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STAFF REPORT: REGULAR CALENDAR

Application No.:	**E-95-07**
Applicant:	**Mobil Exploration and Producing U.S. Inc.**
Project Location:	State Lease PRC 3242, offshore of Mobil's Ellwood Onshore Facility in Santa Barbara County (Exhibit 1).
Project Description:	Replace the miter joint sections of two existing 6" pipelines with long radius bends (approximately 200 lineal feet).
Local Approvals Received:	Santa Barbara County Case Number 94-M-012 (Final Development Plan Revision (95-FDP-24 (RV1)) and Conditional Use Permit 95-CP-050), September 20, 1995.
Substantive File Documents:	See Appendix A.

SYNOPSIS

Mobil Exploration and Producing U.S. Inc. (Mobil) proposes to replace with long radius bends the miter joints of two existing 6" offshore-to-onshore pipelines (one oil emulsion and one sour gas line) that extend between Platform Holly and Mobil's Ellwood Onshore Facility (EOF) (Exhibits 2 and 3). The objective of this project is to enable Mobil to run an electronic internal inspection device called a "smart pig" through the pipelines. Current State Lands Commission rules require annual internal inspection of submarine pipelines by "smart pigs" if mechanically possible. Internal inspection of Mobil's two 6" pipelines is not currently possible due to the existing thirty degree miter joints in each pipeline near shore. The 3-5 day project will require the replacement of approximately 200 linear feet of pipeline on Ellwood Beach. The project will not affect the rate of Platform Holly oil and gas production or expand the throughput capacity of the pipelines.

Potential project-related effects are summarized in Table 1. Staff recommends approval of the proposed project, as conditioned.

Table 1. Issue Summary: Potential Project-Related Impacts

Potential Impact	Analysis
Oil and Gas Spills	Mobil has designed the project to minimize the potential for a hydrocarbon spill into the water and on the beach during construction. All pipelines in the project area, with the exception of an 8" seep gas line, will be shut down prior to and for the duration of construction work. The lines will be pigged and flushed. The 6" sour gas line (which contains hydrogen sulfide (H_2S)) will be flushed and filled with water before pipelines are cut. Therefore, there will be no significant source of H_2S or potentially flammable gas once the cutting of the lines begins. Mobil will, however, station two portable H_2S monitors at the job site. Mobil will also place a spill response trailer at the work site in the event of a release of residual oil that may still be left in the pipelines. Mobil is also a member of Clean Seas oil spill cooperative. Notwithstanding the measures proposed by Mobil to prevent and respond to an oil spill, the staff believes that replacement of the pipelines' miter joints cannot be found consistent with the Coastal Act oil spill and marine resource policies due to the potential for an oil spill and the limitations in current oil spill containment and clean-up technology. However, because the project is a "coastal dependent industrial facility," as defined by section 30101 of the Coastal Act, the proposed project may be approved under section 30260 (coastal dependent industrial "override" provision) if three tests can be met. Staff believes the project meets the standards of section 30260. One of the three requirements of section 30260 is a finding that maximum feasible mitigation will be provided for any adverse environmental impacts that may be caused by the development activity. Staff believes that Mobil's proposed measures to prevent and respond to a spill represent the maximum feasible mitigation measures that are available and can be implemented by Mobil at this time.
Marine Resources/ Environmentally Sensitive Habitat	The project site is located near an area where the federally listed threatened western snowy plover nests. To mitigate any potential impacts to the western snowy plover, the staff recommends that the Coastal Commission require in Special Condition 1 that Mobil apply for an amendment to this permit if Mobil plans to carry out the project during the period between March 15 and September 15, the plover nesting season. An amendment application must be accompanied by evidence that the U.S. Fish and Wildlife Service has determined that project activities will not disturb the federally listed threatened western snowy plover.

1.0 STAFF RECOMMENDATION

The California Coastal Commission (the Commission) hereby grants a permit, subject to the conditions below, for the proposed development on the grounds that the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provision of Chapter 3 of the Coastal Act and will be in conformity with the California Environmental Quality Act.

2.0 STANDARD CONDITIONS

See Appendix B.

3.0 SPECIAL CONDITIONS

1. If Mobil plans to carry out project activities during the period between March 15 and September 15, Mobil shall apply to the Coastal Commission for an amendment to this permit. The amendment application shall be accompanied by evidence that the U.S. Fish and Wildlife Service has determined that project activities will not disturb the federally listed western snowy plover.

4.0 FINDINGS AND DECLARATIONS

The Commission finds and declares as follows:

4.1 Background

Mobil currently owns and operates two 6" offshore-to-onshore pipelines which separately transport sour gas (contains hydrogen sulfide) and oil/water emulsion from Mobil's Platform Holly to the Mobil Ellwood Onshore Facility (EOF). Platform Holly is located approximately two miles offshore from Coal Oil Point in state waters and is currently permitted at a production rate of 20,000 barrels per day of oil/water emulsion and 20 million standard cubic feet per day (MMSCFD) of gas.

Current California State Lands Commission (SLC) rules require annual internal inspection of submarine pipelines by electronic inspection tools ("smart pigs")[1] if mechanically possible. Internal electronic inspection of the two subject pipelines between Platform Holly and the EOF is not currently possible due to existing thirty degree miter joints in each pipeline near shore. As a

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1 "Smart pigs" are equipped with instrumentation for recording wall thickness, evidence of internal corrosion (if any), and overall pipe condition as it passes through the pipelines.

result, the pipelines are hydrotested annually. Although no evidence of internal corrosion in the pipelines exists, and the pipelines are protected by an impressed current cathodic protection system, the ability to conduct internal inspections is preferable from both an operating and safety standpoint. Therefore, the objective of this project is to modify the pipelines in order to allow future internal inspection capability and improve the overall safety of the pipelines.

4.2 Other Agency Approvals

Santa Barbara County

On September 13, 1995, Santa Barbara County (hereinafter "the County") certified Mitigated Negative Declaration 95-ND-022 for the proposed Platform Holly Beachlines Replacement project. On September 20, 1995, the County approved Final Development Plan Revision 95-FDP-24 (RV1) to allow for the replacement of: (1) the miter joint sections of two existing offshore-to-onshore pipelines that extend between Platform Holly and Mobil's EOF, and (2) two existing pig receivers located at the EOF to accommodate receipt of a "smart pig."[2] The County also issued Conditional Use Permit 95-CP-050 for replacement of the miter joint segments of the pipelines. (For Santa Barbara County's Conditions of Approval, see Exhibit 4.)

California State Lands Commission

The SLC did not require a new lease or lease amendment for Mobil's Platform Holly Beachlines Replacement project. However, on September 18, 1995, the SLC staff granted approval to Mobil to flush and clean the pipeline prior to cutting until the oil and grease content of the flush water is less than 30 ppm (parts per million) (Exhibit 4).

4.3 Project Description

Mobil proposes to replace with long radius bends the miter joint sections of two existing 6" pipelines that extend from Platform Holly to the Ellwood Onshore Facility (EOF). The objective of this project is to enable Mobil to run an internal electronic inspection device called a "smart pig" through the pipelines to assess the lines' structural integrity.

The replacement of the miter joints in the existing pipelines will occur within an area of approximately 200 lineal feet of pipeline, located in the surf zone along Ellwood Beach. There are six pipelines and one power cable which cross the beach and surf zone between the EOF and

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2 When smart pigs are run through a pipeline, they are captured at the end of the pipeline in cylindrical pressurized vessels known as "pig receivers." The proposed pig receiver modification will occur within the existing EOF fenceline (and within the County's certified Local Coastal Program permit jurisdiction). Replacement of the existing pig receivers is necessary in order to accommodate receipt of the larger inspection tools (smart pigs).

Platform Holly. Four of the pipelines are from Platform Holly (one 6" active oil/water pipeline, one 6" active sour gas line, one 4" active utility line and one 2" out-of-service utility line). The other lines are an 8" active seep gas pipeline from Mobil's offshore seep containment structure and an out-of-service 6" outfall line.

Portions of the pipelines in the surf zone are seasonally exposed during winter months with sand accumulating during the summer months. Mobil intends to perform construction work either in late fall (mid-November - mid-December) or between January and March 15, 1996. If the proposed project occurs in the late fall approximately 150 cubic yards of sand will be temporarily removed to create a 200 foot trench, with a depth and width of approximately 1.5 yards for pipeline access. The trench depth will vary, decreasing as it nears the surf zone. If the proposed project occurs during the months of January, February or early March, the amount of sand to be removed would be less as there is typically little sand coverage during this period.

If the pipelines are buried, heavy equipment will be used to excavate sand to within 18" of the pipelines. The remaining sand will be displaced by an 800 gallon per minute (gpm) water jet. The jetting activity may be an ongoing process during the pipe locating and cutting phases as the sand may continue to slough in around the pipes due to wave action.

If any excavation is required beyond the water line, fabrication and deployment of a coffer dam system will be necessary to provide protection from the surf (Exhibit 6). Because erosion and sedimentation within the surf zone results in constantly changing pipeline burial depth as well as variations in the exact position of the mean high water line, the need for a coffer dam system cannot presently be determined. The coffer dam system will most likely be used if the proposed project occurs in the late fall. The coffer dam design will be based on a comprehensive survey of the surf zone completed immediately prior to construction. This survey would include locating the exact location of the pipelines with a laser range finder. The coffer dam system would be lifted into place by a rough terrain crane and anchored in the sand using water jets. Construction of a coffer dam will add four hours to the overall schedule. To reduce the risk of sedimentation or erosion of beach sands in the vicinity of the coffer dam, project construction will only proceed during low surf conditions.

Currently, the 8" seep and 4" utility lines cross over the 6" lines and are separated by two rubber tires. Before work can proceed on either of the 6" lines, the 8" seep and 4" utility lines must be supported by A-frames. This will be accomplished by lifting these lines with the rough terrain crane and slipping the A-frames underneath on either side. Following the miter joint replacement, both rubber tires will be removed and replaced by a grout mat with a minimum of 12" of vertical separation.

Construction steps will be as follows: (1) Preliminary pipeline location with metal detectors, (2) Shut down of all pipelines and power cable in the area, with the exception of the natural seep gas pipeline, (3) Pipeline cleaning and flushing, (4) Excavation and water jetting, (5) Miter joint removal, (6) Welding of flanges, (7) Radial bend fabrication and placement, and (8) Work site restoration.

The sand will be redeposited following construction and the site restored. Restoration of the work site will be completed based on pre-construction photographs and detailed survey maps. The beach and the surf zone in the vicinity of the work site will be returned to its original topography. The estimated construction time is 3-5 days.

The construction site will be accessed via Hollister Avenue through the Sandpiper Golf Course entrance and then through the Mobil Ellwood Onshore Facility. A private road (12' wide, unpaved) provides beach access from the EOF, crossing the 11th and 12th fairways of the Sandpiper Golf Course. Mobil currently holds an access easement for this road. Vehicular traffic, heavy equipment, and other supplies will be staged at the EOF in a 40 x 600 foot gravel parking/staging area and moved to the worksite as needed. A 30 x 30 foot helipad at the south end of the EOF is also available for staging equipment (Exhibit 2).

The proposed project will not affect the rate of Platform Holly oil and gas production or expand the throughput capacity of the pipeline system.

4.4 COASTAL ACT ISSUES

4.4.1 Oil and Gas 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.*

Replacement of the miter joints with long radius bends will result in an overall beneficial impact as these new components will allow the pipelines to accommodate a "smart pig." The increased inspection and monitoring capabilities of smart pigs will enhance the safety of the transport system from Platform Holly to the EOF and reduce the risk of an accidental spill . Mobil has committed to visually inspect the pipelines from the surf zone to the EOF on a daily basis for as long as they operate and maintain a log of the inspection times and results, including any evidence of pipeline movement and burial status of the lines. Mobil has also agreed to shutdown production and displace the emulsion line with sea water during periods of large storms (defined as waves measuring more than 12 feet in height) when more than 20 feet of the pipeline is exposed along the beach. Additionally, Mobil has proposed using a grout mat to vertically separate the pipelines from the gas seep line. This, too, should enhance the safety of the pipeline system by preventing physical contact between the pipelines and thereby maintain the integrity of the pipelines' cathodic protection system.

However, the pipeline replacement construction work itself may cause an accidental release of hydrocarbons into the water. The probability of oil spill occurring due to project activities is low, however.

Oil Spill Prevention

The first test of section 30232 of the Coastal Act requires "[p]rotection against the spillage of crude oil, gas petroleum products, or hazardous substances ...." Mobil has designed the project to minimize the potential for a release of hydrocarbons into the water and on the beach. All pipelines and the power cable located in the project vicinity, with the exception of the seep line, will be shut down prior to and for the duration of the construction work.

The unpressurized seep line transports 400,000 standard cubic feet per day (scfd) of natural gas to the EOF. The natural gas stream contains less than 40 ppm of hydrogen sulfide (H_2S,) which is significantly less than the County's H_2S hazard threshold. H_2S is a colorless, acidic gas that is lethal at relatively low concentrations.

During the County's review process, the County and Mobil examined the possibility of shutting down the seep gas line during project operations.[3] To shut-in the seep gas line requires divers to shut off valves at the seep tent located at a 210-212 foot depth. But since the gas naturally percolates from below the seafloor, shutting down the line would not discontinue the flow of gas. In fact, shutting down the seep gas line would cause the gas collecting below the tent to instead resume its natural flow to the surface. The seep tents are designed with relief vents that release excess gas to the surface if the collection below the tent exceeds what the pipeline is capable of transporting. Without the relief valves, the tents themselves would rise to the surface. Mobil estimates that the tent would contain the gas for no longer than 5 to 10 minutes until the entire volume of gas would begin to flow to the ocean surface. Over a 3-5 day construction period, at a flow rate of approximately 400,000 scfd, shutting down the lines could generate up to 2,000,000 scfd of gas which would be released to the atmosphere rather than transported to the EOF. Therefore, shutting down the seep gas line would serve only to move the location of a gas release.

Several factors also reduce the threat of a gas release from the seep gas line. First, the seep gas line crosses over both the 6" lines and will be exposed and clearly visible to construction workers. Also, when the seep gas line was constructed, Mobil anticipated that the concentration of H_2S would be much greater than current levels. Mobil thus installed a 6" fiberglass pipeline sleeve inside an 8" steel line and filled the annulus with concrete. The construction materials used in the seep gas line would therefore be very difficult to penetrate even in the event of a collision with heavy equipment.

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[3] The Santa Barbara Channel has many natural gas "seeps" -- naturally occurring gas releases from the ocean floor which bubble up to the surface of the ocean and dissipate into the atmosphere. Mobil currently operates a seep gas line which runs from an offshore seep tent to the EOF. Gas rising from the seep is captured below a 100 square foot seep tent and is transported along the seafloor in an 8" pipeline to the EOF where the gas is then processed. Approximately 400,000 standard cubic feet per day are transported through the seep gas line.

The County is also requiring that water jetting, not heavy equipment, be used within 18" of the pipelines. Even if construction activities were to cause a rupture or crack in the seep gas line, the line would quickly equalize and fill with sea water, minimizing the amount of a gas release. As a safety precaution, a minimum of two portable continuous H_2S monitors will be stationed on the job site so any hazardous levels of H_2S will be immediately detected. The monitors will be set up directly adjacent to any potential source of H_2S and monitored by either a crew foreman or other staff person. The monitors have audible alarms which sound when 10% of the lower explosive limit is reached or 10 ppm H_2S is detected. The monitors will be checked for proper calibration every morning. Self-contained breathing apparatus will be on the job site for crews working near the lines. Eight-inch repair clamps will also be stored onsite for immediate leak control. The Commission therefore agrees with the County's determination that shutting in the seep gas line during project operations is unnecessary.

Prior to initiating construction operations, however, the other pipelines at the project site will be flushed and pigged (wire scrapper pig) to the EOF to ensure that oil will be removed from the pipelines. The flush water will be monitored at the pipeline outlet and tested for oil and grease content. The lines will not be cut until the oil and grease content is below 30 ppm (parts per million). Shutting down, flushing and cleaning the pipelines prior to and for the duration of the construction period significantly reduces the risk of an oil spill by eliminating hydrocarbons in the pipeline during construction work. Also, the 6" oil and gas lines have automatic shut-off valves at both Platform Holly and the EOF.

The proposed project could result in the release of H_2S gas from the 6" sour gas line if proper operating procedures and safety precautions are not followed. Prior to any excavation activities, Mobil will flush the 6" sour gas line and fill it with water. Therefore, there will not be any significant source of H_2S or potentially flammable gas, once the cutting of pipelines begins.

The Commission believes that Mobil's efforts to prevent an oil and/or H_2S gas release during construction is sufficient and therefore the project is consistent with the first test of Coastal Act section 30232.

Oil Spill Response

The second test of section 30232 of the Coastal Act requires the applicant to provide *effective* containment and cleanup facilities and procedures for accidental spills that do occur. Despite the precautions proposed by Mobil, the possibility remains that residual oil could be released when the pipelines are cut. For example, when the Commission approved the removal of Platforms Helen and Herman *(CDP No. E-87-6, January 1988)*, all indications led the Commission to conclude at the time that "the probability of a major oil spill is virtually impossible..." (e.g., during platform decommissioning, the pipelines were pigged then flushed with sea water for several days). However, during pipeline removal, approximately 40 barrels (1680 gallons) of rust, iron sulfides and suspended tar/oil spilled from these pipelines. Therefore, the possibility of an accidental oil discharge during Mobil's construction activities still exists.

Mobil will place a spill response trailer at the work site to provide immediate response should any residual oil be released during project operations. Included in Mobil's equipment inventory is 400 feet of boom that can be deployed immediately to protect the shoreline and nearby Bell Canyon

Creek from oil in the event of a spill. Mobil personnel are trained to deploy response equipment in the event of a release.

Mobil is a also member of the Clean Seas oil spill co-op located in Santa Barbara County. Clean Seas has in its inventory over 54,000 feet of boom including open ocean, offshore, nearshore and protective boom. Clean Seas has three Oil Spill Response Vessels (OSRV), Mr. Clean, Mr. Clean II and Mr. Clean III, which are usually moored at Santa Barbara Harbor, Point Arguello and Port San Luis. Mr. Clean II, located in the Santa Barbara Harbor, would be the responding OSRV in the case of a significant oil release during this project. Major response equipment on-board includes 1,500 feet of open ocean boom, 3000 feet of medium-duty boom and two advancing skimmers with 750 gallons per minute pump capacity per unit. "Clean Sweep," a fast response support boat also located in the Santa Barbara Harbor, is equipped with a Lori Brush Side Skimmer. "Clean Sweep" will also be available to respond to a spill. Mobil will notify Clean Seas of the construction schedule in order to ensure that a Clean Seas vessel is in the Santa Barbara area during project operations. Response times vary from 1 to 1.5 hours for the fast response vehicle "Clean Sweep" and 2 hours for the OSRV Mr. Clean II.

Notwithstanding the extensive oil spill containment and clean-up equipment provided by Mobil and Clean Seas, the Commission finds that the second requirement of Coastal Act section 30232, which requires *effective* containment and cleanup equipment for spills, cannot be met at this time. The Commission interprets the word "effective" to mean that containment and recovery equipment must have the ability to keep oil off the coastline. Unfortunately, the state-of-the-art is such that no equipment currently available has the capability to recover all oil from large spills and often even small spills in the open ocean.

Testing results of equipment at government research facilities in the United States and Canada have demonstrated that oil recovery equipment functions with about 50% efficiency in relatively calm waters. These tests, and actual experience in the field, demonstrate that recovery efficiencies decrease as sea state (turbulence) increases. In addition to sea state, weather, characteristics of the spilled oil, response time, amount of oil spilled, and the availability of equipment and trained personnel all influence the degree to which a response to a spill is successful. Data from the General Accounting Office indicates that no more than 10-15% of the oil lost in a major spill is ever recovered. In a much smaller spill, such as the rupture of a pipeline at the El Segundo Marine Terminal in 1991, about 25% of the estimated 660 barrels of spilled oil were recovered in spite of a rapid and large spill response.

Therefore, notwithstanding the response equipment provided by Mobil and Clean Seas, the ability to effectively contain and clean-up an oil spill does not exist at this time. The proposed project is thus inconsistent with the second requirement of section 30232 of the Coastal Act.

4.4.2 Marine Resources and Environmentally Sensitive Habitat

Coastal Act section 30230 states:

> *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.*

Coastal Act section 30231 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.*

Coastal Act section 30240 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.*

Adverse impacts to marine water quality, marine resources and environmentally sensitive habitat areas (ESH) in the project vicinity may result from routine, project-related activities and/or upset events, such as an oil spill.

Water Quality and Marine Resource Impacts

The project has the potential to impact water quality and marine resources if residual hydrocarbons remain in the pipeline during replacement work or if a nearby pipeline were to be ruptured by excavation equipment. As discussed in section 4.4.1 of this report, Mobil has developed procedures to minimize water quality and marine resource impacts. Prior to any excavation work, the lines, with the exception of the seep gas line, will be shut down, cleaned and flushed. The flush water will be monitored at the pipeline outlet and tested for oil and grease content. The pipeline will not be cut at the beach location until oil and grease content is below 30 ppm, an acceptable level as defined by the California Ocean Plan.

If construction is required in the surf zone, construction activities will generate short-term, localized water column turbidity. Pipeline removal and installation will disrupt and cover seafloor

sediments and benthic organisms along and adjacent to the area where the new pipeline sections will be placed. This area is composed of sand, some fine gravel and a few boulders. Organisms characteristic of this zone would be the Pismo clam, the bean clam and the purple olive snail. The area affected will be relatively small, however. The turbidity caused by sand displacement will be temporary.

Excavation on the beach will also disturb organisms living in this habitat. However, the sand and gravel habitat through which the disturbance will occur is characterized by a high level of natural disturbance due to wave exposure. Therefore, the level of disturbance will be similar to the disturbance caused by a winter storm.

The Commission therefore finds that the project has been designed to minimize any adverse impacts to water quality and marine resources.

Western Snowy Plover

The project site is located near an area where the small shorebird, the western snowy plover, nests. They nest on coastal sand spits, dune-backed beaches, unvegetated beach strands, open areas around estuaries and on beaches at river mouths from mid-March to mid-September.

In March 1993, the federal government listed the Pacific coast breeding population of western snowy plover as a threatened species. The California Department of Fish and Game currently lists the western snowy plover as a species of special concern. The U.S. Fish and Wildlife Service is currently proposing to designate 28 sites along the coast of California, Washington and Oregon as habitat critical to the survival and recovery of the western snowy plover. Site #CA-14 Devereux Beach Area extends along the coast both north and south of Coal Oil Point within the project vicinity. According to the Negative Declaration, critical habitat for snowy plovers has been reported two to three miles east of the project site.

Human use of nesting beaches has been the greatest factor in the decline of the western snowy plover, especially because the period of heaviest beach use coincides with the bird's breeding season. Even activities such as sunbathing, walking and jogging can cause the birds to abandon their nests, leaving the eggs and chicks particularly defenseless to predators (ravens and gulls). Human disturbance can even cause the birds to abandon entire nesting areas.

Mobil plans to carry out the project in either late fall or between the months of January and mid-March, outside of the period in which the plovers breed and nest. However, Mobil has stated that if it wishes to perform the work during the plover's nesting season, it will first carry out a pre-construction biological survey to determine if there are any nesting sites in the vicinity of the project area that could be impacted. To ensure that the plovers will not be disturbed by construction work, the Commission has required in Special Condition 1 that Mobil apply for an amendment to this permit if it plans to carry out any project activities during the period between March 15 and September 15. The amendment application must be accompanied by evidence that

the U.S. Fish and Wildlife Service has determined that project activities will not disturb the federally listed threatened western snowy plover.

Bell Canyon Creek

Mobil's proposed equipment staging area is within 100 feet of Bell Canyon Creek. Excavation and construction activities will occur 500 feet southeast of Bell Canyon Creek. Due to its biological attributes, the mouth of Bell Canyon Creek is listed as an A-priority or highest priority Environmentally Sensitive Site in the Santa Barbara County Oil Spill Area Contingency Plan. It is also designated as an Environmental Sensitive Habitat (ESH) on Santa Barbara County's Goleta Community Plan maps. The Negative Declaration states that habitat for California red-legged frogs and southwestern pond turtles is found at the lagoon. Brown pelicans can regularly be seen from shore at most times of the year, and peregrine falcons and least terns may occur as rare transients to the estuary and nearshore waters. Although no state or federally listed threatened or endangered aquatic species occur in the vicinity of the project site, the tidewater gobys (proposed for federal listing as endangered) have been observed in the lagoon at the mouth of Bell Canyon.

Mobil proposes to protect the riparian habitat by fencing in the equipment staging area. Fencing shall ensure that workers do not move equipment within close proximity to the creek bank. The County has also prohibited ground disturbance within 50 feet from the top of the bank of Bell Canyon Creek.

The Commission therefore finds that Mobil has designed the project to minimize any adverse impacts to Bell Canyon Creek.

Coastal Foredune Area

Between the beach and the Sandpiper Golf Course is a strip (about 65 feet wide) of coastal foredune scrub (Exhibits 2 and 3). This area is of high biological importance and is habitat for the globose dune beetle, a category 2 candidate species. Coastal foredune scrub is extremely susceptible to disturbance and invasion by exotic annual plant species.

Prior to construction, workers will be briefed about the environmental sensitivity of the foredune area and instructed to avoid this area. The foredune scrub at the project site will be protected during the construction phase by fencing and conspicuous marking. Mobil has agreed to restrict construction activity to no closer than 50 feet from the base of the embankment leading to the Sandpiper Golf Course.

The Commission therefore finds that Mobil has designed the project to avoid any adverse impacts to coastal foredune scrub at the project site.

Oil Spill Impacts

As discussed in section 4.4.1 of this report, the replacement of the pipelines' miter joints could result in an accidental release of oil.

Oil spills affect marine water quality in the water column, on benthic and intertidal substrates, and on and in sediments. In pelagic zones, oil can increase pH, turbidity, biological oxygen demand (BOD), and chemical oxygen demand (COD), as well as increase concentrations of trace metals and petroleum hydrocarbons. Spilled oil in the intertidal zone can concentrate on and in sediments and on rocky intertidal substrates. In all zones, the high BOD of oil can significantly reduce dissolved oxygen. Anaerobic conditions can persist for long periods in the intertidal zone if the oil is not physically recovered.

Oil spills have the potential for various impacts on marine biota. Of most concern are the risks to endangered, threatened and rare species, and coastal marsh and lagoon habitats. Any loss to populations of endangered and threatened species puts these species at further risk of extinction. Marsh and lagoon habitats are particularly vulnerable because they are increasingly degraded, contain endangered species, and are low energy systems which take years to recover if contaminated with oil. Depending on the size and extent of the oil spill, benthic and intertidal communities could also be affected, and could take years to recover.

Marine mammals can be affected by oil directly through contact and indirectly through contamination of prey, habitat destruction, and the loss of adequate foraging. In addition, oil spills may reach haulout areas and rookery habitat thus substantially affecting reproductive efforts. Direct impacts of oil spills include exposure of cetaceans and pinnipeds to petroleum through inhalation, ingestion, or epidermally.

Other marine resources particularly vulnerable to the effects of oil spills include many marine bird species which forage by diving or rest in coastal waters. All colonial seabirds are vulnerable to contact with floating oil because they spend a large portion of their time on the water surface and feed near their breeding areas. Oil can impact birds through several mechanisms: direct contact, sublethal and lethal toxic effects, ingestion through preening, transfer of oil from adults to chicks and eggs, elimination of a portion or all of the species habitat, and contamination and elimination of food sources.

The Commission therefore finds that in the event of an oil spill during project activities, impacts to marine water quality, marine resources and environmentally sensitive habitat areas could be significant, and probably unmitigable.

Conclusion

Mobil has incorporated a number of mitigations into the proposed project, in combination with Special Condition 1 of this permit, that will reduce potential impacts to marine water quality, marine resources and environmentally sensitive habitat areas. However, in the event of an

accidental oil spill during construction activities, impacts to water quality and sensitive resources of marine and coastal ecosystems within the project area could be significant, and in may cases unmitigable. Therefore, since the applicant's ability to clean-up an oil spill, as discussed in section 4.4.1 of this report, is limited at this time, the project is inconsistent with Coastal Act sections 30230, 30231 and 30240(b).

4.4.3 Visual Resources

Coastal Act section 30251 states:

> *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.*

The proposed project will not result in any long-term adverse aesthetic impacts or changes to the visual character of the area After construction, the exposed pipelines will be reburied, debris will be removed, and the beach and surf zone will be returned to its pre-construction state. Short-term visual impacts generated by the project include night lighting as construction will occur on a 24 hour basis. Any adverse visual effects of project operations will be short-term, however, since the project will last only 3-5 days. The Commission therefore finds the project consistent with Coastal Act section 30251.

4.4.4 Public Access/Recreation

Coastal Act section 302ll states:

> *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 beaches to the first line of terrestrial vegetation.*

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.*

There will be minor construction-related impacts involving the exclusion of recreationists (both onshore and offshore) from the immediate work area during the 3-5 day construction period. A 200 foot wide section of beach will be closed off during project operations. In addition, golfers at the Sandpiper Golf Course may be impacted temporarily while construction equipment is moving to the beach. To mitigate any public inconvenience, no work will be scheduled during holidays or

weekends. In addition, Mobil has agreed to establish an alternative lateral beach access route during project operations (Exhibits 2 and 3). The Commission therefore finds the project consistent with section 30211 of the Coastal Act.

4.4.5 Archaeological Resources

Coastal Act section 30244 states:

> *Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.*

Although the Ellwood area is known to be a valuable archaeological resources area, the site of the proposed project is not within a recorded site on the Santa Barbara County archaeological maps. However, two recorded sites are located at the mouth of Bell Canyon Creek and on the western bluff of Bell Canyon approximately 600 feet and 1000 feet respectively from the proposed staging area. Mobil has agreed to advise all project workers of nearby archaeological sites not to be disturbed. The County is also requiring that if archaelogical remains are encountered during grading or trenching work, Mobil is to cease or redirect all work immediately until a County-approved archaeologist and Native American representative evaluate the significance of the find. The Commission therefore finds the project consistent with section 30244 of the Coastal Act.

4.4.6 Air Quality

Coastal Act section 30253(3) states:

> *New development shall be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development.*

Short-term localized construction-related air quality impacts are expected to occur as a result of project operations. However, based on the short duration of the construction and the small amount of excavation activity, project-related emissions are not expected to exceed Santa Barbara County Air Pollution Control District (SBC APCD) thresholds. The SBC APCD has determined that no permits are required for the proposed project. Mobil has committed, however, to implement dust abatement measures during project operations. The Commission therefore finds the project consistent with section 30253(3) of the Coastal Act.

4.4.7 Coastal Act Section 30260 "Override" Provision

In section 30260, the Coastal Act provides for special consideration of coastal-dependent industrial facilities that may otherwise be found inconsistent with the Coastal Act's Chapter 3 resource protection and use policies. As described in sections 4.4.1 and 4.4.2 of this report, the proposed project does not meet the standards of Coastal Act section 30230, 30231, 30232 and 30240(b) due to the potential for and significant impacts caused by an oil spill. Since the project qualifies as a

"coastal-dependent industrial facility" the Commission may nevertheless approve the project if the three requirements of section 30260 can be met. This section states:

> *Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and section 30261 and 30262 if (1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would adversely affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.*

Section 30101 of the Coastal Act defines a coastal-dependent development or use as that which "requires a site on or adjacent to the sea to be able to function at all." Ports, commercial fishing facilities, offshore oil and gas developments and marine terminals are coastal-dependent development types that are given priority in the Coastal Act over other types of development on or near the shoreline.

a. Alternative Locations

The Commission may approve the proposed development if, notwithstanding the project's inconsistency with one or more policies of Chapter 3, it finds that alternative project locations are infeasible or more environmentally damaging. The purpose of this project is to replace sections of two existing pipelines. The new long radius bend sections of pipe are to be laid along the same pipeline corridor as the miter joint sections. Since the new pipeline sections are to be installed for the purpose of reconnecting existing pipelines, any alternative locations are infeasible. The Commission does not thus reach the question of whether the project is sited in the least environmentally damaging location. The project is therefore consistent with the first test of section 30260.

b. Public Welfare

The second test of section 30260 states that nonconforming coastal-dependent industrial development may be permitted if "to do otherwise would adversely affect the public welfare...." The test requires more than a finding that, on balance, a project as proposed is in the interest of the public. It requires that the Commission find that there would be a detriment to the public welfare were the Commission to deny a permit for the proposed project.

Mobil's proposed miter joint replacement project is a voluntary preventative measure. The objective of the proposed project is to replace the miter joint sections of two offshore-to-onshore pipelines with long radius bends to allow Mobil to run an electronic internal inspection device called a "smart pig" through the pipelines.

As discussed in other sections of this report, notwithstanding the project's potential short-term construction impacts, the proposed project will reduce the potential for an oil spill in the long-term by improving Mobil's capability to test the pipelines' structural integrity. As pipelines age, they become more vulnerable to internal and external corrosion and wear, depending on the elements they are exposed to. Pipelines located in the marine waters off the coast of California are also subject to small and large scale seismic activity which can physically strain and threaten the integrity of a pipeline over time. The pipeline material may become brittle with age and fatigue with continued exposure to wave energy.

"Smart pigs" can detect internal and external corrosion without excavating or emptying the pipeline. Smart pigs carry ultrasonic or magnetic-flux leakage measuring instruments to monitor and inspect pipeline conditions. They can detect other pipe flaws such as gouges and dents, and produce data on the metal integrity and condition of the pipeline. Sharp bends, such as the thirty degree miter joints, prevent the use of smart pigs. The State Lands Commission requires the use of smart pigs, where mechanically feasible, as it is the best internal pipeline inspection tool available at this time.

Thus, denial of the project may be detrimental to the public's welfare because it would prevent the implementation of measures that will reduce the risk of an oil spill in the marine waters off the coast of Santa Barbara County.

However, in addition to determining whether a refusal to allow the project to be carried out at all would adversely affect the public welfare (which the Commission has answered in the affirmative), the Commission must also determine whether a refusal to allow the project to be carried out in precisely the manner proposed by the applicant would adversely affect the public interest.

In previous sections of these findings, the Commission has identified and outlined the valuable public policy goals that will be furthered by imposing additional mitigation measures. The question thus becomes whether the conditions of this permit which impose additional mitigation upon the applicant will have an adverse effect on the public interest. The applicant has made no showing that such requirements are financially or otherwise infeasible. Therefore, the Commission finds that the proposed miter joint replacement, as conditioned by this permit, will not have an adverse effect on the public welfare. The proposed project is therefore consistent with the second test of section 30260.

c. Maximum Feasible Mitigation

The third test in section 30260 requires a finding that the adverse environmental impacts of a proposed project have been mitigated to the maximum extent feasible. As discussed in sections 4.4.1 and 4.4.2 of this report, the Commission has determined that the project is inconsistent with sections 30230, 30231, 30232 and 30240(b) due to the potential for and resulting impacts of an oil spill. However, the Commission believes that notwithstanding the limitations in current oil spill containment and clean-up technology, the measures proposed by Mobil represent the maximum

prevention, containment and clean-up capabilities feasibly available at this time. The Commission therefore finds that the potential impacts generated by the proposed project have been mitigated to the maximum extent feasible.

5.0 California Environmental Quality Act

The Coastal Commission's permit process has been designated by the State Resources Agency as the functional equivalent of the California Environmental Quality Act's (CEQA) environmental impact review process. CEQA requires consideration of alternatives to a proposed project, including those less environmentally damaging, and the consideration of mitigation measures to minimize or lessen any significant environmental impacts. Although the Commission finds that the pipeline replacement project may pose a threat to the environment, the Commission finds there are no feasible less environmentally damaging alternatives or additional feasible mitigation measures which would substantially lessen any significant adverse impacts which the activity may have on the environment, other than those identified herein. The Commission also finds that the public benefit of this project, when considered in relation to its impacts, provide overriding considerations supporting its approval under CEQA.

APPENDIX A

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. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.

4. Interpretation. Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.

5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.

6. 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.

7. 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.

APPENDIX B

Substantive File Documents

1. Coastal Development Permit Application E-95-7.

2. Letter from Paul B. Mount, State Lands Commission to John Stieg, Mobil Oil Corporation, September 18, 1995.

3. Negative Declaration, "Platform Holly Beachlines Replacement Project", Santa Barbara County, September 13, 1995.

4. Correspondence regarding spill response strategies from Heidi Togstad, Biologist, Department of Fish and Game Office of Oil Spill Prevention and Response.

5. Letter from John Stieg, Mobil Oil Company, to Zoraida Abresch, Santa Barbara County, July 26, 1995.

6. Santa Barbara County Area Oil Spill Contingency Plan, 1995.

7. Clean Seas Regional Response Manual, 1994.

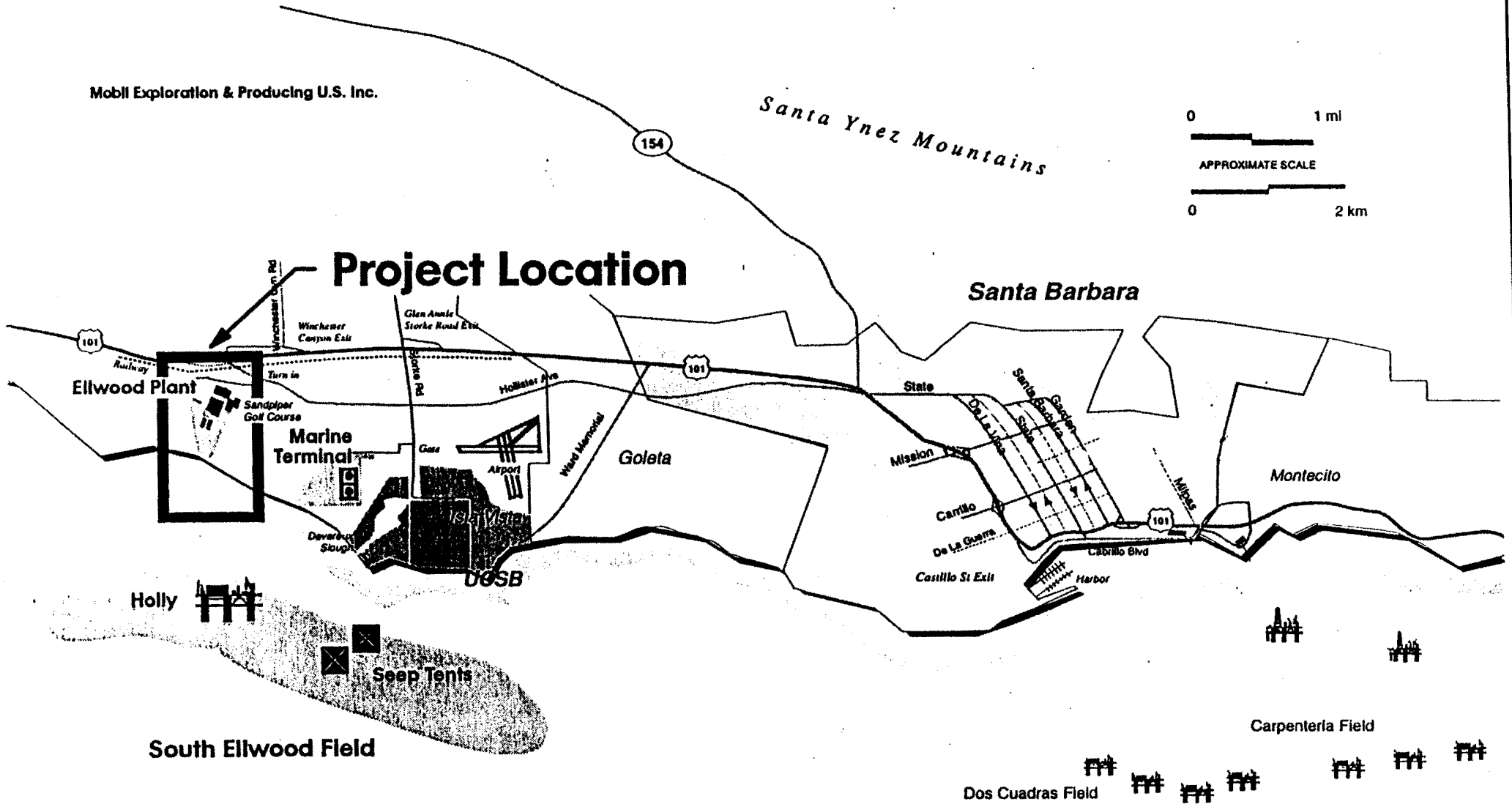
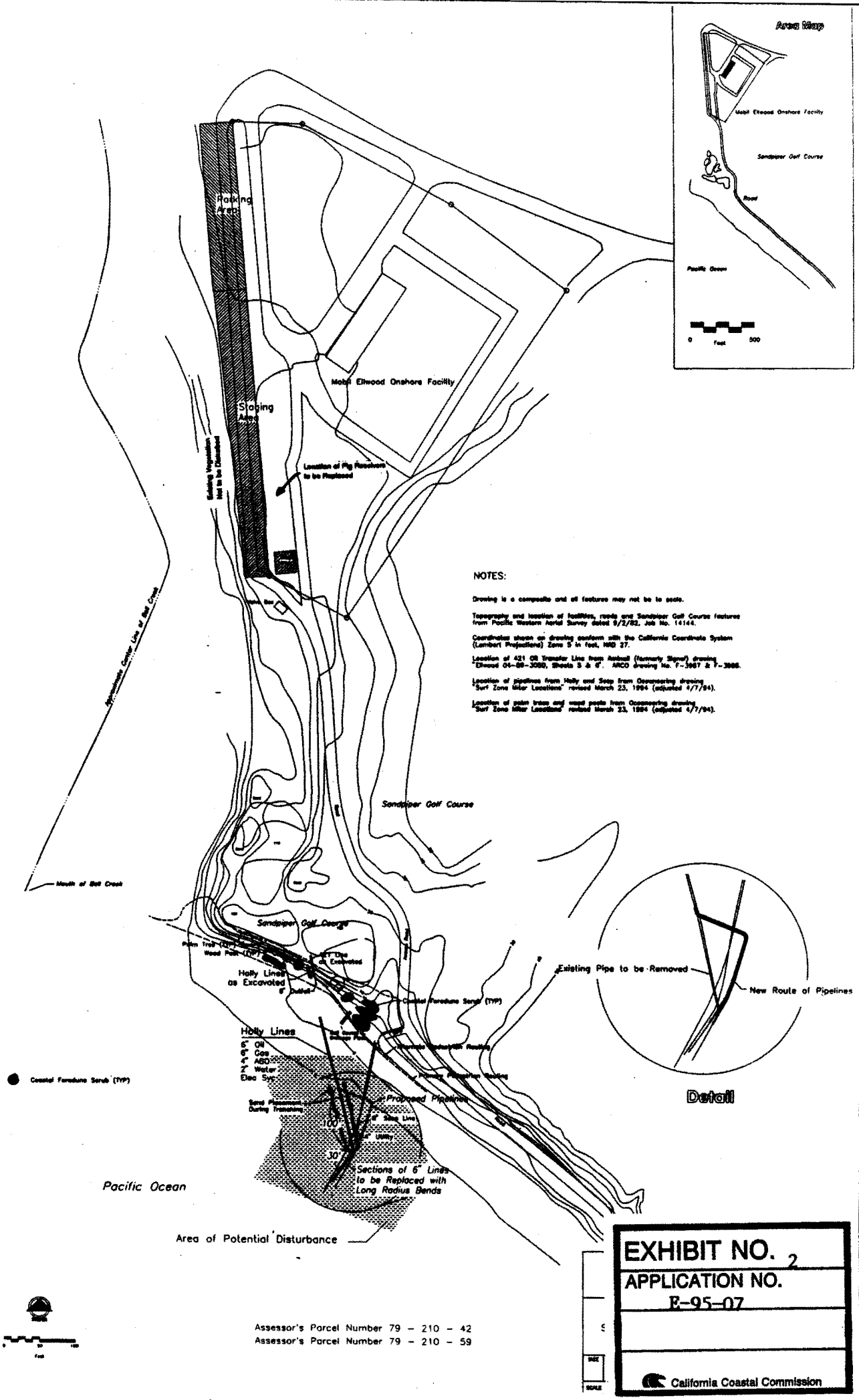


EXHIBIT NO. 1
APPLICATION NO.
E-95-07
California Coastal Commission

FIGURE 1

Vicinity Map
Proposed Platform Holly
Beachline Replacement

MTL/mich 11/94


Area Map
Mobil Elwood Onshore Facility
Sandpiper Golf Course
Road
Pacific Ocean
0
Feet
500
Parking Area
Staging Area
Mobil Elwood Onshore Facility
Existing Vegetation Not to be Disturbed
Location of Pig Receivers to be Replaced
Entrance Road
Centerline Center Line of Bell Creek
NOTES:
Drawing is a composite and all features may not be to scale.
Topography and location of facilities, roads and Sandpiper Golf Course features from Pacific Western Aerial Survey dated 9/2/82, Job No. 14144.
Coordinates shown on drawing conform with the California Coordinate System (Lambert Projections) Zone 5 in feet, NAD 27.
Location of 421 OB Transfer Line from Ashtrail (formerly Signal) drawing "Elwood 04-88-3080, Sheets 5 & 6". ARCO drawing No. F-3987 & F-3988.
Location of pipelines from Holly and Seep from Conoseering drawing "Surf Zone Miter Locations" revised March 23, 1984 (adjusted 4/7/94).
Location of palm trees and weed posts from Conoseering drawing "Surf Zone Miter Locations" revised March 23, 1984 (adjusted 4/7/94).
Sandpiper Golf Course
Mouth of Bell Creek
Sandpiper Golf Course
Palm Trees (3)
Weed Posts (2)
Holly Lines as Excavated
8" Outfall
Coastal Foredune Scrub (TYP)
Holly Lines
8" Oil
6" Gas
4" ABD
2" Water
Elec Sys
Coastal Foredune Scrub (TYP)
Sand Placement During Trenching
Proposed Pipelines
100'
8" Seep Line
4" Utility
30'
Sections of 6" Lines to be Replaced with Long Radius Bends
Pacific Ocean
Area of Potential Disturbance
Existing Pipe to be Removed
New Route of Pipelines
Detail
0
50
100
Feet
Assessor's Parcel Number 79 - 210 - 42
Assessor's Parcel Number 79 - 210 - 59
EXHIBIT NO. 2
APPLICATION NO.
E-95-07
California Coastal Commission

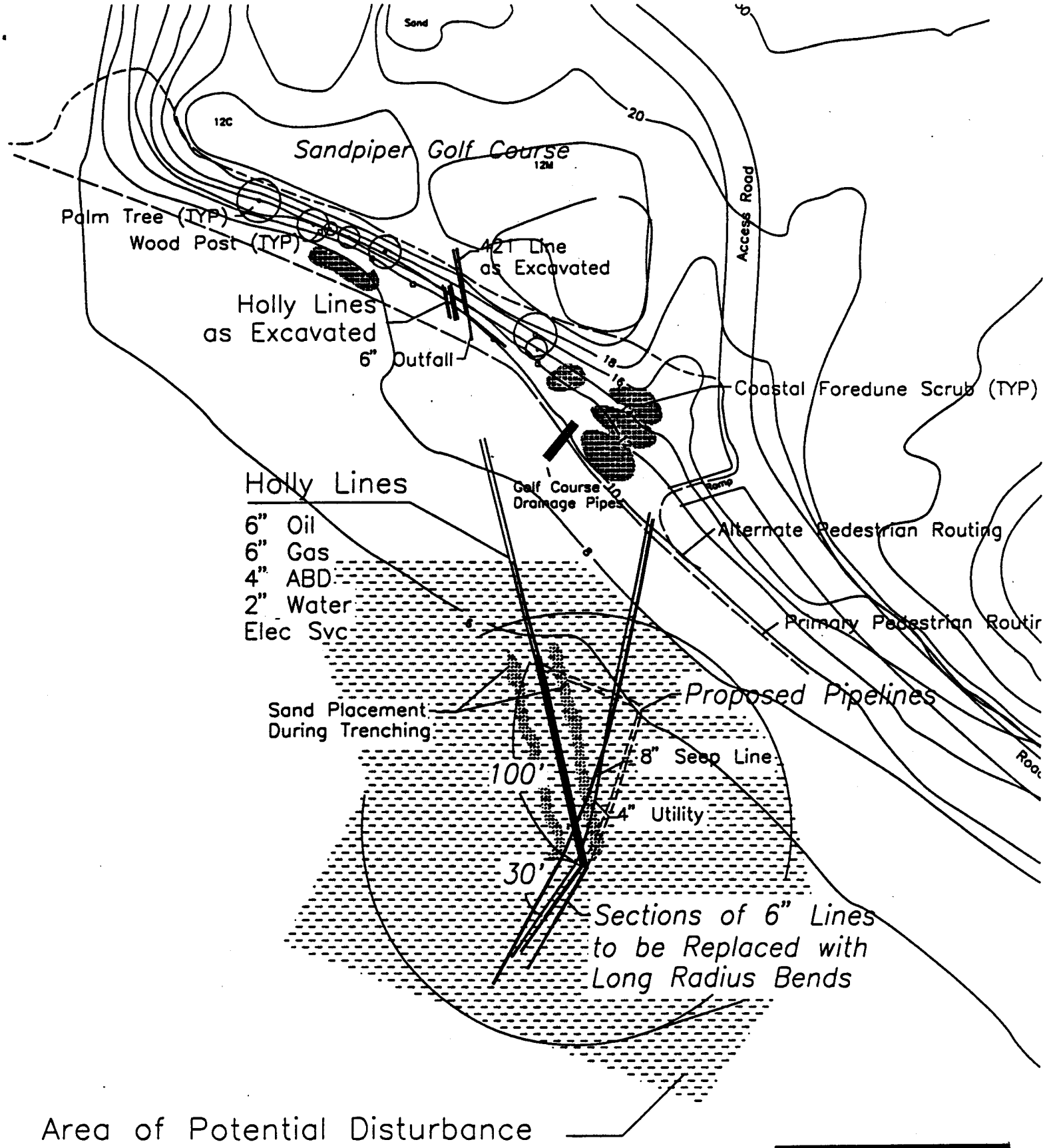


EXHIBIT NO. 3
APPLICATION NO.
E-95-07
California Coastal Commission

ATTACHMENT B
CONDITIONS OF APPROVAL

PLATFORM HOLLY BEACHLINES & PIG RECEIVER REPLACEMENT
Development Plan Revision (94-M-012)

The conditions of approval adopted for the ARCO Ellwood Onshore Facility (Ordinance 2919 included as Attachment D to this staff report) remain in effect and shall be applicable to the Platform Holly Beachlines and Pig Receiver Replacement Project (94-M-012).

In addition, staff recommends addition of the following new conditions.

33. The Planning Commission approved a Final Development Plan Revision (94-M-012) to allow for the Platform Holly beachlines and pig receiver replacement project. This project is based upon and limited to compliance with the project description, the hearing exhibits marked A, dated September 20, 1995, and conditions of approval set forth below. Any deviations from the project description, exhibits or conditions must be reviewed and approved by the County for conformity with this approval. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above described approval will constitute a violation of permit approval.

    In summary, the project description is as follows (see 95-ND-022 for a complete project description):

    Replacement of miter joint segment of two existing 6" offshore-to-onshore pipelines which extend between Platform Holly and the Ellwood Onshore Facility (EOF) and replacement of two existing pig receivers at the EOF to enable internal inspection of the pipelines.

    The grading, development, use, and maintenance of the property, the size, shape, arrangement, and location of structures, parking areas and landscape areas, and the protection and preservation of resources shall conform to the project description above and the hearing exhibits and conditions of approval below. The property and any portions thereof shall be sold, leased or financed in compliance with this project description and the approved hearing exhibits and conditions of approval hereto.

34. Approval of the Final Development Plan shall expire five (5) years after approval by the Planning Commission, unless prior to the expiration date, substantial physical construction has been completed on the development or a time extension has been applied for by the applicant. The decisionmaker with jurisdiction over the project may, upon good cause shown, grant a time extension for one year.

35. No permits for development, including grading, shall be issued except in conformance with an approved Final Development Plan. The size, shape, arrangement, use, and location of buildings, walkways, parking areas, and landscaped areas shall be developed in conformity with the approved development plan marked Exhibit A, dated September 20, 1995. Substantial conformity shall be determined by the Director of P&D.

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

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

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

39. The County's permit compliance program for oil and gas projects requires each permit holder to fund County monitoring of each permit holder's compliance efforts. Mobil shall participate in this permit compliance program and fund all reasonable expenses incurred by the County and/or County contractors for permit condition implementation, reasonable studies, and emergency response directly and necessarily related to monitoring and enforcement of these permit conditions and applicable County ordinances. Mobil shall provide a deposit for these expenses and shall reimburse County within 30 days of invoicing by County.

40. Developer shall defend, indemnify and hold harmless the County or its agents, officers and employees from any claim, action or proceeding against the County or its agents, officers or employees, to attack, set aside, void, or annul, in whole or in part, the County's approval of the development plan revision. In the event that the County fails promptly to notify the applicant of any such claim, action or proceeding,

or that the County fails to cooperate fully in the defense of said claim, this condition shall thereafter be of no further force or effect.

41. In the event that any condition imposing a fee, exaction, dedication or other mitigation measure is challenged by the project sponsors in an action filed in a court of law or threatened to be filed therein which action is brought within the time period provided for by law, this approval shall be suspended pending dismissal of such action, the expiration of the limitation period applicable to such action, or final resolution of such action. If any condition is invalidated by a court of law, the entire project shall be reviewed by the County and substitute conditions may be imposed.

CONDITIONS DERIVED FROM MITIGATION MEASURES CONTAINED IN 95-ND-022:

General:

42. The applicant shall notify the Energy Division at least 48 hours prior to construction and immediately upon completion of construction. To accomplish this, Mobil shall schedule an on-site pre-construction meeting with Energy Division staff, the County's field monitor, and key construction personnel. Following construction, Mobil shall send a brief letter to the Energy Division indicating all work has been completed.

Archaeology:

43. Prior to construction, workers shall be advised of nearby archaeologically sensitive areas not to be disturbed. This notification shall occur during the pre-construction meeting with Energy Division staff or the County's field monitor present.

44. In the event archaeological remains are encountered during grading or trenching, work shall be stopped immediately or redirected until a P&D qualified archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a mitigation program consistent with County Archaeological Guidelines and funded by the applicant.

Air Quality:

45. All applicable Santa Barbara County Air Pollution Control District (APCD) regulations shall be followed including:

a. Documentation shall be maintained to show that all diesel fuel has a sulfur content less than 0.5% by weight.

b. Dust generated from vehicles driving on the dirt access road shall be minimized by watering.

c. Operation of all equipment to be used onsite shall be strictly monitored and controlled to minimize any impact on surrounding areas.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

Biological Resources:

46. All existing riparian habitat shall be protected through the construction phase by fencing. Ground disturbance shall be prohibited within 50 feet from the top of the bank of Bell Creek. The area shall be fenced with a fencing type and in a location acceptable to P&D prior to any work commencing within the riparian corridor. The riparian habitat shall be delineated on all plans involving the proposed project. Prior to the issuance of a Coastal Development Permit (CDP), the applicant shall submit a copy of the grading and/or building plans to P&D for review and approval.

MONITORING: P&D staff and/or P&D approved biologist shall conduct site inspections throughout all phases of construction to ensure compliance with all biological resources measures.

47. Construction equipment access shall be limited to a designated corridor along the existing dirt road to the beach. Equipment access shall be designated on all plans involving the proposed project. Prior to the issuance of a CDP, the applicant shall submit a copy of the grading and/or building plans to P&D for review and approval.

MONITORING: P&D staff and/or P&D approved biologist shall conduct site inspections throughout all phases of construction to ensure compliance with all biological resources measures.

48. Staging areas shall be contained to the helicopter pad and the gravel parking area as defined in the project description, so as not to impact Bell Creek. Staging areas shall be designated on all plans involving the proposed project. Prior to the issuance of a CDP, the applicant shall submit a copy of the grading and/or building plans to P&D for review and approval.

MONITORING: P&D staff and/or P&D approved biologist shall conduct site inspections throughout all phases of construction to ensure compliance with all biological resources measures.

49. To minimize impacts to the western snowy plover, the following mitigation shall be applied, either: (1) Schedule construction work to avoid the western snowy plover nesting season between mid-March and mid-September; or, (2) If work is to occur during this nesting period, a pre-construction biological survey for western snowy plover habitat in the immediate area shall be conducted by a County-approved biologist to determine whether there are any nesting sites that could be affected. Construction work shall be performed in compliance with the findings and recommendation of the survey biologist.

50. A biological monitor shall be onsite prior to and during trenching, and for follow-up restoration.

MONITORING: A P&D approved biologist shall conduct site inspections throughout all phases of construction to ensure compliance with all biological resources measures.

51. The coastal foredune area shall be protected through the construction phase by fencing. Ground disturbance shall be prohibited by restricting construction activity to no closer than 50' from the base of the embankment leading to the Sandpiper Golf Course. Prior to construction, workers shall be briefed about the environmental sensitivity of the foredune region and notified that this region is not to be disturbed. Vegetation within the foredune region shall be marked conspicuously and protected with a fencing type and location acceptable to P&D prior to any work commencing. The foredune area and protective fencing shall be shown on all plans involving work on the beach. Prior to the issuance of a Coastal Development Permit, the applicant shall submit a copy of the grading and/or building plans to P&D for review and approval.

MONITORING: P&D staff and/or P&D approved biologist shall conduct site inspections throughout all phases of construction to ensure compliance with all biological resources measures.

52. A spill response trailer equipped with the response equipment presented in Table 4 of the Negative Declaration, 95-ND-22, shall be staged at the site prior to any work commencing. The spill response trailer shall be staged at the site for the duration of the project.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

53. Each pipeline shall be pressure tested to ensure integrity prior to operation of the pipeline after the miter joint replacement. At a minimum, each line shall hold the indicated test pressure (150% of normal operating pressure) for a period of not less

than 8 hours. A post-construction report shall be submitted to Energy Division within 30 days of work completion. The post-construction report shall include the following: pipeline water ppm test results; hydrotest results; dates of activity; and description of work performed.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

54. The beach and surf zone in the vicinity of the work site shall be returned to its original state. No debris shall be left on the beach or the access road. If sand does not accrue naturally on the beach during the time of proposed disturbance, the applicant shall ensure that the middle and lower intertidal zones have a layer of sand after disturbance in order to aid natural recolonization. The site shall be restored and all debris removed immediately after completion of construction.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

Water Resources:

55. The risk of surface water quality impacts can be mitigated by ensuring that the pipelines are flushed prior to excavation work involving heavy equipment as described in the project description (oil and grease content below 30 ppm). A post-construction report shall be submitted to Energy Division within 30 days of work completion. The post-construction report shall include the following: pipeline water ppm test results; hydrotest results; dates of activity; and description of work performed.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

Risk of Upset:

56. All welding specifications, welding procedures and the welding contractor's qualifications shall be submitted to the County. All welding specifications, welding procedures and the welding contractor's qualifications shall be submitted to the County for review and approval prior to construction.

MONITORING: These specifications and procedures shall be reviewed and approved by Building & Safety.

57. The operating procedure for smart pigging shall be submitted to the County for review and approval prior to smart pigging of the pipelines. Mobil shall notify the County prior to smart pigging of the pipelines and shall submit pigging reports to Energy Division within 30 days of smart pigging of the lines.

MONITORING: These specifications and procedures shall be reviewed and approved by Building & Safety.

58. Mobil shall prepare a HAZOPS for the pig receiver barrel modification. Any mitigation measures required as a result of the HAZOPS shall be implemented. The HAZOPS shall be approved by SSRRC prior to the issuance of a CDP for construction of the entire proposed project.

MONITORING: These specifications and procedures shall be reviewed and approved by the SSRRC.

59. A minimum of two continuous portable H_2S monitors shall be stationed on the job site so any hazardous levels of H_2S will be immediately detected. Self-contained breathing apparatus (SCBA) shall be on the job site for crews working near the lines.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

60. The pipeline shall not be cut at the beach location until oil and grease content is at or below 30 ppm. The flush water shall be monitored at the pipeline outlet and tested for oil and grease content. Test results shall be documented in a post-construction report to be submitted to the Energy Division within 30 days of project completion.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

61. All pipelines and the power cable located in the project vicinity, with the exception of the seep line, shall be shut down prior to excavation and for the duration of the construction work. Mobil shall notify P&D immediately following construction and prior to recommencing operations of the pipelines and power cables. These requirements shall be shown on all plans involving work on the beach.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures. P&D shall document the time and date of notification of resuming pipeline and power cable operations.

62. Water jets, as opposed to heavy trenching equipment, will be used within 18" of the pipelines to minimize the risk of accidental pipeline breakage during excavation. This requirement shall be shown on all plans involving work on the beach.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

63. The oil emulsion and gas pipelines shall be visually inspected from the surf zone to the EOF on a daily basis for as long as they are in operation. At a minimum, the following information shall be logged for all inspections: time and date of the inspection; inspector's name; burial status of the pipelines; length of pipe exposed, if any; estimated wave height at the surf; any evidence of pipeline movement. Log reports shall be maintained at the EOF and made available to the County for inspection upon request.

MONITORING: P&D staff and/or the County's field monitor shall periodically conduct site visits to verify the daily pipeline inspection information.

64. Mobil shall shut down and displace the emulsion line with seawater during large storms events (defined as waves measuring more than 12 feet in height) when more than 20 feet of the pipeline is exposed. Mobil shall notify P&D of the need to shut down the line immediately upon doing so.

MONITORING: P&D staff and/or the County's field monitor shall periodically conduct site inspections, especially during or after heavy storm events.

Noise:

65. No members of the general public shall be exposed to noise levels in excess of the County threshold of 65 dBA outside of the designated work area.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures. If P&D receives noise complaint(s) during project construction, P&D will require Mobil to investigate the source and cease any operations that generate noise levels in excess of 65 dBA.

Recreation:

66. To ensure public safety, lateral beach access shall be re-routed for the duration of the project which is expected to last 3 to 5 days. No work shall be scheduled during holidays or weekends. The lateral beach access route, implementation methods (i.e.

signs, tape, etc.), and a construction schedule shall be submitted to P&D for review and approval prior to construction.

MONITORING: P&D staff and/or the County's field monitor shall conduct site inspections throughout all phases of construction to ensure compliance with all mitigation measures.

mobil\holly\conditns.sr

STATE LANDS COMMISSION
MINERAL RESOURCES MANAGEMENT DIVISION
200 OCEANGATE, 12TH FLOOR
LONG BEACH, CALIFORNIA 90802
TELEPHONE: (310) 590-5201
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CALIFORNIA RELAY SERVICE
TDD/TT: (800) 735-2929
VOICE: (800) 735-2922

SEP 20 [illegible]

File Ref: W 40615.3

September 18, 1995

Mr. John D. Stieg, P.E.
Senior Staff Facilities Engineer
Mobil Oil Corp.
1014 Santa Barbara Street
Santa Barbara, CA 93101

Subject: Platform Holly Pipelines Miter Joint Replacement

Dear Mr. Stieg:

This will confirm agreement reached in discussions with our engineering staff that the requirement to flush and clean the oil emulsion pipeline prior to miter joint replacement until the flush water contains 15 ppm of oil and grease is modified.

Approval is hereby granted to flush and clean the pipeline prior to cutting until the oil and grease content of the flush water contains less than 30 ppm. Pursuant to this approval, Item 4 of the required post construction submittals as set forth in our letter to you dated September 1, 1995 is amended to replace the words "15 ppm" with "30 ppm".

With respect to the beach separation between crossing pipelines, we have determined that at a minimum, separation shall be by a cement grout bag installation that provides a stable separation between the pipes, with a minimum 12 inches pipes separation.

Sincerely,

Paul B. Mount II, P.E.
Chief, Minerals Resources Management Division

cc: Michelle Gasperini, Santa Barbara County P&D

EXHIBIT NO. 5
APPLICATION NO.
E-95-07
California Coastal Commission

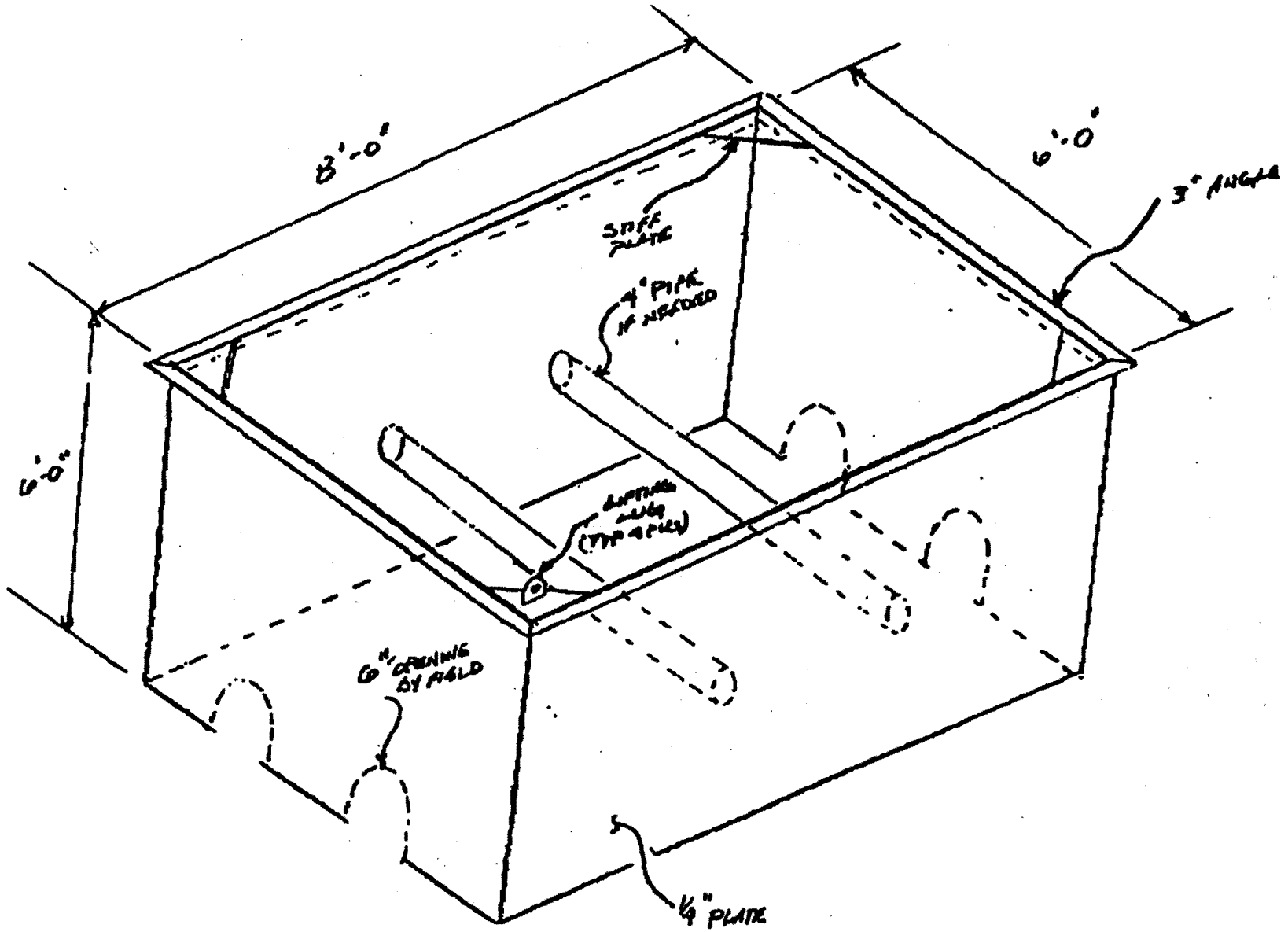

EXHIBIT NO. 6
APPLICATION NO.
E-95-07
California Coastal Commission

Example of a Coffer Dam