

APPENDIX J

POLICY CONSISTENCY ANALYSIS

DECOMMISSIONING AND REMEDIATION OF THE CARPINTERIA OIL AND GAS PROCESSING FACILITIES

CARPINTERIA, SANTA BARBARA COUNTY

Project No. 2002-5211

Prepared for:

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TABLE OF CONTENTS

1.0 INTRODUCTION.....	1-1
1.1 PROJECT OVERVIEW	1-1
1.2 PROJECT LOCATION	1-1
1.3 PERMITTING JURISDICTIONS AND APPLICABLE POLICIES.....	1-1

LIST OF TABLES

Table 1. State and Local Policy Consistency Matrix	1-1
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APPENDIX J – POLICY CONSISTENCY ANALYSIS

1.0 INTRODUCTION

1.1 PROJECT OVERVIEW

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 (Project Site) to accommodate the site's potential future redevelopment. Any residually impacted soils at the Project site will be remediated to approved by the Santa Barbara County Public Health Department, Environmental Health Services Department (SBCEHS), Regional Water Quality Control Board (RWQCB) and U.S. Environmental Protection Agency (USEPA) to facilitate reuse of the property for land use acceptable under the City's current Draft General Plan/Local Coastal Plan Update (anticipated to be Planned Unit Development and Open Space/Recreation). Nearshore and offshore pipeline segments will be removed.

1.2 PROJECT LOCATION

The onshore Project Site is located within the Coastal Zone in the eastern portion of the City of Carpinteria, California, between U.S. Highway 101 and the Pacific Ocean. The offshore Project site is located from the shoreline out to the State waters limit (3 nautical miles offshore) in the Santa Barbara Channel within California State Lands Commission Lease Numbers PRC 3133, 3150, 4000, and 7911.

1.3 PERMITTING JURISDICTIONS AND APPLICABLE POLICIES

The City of Carpinteria General Plan/Local Coastal Plan (GP/LCP) 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. In support of the Project, an application for a Coastal Development Permit (CDP) is being filed with the City of Carpinteria (City) (in addition to other required permits).

Applicable policies pertaining to the Project from the California Coastal Act and City of Carpinteria General Plan/Local Coastal Plan as well as a determination of the Project's consistency with these policies is presented in Table 1 below.

Table 1. State and Local Policy Consistency Matrix

Policy	Consistency Determination
California Coastal Act	
30211. Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal	The proposed Project would not require the construction of any permanent structure that would interfere with the public's right of access to the sea. The Project would include removal of onshore facilities as well as offshore pipelines within PRC 3133, 3150, 4000, and 7911 within

Policy	Consistency Determination
<p>beaches to the first line of terrestrial vegetation.</p>	<p>State waters. During pipeline removal within the beach crossing area, equipment would be present that would temporarily preclude access for approximately 20 days, however the beach area outside of the pipeline corridor(s) will remain open east and west of the Project site(s). As feasible, the Project will be scheduled for the off-season months to reduce potential impacts to recreational uses. A Notice to Mariners (NTM) with the U.S. Coast Guard (USCG) will be published regarding any offshore vessels and traffic approximately 15 days prior to initiation of offshore Project activities.</p> <p>The proposed Project would not provide new public access to the sea, nor would it interfere with existing public access to the sea. The proposed Project would make the required warning and hazard notifications to local mariners and harbors through the Local Notice to Mariners. The proposed Project is therefore consistent with this section of the CCA.</p>
<p>30221. Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.</p>	<p>The Project site is currently zoned in support of Open Space/Recreation south of the UPRR right-of-way along the bluffs. The Project includes removal of equipment adjacent to and within this oceanfront land. Following removal of equipment, the lower parking lot within this bluff area will be restored to natural conditions and planted with native seed mix along the bluffs in accordance with the Restoration Plan included in Appendix C3. Therefore, the Project is consistent with this Section of the CCA.</p>
<p>30230. Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.</p>	<p>The offshore Project site is located within a sandy beach and intertidal habitat leading offshore to a water depth of approximately 148 feet. The intertidal zone within the Project area consists primarily of sand with a mosaic of intermittent low- to medium-relief rocks and soft-bottom sediments. Additionally, the Carpinteria Harbor Seal Rookery and Preserve (rookery) is located within and adjacent to the Project area approximately 160 feet east of the Casitas Pier. A kelp bed is located offshore approximately 470 feet east of the end of Casitas Pier (adjacent to the Project site), which is also associated with hardbottom habitat.</p> <p>During decommissioning, offshore/nearshore pipeline recovery activities will be restricted to their respective corridors. Localized, temporary disturbance of seafloor habitats will occur during removal of the pipeline(s) and</p>

Policy	Consistency Determination
	<p>anchoring during pipeline recovery. This short-term turbidity would temporarily disturb biological resources. However, removal of these pipelines will eliminate any additional impacts to these resources by returning the area to its pre-Project condition. Once a contractor has been selected, a Project Anchoring Plan will be developed and submitted as part of the Contractor's Project Work and Safety Plan that would be implemented during Project implementation to reduce potential impacts to existing hardbottom habitat.</p> <p>Common dolphin, bottlenose dolphin, Risso's dolphin, Pacific white-sided dolphin, California gray whale, blue whale, minke whale, humpback whale, California sea lion and Pacific harbor seal have the potential to be encountered during offshore pipeline removal activities. However, to reduce potential impacts to marine wildlife, Chevron will implement a Marine Wildlife Contingency and Training Plan as approved by the responsible agencies for Project decommissioning. Additionally, a Harbor Seal Rookery Monitoring and Protection Plan (Appendix C5) has been developed for the Project and will be implemented during all Project-related activities within 1,000 feet of the haul-out/rookery.</p> <p>The proposed Project will be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms. The proposed Project is consistent with this section of the CCA.</p>
<p>30231. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of groundwater supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.</p>	<p>Offshore decommissioning activities are anticipated to result in small-scale, temporary increases in turbidity. However, a portion of the Project site is located within sandy intertidal and shallow subtidal habitats that are regularly disturbed by wave action. Therefore, Project disturbance is not anticipated to result in any significant difference in turbidity compared to that which occurs naturally in this coastal region. Additionally, as discussed above, once a contractor has been selected, a Project Anchoring Plan will be developed and submitted as part of the Contractor's Project Work and Safety Plan that would be implemented during Project implementation to reduce potential impacts to existing hardbottom habitat. Construction would be short-term in nature; and the area would return to its pre-Project condition through natural processes and through restoration of the natural seafloor</p>

Policy	Consistency Determination
	<p>following pipeline removal as a result of decommissioning activities.</p> <p>Water quality impacts could also result from the inadvertent release of a small amount of petroleum products from the equipment. Should a spill occur, the Project Oil Spill Contingency and Response Plan would be executed immediately to reduce impacts to less than significant. Chevron also maintains an agreement with MSRC (spill response co-op) for larger spill response support services.</p> <p>In the absence of proper controls, ground disturbance associated with removal of the facilities and impacted soil would also have the potential to temporarily impact surface water quality. These issues would be addressed through implementation of engineering controls such as identified within the Project's Interim Remedial Action Plan (IRAP), including stockpile management. In addition, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented as required by the State Water Resources Control Board's Statewide Construction General Permit (Order No. 2012-0006-DWQ). Compliance with required effluent limitations would prevent significant impacts associated with pipeline flush water or groundwater discharge to surface waters.</p> <p>As such, the proposed Project will not impact surface waters or streams. The proposed Project will be carried out in a manner that is consistent with this Section of the CCA.</p>
<p>30232. Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.</p>	<p>Decommissioning activities would utilize diesel-fueled equipment and carry materials that would have the potential to contribute to impacts related to a release of hazards and hazardous materials. As such, the facilities existing Oil Spill Contingency and Response Plan (OSCRP) will be adhered to during all work activities. The OSCRP includes preventative measures, as well as procedures to be followed in the event of a spill, including hydraulic fluids as well as fuel and other types of oil spills onshore.</p> <p>Additionally, as required by the USCG, any Project vessels will operate in accordance with the navigational safety requirements of Title 33 CFR Parts 154-156 (Navigational Safety). In addition, Chevron will ensure the publication of a local NTM, describing the nature,</p>

Policy	Consistency Determination
	<p>location, and duration of Project activities, at least 15 days prior to initiation of activity. The notice will be given to the Commander, Eleventh Coast Guard District, 501 West Ocean Boulevard, Long Beach, California 90802 and will include all pertinent Project information.</p> <p>Project design considerations as well as appropriate noticing, and adherence to the approved OSCRP would be implemented to avoid a potential spill. In the event of an accidental petroleum release, the containment and cleanup measures specified in the OSCRP would reduce effects to the greatest extent possible. Chevron also maintains an agreement with MSRC (spill response co-op) for larger spill response support services. Therefore, the Project's activities would be carried out in a manner that is consistent with this section of the CCA.</p>
<p>30234.5. The economic, commercial, and recreational importance of fishing activities shall be recognized and protected.</p>	<p>Offshore pipeline removal operations may temporarily impede commercial/recreational fishing opportunities in the immediate area for approximately 40 days during offshore decommissioning activities. To prevent potential interaction and provide information to local fisherman, Chevron will ensure the publication of a NTM, describing the nature, location, and duration of pipeline removal activities, at least 15 days prior to initiation of activity.</p> <p>The proposed Project would return the area to pre-Project conditions, which will have a long-term beneficial impact on any offshore areas within State waters that support recreational boating and/or commercial fishing activities. Decommissioning activities would be temporary and would not reduce the importance or the economic value of recreational and commercial fishing. The Project would not require the closure of any local ports or restrict vessel traffic in or out of those ports. No additional berthing would be required to support the Project. Recreational boaters and commercial fishing vessels would have unlimited access to water areas that are not within the offshore construction area. Information on coastal and sea access and warnings of any hazards would be provided through the issuance of a local NTM to the U.S. Coast Guard at least 15 days in advance of the initiation of offshore activities. As proposed, Project activities would be conducted in a manner that is consistent with these sections of the CCA.</p>
<p>30240. (a) Environmentally sensitive habitat areas shall be protected against any</p>	<p>An Environmentally Sensitive Habitat Area (ESHA) is defined as "any area in which plant or animal life or their</p>

Policy	Consistency Determination
<p>significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.</p> <p>(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.</p>	<p>habitats are either rare or especially valuable....” In accordance with this definition, ESHAs in the Project area would include all Marine Protected Areas (“MPAs”), which were created for protection of marine life and habitat; currently occupied habitat for Threatened or Endangered species; rookery sites for birds along the coast; and streams, wetlands, and sensitive natural communities.</p> <p>The City’s General Plan/Local Coastal Plan identifies the following areas within or adjacent to the Project site as ESHA: Monarch butterfly roost at the Project site, Buffer Zone, Harbor seal rookery near the Casitas Pier, Onshore areas seaward of the UPRR, and Intertidal and nearshore areas (including rock reefs and kelp beds) near the Project site and extending approximately 3,000 feet offshore.</p> <p>Project activities would not affect the monarch butterfly roost or the Buffer Zone onshore, however pipeline removal activities would occur in proximity to the Pacific harbor seal haul-out/rookery. In order to minimize potential impacts, Project activities would be scheduled to avoid peak periods (December 1 through May 31). Additionally, a Harbor Seal Rookery Monitoring and Protection Plan has been developed for the Project and would be implemented during all Project-related activities within 1,000 feet of the haul-out/rookery.</p> <p>As discussed above, the Project site is located within the sandy intertidal and shallow subtidal habitat immediately offshore to a water depth of 148 feet. The nearest MPA is the Campus Point SMCA, which is located approximately 20 miles northwest of the Project area. Additionally, a kelp bed is located offshore approximately 470 feet east of the end of Casitas Pier (adjacent to the Project site), which is associated with hardbottom habitat.</p> <p>Decommissioning activities will be restricted to the areas of original installation for the pipelines. Impacts to essential fish habitat would be limited as hard bottom habitat would be avoided. Localized, temporary disturbance of seafloor habitats will occur during removal of the pipeline(s). This short-term turbidity would temporarily disturb biological resources. Turbidity generated by hand jetting would be very localized and temporary and not substantially affect EFH. Seafloor depressions caused by pipe removal would be filled by natural sediment transport processes caused by currents</p>

Policy	Consistency Determination
	<p>and wave energy. All project vessel anchor placement/retrieval and pipe removal in proximity to the intertidal and nearshore areas will be conducted in accordance with a project specific anchoring plan that avoids areas of known kelp beds and rocky reef habitats. Removal of the pipelines will eliminate any additional impacts to these resources by returning the area to its pre-Project condition.</p> <p>The proposed Project activities would include temporary disturbance within the sandy beach/sandy intertidal zone and potentially sensitive habitat nearshore/offshore but would not significantly disrupt or degrade habitat values over the long-term. Because the Project involves removing infrastructure and allowing natural restoration of the original habitat, the Project will provide an overall benefit to environmentally sensitive habitat.</p>
<p>30244. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.</p>	<p>The Project site is in an area considered sensitive for archaeological resources; therefore, there is a potential for the Project to impact onshore archaeological resources. No known shipwrecks or sites occur in the offshore Project area of potential effect. Additionally, the Project does not include excavation within the vicinity of known paleontological resources. A number of mitigation measures have been included in the Project to avoid and or minimize impacts to archaeological resources. Therefore, the Project is consistent with Section 30244 of the CCA.</p>
<p>30251. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.</p>	<p>The Project site is located along a stretch of coastal bluffs in the eastern portion of the City of Carpinteria, California. The site is located between U.S. Highway 101 and the Pacific Ocean. The offshore Project site is located in the Santa Barbara Channel. Public views of the Project site are available from the existing Carpinteria Coastal Vista Trail system parallel and south of the Union Pacific Railroad easement, Amtrak passengers on the railroad corridor, from some portions of Carpinteria Avenue, from some portions of U.S. Highway 101, from Tar Pits Park Beach/Carpinteria State Beach, and from immediately offshore. U.S. Highway 101 has been designated by the State as an eligible scenic highway.</p> <p>During decommissioning, construction activities will be conducted during daytime hours for approximately 670 days over the course of approximately 3 years. During this time, activities would be visible at the onshore facility</p>

Policy	Consistency Determination
	<p>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 Tarpits Park, and offshore. Decommissioning activities may have a temporary impact to aesthetics from the viewshed along U.S. Highway 101 and Carpinteria Avenue, to Amtrak passengers, and to recreational users along the bluff trails, Tarpits Park, or vessels offshore.</p> <p>Additionally, in order to remediate soils within the Main Plant Area and Chevron Pipeline Area, approximately 62 (60 non-native blue gum eucalyptus and 2 Monterey cypress trees) trees will be removed (of the 1,500 trees onsite). Project-related tree removal represents four percent of the 1,500 trees on the Project site, which is less than the City's threshold of significance of 10 percent. 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.</p> <p>Following completion of decommissioning activities, this area of coastline would be returned to pre-Project conditions. This would be a benefit to aesthetics within the area. The Project is therefore consistent with this Section of the CCA.</p>
<p>30253. New development shall:</p> <p>(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.</p> <p>(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.</p> <p>(c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development.</p>	<p>a) and b) The Project area contains soils that have been mapped as having a high potential for settlement. Additionally, areas along the Carpinteria bluffs have demonstrated bluff erosion potential. Soil would be disturbed during removal of equipment, pipelines, surface materials (asphalt, gravel) and remediation of impacted soils. Disturbed areas would be graded to approximate pre-Project topography. Excavations would be backfilled with clean imported soil and compacted to achieve a minimum of 90 percent of the maximum dry density of the selected fill material. A soil binder and/or seed mix would be applied to minimize erosion of exposed soils. Therefore, substantial soil erosion would not occur.</p> <p>The coastal bluff at the Project site is known to be retreating. Proposed removal of pipe segments and concrete armoring within and adjacent to the bluff face</p>

Policy	Consistency Determination
<p>(d) Minimize energy consumption and vehicle miles traveled.</p> <p>(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.</p>	<p>may cause localized bluff erosion and accelerate existing bluff retreat. As such, 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 proposed Project to cause accelerated bluff retreat. Stabilization may include backfill and compaction using suitable fill material, and revegetation, or other measures identified by a geotechnical engineer.</p> <p>c) Project decommissioning activities would result in short-term air quality impacts from operation of construction equipment onshore, trucking scrap steel and impacted soil from the onshore Project site, and a marine spread offshore. However, short-term air quality (including GHG) impacts from construction are not considered significant environmental impacts by the Ventura County Air Pollution Control District, and the Project would not exceed the emissions thresholds set by the County of Santa Barbara APCD or South Coast Air Quality Management District. No long-term emissions would be generated following decommissioning of the existing facilities.</p> <p>d) The proposed Project would consume non-renewable energy in the form of fuels for vehicles, vessels and equipment used for decommissioning and remediation. This energy use would not be wasteful, inefficient or unnecessary.</p> <p>e) The proposed Project does not involve any new structures or land uses that may result in any increased use of existing parks or other recreational facilities. Proposed decommissioning and remediation activities would not require closure or reduce access to Tar Pits Park and the Carpinteria Bluffs Trail. Additionally, all activities will be coordinated with appropriate agencies, including but not limited to: the City of Carpinteria, CSLC, CCC, and U.S. Coast Guard to minimize potential land use impacts. A NTM will be issued approximately 15 days prior to offshore construction to provide adequate notice to offshore recreational vessels. As part of the CDP process, notices will be sent to interested parties and mailed to adjacent properties owners prior to initiation of Project construction activities. Signs will also be posted on-site to alert visiting recreational users of the timing and nature of short-term construction activities in this area. Project coordination would reduce potential short-term impacts to the greatest extent feasible.</p>

Policy	Consistency Determination
City of Carpinteria	
<p>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.</p>	<p>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.</p>
<p>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.</p>	<p>The Project is intended to remove existing equipment and subsurface facilities and return the Project site to pre-developed conditions. North of the UPRR right-of-way, 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 will occur outside of the active nesting period.</p> <p>The area(s) south of the UPRR right-of-way within the bluffs and gravel parking lot area will be cleared of equipment, regraded, and also be replanted with a native seed mix in accordance with the Project Restoration Plan (Appendix C3) to establish additional habitat/open space within this area.</p> <p>No long-term adverse impacts to onshore habitat would result.</p>
<p>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,</p>	<p>As previous discussed, the Project is intended to remove existing equipment and subsurface facilities and return the Project site to pre-developed conditions. North of the UPRR right-of-way, the western portion of the Project site will remain as restored open space. The area east of</p>

Policy	Consistency Determination
<p>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.</p>	<p>Dump Road will be cleared of equipment, regraded, and compacted.</p> <p>The Project site is currently zoned in support of Open Space/Recreation south of the UPRR right-of-way along the bluffs. The Project includes removal of equipment adjacent to and within this oceanfront land. Following removal of equipment, the lower parking lot within this bluff area will be restored to natural conditions and planted with native seed mix along the bluffs in accordance with the Restoration Plan included in Appendix C3.</p> <p>Proposed decommissioning and remediation activities would not require closure or reduce access to Tar Pits Park and the Carpinteria Bluffs Trail.</p> <p>The Project would be consistent with Policy LU-3k.</p>
<p>CDS6-2. Ensure that development is controlled to avoid impacts to significant viewsheds, vistas, and view corridors.</p>	<p>No new structures would be constructed for the proposed Project; therefore, there would be no permanent obstruction of any viewshed, vista, or view corridors open to the public. However, the presence of construction equipment intermittently for approximately 670 days over the course of approximately 3 years to remove equipment and remediate the Project site would 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 Tarpits 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, Tarpits Park, or vessels offshore.</p> <p>Additionally, 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.</p> <p>One of the primary objectives of the Project is to remove idle surface facilities from the Project site and return the</p>

Policy	Consistency Determination
	site to natural conditions. Following completion of the Project; a permanent beneficial impact to aesthetics would result.
<p>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.</p>	See Response to CDS6-2 above.
<p>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.</p>	The proposed Project includes a Restoration Plan (Appendix C3) that will be submitted to the City for review and approval prior to Project implementation. The Restoration Plan includes replanting with native trees and restoration of open space areas utilizing a native seed mix to match the adjacent habitat along the Carpinteria Bluffs area.
<p>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.</p>	<p>Project work activities would be conducted predominantly during daytime hours, and no significant sources of light or glare would be used during that time that would have the potential to affect views in the area. Some nighttime operations may be required to take advantage of tide and weather conditions and may include 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.</p> <p>Therefore, nighttime work illumination could impact adjacent recreational users, and the adjacent Concha Loma neighborhood. It is not anticipated that Project activities requiring lighting would 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. However, lighting 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. With the implementation of this measure, potential impacts resulting from glare would be less than significant.</p>

Policy	Consistency Determination
CD-13a. Lighting for development adjacent to an ESHA shall be designed to further minimize potential impacts to habitat.	See response to CDS6-e above.
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.	See response to CDS6-e above.
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.	The Project would not introduce any permanent structures or facilities that would contribute to existing traffic flow. However, during construction, the Project would generate temporary decommissioning and remediation-related vehicle trips, vehicle miles traveled and associated climate change and air quality impacts. The proposed Project would generate about 62 vehicle trips per day associated with worker transportation, export of soil and removed equipment and importation of backfill material. Projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact (Governor’s Office of Planning and Research, 2018). Therefore, the Project is consistent with Section 15064.3 of the State CEQA Guidelines and Policy C-3h of the City’s General Plan.
C-7a. Ensure that major businesses prepare and implement Transportation Systems Management Plans to achieve a reduction in the number of trips generated by their employees and operations...	See response to C-3h above.
OSC-1a. Protect Environmentally Sensitive Habitat Areas (ESHA) from development and maintain them as natural open space or passive recreational areas.	See response to LU-2b above.
OSC-1b. Prohibit activities, including development, that could damage or destroy ESHA.	See response to LU-2b above.
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	See response to LU-2b above.

Policy	Consistency Determination
beds and the intertidal zones along the shoreline.	
OSC-2. Preserve and restore the natural resources of the Carpinteria Bluffs.	See response to LU-2b above.
OSC-2c. Preserve all coastal bluff scrub habitat designated as open space with an appropriate buffer.	See response to LU-2b above.
OSC-2f. Protect significant historical and archaeological resources within the Bluffs Area.	See response to CCC Section 30244 above.
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.	<p>During decommissioning, construction activities will be conducted during daytime hours for approximately 670 days over the course of approximately 3 years. During this time, activities would 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 Tarpits Park, and offshore.</p> <p>Following completion of decommissioning activities, this area of coastline would be returned to pre-Project conditions. This would be a benefit to aesthetics within the area. The Project is therefore consistent with this Section of the CCA.</p>
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	See responses to CDS 6-2 and CDS 6-d above.

Policy	Consistency Determination
<p>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.</p>	
<p>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.</p>	<p>The Project would require temporary and permanent impacts to coastal wetlands delineated onsite. However, MM BIO-7 (Coastal Wetlands Replacement) includes replacement of wetlands through expansion of existing wetlands within the Drainage 4 area. As part of this mitigation, a coastal wetlands mitigation plan will be prepared by Chevron and submitted to the City for review and approval. Additionally, the Project includes best management practices (BMPs) with respect to minimization of sediment and runoff. Potential impacts to adjacent wetlands would be less than significant after mitigation and BMPs are implemented.</p>
<p>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.</p>	<p>Offshore pipeline removal activities would be limited to the pipeline corridor itself. All project vessel anchor placement/retrieval and pipe removal in proximity to the intertidal and nearshore areas will be conducted in accordance with a project specific anchoring plan that avoids areas of known kelp beds and rocky reef habitats. Impacts would be limited through avoidance of these resources.</p>
<p>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.</p>	<p>The Carpinteria harbor seal rookery is located within the Project site on the east side of the Gail and Grace pipeline bundle and 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.</p> <p>In order to minimize potential impacts, Project activities would be scheduled to avoid peak periods (December 1 through May 31). Additionally, a Harbor Seal Rookery Monitoring and Protection Plan has been developed for the Project and would be implemented during all Project-related activities within 1,000 feet of the haul-out/rookery.</p>

Policy	Consistency Determination
	Implementation of these measures would reduce the potential impacts to harbor seals to less than significant.
<p>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.</p>	<p>The Onshore Project Site will be graded, backfilled, and compacted to regulatory specifications. A soil binder and/or native grass mix will be utilized to stabilize any exposed soils onsite. No alterations to existing streambeds or drainages would occur. Proposed removal of concrete foundations, asphalt and oil sprayed areas would reduce the area of impervious surfaces on-site and may reduce the rate and amount of storm water run-off but would improve natural drainage patterns.</p>
<p>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.</p>	<p>Equipment removal activities would be limited to above-ground, idle facilities that have been previously purged of any liquids and taken out of service. However, during demolition, water quality impacts could also result from the inadvertent release of petroleum products from the equipment. Should a spill occur, the Project Oil Spill Contingency and Response Plan would be executed immediately to reduce impacts to less than significant. Chevron also maintains an agreement with MSRC (spill response co-op) for larger spill response support services.</p> <p>In the absence of proper controls, ground disturbance associated with removal of the facilities and impacted soil would have the potential to impact surface water quality. These issues would be addressed through implementation of engineering controls such as identified within the Project's Interim Remedial Action Plan, including stockpile management. In addition, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented as required by the State Water Resources Control Board's Statewide Construction General Permit (Order No. 2012-0006-DWQ). Compliance with required effluent limitations would prevent significant impacts associated with pipeline flush water or groundwater discharge to surface waters. As such, the proposed Project will not impact water quality.</p>
<p>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</p>	<p>No native trees are proposed for removal as part of the Project.</p>

Policy	Consistency Determination
protected through appropriate development standards.	
<p>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.</p>	<p>The Project is intended to remove existing equipment and subsurface facilities and return the Project site to pre-developed conditions. North of the UPRR right-of-way, 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 in support of future uses. Approximately 60 non-native blue gum eucalyptus trees and 2 cypress trees will require removal in order to allow for soil restoration in the southeastern corner of the Main Plant Area. However, Project-related tree removal represents four percent of the 1,500 trees on the Project site, which is less than the City’s threshold of significance of 10 percent.</p> <p>The area(s) south of the UPRR right-of-way within the bluffs and gravel parking lot area will be cleared of equipment, regraded, and also be replanted with a native seed mix to establish additional habitat/open space within this area.</p>
<p>OSC-8a. Protect trees supporting Monarch butterfly populations.</p>	<p>The Project does not include disturbance or removal of any trees observed during past or current biological surveys to contain Monarch butterfly populations (aggregations). Proposed tree removal would be located at least 800 feet from the known aggregation areas and would not substantially modify the micro-environment within the aggregation area (wind, temperature). The applicant has proposed the following measure in support of Monarch butterfly protection:</p> <ul style="list-style-type: none"> • MM BIO-1: Monarch Butterfly Avoidance. A qualified biologist shall conduct twice monthly surveys of the aggregation area at least 30 days prior to any planned heavy equipment activity from October through December near the aggregation area. If roosting Monarch butterflies are found, work within 50 feet of the aggregation area tree canopy perimeter shall be postponed until the Monarch butterflies have abandoned the aggregation area. Plan Requirements/Timing: A compliance plan shall be submitted to the City and approved prior to the initiation of work and implemented for all work from October through December. Monitoring: Implementation of this

Policy	Consistency Determination
	<p>measure shall be initiated by the applicant project manager and monitored by the designated biological monitor.</p>
<p>OSC-10a. Minimize the erosion and contamination of beaches. Minimize the sedimentation, channelization and contamination of surface water bodies.</p>	<p>Pipeline recovery activities will be restricted to their respective corridors. Localized, temporary disturbance of seafloor habitats will occur during removal of the pipeline(s), however seafloor depressions caused by pipe removal would be filled by natural sediment transport processes caused by currents and wave energy. Additionally, construction would be short-term in nature; and the area would return to its pre-Project condition following completion of decommissioning activities.</p> <p>Onshore construction would include grading of impacted soils. In the absence of proper controls these activities could result in erosion and sedimentation or the discharge of pollutants. However, these issues would be addressed through the implementation of engineering controls as identified in the Interim Remedial Action Plan, including stockpile management (use of soil cement, perimeter berms, stockpile removal within 180 days), covering trucks transporting soil, watering exposed or disturbed soil surfaces, cleaning vehicles prior to leaving the site, and sweeping adjacent streets of soil. In addition, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented as required by the State Water Resources Control Board's Statewide Construction General Permit (Order No. 2012-0006-DWQ). Implementation of the SWPPP would prevent significant impacts associated with storm water run-off.</p> <p>The coastal bluff at the Project site is also known to be retreating. Proposed removal of pipe segments and concrete armoring within and adjacent to the bluff face may cause localized bluff erosion and accelerate existing bluff retreat. As such, 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 proposed Project to cause accelerated bluff retreat. Stabilization may include backfill and compaction using suitable fill material, and revegetation, or other measures identified by a geotechnical engineer.</p> <p>The Project would be consistent with Policy OSC-10a.</p>
<p>OSC-10c. Degradation of the water quality of groundwater basins, nearby streams or</p>	<p>See response to CCC Section 30240 above.</p>

Policy	Consistency Determination
<p>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.</p>	
<p>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.</p>	<p>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 (Project Site). All obsolete equipment will be removed as part of the Project objective.</p>
<p>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.</p>	<p>As noted above, the Project area(s) south of the UPRR right-of-way within the bluffs and gravel parking lot area will be cleared of equipment, regraded, and also be replanted with a native seed mix to establish additional habitat/open space within this area. This is consistent with the area's zoned existing use in support of Open Space and recreation.</p>
<p>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.</p>	<p>The proposed Project includes a Restoration Plan that will be submitted to the City for review and approval prior to Project implementation. The Restoration Plan will include appropriate setbacks from the potential bluff retreat area as specified. No irrigation has been proposed, and the area will be planted with a drought-tolerant native seed mix.</p>
<p>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.</p>	<p>No development is proposed that would include use, storage, or distribution of hazardous materials. Equipment removal activities would be limited to above-ground, idle facilities that have been previously purged of any liquids and taken out of service. However, during demolition, impacts to ground or surface water could result from accidental spills of materials such as oil, fuels, grease, or debris from Project equipment. Adherence to best management practices outlined in the facilities' existing Hazardous Materials Management Plan will incorporate measures intended to reduce the potential for accidental spills; therefore, the risk will be greatly reduced, and no significant impacts are anticipated. In the event that a minor spill occurs, response procedures outlined in the Plant's existing Oil Spill Contingency Plan would be implemented.</p>

Policy	Consistency Determination
<p>N-4. Minimize noise spillover from industrial operations into adjacent residential neighborhoods and other sensitive uses.</p>	<p>Noise modeling was conducted by Behrens and Associates, Inc. (2021) to determine peak day noise levels generated by proposed decommissioning and remediation activities at the Project site. Based on peak day noise scenario modeling, the City’s 75 dBA CNEL construction noise standard would not be exceeded, and Project-related noise increases would not be readily noticeable (less than 3 dBA). Therefore, temporary noise impacts associated with proposed decommissioning and remediation activities would be less than significant.</p>
<p>N-5b. The City will require that construction activities adjacent to sensitive noise receptors be limited as necessary to prevent adverse noise impacts.</p>	<p>See response to Policy N-4 above.</p>
<p>N-5c. The City will require that construction activities employ techniques that minimize the noise impacts on adjacent uses.</p>	<p>See response to Policy N-4 above.</p>

