

March 4, 2016

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To: The California Coastal Commission

From: Ingeborg Cox MD, MPH

Application No: 9-15-0027

Hearing date: 3/9/16

Project description: Repair and maintenance activities to access road between Ellwood Onshore Facility (EOF) and the 421 piers (**Item No. W18a**)

Item postponed from 11/5/15 (**Item No. Th 10a** my comments were submitted)

Dear Commissioners:

According to the recent California Coastal Commission “Summary of Staff Recommendation”, dated 2/26/16: “Venoco, Inc. has applied for **after-the-fact** approval for unpermitted repair work to the dirt access road and adjoining revetment conducted between 2002 and 2015”, as well as authorization for periodic as-needed repairs to the **same access road over the next five years**. The report mentions that the “**unpermitted road repairs occurred nine times** between 2004 and 2014. (Pg. 7 Item W18a). This road provides access from the Ellwood Onshore Facility (EOF) to State Lease PRC 421. The access road extends from the EOF for 500 feet across Sandpiper Golf Course then turns east extending for ~ 1,300 feet along the beach to the PRC 421 piers. The EOF is a nonconforming use in the City of Goleta. The City of Goleta has not yet submitted their LCP to the CCC for certification and as such, Project components within the coastal zone require a coastal developmental permit from the CCC.

The City of Goleta’s Final Mitigated Negative Declaration (MND) “PRC 421 Access Road Maintenance and Repair Project” mentions that the surface is compact dirt and gravel. (pg.10). Is there a plan of the actual road? The CCC mentions that the “**unpermitted road repairs occurred nine times** between 2004 and 2014”. (Pg. 7 Item W18a). Can a project have multiple violations and still obtain an **after-the-fact permit** from the **CCC**?

The Final EIR Revised PRC 421 Recommissioning Project (Nov. 2014 pg. 4-45) states “the access road, seawall and revetment may have been constructed on beach sand and may consist of **fill soils of unknown origin**”. Why has a Geotechnical Engineer not been consulted? This road, which was constructed **in the 1920’s**, extends from near Bell Canyon Creek ESHA for ~1,300 feet along the bluff to the PRC 421 piers. Inside the roadbed you have an existing pipeline. Is the pipeline that is currently exposed near PRC 421-1 be the one going to be used if PRC 421 is permitted? (See picture)

According to the revised PRC 421 Recommissioning Project FEIR the Project is located in an area of special biological importance. Kelp beds, rocky intertidal habitat and three coastal estuaries have been identified. There are several ESHAs in the Project vicinity: the Deveraux Slough, Bell and Tecolote Creeks, two small wetlands adjacent to the access road, snowy plover habitat near Coal Oil Point and rocky intertidal areas.

The access road is close to ESHAs. Bell Canyon Creek is a riparian ESHA. If not mistaken it is home to several status species including monarch butterflies. According to Collette M. Thogerson, PhD from the South Coast Division of US Fish and Wildlife service, the repair project may negatively impact threatened and endangered species: red legged frog and tidewater goby and surveys are recommended prior to issuance of the permits. Has this been done?

Is the refueling of equipment on the access road west of the EOF going to affect Bell Canyon Creek? Are the setbacks of 100 feet to an ESHA met?

The PRC 421 access road is located on Sage Scrub/Dune/Bluff Scrub habitat which is designated as an ESHA by the Goleta General Plan.

Three individual wetland areas have historically existed within PRC 421 access road. They total 6,125 square feet. (pg. 32 Final MND PRC 421 Access Road Maintenance and Repair Project)

Under project specific hazards in the NMD it is stated that “no geologic hazards have been identified in the project vicinity”. (Pg. 40). Isn’t the More Ranch Fault Zone close to the project and does it not extend all the way into the ocean? As such shouldn’t it be considered “in the project vicinity”?

Isn’t the Lavigia Fault classified as potentially active located beneath PRC 421? And aren’t the Monterey Formation and the soils that overlie the area of PRC 421 geologically unstable and have the potential for slope failure? (FEIR Revised PRC 421 Recommissioning Project)

In 2004, 2010 and 2014 plywood was used to repair the existing wood retaining wall. What should the thickness of plywood be to be used in the former sea wall?

Why has this seawall been allowed to deteriorate so much? One can also see concrete slabs in the sea wall area. Are concrete slabs allowed? Does the repair of a seawall require plans? What happens if there are NO original plans?



To: California Coastal Commission

Nov. 1, 2015

From: Ingeborg Cox MD, MPH

Re: Application No: 9-15-0027 Item: Th 10a Hearing date: 11/5/15

Applicant: Venoco Inc

Location: Ellwood Onshore Facility 7979 Hollister Ave extending to State Lease 421 Piers

City of Goleta, Santa Barbara County

Dear Commissioners:

It appears that Venoco is seeking approval “after the fact” for **unpermitted** “repair work” **nine times** between 2004 and 2014 (see staff report page seven) to an access road from the Ellwood Onshore Facility (EOF) to State Lease 421 (PRC 421).

The City of Goleta just released their Draft Mitigated Negative Declaration (DMND) on the same project and public comments are due by December 4, 2015. Why is the Coastal Commission (CCC) not awaiting the public comments on this DMND before considering staff’s recommendation?

On page six of this report Venoco requested a Coastal Development Permit to allow periodic maintenance and repair of the existing Pier 421 access road. According to CCC Enforcement Program Overview Section 30106 “Development means, on land, in or under water, the placement or erection of any solid material or structure...” This requires a permit. According to the report on page seven “rock was placed in the road and on the seaward side of the road behind an existing wood retaining wall...” Why is staff calling what happened “repair work” and not “Development” as defined by Section 30106?

The beginning section of the road extends from the EOF for 500 feet across the Sandpiper Golf Course and then turns east and extends approximately **1,300 feet** along the beach to the PRC 421 piers. An existing 6- inch pipeline connects PRC 421 to Line 96. (Revised PRC 421 Recommissioning Project Final EIR page 2-6).

The access road is close to an ESHA, Bell Canyon Creek. Bell Canyon Creek was determined to be a riparian ESHA by the Commission’s staff ecologist Dr. Jonna Engel. Bell Canyon Creek is also the home to several special-status species, including monarch butterflies, red-legged frog and tidewater goby. If not mistaken, the red-legged frog is endemic to California and is also listed on the federal Endangered Species Act. How did staff determine that this unpermitted work did not result in permanent impacts to the ESHA, wetlands and beach habitat?

A website www.californiacoastline.org has thousands of pictures taken of the coastline at different time intervals. It is called the California Coastal Records Project. According to this website, Image 200800536 was taken on **Sep 18, 2008** and some of the elements you see are: the Sandpiper Golf Course, the EOF and Bell Canyon; Image 200800537- 200800542, when scrolled down, shows the bluff, the access road to PRC 421 and also a visual of the deteriorating bluff.

According to the website, Image 200600484 through Image 200600487 (**Sep. 16 2006**) show the access road from the EOF to State Lease 421.

Image 200404652 and 200404653 (**October 23, 2004**) shows Pier 421 undergoing repair. (Comparing the above images shows the affects of ocean action.)

Will the access road adjacent to the EOF be designated as the staging area for the equipment? What is the impact of this activity to Bell Canyon Creek ESHA and the other wetlands near PRC 421? Isn't activity that potentially can degrade an ESHA inconsistent with the Coastal Act? What happens to the 100-foot buffer for an ESHA? Also, there is an archaeological site in the vicinity of Bell Canyon.

This road was constructed in the 1920's according to the DMND. Can this road support heavy duty construction equipment without further deterioration and failure?

Final EIR Revised PRC 421 Recommissioning Project Nov. 2014 page 4-45 states: ".the access road, seawall and revetment may have been constructed on beach sand and may consist of fill soils of unknown origin... One soil boring was drilled through the access road during the caisson wall repair for Pier 421-1 in 2004. However the subsurface conditions were not logged for the first 20 feet below the surface road. Therefore the potential for settlement and liquefaction of these soils must be assumed until evaluated. If settlement or liquefaction of the fill or soils beneath the access road were to occur, the pipeline in the access road could be damaged and an oil spill could potentially occur."

The Final EIR further states on page 4-42 and 4-43: "All components of the Project (e.g. access road, coastal cliff, Pier 421-2) are located on soil units or fill that overlie the Monterey Formation... The Monterey Formation and the soils that overlie it in this area are considered to be geologically unstable and have the potential for slope failure or landslide." This side of the road is the proposed location for a new trench with power cables. (See FEIR page 2-27 and a drawing on page 2-25) Please take this into consideration.

Special Condition 1 from the Coastal Commission requires that the access road should not exceed a width of 12 feet. How and where will the above equipment turn once they are loaded?

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W18a

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Staff:	K.Huckelbridge-SF
Staff Report:	2/26/16
Hearing Date:	3/9/16

STAFF REPORT: REGULAR CALENDAR

Application No.: 9-15-0027

Applicant: Venoco, Inc.

Location: Ellwood Onshore Facility, 7979 Hollister Ave., extending to the State Lease 421 Piers, City of Goleta, Santa Barbara County.

Project Description: Repair and maintenance activities to the access road between the Ellwood Onshore Facility (EOF) and the 421 piers.

Staff Recommendation: Approval with conditions.

SUMMARY OF STAFF RECOMMENDATION

Venoco, Inc. has applied for after-the-fact approval for unpermitted repair work to an existing dirt access road and adjoining revetment conducted between 2002 and 2015, as well as authorization for periodic as-needed repairs to the same access road over the next five years. The existing access road provides access from the Ellwood Onshore Facility (EOF), to State Lease PRC 421 where Venoco maintains two oil and gas piers on the beach (Exhibit 1). These

wells are currently shut-in. The proposed repairs are necessary to provide safe access to allow for inspection and maintenance of the 421 wells and piers and for emergency response vehicles.

The key Coastal Act issue raised by this project is potential impacts to biological resources. The access road lies at the base of a coastal bluff and is surrounded by coastal bluff scrub that has been identified as an environmentally sensitive habitat area (ESHA). The eastern terminus of the road is also located adjacent to a wetland. In addition, just seaward of the access road is Ellwood Beach, which provides habitat for coastal species, including the Western Snowy Plover, a federally listed species.

Potentially significant impacts to these habitat areas include direct impacts from encroachment and indirect construction-related impacts. Analysis of unpermitted work between 2002 and 2015 indicates that repair activities did not result in permanent impacts to ESHA, wetlands or beach habitat. Future repair activities also have been designed to avoid direct impacts and minimize indirect impacts to adjacent ESHA, wetlands and beach habitat.

To ensure permanent impacts to these habitats are avoided during the future five year period, **Special Condition 1** requires that the access road remain in its current alignment and not exceed a width of 12 feet. **Special Condition 2** requires that repair activities not enlarge or extend the existing revetment providing support to the road, including by extending the base further onto the beach. To minimize temporary construction-related impacts to adjacent sensitive species and habitats, **Special Condition 3** requires that Venoco hire a qualified biologist to conduct pre-construction biological surveys and recommend avoidance measures for any identified sensitive species. **Special Condition 4** requires biological monitoring during project-related activities; this condition also requires that if biological monitoring reveals any unintended impacts on the existing wetland habitat, Venoco will be required to apply for a permit amendment to address these impacts. **Special Condition 5** requires that Venoco install construction fencing to prevent encroachment into ESHA and wetlands. As conditioned, the staff recommends the Commission find the proposed project consistent with the sensitive habitat (Section 30240) and water quality/wetland buffer (Section 30231) policies of the Coastal Act.

The repair project is located in an area that is subject to geologic hazards, such as from wave action. However, based on information provided by the applicant, the available evidence does not suggest that the past unpermitted repair work has resulted in any reduced stability, erosion, oil spills or access impacts. Moreover, not performing the repair and maintenance activities could increase oil spill risks. Furthermore, with the inclusion of applicant-proposed mitigation measures and the Special Conditions outlined above, future repair work over the next five years would not result in adverse coastal-related impacts. Thus, as conditioned, the staff recommends the Commission find the repair project consistent with Coastal Act policies related to hazards and erosion (Section 30253), oil spills (Section 30232) and public access and recreation (Sections 30210, 30220 and 30240(b)).

Commission staff recommends **approval** of coastal development permit application 9-15-0027, as conditioned. The standard of review for proposed project is the Chapter 3 policies of the Coastal Act, because the City of Goleta does not have a certified Local Coastal Program.

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EXHIBITS

Exhibit 1 – Project Location

Exhibit 2 – Aerial Map of Project Location with Photo Key

Exhibit 3 – Site Photos

Exhibit 4 – Map of ESHA adjacent to the EOF

Exhibit 5 – 2002 Survey of the Pier 421 Access Road

Exhibit 6 – 2015 Survey of the Pier 421 Access Road (1 of 2)

Exhibit 7 – 2015 Survey of the Pier 421 Access Road (2 of 2)

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit 9-15-0027 subject to the conditions set forth in the staff recommendation.*

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in conditional approval of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves Coastal Development Permit 9-15-0027 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Road Alignment.** The access road to the 421 piers shall remain in its current alignment and shall not exceed a width of 12 feet.
2. **Revetment Footprint.** The replacement of supplemental rip rap (rock) shall not enlarge or further extend the revetment, including by extending the base of existing rip rap towards the beach. The placement of additional rock shall be restricted to specific locations where the seaward road embankment has failed and the existing revetment has deteriorated. The installation of supplemental rock shall be coordinated with and approved by a qualified biologist, approved by the Executive Director.
3. **Pre-construction Biological Surveys.**
 - a. NO LATER THAN 30 DAYS PRIOR TO COMMENCEMENT OF ANY FUTURE REPAIRS, a qualified biologist approved by the Executive Director shall conduct pre-construction surveys for special-status species and nesting birds protected under the Migratory Bird Treaty Act and California Fish and Wildlife Code section 3503. Pre-construction surveys shall target monarch butterflies, California red-legged frog, Western Snowy Plovers and white-tailed kites. Appropriate survey methods and timeframes shall be established by the consulting qualified biologist.
 - b. If aggregations of monarch butterflies are observed within the adjacent areas, Venoco shall implement avoidance measures to ensure that aggregations of monarch butterflies are not disturbed. Venoco shall establish a minimum 100-foot buffer, as measured from the outer extent of the tree canopy. If monarch butterfly aggregations are detected, construction activities within the designated buffer of the aggregation shall be halted until monarch butterflies have left the site and the consulting biologist has determined that the resumption of construction will not adversely affect the monarch butterfly habitat.
 - c. If nesting birds are observed, the Permittee shall implement avoidance measures to ensure that nests are not disturbed until after young have fledged. Construction activities within the designated buffer of the nest shall be halted until the consulting biologist has determined that the resumption of construction will not adversely affect the nest.
 - d. If other listed species are encountered, the Permittee shall consult with the U.S. Fish and Wildlife Service (USFWS), the California Department of Fish and Wildlife (CDFW), City of Goleta and the Executive Director before continuing with work.

- e. The pre-construction survey shall fully document the extent and condition of the wetland located at the eastern end of the access road and any other previously unknown wetland areas within the immediate project vicinity.
- f. The results of the preconstruction surveys, including graphics showing the locations of any nests detected, and all avoidance measures implemented for special-status species, shall be submitted to the Executive Director within 14 days of completion of the surveys.

4. **Biological Monitoring.**

- a. A biological monitor approved by the Executive Director shall be present during all onshore construction. The biological monitor shall be authorized to halt all construction activities if conditions of this permit are violated or a special status species is observed within or near the construction area. Prior to commencement of any future repairs, the biological monitor shall clearly designate on project maps and plans, and at the construction site, sensitive resource areas identified during the pre-construction survey, including the required buffer zone. Staging and storage areas shall not be placed in or near sensitive resources areas.
- b. The results of the monitoring, including graphics showing the locations of any nests detected, and all avoidance measures implemented, shall be submitted to the Executive Director within 14 days of project completion.
- c. If biological monitoring results indicate fill or dredging or any other adverse impacts to any wetland areas, the Permittee shall amend this permit to address these impacts and fully restore any disturbed wetlands to its pre-project condition, unless the Executive Director determines that no such permit amendment is needed.

5. **Highly Visible Fencing.** PRIOR TO COMMENCEMENT OF ANY FUTURE REPAIRS, the Permittee shall install highly visible construction fencing to prevent encroachment into ESHA and wetlands. If the repair work is carried out during the winter months, the bottom of the fencing shall be raised to allow for the migration of California red-legged frogs through the project area, where applicable.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

Venoco requests approval of a Coastal Development Permit to allow periodic maintenance and repair of the existing Pier 421 access road. The compacted dirt and gravel road provides access from the Ellwood Onshore Facility (EOF), through the Sandpiper Golf Course, and terminating at State Lease PRC 421 (Exhibits 1-3). Venoco maintains two oil and gas piers on the beach within PRC 421 that are currently shut-in and idle. The proposed repairs are necessary to provide safe access to Venoco's 421 piers to allow for inspection and maintenance of the wells and piers and for access by emergency response vehicles. In addition to authorizing repair and maintenance activities over a five year period, the CDP would also serve as an after-the fact

approval of access road repairs that have occurred since 2001 (see Section B for additional details).

Venoco proposes to conduct repair and maintenance activities annually or as needed depending on impacts to the road from seasonal storm activity. Specifically, repair activities undertaken over the past fourteen years and proposed for the next five years include:

- Routine storm maintenance activities including removing muddy materials from the road surface and installing 2-3 inches of road base to replace material that has washed off and ensure an all-weather road surface.
- Repair, as needed, larger potholes created by larger storm events by excavating loose material and filling with layers of larger angular rock (4-12 inches), crushed rock (2 inches) and road base. When needed, larger rocks that stabilize the road fill and the revetment seaward of the road will be replaced. If gaps in the revetment wall are large enough to allow road material to spill over onto the beach, plywood may be used to repair the revetment to ensure the road material is contained.

Equipment, vehicles and personnel involved in the proposed work will be staged from the existing access road west of the EOF. Repairs are expected to last between one and five days and will require use of a front-end loader, dump truck, rubber-tired or tracked excavator or larger excavator as needed. Recovered materials will be recycled or disposed of at a waste management facility. If any roadway materials have migrated to the beach, they will be removed by hand and disposed of at a waste management facility. No motorized equipment will be used on the beach. If necessary, Venoco will install tarps, plywood or similar materials to prevent any repair materials from falling onto the beach. In addition, Venoco will implement all standard fugitive dust and diesel particulate and NO_x emission control measures as required by the Santa Barbara County Air Pollution Control District. Proposed repair and maintenance activities would not result in changes to the footprint of the existing road or the adjoining revetment.

B. PROJECT BACKGROUND

Most of the development in the project area, including the EOF, 421 piers, wells and the access road were constructed prior to adoption of the Coastal Act. Since the Coastal Act was enacted, the Commission has authorized repair work on the road. In 2001, the Commission issued Emergency Permit E-01-027-G, which included emergency repairs on the access road. Specifically, that permit authorized (a) grading the road; (b) adding 520 tons of float rock (2 in. to 8 in. rock) as a base layer where needed; (c) adding 662 tons of gravel as road base and; (d) placing approximately 645 tons of rip rap within the gaps of the existing beachside rock revetment at the base of the road. The purpose of these repairs was to provide safe passage for heavy equipment to the 421 piers to repair of a leak at one of the PRC 421 wells. The Commission-approved, follow-up regular permit, E-01-030, did not authorize future repairs to the access road or the adjoining revetment.

Since the 2001 repair work was completed, Venoco has performed repair and maintenance work on the access road without the Commission's authorization. Unpermitted road repairs occurred nine times between 2004 and 2014. Repairs were consistent with the proposed activities

described in the project description above. In addition to the activities described above, in 2004 and 2014, rock was placed in the road and on the seaward side of the road behind an existing wood retaining wall (similar to activities authorized under E-01-027-G). In 2004, 2010 and 2014, plywood was used to repair the existing wood retaining wall to prevent road backfill material from falling through the gaps in the wood sheet piles that make up the retaining wall and migrating onto the beach. This work was conducted from the access road using a small truck-mounted crane or the bucket of a backhoe to install the plywood, and hand tools to secure the plywood to the retaining wall. The purpose of this CDP, in part, is to provide an after-the-fact analysis and authorization of these unpermitted repair activities.

C. OTHER AGENCY APPROVALS

City of Goleta

The City of Goleta finalized a Mitigated Negative Declaration (MND) for the project in February of 2016. The City has scheduled formal action on this MND as well as consideration of a Development Plan and Permit by the City's Planning Commission on February 29, 2016.

D. COMMISSION'S PERMIT AUTHORITY FOR REPAIR AND MAINTENANCE ACTIVITIES

This proposal consists of repair and maintenance activities. Coastal Act Section 30610(d) generally exempts from Coastal Act permitting requirements the repair or maintenance of structures that does not result in an addition to, or enlargement or expansion of, the structure being repaired or maintained. However, the Commission retains authority to review certain extraordinary methods of repair and maintenance of existing structures that involve a risk of substantial adverse environmental impact as described in Section 13252 of the Commission's regulations.

Section 30610 of the Coastal Act provides, in relevant part:

Notwithstanding any other provision of this division, no coastal development permit shall be required pursuant to this chapter for the following types of development and in the following areas: . . .

(d) Repair or maintenance activities that do not result in an addition to, or enlargement or expansion of, the object of those repair or maintenance activities; provided, however, that if the commission determines that certain extraordinary methods of repair and maintenance involve a risk of substantial adverse environmental impact, it shall, by regulation, require that a permit be obtained pursuant to this chapter.

Section 13252 of the Commission administrative regulations (14 CCR 13000 *et seq.*) provides, in relevant part (emphasis added):

For purposes of Public Resources Code section 30610(d), the following extraordinary methods of repair and maintenance shall require a coastal development permit because they involve a risk of substantial adverse environmental impact:...

(3) Any repair or maintenance to facilities or structures or work located in an environmentally sensitive habitat area, any sand area, within 50 feet of the edge of a coastal bluff or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams that include:

(A) The placement or removal, whether temporary or permanent, of rip-rap, rocks, sand or other beach materials or any other forms of solid materials;

(B) The presence, whether temporary or permanent, of mechanized equipment or construction materials.

All repair and maintenance activities governed by the above provisions shall be subject to the permit regulations promulgated pursuant to the Coastal Act, including but not limited to the regulations governing administrative and emergency permits. The provisions of this section shall not be applicable to methods of repair and maintenance undertaken by the ports listed in Public Resources Code section 30700 unless so provided elsewhere in these regulations. The provisions of this section shall not be applicable to those activities specifically described in the document entitled Repair, Maintenance and Utility Hookups, adopted by the Commission on September 5, 1978 unless a proposed activity will have a risk of substantial adverse impact on public access, environmentally sensitive habitat area, wetlands, or public views to the ocean.... (emphasis added)

The proposed project qualifies as a repair and maintenance under Section 30610(d) of the Coastal Act and Section 13252 of the Commission's regulations because the project: (a) does not involve an addition to or enlargement or expansion of the road or revetment and (b) does not involve replacement of 50% or more of the road or revetment. Although the proposed repair and maintenance activities will not add to or enlarge the subject access road, the proposed work involves placing construction materials, removing and placing solid materials, and the temporary use of mechanized equipment, all within 50 feet of ESHA and a coastal bluff and 20 feet of coastal waters. The proposed repair project therefore requires a coastal development permit under CCR Section 13252.

In considering a permit application for a repair or maintenance project pursuant to the above-cited authorities, the Commission reviews whether the proposed method of repair or maintenance is consistent with the Chapter 3 policies of the Coastal Act. The Commission's evaluation of such repair and maintenance projects does not extend to an evaluation of the conformity with the Coastal Act of the underlying existing development.

E. BIOLOGICAL RESOURCES

Section 30240(b) of the Coastal Act states:

(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.

Section 30231 of the Coastal Act states:

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 ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

1. Environmentally Sensitive Habitat Areas

Project activities have the potential to affect environmentally sensitive habitat areas (ESHA) and special status species associated with ESHA adjacent to the project site. The access road, in the vicinity of proposed project activities, lies at the base of a coastal bluff. Vegetation adjacent to the road is dominated by saltbrush scrub and southern coastal bluff scrub, identified as Sage Scrub/Dune/Bluff Scrub ESHA in the Commission's findings for CDP E-13-001 and the City of Goleta's General Plan (see Exhibits 2-4). Directly to the west and south of the access road adjacent to the EOF (where equipment will be staged) is riparian habitat associated with Bell Canyon Creek and designated as riparian/marsh ESHA in the Commission's findings for CDP E-13-001 and the City of Goleta's General Plan (see Exhibit 4). In addition, seaward of the access road and associated retaining wall is Ellwood Beach. In addition to public access to the ocean, this beach provides habitat for a variety of birds, invertebrates and fish.

In conjunction with a project to replace a power cable between the EOF and Platform Holly, approved in 2012 under CDP E-13-001, Venoco conducted an onshore biological study to identify special-status species and critical habitat areas in the vicinity of the EOF. This study identified several listed species, including the monarch butterfly (*Danaus plexippus*), the red-legged frog (*Rana draytonii*) and the white-tailed kite (*Elanus leucurus*) as special-status species with a high potential to occur within the project area. In addition, tidewater goby (*Eucyclogobius newberryi*), a species listed by the US Fish and Wildlife Service as federally endangered and as a California Department of Fish and Wildlife Species of Special Concern, is known to reside in Bell Canyon Creek, immediately adjacent to the project site. Most of these species have been observed in the ESHA areas to the west of the EOF, however, it is possible they could also be found closer to the project area. In addition, Ellwood beach provides habitat suitable for Western snowy plover (*Charadrius alexandrinus nivosus*), listed as federally threatened by the US Fish and Wildlife Service, and spawning grounds for grunion (*Leuresthes tenuis*).

The most significant potential adverse impact from past unpermitted road repairs and future proposed work would be the encroachment of the road into adjacent ESHA or beach habitat. In 2001-2002 when repairs to the access road were last approved, emergency permit E-01-027-G included a requirement that the access road not exceed 12 feet in width, to ensure adjacent habitat areas remained intact. As part of the application for the proposed project, Venoco submitted a survey of the road conducted in April 2015 (see Exhibits 6 and 7). Comparison of this survey with an as-built road survey conducted in 2002 (see Exhibit 5), confirms that the roadway footprint has not been extended or enlarged and remains approximately 12 feet wide.

Thus, unpermitted road repairs between 2002 and 2015 did not result in permanent impacts to adjacent ESHA habitat. To ensure that future proposed repairs will also avoid encroachment into adjacent ESHA, **Special Condition 1** requires that the access road remain in its current alignment and not exceed 12 feet in width.

Regarding revetment repairs, the 2001 emergency permit included requirements limiting the replacement of larger rocks to ensure that the existing revetment did not encroach further onto the beach. Descriptions of unpermitted work between 2002 and 2015 as well as photos provided by the City of Goleta, do not provide any evidence that the revetment was extended during this time. To ensure that the revetment does not encroach further onto beach habitat as a result of future repairs, **Special Condition 2** requires that the replacement of supplemental rip rap (rock) shall not enlarge or extend the revetment, including by further extending the base of existing rip rap towards the beach.

In addition to potential loss of habitat, past and future road repair work could adversely affect special-status species and their habitats due to noise, fugitive dust, erosion, runoff and other construction-related impacts. Given the short duration and long frequency of the proposed activities, construction-related activities would be temporary and minor. Most of the species listed above are mobile and would likely avoid the construction site. Thus, direct impacts resulting in mortality or injury are improbable. Indirect impacts due to noise or vibration or fugitive dust are likely to be minor due to the temporary nature of project activities and in some cases, the distance between the project site and desirable habitat. For example, the project site is located about 500 feet from the mouth of Bell Canyon Creek, and thus the project is sited far enough from species that live in the associated riparian ESHA that such species would not be subject to significant adverse impacts related to the proposed project.

To further reduce the potential for impacts to sensitive species and habitat, Venoco has proposed the following measures:

- A pre-job meeting will take place with all on site contract personnel. Venoco will provide site-specific environmental training and explain the sensitive nature of the work area and the necessary protective and mitigation measures. The City of Goleta approved environmental monitor will be present for this meeting and provide any additional needed information. Agency staff will be invited to attend.
- To avoid potential impacts to shore birds, western snowy plover, and grunion, no activities will take place on the beach.
- The area south of the roadway will be protected by continuous silt fencing as necessary where repairs are being performed or equipment is working.
- The bluffs and northern side of the road where repairs are being performed or equipment is working will be staked with reflective marker stakes approximately every five meters as necessary.
- The environmental monitor will conduct periodic site inspections as required to ensure project compliance.
- Material from the roadway will be properly disposed of offsite at a waste management facility.

- Venoco will enforce good housekeeping practices at the work site to minimize the chance of worksite debris entering the ocean.
- Work will be performed as much as possible, when there is little chance of rain that could cause offsite erosion.

Additional applicant-proposed measures to prevent a release of oil or hazardous material into the surrounding ESHA or ocean are discussed further in Section F. To further reduce the potential for impacts to sensitive species, the Commission is requiring **Special Conditions 3, 4 and 5**. Although Venoco included periodic site inspections as one of its mitigation measures, **Special Condition 3** requires that Venoco employ a biologist to conduct pre-construction surveys to detect the presence of special status species and nesting birds in the project vicinity. If special status species, such as the monarch butterfly, or nesting birds are discovered, avoidance measures including but not limited to those from the City of Goleta's Coastal Land Use Plan will be implemented. **Special Condition 4** requires Venoco to employ a qualified biological monitor to mark all sensitive resource zones and enforce environmental protection measures during all construction activities. If special-status species are observed during construction, the biologist shall have the authority to halt construction and confer with the US Fish and Wildlife Service (USFWS), CDFW, the City of Goleta, and Commission staff prior to allowing work to resume. Finally, **Special Condition 5** requires Venoco to establish the boundaries of the work area with highly visible fencing to avoid encroachment into sensitive habitats adjacent to the project site.

With these conditions, the proposed project is sited and designed to prevent impacts that would significantly degrade adjacent habitat areas and is compatible with the continuance of the habitat areas in and around the project site. Thus, the Commission finds the project, as conditioned, consistent with Coastal Act Section 30240(b).

2. Wetlands

In January 2001, Venoco conducted a wetland delineation survey at the project site. The survey identified three wetland areas within and adjacent to the access road that exhibited all three wetland parameters included in the Commission's definition of wetlands: hydrophytic vegetation, hydric soils, and wetland hydrology. All three wetland areas were supported by natural seeps and dominated by coastal salt marsh vegetation including saltgrass, rabbitsfoot grass, saltbush, African brassbuttons, and saltmarsh sandspurry.

Under emergency permit E-01-027-G and the associated follow-up CDP, E-01-030, the Commission approved permanent impacts to two of the three wetlands (wetlands #1 and #2 totaling 475 square feet) that were located directly in the roadway (preceding pier 421-1). Venoco was required to mitigate these impacts according to a plan approved jointly by Coastal Commission staff and County of Santa Barbara staff. In the years since the 2001-2002 permitted road repair work, the seeps that supported these two wetlands have continued to create wet, unvegetated areas in the roadway (City of Goleta 2016). However, these areas have not extended beyond the initial 475 square feet of permanent impacts authorized under CDPs E-01-027-G and E-01-030 (Storrer 2016). Thus, no additional impacts to wetlands #1 and #2 are anticipated under past unpermitted and future proposed repair activities.

The third wetland (wetland #3), approximately 5850 square feet in size, is located at the eastern end of the access road near pier 421-2 (see Exhibits 3 and 7). About 1,107 square feet of this wetland was filled during the 2001-2002 permitted road repair work. Partial filling of this wetland was necessary to provide for heavy equipment access to pier 421-2 and to increase the load-bearing capacity of the road. Venoco was also required to mitigate permanent impacts to wetland #3.

Past and future repairs and maintenance to the access road have the potential to impact the existing wetland (wetland #3) located at the eastern end of the access road. Comparison of the surveys of the access road and the adjacent wetland area conducted in 2002 and 2015 confirm that the boundary between the roadway and the wetland has not changed. Venoco did note in its application that the protective berm located at the edge of the boundary was expanded to provide additional protection to the wetland area, but this expansion occurred solely on the roadway and did not encroach into the wetland (see Exhibits 3 and 7). Thus, unpermitted road repairs between 2002 and 2015 did not result in fill or dredging of the wetland or any other permanent wetland impacts. Although it is possible these repairs resulted in unintended impacts to this wetland area, these impacts would have been short-lived due to the short duration of repair activities.

As proposed, the project will not result in fill or dredging of existing wetland areas. To further protect this sensitive wetland area, in addition to the measures listed above in Section D.1. that will minimize erosion and ensure good housekeeping practices, Venoco proposes to mark the boundary of the wetland with temporary construction fencing. This protection measure is consistent with **Special Condition 5**, which requires that highly visible fencing be used to establish the boundaries of the work area to avoid impacts to, and protect, all sensitive habitats, including wetland areas. To ensure that wetland areas are protected and impacts are avoided, **Special Condition 3** requires a pre-construction biological survey that specifically includes documenting the extent and condition of wetland #3 and any other previously unknown wetland areas. Furthermore, **Special Condition 4** requires biological monitoring during project activities to ensure that impacts to sensitive wetland species and habitat are avoided. If the results of biological monitoring indicate that the project has resulted in unintended fill or dredging of wetland areas or any other significant adverse impacts, Venoco will be required to submit an application for a permit amendment to address these unintended impacts and provide required mitigation.

With the applicant-proposed measures in place, and as conditioned above, the project would provide an adequate buffer for the adjacent wetland, and would ensure that these areas remain protected. Thus, the Commission finds the project, as conditioned, consistent with Coastal Act Sections 30240(b) and 30231.

F. HAZARDS

Coastal Act Section 30253(2) states:

New development shall:...(2) 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.

This project involves repairing an existing access road and revetment that parallels the toe of a bluff along a section of Ellwood Beach. The bluff face is subject to natural erosion, which causes chunks of mud and sediment to fall onto the access road below, in part necessitating the past and future proposed repair activities. The existing revetment, consisting mostly of rip rap but also including some sections of wood planks, located on the seaward side of existing access road, provides support and stability for the road. The proposed project would not result in the construction of new structures or the expansion of the seawall.

Potential hazards-related impacts from the proposed project include undermining the stability of the adjacent bluff and seawall and exacerbating erosion. Bluff stability could be compromised if the road is allowed to migrate landward, thus cutting into the toe of the bluff. To prevent potential adverse impacts to the bluff, emergency permit E-01-027-G, issued in 2001 to authorize emergency repairs to the access road and 421 piers, limited the width of the road to 12 feet, the minimum width necessary to allow safe passage of equipment needed to maintain the piers. Comparison of the 2002 as-built drawings and survey drawings of the existing 2015 road alignment show that the footprint of the road has not changed significantly, and the road width has not increased above 12 feet (see Exhibits 3-5). To ensure that future repairs do not result in alteration of the bluff face or toe, **Special Condition 1** requires that the access road remain in its existing alignment and not exceed 12 feet in width.

In addition to bluff undercutting, project activities could result in structural impacts to the existing rip rap revetment or increased erosion onto the beach. Emergency permit E-01-027-G authorized placement of additional rock riprap to maintain support of the road, but limited the placement of additional rock to specific locations where the seaward side of the road embankment had failed and the existing revetment had deteriorated. The emergency permit prohibited extending the base of the revetment towards the beach, thus ensuring that the existing footprint of the revetment was not enlarged. Similar work was conducted in 2004 and 2014, without the benefit of a permit. Although these repairs were not restricted by permit conditions similar to those described above, there is no evidence to suggest that the unpermitted work resulted in an extension or enlargement of the existing revetment. In fact, repairing the existing seawall through replacement of rip rap and plywood likely prevented accelerated erosion of the road. Thus, past unpermitted repairs did not create or significantly contribute to erosion or geologic instability of the project area. To ensure that future repair work maintains the structural integrity of the existing road and minimizes erosion onto the beach and into the ocean, **Special Condition 2** requires that repair work not enlarge or extend the revetment, including by extending the base of the existing seawall towards the beach. In addition, the placement of additional rock shall be restricted to specific locations where the seaward road embankment has failed and the existing revetment has deteriorated.

As conditioned, the Commission finds that the project would not “contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area” and is therefore consistent with Coastal Act Section 30253.

G. OIL SPILLS

Coastal Act Section 30232 states:

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.

Leakage or spillage of fuel or lubricants from the project vehicles or equipment could result in the release of oil or petroleum hydrocarbons onto the beach or habitat areas adjacent to the access road. Although project activities will not directly involve equipment or personnel on the PRC well heads, there is a small chance that an accident could lead to the release of hydrocarbons from one of the wells. To ensure against these types of accidental releases, Venoco proposes the following measures:

- Venoco's existing Ellwood Oil Spill Contingency Plan and Emergency Response Plan will be in effect for the duration of the project. These plans include prevention, response and clean-up measures to be deployed in the event of an oil spill or other emergency. In addition, Venoco has personnel on site that are trained to respond to a spill or other emergency.
- Spill response equipment will be kept in emergency response trailers staged at the EOF.
- Refueling of equipment and vehicles will occur at the EOF or on the access road adjacent to the EOF. Refueling will not occur on the access road adjacent to the beach or other habitat areas. Appropriate procedures, such as the use of tarps and drip pans, will be used to minimize the release of hydrocarbons during refueling.
- All equipment will be clean prior to mobilization to the site and maintained throughout the project. Equipment will be inspected daily for fuel or fluid leaks.
- No washdown or maintenance of equipment will be allowed on-site.

In addition to the above prevention and response measures, Venoco maintains contracts with two companies that provide secondary response services; CleanSeas for marine spills, and Advance Clean Up Technologies, Inc, for terrestrial spills. With these measures in place, the Commission finds that the project includes sufficient oil spill prevention and response procedures and equipment and is thus consistent with Coastal Act Section 30232.

H. PUBLIC ACCESS AND RECREATION

Section 30210 of the Coastal Act states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Coastal Act section 30220 states:

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Coastal Act section 30240(b) states:

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.

The project has the potential to affect public recreation near the project site, such as at the adjacent Sandpiper Golf Course, and the adjacent Ellwood Beach. A section of Venoco's access road is located within an easement that runs through the golf course past the 12th tee (see Exhibits 6-7). Although repairs on this section of road are not anticipated, vehicles and project personnel will need to traverse this road on a more frequent basis than is typical to facilitate repairs on the adjacent section of road. To mitigate potential effects from the proposed project, Venoco included the following measures as part of the proposed project:

- Venoco will coordinate with management personnel of the golf course to minimize any interference with golf course operations including equipment and materials delivery during times the golf course is not in use, and stockpiling materials as much as possible during these periods of inactivity. Temporary signs will be erected and maintained as necessary around the construction area during non-work hours. Venoco will also provide the golf course management with construction status updates and a listing of upcoming activities for planning purposes.
- Should it become necessary, a flag person will be stationed near the 11th hole and 12th tee during equipment transit across the golf course to assist with safe passage. Project-related traffic shall yield to golfers and golf course maintenance personnel.
- Project personnel will park their personal vehicles at the EOF or the temporary laydown areas immediately west of the EOF. To minimize traffic across the golf course, workers not involved in moving equipment, materials or tools will walk across the golf course to access the site.

With these measures in place and taking into account the project's short duration and low frequency (1-5 days, once/year), impacts to golfing would be minimized.

In addition to the golf course, the public also uses Ellwood Beach, which fronts the golf course and PRC 421, for jogging, walking and other beach-related recreation. Project activities could result in temporary impacts from noise and the presence of workers immediately adjacent to the beach. However, these impacts are temporary and infrequent. In addition, no mechanized equipment will be used on the beach, and any work that does occur on the beach (i.e., removal by hand of rocks or other road material that fell onto the beach) will be short-term, unobtrusive, and will result in a cleaner beach for beach goers to enjoy. Furthermore, the purpose of the road repairs is to facilitate inspection and repair of the shut-in oil and injection wells at the 421 piers. Maintaining these wells and piers will prevent leakage of oil or other substances that could result in a much more extensive significant adverse impact to public access.

Thus, for the reasons stated above, the Coastal Commission finds that impacts to public access and recreation will be temporary, infrequent, and minimized by implementation of the above-described measures. The Commission thus finds the project consistent with Coastal Act sections 30210, 30220, and 30240(b).

I. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The City of Goleta will serve as the lead agency for the project for CEQA purposes. The City is in the process of preparing a mitigated negative declaration for the project that is expected to be available for public review at the end of October.

Section 13096 of the Commission's administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as modified by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act ("CEQA"). Section 21080.5(d)(2)(A) of CEQA prohibits approval of a proposed development if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant impacts that the activity may have on the environment.

The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. As discussed above, the proposed project has been conditioned to be consistent with the policies of the Coastal Act. As specifically discussed in these above findings, which are hereby incorporated by reference, mitigation measures that will minimize or avoid all significant adverse environmental impacts have been required. As conditioned, there are no other feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impacts which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned, is consistent with the requirements of the Coastal Act to conform to CEQA.

APPENDIX A: SUBSTANTIVE FILE DOCUMENTS

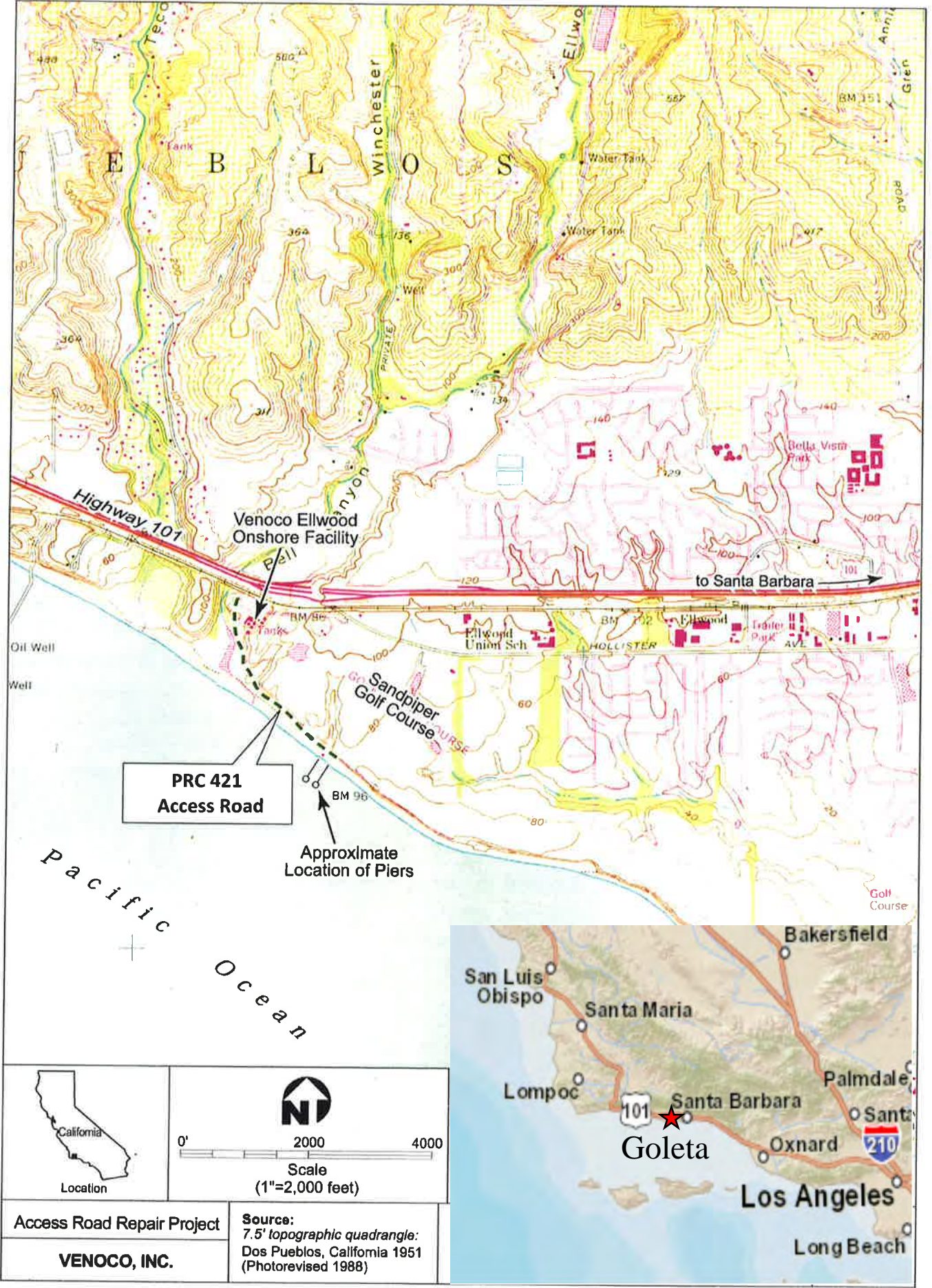
City of Goleta, PRC 421 Access Road Maintenance and Repair Project, Final Mitigated Negative Declaration. February 2016.

City of Goleta, Staff Report on the PRC 421 Access Road Maintenance and Repair Project. Published February 24, 2016.

Imgrund, Heather (City of Goleta), email communication to Kate Huckelbridge on 1/29/15, 2/5/2015 and 10/19/15.

Storrer, John (Biological Monitor for the City of Goleta), personal communication to Kate Huckelbridge on 2/24/16.

Venoco, Inc., Coastal Development Permit Application and accompanying documents. Originally submitted January 6, 2015 and supplemented on 4/29/15 and 10/16/15.





Venoco, Inc. PRC 421 Access Road
Photo Key for Site Photos Taken Dec. 24, 2014

Gate

1

2

3

4

5

6

Venoco PRC 421 Access Road
Site Photos Taken December 24, 2014



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



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



FIGURE 4.7-1

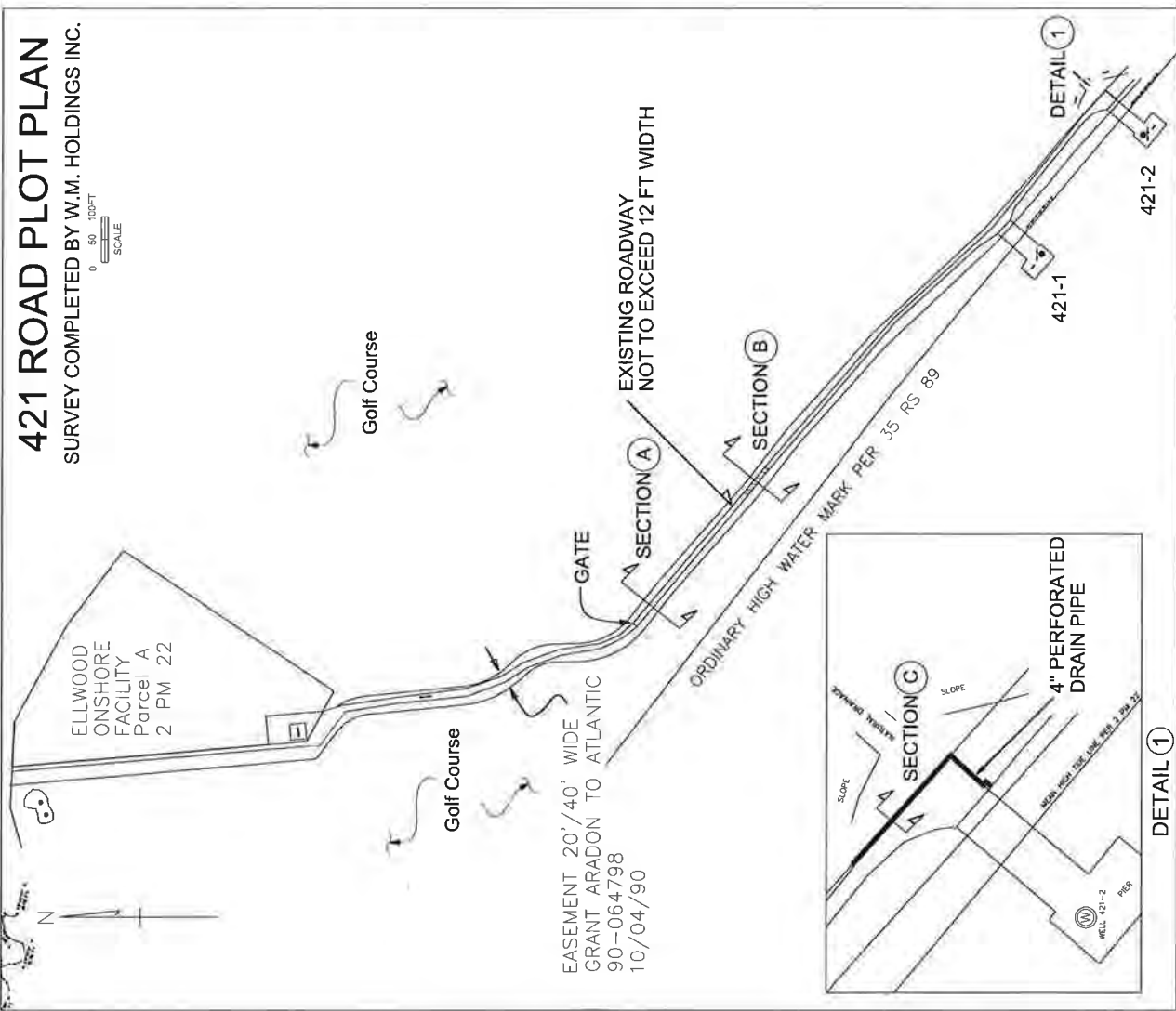
Terrestrial Biological Resources in the Project Vicinity



421 ROAD PLOT PLAN

SURVEY COMPLETED BY W.M. HOLDINGS INC.

SCALE
0 60 120 FT



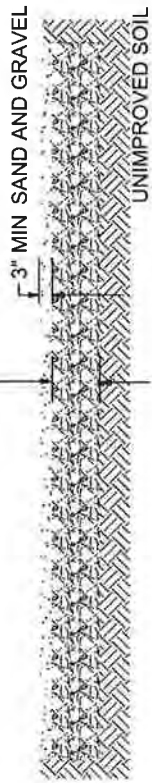
AS-BUILT OF REPAIRS MADE TO EXISTING ROAD TO 421 LEASE

NOT TO EXCEED 12 FT



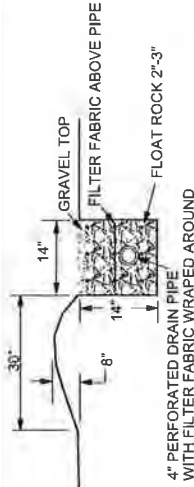
SECTION A

FLOAT ROCK 8" TO 3/4" SIZE



SECTION B

ROAD



SECTION C

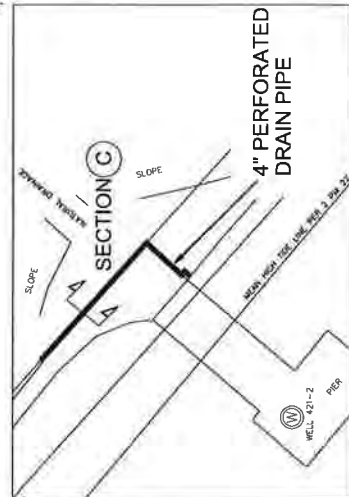
REV. 1 ADDED EXISTING GATE LOCATION
12-29-14 A C S/B/M

VENOCO
INC
5464 Carpinteria Ave., Suite J
Carpinteria, CA 93013-1423

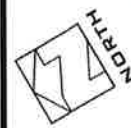
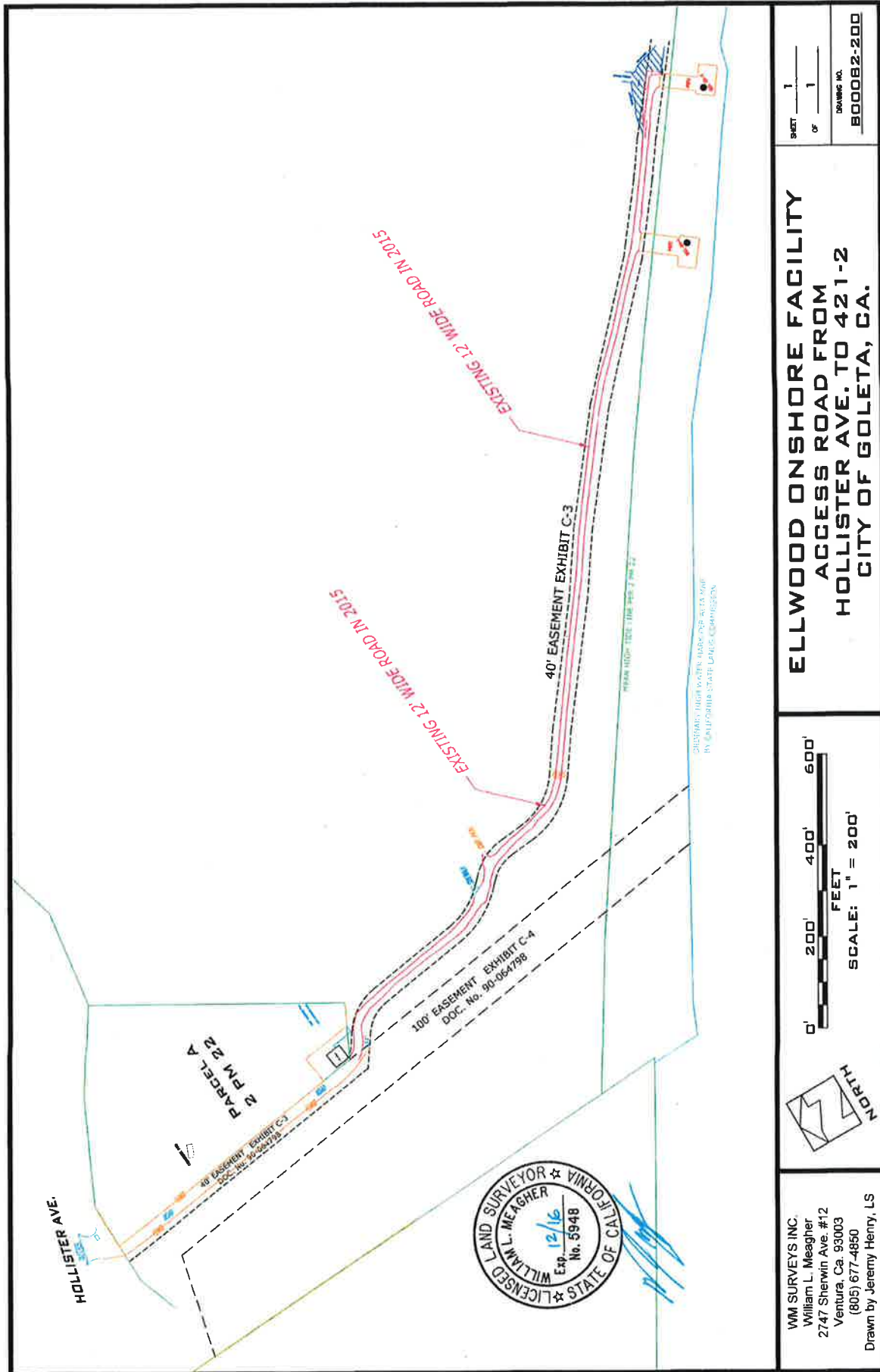
REVISION:	D
DATE:	4-5-02
SCALE:	AS SHOWN
DRAFTER:	A C S
ENGINEER:	R C T
SURVEYOR:	WM HOLDINGS INC
DATUM:	ASSUMED

AS-BUILT OF REPAIRS FOR ROAD TO 421 LEASE
ROAD PLOT PLAN WITH SECTIONS AND DETAILS.
ELLWOOD 421-1 AND 421-2 FACILITIES

DRAWING NUMBER : E-SB-11315-1



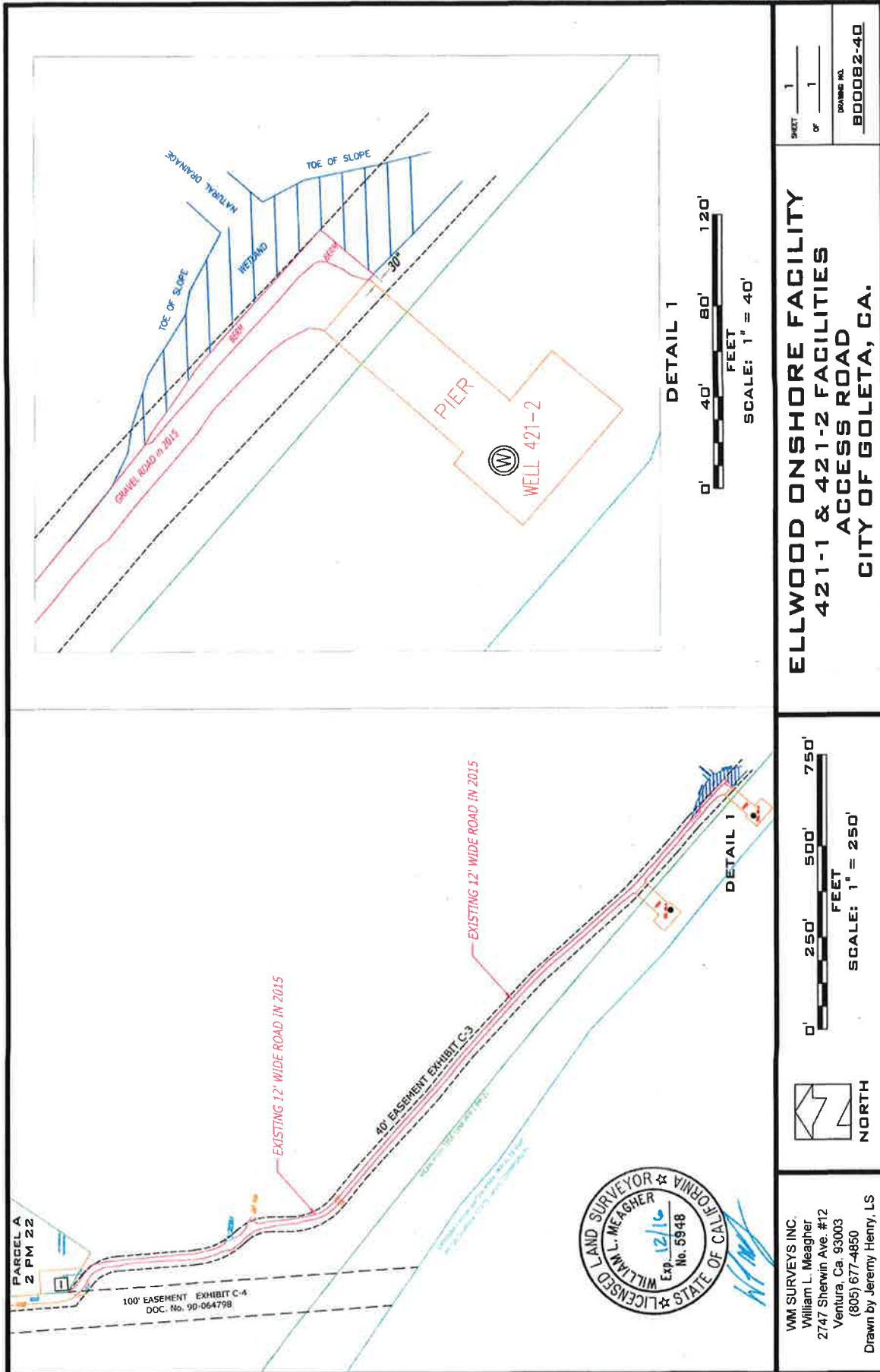
DETAIL 1



ELLWOOD ONSHORE FACILITY
ACCESS ROAD FROM
HOLLISTER AVE. TO 421-2
CITY OF GOLETA, CA.

SHEET 1
 OF 1
 DRAWING NO. B00082-200

WM SURVEYS INC.
 William L. Meagher
 2747 Sherwin Ave. #12
 Ventura, Ca. 93003
 (805) 677-4850
 Drawn by Jeremy Henry, LS



SHEET 1
OF 1
DRAWING NO. BDD0082-40

ELLWOOD ONSHORE FACILITY
421-1 & 421-2 FACILITIES
ACCESS ROAD
CITY OF GOLETA, CA.

0' 250' 500' 750'
 FEET
 SCALE: 1" = 250'

NORTH

WM SURVEYS INC.
 William L. Meagher
 2747 Sherwin Ave. #12
 Ventura, Ca. 93003
 (805) 677-4850
 Drawn by: Jeremy Henry, LS