible for all expenses associated with the curation of the materials at the qualified curatorial facility. If cultural materials are found within "contaminated" soil, and those materials are collected, then will have to be cleaned before they can be curated.
The CRMP should describe the process to clean any materials from "contaminated" soil; and **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
11. A description of monitoring reporting procedures including the requirement that reports resulting from the Project be filed with the Central Coast Information Center (CCIC) within one year of Project completion. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**, The wording is off, A final monitoring report that discusses the results of the monitoring work resulting from the project be filed with the CCIC within one year of Project completion. A monitoring report could vaguely constitute as data recovery by way of collecting

scientifically consequential information from and about the resource by way of monitoring results.
10 of the 11 CRMP are procedures and actions used to Identify a resource. Responsibilities and Roles and activities of personnel is all it is. The use of Monitoring is for the professional identification and classification of a resource on site. Individuals that are professionally qualified to be able to identify a resource during construction activities. Once a resource is identified, it is then that the Mitigation Measure is to take effect.

The CRMP as it is presented is not a Mitigation Measure under and is not Consistent with CEQA Guidelines Section 15126.4(b).
(pg 243/432)

Cul.1b Worker Cultural Resources Awareness Program. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
Cul.1c Cultural Resources Monitoring. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
Cul.1d Exclusion Zones **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
This term "Exclusion zone" conflicts with Hazwoper terminology. In HAZWOPER (Hazardous Waste Operations and Emergency Response) 40 training, the Exclusion Zone (also known as the Hot Zone) is the area with actual or potential contamination, and is where cleanup work and other hazardous activities take place. It's the area with the highest potential for exposure and is typically marked by the "Hotline" boundary. Any item located in the Hazwoper Hot zone must have a process in place for removal of contaminated items from the exclusion zone.
Cul.1e Phase III Data Recovery Excavations; **Data Recovery is a Mitigation Measure.**
(pdf pg.244/432)

Cul.1f Curation of Project Materials. - ~~"all archaeological materials recovered from the Project Site"~~. All scientifically significant archaeological material recovered from the Project site shall be curated. Not all resources discovered are qualified to be sent to a curation facility. To tribal groups those resources are still of great concern. They are often requested to be re-buried on-site at end of the project. This activity should be discussed and presented under Tribal Cultural resources.
Cul.2a On-Call Forensic Anthropologist. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
Additionally, "if numerous bone fragments are encountered during"- DEFINE NUMEROURS, AND RELEVANCE?
(pg.244/432)

Cul.2b Human Remains Discovery. (No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION) This is a requirement as a law, Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered.

245/432--Cul.2a
Additionally, the following actions shall be taken:
1. ~~No further disturbance shall occur in the area of any found human remains until the City Coroner has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative~~. On-Call Forensic Anthropologist will be called on site to confirm Human remains and the County Coroner will be called to make the determination of prehistoric/historic based on available site location finds and confirmation from On-Call Forensic Anthropologist.

2. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by ~~Chevron~~ NAHC *or their representative in order to determine proper treatment and disposition of the remains.*
3. ~~Chevron or their representative shall notify the Native American representative of the identification of human remains.~~
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**
5. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered. **(No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)**

Cul.2b Human Remains Discovery*. If human remains are discovered, the following actions shall be taken:*
~~1. Chevron or their representative shall contact the City and County Coroner.~~ The Archaeologist on site shall confer with the On-Call forensic Anthropologist as to the type of faunal remain recovered, Animal, or Human. If human, the County Coroner is to be called. Once that has been done City, Client can be notified.
~~2. No further disturbance shall occur in the area of the find until the County Coroner has made necessary findings as to origin. Should the human remains need to be taken off site for evaluation, they shall be accompanied by a Native American representative~~. Never a need.
3. If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be ***contacted by*** NAHC ~~**Chevron**~~ **or their representative in order to determine proper treatment and** disposition of the remains.
~~4. Chevron or their representative shall notify the Native American representative of the identification of human remains.~~

5. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98

has been conducted. (No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)

6. Public Resources Code § 5097.98, CEQA § 15064.5 and Health & Safety Code § 7050.5 shall be followed in the event that human remains are discovered. (No Preservation in Place (4 options) or Data recovery-NOT a MITIGATION)

4.12 Tribal cultural resources (pdf pg 392/432)- "Additional consultation would occur as part of the development of the CRMP" Consultation was deemed completed as of Dec 2023. Any further activity that would suggest further consultation would negate the previous competition and this new activity is re-initiating consultation, AB52 does not have a mechanism for such action. Further activity would need to be defined as "meet and confer" as to not misrepresent how AB52 works.

Thank you for your time,

Best wishes, Frank Arredondo
Ksen~Sku~Mu
Chumash MLD
[redacted]
Email [redacted]

Attachment F.

Chevron Response to Appeal

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

Mark Korte-Nahabedian
Corporate Affairs Advisor
West Coast Decommissioning Program

June 11, 2025

To: Carpinteria City Council

RE: F. Arredondo Appeal – Carpinteria Oil and Gas Plant Decommissioning Final EIR

Dear City Council,

We understand that the City of Carpinteria has received an appeal to the Final Environmental Impact Report for the Carpinteria Oil and Gas Plan Decommissioning Project (FEIR) and that the appeal is based on two issues related to cultural resources. The appellant alleges (1) that the FEIR improperly designates a specific tribe to conduct cultural monitoring work and (2) that the FEIR misidentifies "procedures" as mitigation measures. As discussed below, neither of the appellants claims is supported, and the City Council should accordingly dismiss the appeal and uphold the Planning Department's certification of the FEIR.

I. The FEIR Does Not Identify any Specific Organization to Conduct Cultural Monitoring.

The appellant alleges that the FEIR requires that a specific Tribe conduct cultural monitoring and disregards other Tribes in the Project area. This is incorrect. The operative mitigation measure in the FEIR is neutral as to the affiliation of who will conduct cultural monitoring. *See* FEIR, p. 4.4-29 (Mitigation Measure Cul.1c, Cultural Resource Monitoring).

The appellant instead cites language describing a *request* received from a Tribe during AB 52 consultation. Specifically, during consultation, one of the tribes requested that: "The Tribe would also like the entire Project to be monitored by Chumash Tribal representatives during ground disturbance work." FEIR, p. 4.12-2. This language cited by the appellant is simply a summary of a request received during consultation; it is not a mitigation measure. The operative mitigation measure does not mandate the affiliation of the monitor.

The FEIR describes the City's government-to-government consultation pursuant to AB 52 with both federally- and state-recognized Tribes as provided by the Native American

Chevron North America Exploration and Production Company
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3916 State Street, Suite 200, Santa Barbara, CA 93105
Tel 805 979 3507
markkn@chevron.com

Heritage Commission (NAHC)[1] to evaluate and mitigate potential impacts to Tribal cultural resources. Complementing the City's AB 52 consultation process, Chevron has been working iteratively with Tribal leadership from these same Tribes, the Santa Ynez Band of Chumash Indians, the Coastal Band of the Chumash Nation, Barbareño/Ventureño Band of Mission Indians, and Barbareño Band of Chumash Indians (collectively known as the Advising Tribes), to co-develop the Cultural Resources Management Plan (CRMP) for the Project. The CRMP serves as the primary mitigation measure (Mitigation Measure Cul. 1a) for potential impacts to cultural resources outlined in the FEIR. According to applicable laws and its own terms, the CRMP must be kept confidential and therefore will not be made public, but it will be submitted to the City of Carpinteria in accordance with the mitigation measure for final approval. For your information and to help respond to the appellant's concerns, we offer the following excerpt from the CRMP, with the consent of the Advising Tribes:

> *In accordance with MM Cul.1c of the Project FEIR, cultural resources monitoring shall be conducted during Project-related ground-disturbing activities for the purpose of identifying and avoiding potential impacts to cultural resources . . . .* ***Chevron shall also retain a Tribal Monitor that is an authorized representative of each of the Advising Tribes to monitor all ground disturbance in Project excavation areas.***

Consistent with the City's AB 52 consultation, the CRMP requires a monitor for "each of the Advising Tribes" and is not limited to the federally recognized Tribe as appellant contends. Further, there is no requirement in the FEIR or the CRMP that the monitor be a member of the Advising Tribe; instead, each Tribe may choose any authorized representative that meets the minimum qualifications of a cultural monitor. This provision from the CRMP and the mitigation measure in the FEIR directly refute the allegation that a specific Tribe or organization has been identified to conduct cultural resource monitoring. Rather, it ensures that each Tribal Monitor is an individual qualified and authorized to monitor operations on behalf of the Advising Tribes,

[1] State and local agencies are required to coordinate with the NAHC to satisfy tribal consultation requirements under CEQA. *See* Cal. Pub. Resources Code §§ 5097.94, 5097.95.

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thereby providing diverse tribal involvement to address any cultural resources encountered during decommissioning.

II. Mitigation Measures May Include Procedures and Legally Required Actions.

The appellant has also made comments in prior correspondence raising concerns regarding the adequacy of cultural mitigation. In particular, the appellant has stated that the FEIR improperly classifies established regulatory procedures as mitigation measures. This is incorrect. It is a settled principle of law under CEQA that "a condition requiring compliance with regulations is a common and reasonable mitigation measure, and may be proper where it is reasonable to expect compliance." *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906 (upholding mitigation measure requiring compliance with regulations pursuant to the California Building Code and Seismic Hazards Mapping Act as a mitigation measure). This has been further upheld where applicants are required by a mitigation measure to prepare plans that comply with existing regulations. *Tiburon Open Space Committee v. County of Marin* (2022) 78 Cal.App.5th 700, 763 (upholding mitigation measure mandating applicant prepare a stormwater pollution prevention plan and a resource management plan as required by the resource agencies). Here, the appellant has not offered any evidence that the applicant would fail to comply with these otherwise applicable statutory and regulatory requirements. The FEIR's incorporation of these measures was appropriate and supported by substantial evidence.

In addition, substantially similar mitigation measures establishing procedures for the handling of cultural resources have already been upheld by the California Court of Appeals. In particular, in *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 470-71, the court upheld a substantially similar mitigation measure providing data recovery procedures for archaeological resources when avoidance and preservation in place were not feasible. *See also Preservation Action Council of San José v. City of San José* (2023) 91 Cal.App.5th 517, 535 (upholding mitigation measure "documenting the four historic structures prior to any disturbance of the project site, in accordance with specified guidelines (including drawings, photographs, and written documentation)").

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We are proud of the relationships we have built with Tribal communities and the CRMP we developed through collaboration with the Advising Tribes, and we value the participation and perspective from Tribes on the decommissioning project. We look forward to continuing to work with Tribal leadership and their designated representatives throughout the duration of this project. We respectfully request that the City Council dismiss the appeal and uphold the Planning Commission's certification of the FEIR.

Kind regards,

Mark Korte-Nahabedian

Mark Korte-Nahabedian
Corporate Affairs Advisor

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Attachment G.

Final Environmental Impact Report (FEIR)

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

Attachment G-1.

Final Environmental Impact Report (FEIR) for the Chevron Decommissioning and Remediation of the Carpinteria Oil and Gas Processing Facilities Project

The FEIR includes the following: Executive Summary; FEIR; and Technical Appendices A- J.

Comments received on the Draft EIR and responses to those comments are included in Appendix I.

The full document is available at this link:
https://carpinteriaca.gov/city-hall/community-development/oil-gas-information/oil-processing-facility-decommissioning/

Attachment G-2.

Executive Summary of

Final Environmental Impact Report

Appeal of the Chevron Carpinteria Oil and Gas Processing Facilities Decommissioning and Remediation Project

Project 21-2128-DP/CDP

July 15, 2025 City Council Special Meeting

Final
Environmental Impact Report

Decommissioning and Remediation of the Chevron Carpinteria Oil & Gas Processing Facility Project

Executive Summary

State Clearinghouse No. 2022080026



April 2025

Prepared by:

City of Carpinteria
Community Development
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Prepared with assistance from:
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Executive Summary

This Final Environmental Impact Report (EIR) has been prepared to address the environmental impacts associated with the Decommissioning and Remediation of the Chevron Oil and Gas Processing Facility (Project). Chevron USA (Chevron, or "the Applicant") is currently planning to decommission and remediate the Carpinteria Oil and Gas Processing Facilities (Project Site). The proposed Project-related activities would also include the removal of nearshore/offshore pipelines out to three nautical miles (nmi) (state waters limit) (State Waters Offshore Pipelines). In support of this activity, an application for a Coastal Development Permit (CDP) is being filed with the City of Carpinteria (City).

The Project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City of Carpinteria is the Lead Agency with principal responsibility for considering the Project for approval (14 California Code of Regulations [CCR] 15000 et seq.).

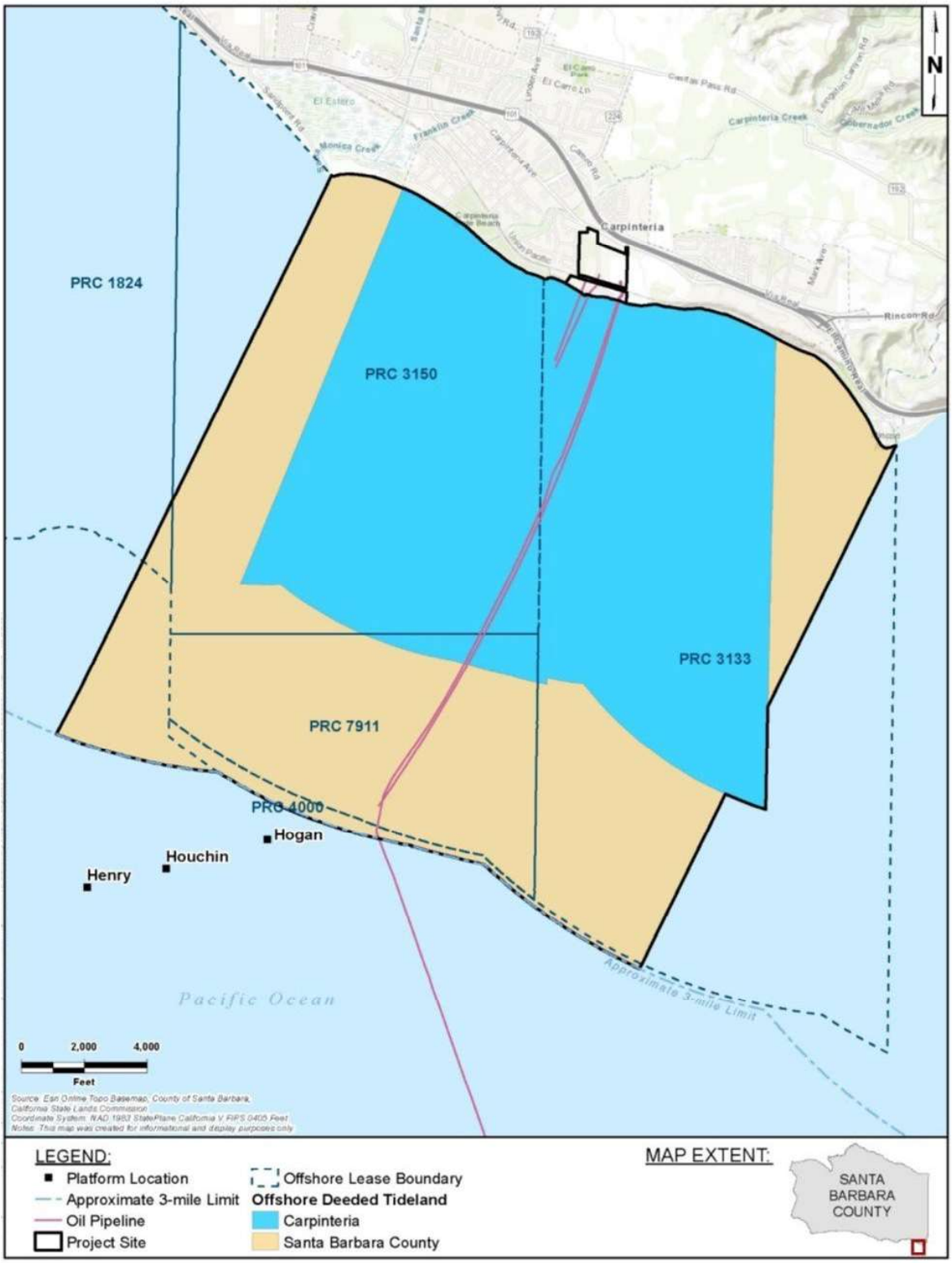
This EIR is an informational document that is being used by the general public and governmental agencies to review and evaluate the Project. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Project. Specifically, the EIR should be consulted for information about the environmental effects associated with the Project and potential mitigation measures to address or minimize those effects.

The remainder of the Executive Summary consists of the following sections:

- An introduction, which discusses the regulatory oversight in the preparation of the EIR and public scoping process, and agency use of the EIR;
- A brief description of the Project and the Project objectives;
- A discussion of the background environmental setting;
- A brief description of the alternatives evaluated in detail in the EIR;
- A summary of key impacts of the Project, alternatives, and cumulative impacts; and
- A discussion of the Environmentally Superior Alternative.

Tables ES.4 through ES.6, located at the end of this Executive Summary, summarize the impacts and mitigation measures for the Project. The impacts and mitigation measures for the Project are discussed in detail in Sections 4.1 through 4.13 of this EIR.

Figure ES-1 Project Site Location Map



Source: Applicant Project Description, 2021.

ES.1 Introduction

The City, as Lead Agency under CEQA, determined that an EIR would be required as part of the permitting process for the Project. The City's decision to prepare an EIR is documented in an Initial Study included in Appendix D of this EIR. The Initial Study, which consists of a checklist of possible effects on a range of environmental topics, found that the Project may have significant environmental impacts related to:

- Aesthetics;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Climate Change and Greenhouse Gas Emissions;
- Hazardous Materials and Risk of Upset;
- Hydrology and Water Resources;
- Land Use and Planning;
- Noise and Vibration;
- Transportation and Circulation; and
- Tribal Cultural Resources.

A detailed analysis associated with an EIR is needed to further assess potential effects. While these issue areas are the main topics of focus in this EIR, other issue areas are included in Section 4.13 which provides a discussion of issue areas that were found not to have the potential for significant impacts.

On August 1, 2022, the City, as the Lead Agency, issued a Notice of Preparation (NOP) to inform the general public and agencies that an EIR would be prepared for the Project and to solicit comments on environmental issues to be addressed in the document. The public scoping comment period was extended by 30 days and closed on September 30, 2022. Comments received in response to the NOP were used to further refine the scope of the analysis and the technical studies in this EIR. Written comments received in response to the NOP are provided in Appendix D with an indication of specific EIR sections where topics related to individual comments are addressed.

The City of Carpinteria is the Lead Agency per CEQA Guidelines Section 15051. In addition, a number of public agencies with discretionary authority over this Project have been identified as Responsible Agencies which may rely on this EIR, once certified, as part of the deliberative review in deciding whether to approve or disapprove a particular activity. Table 1.2 provides a listing of these Responsible Agencies and their applicability to the Project. The City, as the CEQA Lead Agency, will act first on the Project before any of the Responsible Agencies act on the Project. City decision-makers (Planning Commission and City Council) will use the EIR for decision-making regarding the Project. If the Project is approved by all required permitting agencies, the City would be responsible for reviewing and approving all pre-construction compliance plans and ensuring that the Project modifications and operations are conducted in accordance with the permit conditions.

The City of Carpinteria issued a Draft EIR on November 30, 2023. The public comment period on the Draft EIR ran through January 31, 2024. The City of Carpinteria held a public comment meeting on December 18, 2023.

The public comments received on the Draft EIR were reviewed and responded to as required by CEQA and the CEQA Guidelines. This Final EIR has been prepared, incorporating all of the comments received, written responses to received comments, and the Draft EIR, along with any changes to the Draft EIR that resulted from the comments received.

The Draft EIR (paper copy form) as well as the Final EIR will be available to the general public for review at these locations:

City of Carpinteria Community Development Department
City of Carpinteria Public Library

CD and paper copies of the Draft EIR and the Final EIR may be obtained (free of charge) at the City of Carpinteria Community Development Department.

The Draft EIR and the Final EIR are also available on the City of Carpinteria's website at: https://carpinteriaca.gov/city-hall/community-development/oil-gas-information/oil-processing-facility-decommissioning/

Revision marks showing the changes from the Draft EIR are shown in the Final EIR where changes are shown as lines in the margins, and added text is shown underlined. Deleted text is not shown due to formatting issues. A full revision version is available by request that shows deletions also.

ES.2 Project Description

The Project proposes to demolish and remove the Facility including, but not limited to the onshore portions of the Facility (Onshore Facility), and State Waters Offshore Pipelines and complete remediation of impacted soils and groundwater at the Facility. Remediation is proposed to comply with levels established in a Remedial Action Plan (RAP) that will be reviewed by the Santa Barbara County Public Health Department, Environmental Health Services (SBCEHS), Regional Water Quality Control Board (RWQCB), and United States Environmental Protection Agency (U.S. EPA). The Project proposal assumes the most stringent clean up levels for the purpose of determining soil excavation and truck trip estimates and therefore a maximum amount of remediation activities (e.g., truck trips, site activities). The Applicant states remediation efforts will be performed along with preservation of existing site resources, including mature trees and bluffs, and in coordination with site constraints including buffer zones adjacent to the Union Pacific Railroad (UPRR) right-of-way (ROW). The most stringent clean up levels would also result in greater flexibility for development on the site meeting the most rigorous standards (e.g., unrestricted land use).

ES.3 Objectives of the Project

Pursuant to Section 15124(b) of the CEQA Guidelines, the description of the Project is to contain "a clearly written statement of objectives" that would aid the Lead Agency in developing a reasonable range of alternatives to evaluate in the EIR and would aid decision makers in preparing findings and, if necessary, a statement of overriding considerations. The City is the CEQA Lead Agency responsible for preparing the EIR. The City decision-makers will consider the EIR for certification and the Project for approval.

The underlying purpose of the Project is to remediate the environmental impacts of the legacy oil and gas facilities on the Project site.[1] More specifically, the Project's purpose is to demolish and remove surface and subsurface facilities and subsequent remediation of any impacted soils connected to activities from the Onshore Facility to accommodate the site's potential future redevelopment. Any residually impacted soils at the Onshore Facility will be remediated to an unrestricted land use standard consistent with the approvals from the SBCEHS, RWQCB, and U.S. EPA to facilitate reuse of the property for land use acceptable under the City's current Draft General Plan/Local Coastal Plan (General Plan) Update (anticipated to be Planned Unit Development and Open Space/Recreation). The State Waters Offshore Pipelines will also be removed. The Project objectives as provided by the Applicant are summarized as follows:

- Idling and removal of existing surface and subsurface equipment, piping, pipeline segments and structures associated with the Facility including removal of concrete foundations, asphalt, oil spray, and road base within the Facility;
- Pig and flush pipelines in preparation for removal and removal of State Waters Offshore Pipelines out to the 3-nmi state waters limit;
- Excavation/remediation of any impacted soils within the Facility and restoration of the affected portions of the Project Site in accordance with the agency approved Remedial Action Plan;
- Complete removal of State Waters Offshore Pipelines; and
- Recycling/disposal of all materials removed from the Project Sites.

ES.4 Background and Historic Operations

The Project Site is located within an area that has been historically utilized for agricultural production and more recently for oil and gas development support activities. Historical agricultural production activities documented at the Project Site from the 1920s through 1959 included dry farming, row crop production, orchards (fruit trees and nuts), and commercial flower production (plant nursery).

Oil and gas processing equipment was initially constructed onsite in the 1950s to support production from the offshore Summerland field developed by the Standard, Humble, and Summerland State (SHSS) joint venture. Oil and gas first flowed through Project Site in 1959 after the commissioning of offshore Platform Hazel. The processed oil was metered and transferred to Tank 861, a 217,000-barrel (bbl) capacity above-ground storage tank (AST) with a floating top roof operated by Standard Oil's Pipeline Department (now Chevron Pipeline & Power). Produced gas that flowed to the Project Site from Platform Hazel and later other offshore platforms was processed onsite and then sold to Southern California Gas Company (SoCalGas) via the Sales Gas Area (pipes, valves, meters, and equipment), which was also constructed in the late 1950s.

Historically, processing levels at the Facility have been as high as 20,000 barrels per day of crude oil and 20 million standard cubic feet (MMSCF) per day of natural gas. The Facility consisted of offices, production pipelines from offshore platforms, a connected system of product separation, processing, and storage facilities. Processed natural gas from the Facility was fed into the SoCalGas network. Processed crude oil and natural gasoline were blended and shipped from the Facility by way of pipeline to Ventura, from where it was piped to refineries in the Los Angeles area.

[1] 14 Cal Code Regs §15124(b); See *Golden Door Props., LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 546; *Bay Area Citizens v. Association of Bay Area Gov'ts* (2016) 248 Cal.App.4th 966, 1013.

Historically, refined products and crude oil were also transferred from the Facility via marine tanker. However, the marine terminal, formerly accessed by an offshore mooring, is no longer operational. From 1960 to 1989, the Facility received oil and gas from Platform Hazel as well as several other offshore platforms constructed in the Santa Barbara Channel, including Hilda, Hope, and Heidi (Carpinteria Field), and Gail and Grace (Santa Clara Field and Sockeye Field). Upgrades and additions to the Facility were completed to accommodate the varied quality of the additional oil and gas volume. Abandonment of the wells and decommissioning/removal of offshore Platforms Hazel, Hilda, Hope, and Heidi (4H Platforms) from the Santa Barbara Channel were completed in 1996.

The Applicant sold its Santa Barbara Channel assets to Venoco, Inc. in 1998. Platform Grace ceased operations in 1998 and Platform Gail in 2017. Chevron purchased the property as part of Venoco bankruptcy proceedings and is the Operator of record and Applicant for the decommissioning Project.

ES.5 Description of Alternatives

Alternatives to the Project were developed per CEQA Guidelines Section 15126.6. Section 5.0, Environmental Analysis and Comparison of Alternatives, provides a complete description of all alternatives considered, including an explanation for rejecting potential alternatives for further analysis. In addition, in response to comments made on the Draft EIR, an additional alternative, the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative, has been added to this EIR, which is described below and included in the comparative analysis. The following were the alternatives evaluated and carried forward to the Environmentally Superior Alternative Discussion.

ES.5.1 No Project Alternative

CEQA requires an evaluation of the No Project Alternative so that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project. According to CEQA Guidelines §15126.6(3)(B), for a development project the No Project Alternative is the circumstances under which the Project does not proceed. If disapproval of the Project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed.

Under the No Project Alternative, the Project as proposed would not occur and the Applicant would not conduct the site demolition and remediation activities proposed by the Project. The CPF would remain at the site in a shut-down status and facilities would not be decommissioned. This would include onshore facilities, and offshore pipelines. It should be noted that remediation activities may still be required to proceed since the U.S. EPA and SBCEHS would likely continue to require that these facilities be cleaned up of contaminated materials and appropriately remediated. However, without the removal of above-ground equipment and tanks, it would be difficult to fully access all areas targeted for excavation and remediation.

ES.5.2 Full Removal of Facilities Alternative

The Project as proposed excludes a number of facilities that are not slated for decommissioning for a variety of reasons. Under this alternative all oil and gas facilities within the property and all related offshore facilities that can be addressed would be fully decommissioned. Those facilities would include the plugging and abandonment of the seven wells that exist within the Project Site; removal and remediation of naturally occurring petroleum hydrocarbons which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area; and removal of former Platforms Hazel and Hilda pipeline bundle, which include two, 8-inch diameter and one, 6-inch diameter

abandoned pipelines that come from offshore, across the beach near the western extent of the Project area and a 36-inch diameter corrugated metal vault located at the edge of the bluffs.

This alternative would potentially eliminate potential long term oil spill impacts related to oil well blowouts and would eliminate the impacts associated with ongoing oil seeps. In addition, removal of pipelines through the bluffs would prevent future erosion impacts and would address pipelines that were not previously removed and would not become a burden on the public for addressing future removal.

ES.5.3 Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative

The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative consists of all the components of the Proposed Project together with removal of the onshore and nearshore portion of the former Platforms Hazel and Hilda pipeline bundle, which was abandoned in place as approved by the State Lands Commission during the platform removal project in 1997. This alternative is a revised version of the Full Removal of Facilities Alternative described in Section 5.3.2 but does not include removal and remediation of naturally occurring hydrocarbon seeps, plugging and abandonment of seven existing wells within the Project Site, or removal of the former Platforms Hazel and Hilda pipeline bundle further from shore, beyond a depth of 30 feet of water.

Comments from the Applicant and others pointed out that the hydrocarbon seeps and historic wells are not required to be intervened by any regulatory agency and are not feasible under the existing Project. The California Coastal Commission has stated that the seeps are a chronic natural occurrence that is part of the environmental setting and would not be considered an impact. The seeps, which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area, are natural environmental features resulting from geological conditions. The California Coastal Commission commented that leaving the seeps undisturbed in their natural state would not be inconsistent with the Coastal Act. (California Coastal Commission letter, 1/31/2024). Previous attempts to cement over seeps in southern California have resulted in seeps moving around the cement cap. (Chevron letter, 1/31/2024). Abandonment of the historic wells on the property that were installed and operated by others are not proposed to be affected by the Proposed Project decommissioning activities and as such, are not considered the Applicant's responsibility. The California Geologic Energy Management Division (CalGEM) advised that the property owner would be responsible for well reabandonment if the property owner proposed construction that would prevent or impede well access, but the Proposed Project is not projected to build over or impede access to the historic wells. (CalGEM letter, 2/1/2024). CalGEM has determined that there is no regulatory requirement for Chevron to plug or abandon the wells as part of the Proposed Project.

In response, the City has requested and the Applicant has agreed to propose and, if approved, carry out the revised Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative which consists of the original Proposed Project together with partial removal of the former Platforms Hazel and Hilda pipeline bundle, but does not disturb the naturally occurring seeps or historic wells. Under this alternative, in addition to the Proposed Project, the Applicant would remove a portion of the former Platforms Hazel and Hilda pipeline bundle, onshore from the base of the bluff and offshore for approximately 1,400 feet, to a depth of 30 feet of water. The rest of the offshore pipeline bundle would remain abandoned in place, with the ends sealed by mechanical plugs. The 30-foot water depth was selected to ensure that the work barge has sufficient water depth to work safely and in accordance with the proposed removal procedures for the adjacent marine terminal pipelines. In addition, the related 36-inch diameter corrugated metal vault located on the bluff would be fully removed.

The Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would achieve the basic objectives of the Project by accomplishing the components of the original Proposed Project. In addition, removing the former Platforms Hazel and Hilda pipeline bundle through the bluffs would prevent future erosion and avoid the pipelines becoming a burden on the public if removal is necessary in the future, as noted by the California Coastal Commission. (California Coastal Commission letter, 1/31/2024).

ES.5.4 Other Alternatives Examined

Other alternatives were examined and eliminated from detailed consideration, including:

- Removal of Offshore Facilities only Alternative;
- Removal of Onshore Facilities only Alternative; and
- Limitations on Trucking Destinations Alternative.

These are discussed in Section 5.3, Alternatives Description.

ES.6 Impacts of Project, Alternatives, and Cumulative Development

In the Impact Summary Tables (ES.1 through ES.6) in this Executive Summary and throughout this EIR, the impacts of the Project and alternatives have been classified using the categories Class I, II, III, and IV as described below:

Class I – Significant and Unavoidable: Significant unavoidable adverse impacts for which the decisionmaker must adopt a statement of Overriding Considerations: these are significant adverse impacts that cannot be effectively avoided or mitigated. No measures could be taken to avoid or reduce these adverse effects to insignificant or negligible levels. Even after application of feasible mitigation measures, the residual impact would be significant;

Class II – Less Than Significant with Mitigation: Significant environmental impacts that can be feasibly mitigated or avoided for which the decision maker must adopt Findings and recommended mitigation measures: these impacts are potentially similar in significance to those of Class I but can be reduced or avoided by the implementation of feasible mitigation measures. After application of feasible mitigation measures, the residual impact would not be significant;

Class III – Less than Significant: Adverse impacts found not to be significant for which the decision maker does not have to adopt Findings under CEQA: these impacts do not meet or exceed the identified thresholds for significance. Generally, no mitigation measures are required for such impacts; and

Class IV – Beneficial: Impacts beneficial to the environment.

The term “significance” is used in these tables and throughout this EIR to characterize the magnitude of the projected impact. For the purposes of this EIR, a significant impact is a substantial or potentially substantial change to resources in the local Project area or the area adjacent to the Project in comparison to the threshold of significance established for the issue area. Within each issue area an analysis of potential impacts compared to the appropriate significance criteria is presented.

The remainder of this section provides a brief discussion of the significant and unavoidable Class I impacts identified for the Project, the alternatives, and cumulative development. A detailed listing of the impacts associated with the Project can be found in the Impact Summary Tables at the end of this section. Sections 4.1 through 4.13 provide a comprehensive discussion of impacts of the Project and discussions of the impacts associated with the cumulative development. Section 5.0, Alternatives, provides an analysis of

the impacts of each selected alternative, compares the impacts of each alternative relative to the Project, and identifies the Environmentally Superior Alternative.

ES.6.1 Impacts Associated with the Project

Table ES.1 summarizes the Project impacts and mitigation measures.

Table ES.1 Summary of Project Impacts and Mitigation Measures

Issue Area	Impact	Description	Class*	Mitigation Measures
Aesthetics	A.1	Scenic Vistas	III	-
	A.2	Scenic Resources	III	-
	A.3	Visual Character/Quality	III	-
	A.4	Night Lighting	II	A.4: Beach/Nearshore Night Lighting Minimization
Air Quality	AQ.1	Standards	III	-
	AQ.2	Odors	II	AQ.2. Odor Control and Purging Plan
	AQ.3	Toxic Air Emissions	III	-
Biological Resources	Bio.1	Listed Species	II	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys Bio.1d: Fencing Bio.1e: Worker Education & Awareness Plan Bio.1f: Marine Wildlife Contingency & Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring & Protection Bio.1h: Wildlife Relocation Monitoring
	Bio.2	ESHA	II	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance
	Bio.3	Wetlands	II	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Requirements Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Program
	Bio.4	Movement of Wildlife	III	-
	Bio.5	Policy Conflicts	II	Bio.5: Tree Removal Mitigation
	Bio.6	Conservation Plan Conflicts	III	-
	Bio.7	**Accidental Oil Spills**	**I**	**Bio.7: Oil Spill Contingency Plan**
Cultural Resources	Cul.1	Known Resource CA-SBA-6	II	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
	Cul.2	Human Remains	II	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery

Table ES.1 Summary of Project Impacts and Mitigation Measures

Issue Area	Impact	Description	Class*	Mitigation Measures
Geology & Soils	Geo.1	Earthquake Fault	III	-
	Geo.2	Erosion	II	Geo.2: Erosion Control Best Management Practices
	Geo.3	Sedimentation	II	Measure Geo.2
	Geo.4	Unstable Bluffs	II	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removal Geo.4c: Bluff Stabilization Following Pipeline Removal
	Geo.5	Expansive Soils	III	-
	Geo.6	Septic Tanks	III	-
	Geo.7	Paleontological/Geologic Feature	II	Measures Cul.1a-f
Climate Change & GHG	GHG.1	GHG Emissions	II	GHG.1: GHG Emissions Reductions
	GHG.2	Plans	II	Measure GHG.1
Hazardous Materials & Risk of Upset	Haz.1	Routine Operations	II	Haz.1: Contaminated Soil Handling
	Haz.2	**Accidental Releases**	**I**	**Haz.2a: Spill Response Planning** **Haz.2b: Asbestos and Lead Planning**
	Haz.3	Schools	III	-
	Haz.4	Site Contamination	III	-
	Haz.5	Airports	III	-
	Haz.6	Emergency Response	III	-
	Haz.7	Wildland Fires	II	Haz.7: Fire Response Planning
Hydrology & Water Resources	**WR.1**	**Standards**	**I**	**WR.1: Stormwater Pollution Prevention Plan**
	WR.2	Groundwater Supplies	III	-
	WR.3	Drainage Patterns	III	-
	WR.4	Pollutants	III	-
	WR.5	Control Plans	III	-
Land Use & Planning	LU.1	Create Divisions	III	-
	LU.2	Policy Conflict	III	-
Noise & Vibration	N.1	12-hour CNEL	III	
	N.2	Hourly Average Ambient Noise	II	N.2a: Noise Barriers N.2b: Nighttime Activities
	N.3	Vibration	III	-
	N.4	Airport Noise Conflicts	III	-
Transportation & Circulation	T.1	Policy Conflicts	III	-
	T.2	VMT	III	-
	T.3	Traffic Hazards	III	-
	T.4	Emergency Access	III	-
Tribal Cultural Resources	TCR.1	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b
	TCR.2	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b
Other	All	Ag, Energy, Mineral, Housing, Public Services, Recreation, Utilities, Wildfire	III	-

*Class I = Significant and Unavoidable; Class II = Less than Significant with Mitigation; Class III = Less than Significant; Class IV = Beneficial.

ES.6.1.1 Significant and Unavoidable Class I Impacts

Significant and unavoidable Class I impacts would occur related to biological resources, hazardous materials and risk of upset, and hydrology and water resources. See Table ES.4 for a description of the Project Class I impacts and the required mitigation measures for each respective impact.

ES.6.1.2 Beneficial Class IV Impacts

No beneficial impacts are associated with the Project.

ES.6.2 Impacts Associated with the Alternatives

As discussed in Section ES.5, several alternatives to the Project were evaluated that had the potential to reduce significant impacts. The relative impacts of each of these alternatives to the Project are summarized below.

ES.6.2.1 No Project Alternative

As described above, under the No Project Alternative the Project as applied for would not occur and the Facility would remain in place and not be decommissioned. This assumes that the Project would not move forward and that no facilities are removed, some accessible contaminated materials could still be removed and remediated in accordance with agency requirements. The No Project Alternative does not meet the purpose of the Project and fails to meet most of the Project objectives.

Equally, the offshore facilities scheduled for decommissioning would not occur and pipelines would remain in place. However, regulatory agencies are likely to still require that remediation activities take place and the contaminated soil excavated and removed from the site. The Applicant would have to fulfill the obligations under their existing regulatory requirements for remediation under the U.S. EPA and the SBCEHS. It is possible that the Applicant would still be required to remediate the Project Site as ordered by the various agencies.

If the Project does not move forward, facilities such as Tank 861 would remain in place and would remain visible from the seal area and public trails; however, because the facility is well screened from surrounding neighbors, and the dominant views from the trail are towards the ocean and the seal rookery, this would not constitute a significant impact. However, it should be noted that elimination of visible industrial equipment in a scenic area would be beneficial and leaving them in place as part of the No Project Alternative would continue to expose passersby to an industrial facility. The No Project Alternative would fail to meet most of the objectives of the Project since it would not remove onshore and offshore facilities and it would not ensure the excavation and remediation of all impacted soils within the Facility.

Under the No Project Alternative, no impacts to air quality would occur since no equipment would be used for decommissioning and no trucks would be used to transport decommissioned materials. Trucks would still be used to transport contaminated materials although it might be significantly less since above ground facilities would remain and excavation could not be completed under Tank 861 and other facilities. It is likely that additional remediation would have to occur at a later date once a landowner proposes some other development at the site and effectuates the removal of the facilities onsite. Air impacts of the proposed Project were considered less than significant and impacts of the reduced activities under the No Project Alternative would be less than those for the proposed Project. Impacts to greenhouse gases (GHG) from trucking of contaminated materials would be less than those for the proposed Project since fewer activities would occur, and fewer emissions of GHGs would be generated. Mitigation measure GHG.1 would still be applicable. Trees and other vegetation would not be removed to facilitate remediation

activities and no impacts to biological resources would occur. However, if facilities are not removed, then some contaminated soils under existing facilities would remain in place and could potentially leach into underground water resources or the contaminated soils erode as part of storm cycles and be drained into the ocean, causing potential impacts.

Hazards impacts are likely to be significant since facilities would not be removed and could continue to deteriorate and result in potential spills of material left in pipelines or in other facilities. The No Project Alternative also would not address the seven idle wells within the property and those wells could potentially leak in the future and result in impacts to biological resources and water resources as with the proposed Project.

Cultural resources impacts would still occur since it is likely that regulatory agencies would still require excavation and remediation of contaminated materials. Some of the contaminated materials are within sensitive cultural resources sites and impacts would still occur. Mitigation measures under the cultural resources section would still be applicable (mitigation measures Cul.1a through Cul.1f, Cul.2a, and Cul.2b) to mitigate some of the impacts including the preparation of a Cultural Resources Management Plan and requirements for the presence of Native American monitors. Impacts would be similar to those identified under the proposed Project.

Impacts to geological resources and soils would be similar to those for the proposed Project since excavation of contaminated soils is likely to be required. Requirements for an Erosion Control Plan and best management practices would still occur and would mitigate impacts to less than significant. Pipelines would not be removed through the bluff area and erosion impacts in that area could continue to occur with those facilities being left in place.

Impacts to land use would be considered significant but mitigable since the facility would not be decommissioned and future land uses would be hampered by the existence of these obsolete industrial facilities. Also, environmental impacts could occur as a result of leaving facilities behind, such as oil seeps and idle wells that could leak in the future and cause impacts to biological and water resources.

Impacts from noise under the No Project Alternative would be substantially less than the proposed Project since only the remediation activities would occur, but there would be no impacts associated with offshore or onshore decommissioning activities.

ES.6.2.2 Full Removal of Facilities Alternative

This alternative would have similar aesthetic impacts as the proposed Project since the site is well screened from public viewing areas. However, the public trail and seal viewing area have good views of the equipment and removal of all facilities would be beneficial to those passersby. It should be noted that the dominant attractions for the passersby on the trail are the Pacific Ocean and seal rookery. The addition of a rig to plug and abandon the seven wells within the site would have some added temporary aesthetic impacts beyond those from the proposed Project; however, those impacts would be temporary. Additional mitigation could include temporary screening barriers, which could also help diminish noise impacts, if needed.

This alternative would result in more emissions than the proposed Project since it would include additional work efforts to plug and abandon wells and remove additional pipelines, which would require more equipment. It would also result in additional GHG emissions for the same reasons stated above. Impacts associated with GHGs from trucking of contaminated materials would be slightly more than those for the proposed Project since more activities would occur, and higher emissions of GHGs would be generated. The intensity of work would most likely be the same as the proposed Project, but the duration would

increase, which would increase emissions. The same GHG mitigation measure, GHG.1, for the proposed Project would apply for this alternative.

Trees and other vegetation would be removed to facilitate remediation activities and impacts to biological resources would be similar to those from the proposed Project.

Hazards impacts are likely to be similar to those of the proposed Project since facilities would be removed and there could be accidental releases during the decommissioning process and result in potential spills of material left in pipelines or in other facilities. This alternative would address the seven idle wells within the property and those wells could potentially leak during the plugging and abandonment process but would permanently remove any potential risk of future oil spills. In the event of a leak, impacts would occur to biological and water resources similar to the proposed Project and require the same mitigation measures. Under this alternative, the seeps would also be addressed, and this would prevent future releases of oil that could occur from the seeps during storm events if left in place.

Cultural resources impacts would still occur since the Project would still require excavation and remediation of contaminated materials. Some of the contaminated materials are within sensitive cultural resources sites and impacts would still occur. Mitigation measures under the cultural resources section would still be applicable (mitigation measures Cul.1a through Cul.1f, Cul.2a, and Cul.2b) to mitigate some of the impacts including the preparation of a Cultural Resources Management Plan and requirements for the presence of Native American monitors. Impacts would be similar to those identified under the proposed Project.

Impacts to geological resources and soils would be similar to those for the proposed Project since excavation of additional pipelines on the bluff could have erosional impacts. Requirements for an Erosion Control Plan and best management practices would still be required and would mitigate impacts to less than significant. Mitigation measures Geo.4a, 4b, and 4c would still be required to mitigate any potential impacts to the bluff area similar to the proposed Project.

Land use impacts would be beneficial since the facility would be completely cleaned up and wells properly plugged and abandoned, resulting in a site ready for development.

Impacts from noise under this alternative would be more than the proposed Project since additional activities would occur as part of the added well abandonment and the added pipeline removal, with the added impacts associated with offshore or onshore decommissioning activities. Peak noise is probably the same, but the duration of the impact would likely increase. Mitigation measures N.2a and N.2b would still apply.

Traffic impacts would be slightly higher than those of the proposed Project. Duration would be longer, meaning more vehicle miles traveled, but peak impacts would probably be the same. Impacts would still be considered to be less than significant under this alternative. Finally, and as detailed above, the Full Removal Alternative with all its components is not considered feasible or viable at this point since plugging and abandonment of the historic wells are not Chevron's responsibility and since the Coastal Commission considers the seeps to be part of the existing, natural environment and do not require intervention.

ES.6.2.3 Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative

Since the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative is a subset of the Full Removal of Facilities Alternative, it would not result in any impacts not previously identified for the Full Removal of Facilities Alternative. Like the Full Removal Alternative, the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would have additional impacts compared to the Proposed Project due

to the additional decommissioning activities and equipment involved, but at a reduced magnitude since the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative does not include all of the additional components and activities of the Full Removal Alternative. Since the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative would not affect the natural seeps and historic wells, it would not alter the potential for future oil releases from those existing conditions. The Platform Hilda and Hazel pipelines were cleaned by flushing and running a "pig" through the lines to remove all hydrocarbons, and filled with grout to a distance of 800 feet offshore from the bluff, prior to abandonment in place in the platform removal project. (State Lands Commission, Mitigated Negative Declaration for the Abandonment and Removal of Four Offshore Oil Platforms, Santa Barbara County, 8/3/1994). As a result, the pipelines do not pose a risk of future oil releases in their existing condition.

This alternative would have similar aesthetic impacts as the Proposed Project since the Site is well screened from public viewing areas. However, the public trail and seal viewing area have good views of the bluffs and will be temporarily affected by the removal of all facilities. It should be noted that the dominant attractions for the passersby on the trail are the Pacific Ocean and seal rookery. The additional removal of pipelines on the bluff area would have some added temporary aesthetic impacts beyond those from the Proposed Project; however, those impacts would be temporary. Additional mitigation could include temporary screening barriers, which could also help diminish noise impacts, if needed.

This alternative would result in slightly more emissions than the Proposed Project since it would include additional work efforts to remove additional pipelines, which would require slightly more equipment. It would also result in additional GHG emissions for the same reasons stated above. Impacts associated with GHGs from trucking would be slightly more than those for the Proposed Project since more activities would occur, and higher emissions of GHGs would be generated. The intensity of work would most likely be the same as the Proposed Project, but the duration would slightly increase, which would increase emissions. The same GHG mitigation measure, GHG.1, for the Proposed Project would apply for this alternative.

Impacts to biological resources would be similar to those from the Proposed Project since the added pipeline removal is unlikely to affect any additional biological resources.

Hazards impacts are similar to those of the Proposed Project since facilities would be removed and there could be accidental releases during the decommissioning process and result in potential spills by onshore and offshore equipment during decommissioning activities. However, there would be no added reduction of significant impacts related to oil spills from the added pipeline removal since those pipelines are empty of hydrocarbons and would not be a potential source of spills. Mitigation measures Haz.1, Haz.2a, Haz.2b and Haz.7 will still be applicable under this alternative.

Cultural resources impacts would still occur since the Project would still require excavation and remediation of contaminated materials. Some of the contaminated materials are within sensitive cultural resources sites and impacts would still occur. Mitigation measures under the Cultural Resources Section would still be applicable (mitigation measures Cul.1a through Cul.1f, Cul.2a, and Cul.2b) to mitigate some of the impacts including the preparation of a Cultural Resources Management Plan and requirements for the presence of Native American monitors. Impacts would be similar to those identified under the Proposed Project.

Impacts to geological resources and soils would be similar to those for the Proposed Project since excavation of additional pipelines on the bluff could have erosional impacts. Requirements for an Erosion Control Plan and best management practices would still be required and would mitigate impacts to less than significant. Mitigation measures Geo.4a, 4b, and 4c would still be required to mitigate any potential

impacts to the bluff area similar to the Proposed Project. Long term impacts to the bluffs would be reduced since elimination of the additional pipelines would result in a reduction of potential paths for erosion.

Land use impacts under this alternative would be similar to those of the Proposed Project. However, it is worth noting that this alternative would result in fewer impediments to achieving a fully cleaned up Site by removing more pipelines from the Site.

Impacts from noise under this alternative would be more than the Proposed Project since additional activities would occur as part of the added pipeline removal, with the added impacts associated with offshore or onshore decommissioning activities. The duration of the decommissioning activities would likely last slightly longer and thus the duration of noise impacts would increase; however, peak noise would be the same since it would involve the same types of activities as the Proposed Project. Mitigation measures N.2a and N.2b would still apply.

Traffic impacts would be slightly higher than those of the Proposed Project. The duration of the vehicular traffic associated with the decommissioning activities would likely be longer, and thus would result in more vehicle miles traveled (VMT). However, peak impacts would probably be the same as the Proposed Project since truck trips per day would be the same with added work days to account for the additional work. Impacts would still be less than significant under this alternative.

ES.6.3 Impacts Associated with the Cumulative Development

Section 15130(a)(1) of the CEQA Guidelines (14 California Code of Regulations [CCR], Div. 6, Ch. 3) states that a "cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." CEQA requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable" (14 CCR §15130(a)). Section 3.0 of this EIR provides a list of past, present, and probable future projects that could have cumulative effects with the Project. Table ES.2 provides a summary of the Project's cumulative effects.

Table ES.2 Cumulative Impacts

Issue Area	Proposed Project Cumulative Impacts	Cumulative Impacts Additional Mitigation Measures
Aesthetics	Class III	None
Air Quality	Class III	None
Biological Resources	Class I	None
Cultural Resources	Class II	None
Geology & Soils	Class III	None
Climate Change & GHG	Class II	None
Hazardous Materials & Risk of Upset	Class III	None
Hydrology & Water Resources	Class III	None
Land Use & Planning	Class III	None
Noise & Vibration	Class III	None
Transportation & Circulation	Class III	None
Tribal Cultural Resources	Class II	None

Significant and unavoidable Class I cumulative impacts to biological resources would be realized in the event of an accidental oil spill from the Project Site or the offshore pipelines.

ES.7 Environmentally Superior Alternative

Section 5.0, Alternatives, provides an analysis of the impacts of each selected alternative, compares the impacts of each alternative to the Project, and identifies the Environmentally Superior Alternative. Table ES.3 provides a relative comparison of the Class I, Class II, and Class III impacts of each alternative to the Project by issue area and impact.

Table ES.3 Alternatives Comparison

Issue Area	Proposed Project	No Project	Full Removal	Project plus Hilda and Hazel Pipelines
Aesthetics	Class III	Class III	Class II	Class III
Air Quality	Class II	Class III↓	Class II	Class III↑
Biological Resources	Class I	Class I	Class I	Class I
Cultural Resources	Class II	Class II	Class II	Class II
Geology & Soils	Class II	Class II	Class II↑	Class II↓
Climate Change & GHG	Class II	Class II↓	Class II↑	Class II↑
Hazardous Materials & Risk of Upset	Class I	Class I	Class I	Class I
Hydrology & Water Resources	Class I	Class I	Class I	Class I
Land Use & Planning	Class III	Class II	Class IV	Class III
Noise & Vibration	Class II	Class II↓	Class II↑	Class II↑
Transportation & Circulation	Class III	Class III↓	Class III↑	Class III↑
Tribal Cultural Resources	Class II	Class II	Class II	Class II
Other	Class III	Class III	Class II	Class III

Notes: ↓ = decrease in severity, ↑ = increase in severity

As the discussion above indicates, impacts from the various alternatives and the proposed Project are similar in classification for those impacts that are significant and mitigable. There are also some slight differences in severity as indicated above for those impacts that are significant and mitigable and for those impacts that are less than significant. However, because the Full Removal Alternative is not considered feasible and there are no regulatory requirements for this alternative, this alternative is not considered environmentally superior. Finally, although the various alternatives have similar levels of impacts, the reduction of long-term geological impacts to the bluffs from elimination of the additional pipelines under the Proposed Project Plus Hilda and Hazel Pipeline Removal Alternative results in this alternative being the environmentally superior alternative.

Table ES.4 Proposed Project Class I Impacts
Impacts That Are Significant and Unavoidable Levels

(Impacts that must be addressed in a "statement of overriding consideration" if the Project is approved in accordance with Sections 15091 and 15093 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measures
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.7	Any accidental oil spill and subsequent clean-up efforts have the potential to directly affect any part of the population of a threatened, endangered, or candidate species or result in the loss or disturbance to its habitat, specifically, species that inhabit Carpinteria Salt Marsh, Carpinteria Creek, or forage along the coast along the CPF.	Construction	Bio.7: Oil Spill Contingency Plan
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.2	The Project may 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.	Construction	Haz.2a: Spill Response Planning Haz.2b: Asbestos and Lead Planning
HYDROLOGY AND WATER RESOURCES (Section 4.8)			
WR.1	Surface water quality may be impaired during Project decommissioning. As a result, the Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Accidental discharge of petroleum hydrocarbons into marine waters could adversely affect water quality.	Construction	WR.1: Stormwater Pollution Prevention Plan

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Sections 15091 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measure
AESTHETICS (Section 4.1)			
A.4	The Project would create a temporary new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Construction	A.4: Beach/Nearshore Night-Lighting Minimization
AIR QUALITY (Section 4.2)			
AQ.2	There is a potential for hydrocarbon-related odors from the decommissioning and demolition of pipelines, tanks, contaminated soils, and other oil and gas processing infrastructure.	Construction	AQ.2: Odor Control and Purging Plan
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.1	The proposed Project could potentially affect federal or state-listed threatened, endangered, or rare plant and animal species, other special status species, or habitat that supports these species, including nesting birds and marine species.	Construction	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys and Protection Bio.1d: Fencing Bio.1e: Worker Education and Awareness Plan Bio.1f: Marine Wildlife Contingency and Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring and Protection Bio.1h: Wildlife Relocation Monitoring
Bio.2	The proposed Project could have an adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, including City of Carpinteria and Coastal Commission defined ESHA ,or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries. .	Construction	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance
Bio.3	Project activities would have an adverse effect on state or federally protected wetlands and/or Waters of the US/State (including riparian areas) as defined by Sections 401 and 404 of the Clean Water Act, or other state and local agencies.	Construction	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Regulations Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Plan

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Sections 15091 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measure
Bio.5	The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Construction	Bio.5: Tree Removal Mitigation
CULTURAL RESOURCES (Section 4.4)			
Cul.1	Grading and excavation associated with decommissioning would potentially result in a substantial adverse change in the significance of an archaeological resource. Specifically, the Project would cause disturbance to known and unknown CA-SBA-6 deposits. Equally, in the event of an oil spill, the spill and cleanup efforts would potentially result in disturbance to cultural resources.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
Cul.2	The Project would disturb human remains, including those interred outside of dedicated cemeteries.	Construction	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery
CLIMATE CHANGE AND GREENHOUSE GASES (Section 4.6)			
GHG.1	Construction GHG emissions (including mobile sources) would exceed the Santa Barbara County threshold of significance and therefore GHG emissions, either directly or indirectly, may have a significant impact on the environment.	Construction	GHG.1: GHG Emissions Reductions
GHG.2	The Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Construction	GHG.1: GHG Emissions Reductions
GEOLOGY AND SOILS (Section 4.5)			
Geo.2	The Project could result in substantial soil erosion or the loss of topsoil.	Construction	Geo.2: Erosion Control Best Management Practices
Geo.3	Ground-disturbing activities would potentially result in erosion-induced siltation of nearby drainages and the Pacific Ocean.	Construction	Geo.2: Erosion Control Best Management Practices
Geo.4	Part of the Project location incudes the Carpinteria Bluffs, a geologic unit that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site erosion.	Construction	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removals Geo.4c: Bluff Stabilization Following Pipeline Removal

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Sections 15091 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measure
Geo.7	The Project would potentially impact a unique paleontological resource or site or unique geologic feature.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.1	The Project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.		Haz.1: Contaminated Soil Handling
Haz.7	The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Construction	Haz.7: Fire Response Planning
NOISE AND VIBRATION (Section 4.10)			
N.2	The Project would result in the generation of a temporary increase in hourly average ambient noise levels in the vicinity of the Project.	Construction	N.2a: Construction Noise Control N.2b: Nighttime Activities
TRIBAL CULTURAL RESOURCES (Section 4.12)			
TCR.1	The proposed decommissioning and remediation Project activities would directly affect known or suspected tribal cultural resources.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery
TCR.2	The Project would/cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and	Construction	Same as above: Cul.1a through Cul.2b

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Sections 15091 of the State CEQA Guidelines)

Impact #	Description of Impact	Phase	Mitigation Measure
	scope of the landscape, sacred place, or object with cultural value to a California Native American tribe.		

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
AESTHETICS (Section 4.1)			
A.1	The Project would not have a substantial adverse effect on a scenic vista.	Construction	None required.
A.2	The Project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	Construction	None required.
A.3	The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, nor would the Project conflict with applicable zoning and other regulations governing scenic quality.	Construction	None required.
AIR QUALITY (Section 4.2)			
AQ.1	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.	Construction	None required.
AQ.3	Expose sensitive receptors to substantial pollutant concentrations.	Construction	None required.
AQ.4	Conflict with or obstruct implementation of the applicable air quality plan.	Construction	None required.
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.4	The Project could interfere substantially with the movement of wildlife or any resident or migratory fish species.	Construction	None required.
Bio.6	The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	Construction	None required.
GEOLOGY & SOILS (Section 4.5)			
Geo.1	The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.	Construction	None required.
Geo.5	The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994); therefore,	Construction	None required.

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
	there would be no substantial direct or indirect risks to life or property.		
Geo.6	The Project Site does not 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.	Construction	None required.
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.3	The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Construction	None required.
Haz.4	The Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would not create a significant hazard to the public or the environment.	Construction	None required.
Haz.5	The Project is not located with an airport land use plan nor within two miles of a public or public use airport.	Construction	None required.
Haz.6	The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Construction	None required.
HYDROLOGY AND WATER RESOURCES (Section 4.8)			
WR.2	The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.	Construction	None required.
WR.3	The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces.	Construction	None required.
WR.4	The Project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation.	Construction	None required.
WR.5	The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Construction	None required.

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
LAND USE AND PLANNING (Section 4.9)			
LU.1	The Project would not physically divide an established community.	Construction	None required.
LU.2	The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Construction	None required.
NOISE AND VIBRATION (Section 4.10)			
N.1	The Project would result in the generation of a temporary increase in CNEL average ambient noise levels in the vicinity of the Project.	Construction	None required.
N.3	The Project could result in the generation of excessive ground borne vibration or ground borne noise levels during construction/demolition activities.	Construction	None required.
N.4	The Project would not result in excessive noise for people residing or working within two miles of a public, or public use, airport.	Construction	None required.
TRANSPORTATION AND CIRCULATION (Section 4.11)			
T.1	The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Construction	None required.
T.2	The Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).	Construction	None required.
T.3	The Project would not substantially increase hazards.	Construction	None required.
T.4	The Project would not result in inadequate emergency access.	Construction	None required.