

CALIFORNIA COASTAL COMMISSION

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Hearing Date: December 12, 2003

STAFF REPORT: REGULAR CALENDAR

APPLICATION FILE NO.: E-02-019

APPLICANT: Venoco, Inc.

PROJECT LOCATION: Casitas Pier, Carpinteria

PROJECT DESCRIPTION: Repair up to 26 pilings at Casitas Pier, in Carpinteria, Santa Barbara County.

- 1.0 PROJECT SUMMARY:** This staff report evaluates the proposed repair of up to 26 pilings at the Casitas Pier, located along the Santa Barbara Channel in the City of Carpinteria. The work involves using the “tremie” method to pour concrete within casings placed around each piling. The project is located near an area used by harbor seals as a pupping and haul-out area. To avoid adverse impacts to harbor seals, work will be subject to marine mammal protection measures and will occur outside of the seals’ pupping and molting seasons that run from December 1st to July 31st each year.

Staff recommends that the Commission approve the proposed project, as conditioned. **Special Condition 1** would require the project to occur outside the more sensitive times of year for the seals; **Special Condition 2** would require several specific seal protection measures; **Special Condition 3** would require the Applicant to submit a report on the project activities and any effects on the seals; and **Special Condition 4** would require the Applicant to remove all project-related debris from the area.

Staff has determined that the proposal, as conditioned, will comply with Coastal Act sections 30230 and 30231 (marine biological resources and water quality), 30232 (spill prevention, containment, and cleanup), 30233 (placing fill in coastal waters), 30211 (public access and recreation), and 30251 (scenic and visual resources).

2.0 STAFF RECOMMENDATIONS

The staff recommends conditional approval of the permit application.

Motion:

I move that the Commission approve Coastal Development Permit E-02-019 subject to conditions specified below.

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

Resolution:

The Commission hereby approves a Coastal Development Permit for the proposed development 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.

2.1 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.

2.2 SPECIAL CONDITIONS

1. **Project Timing.** Project mobilization, site preparation, pier repair, and de-mobilization, shall occur only between August 1 and November 30.
2. **Marine Mammal Protection Measures.** This permit does not authorize disturbance or “take” of marine mammals. In addition to measures proposed by the Applicant to protect marine mammals and to prevent “take”, the Applicant shall implement the following measures to avoid or minimize any adverse effects to harbor seals using the rookery and haul-out area to the east of Casitas Pier:
 - a) Before starting project-related activities at the pier or staging area, the Applicant shall provide training to all project personnel on measures necessary to avoid or minimize disturbance to marine mammals.
 - b) Project activities shall not occur when seal pups, pregnant seals, or molting seals are observed at the rookery area or within 500 feet of the project site.
 - c) The repaired pilings shall be finished with a smooth surface that will reduce the possibility of harm to human or marine life and will reduce snagging of marine debris.
 - d) The Applicant shall provide a video and sound recording of all phases of construction. Before staging equipment or beginning site preparation, at least one video camera shall be set up at a location that provides a clear picture and sound recording of the staging area, the construction area, and the seal rookery. The recording shall include a date and time imprint. The camera is to run continuously during staging, construction, and de-mobilization. All recordings shall be made available to Coastal Commission staff immediately upon request.
 - e) If any marine mammals are disturbed during project-related activities, the Applicant shall take the following actions:
 - i. Stop all construction work.
 - ii. Take all reasonable measures necessary to avoid further disturbance to the marine mammals.
 - iii. Note the disturbance in a logbook, describing the type of disturbance, the number of marine mammals affected, the time and date, the likely cause of the disturbance, and the measures taken to stop the disturbance and avoid further disturbances. The logbook and associated video recordings shall be made available upon request to Coastal Commission staff.
 - iv. Contact representatives of the appropriate agencies, including the Coastal Commission, the California Department of Fish and Game, and the National Marine Fisheries Service to report the disturbance and describe the measures taken in response to the disturbance.

3. **“As-built” Report:** Within 30 days of project completion, the Applicant shall provide an “as-built” report to the Executive Director of the Coastal Commission. This report shall include final project drawings or photographs and shall identify whether additional repair work remains to be done. The report shall also describe any noted effects of the project activities on harbor seals or other marine mammals, and shall include the logbook described in Special Condition 2 above.
4. **Debris Removal:** The Applicant shall remove all project-related debris from coastal waters and the pier to the maximum extent feasible, and the debris shall be properly disposed of at an approved upland location.

3.0 PROJECT DESCRIPTION, SETTING, AND BACKGROUND

The proposed project involves repairing up to 26 concrete and metal pilings on the Casitas Pier. The pier is located along the Santa Barbara Channel on state tidelands granted to the City of Carpinteria and leased by Venoco, Inc. (the Applicant). It was built in the mid- to late-1960s and extends approximately 1250 feet from shore (see Exhibits 1 and 2 for location map and site map).

The pier includes 19 parallel sets of pilings made of either steel or steel and concrete. In 1996, Chevron, Inc., the previous pier lessee, repaired seven of the pilings and noted that repairs would soon be needed on an additional 19 pilings due to corrosion of the steel. The seven pilings previously repaired were 8A&B, 9A&B, 11A&B, and 13A. The additional pilings to be repaired as part of this project are 4A&B, 5A&B, 6A&B, 7A&B, 10A&B, 12A&B, 13B, 14A&B, 15A&B, and 16A&B. [Note: the pilings are numbered from the shoreline waterward. Those on the east side of the pier are designated with an “A” and those on the west with a “B”].

Project Setting: The pier is located in the nearshore area of the Santa Barbara Channel and extends out from a coastal bluff at approximately twenty feet above the water surface. The pier is used by the Applicant and two other companies (Nuevo Energy and Pacific Offshore Operators, International) to service offshore oil and gas operations. Approximately 50 to 75 feet east of the pier are an oil pipeline, gas pipeline, and electrical cable that come ashore from various offshore platforms. The pier is also within approximately 100 to 300 feet of a rocky shoreline area used by Pacific harbor seals (*Phoca vitulina richardsi*) as a pupping, rookery, and haul-out area. Additionally, the beach at and near the pier is subject to very high rates of scour over the course of the year. During the summer, sand can be up to about twenty feet deep, while in the winter, sand can be entirely absent, with the shoreline scoured to bedrock.

Proposed Project Activities: The proposed project involves inspecting the pilings that were previously repaired in 1996 and repairing them again, if necessary, and repairing an additional 19 pilings. Repairs would be done using the “tremie” method, which involves pouring concrete into forms placed around each piling. The nearshore-most pilings will be repaired first and work will continue to the outermost pilings. The Applicant anticipates the work will require about 98 cubic yards of concrete. The work is expected to take 30 to 40 10-hour days.

The Applicant performed a pre-project survey to determine the likely extent of repairs needed, the dimensions of the existing pilings, and site conditions. The repairs involve several main steps:

- **Mobilization**: Equipment and vehicles to be used during the project would be stationed either on the pier or on the nearby parking area, which would serve as a staging area for the project activities. Diver support equipment, compressors, equipment for delivering concrete, and other equipment would be vehicle mounted so it can be removed from the pier at the end of each work day. Temporary scaffolding may be mounted below the pier surface if needed to support the divers.
- **Site preparation**: Divers would use a water jet to remove marine growth from the pilings and roughen the piling surfaces to allow better concrete adhesion. Divers would also jet away sand from the base of each piling if necessary to allow better contact between the forms and the underlying bedrock. Based on surveys, the Applicant anticipates that divers might need to jet away up to about four feet of sand from each piling to reach bedrock.
- **Placing forms**: Divers would place forms around each piling, along with the internal re-bar needed to strengthen the concrete. Forms will be rounded steel about five feet in diameter and will vary from about seven to 12 feet high. The divers would also place sandbags around the base of each form as necessary to block any gaps between the forms and the bottom surface to prevent concrete from leaking out.
- **Pumping concrete**: Concrete would be pumped into the forms from a concrete truck on the pier through a hose controlled by divers. The divers would use an electronic communication system to stay in voice contact with the personnel on the pier. To ensure the concrete does not overtop the forms, divers will stop the pumping before concrete reaches the top of the forms. A valve or ball within the concrete hose will further reduce the exchange between the concrete and the water column.
- **Cleanup and demobilization**: Equipment used to place the concrete will be moved to a wash tank located on the parking lot rather than on the pier. Wash water will be treated in a Baker tank and will not drain to the ocean. The forms will be removed from the pilings when the concrete has set sufficiently.

The project is more fully described in the Applicant's August 2003 Casitas Pier Piling Restoration Project submitted as part of the coastal development permit application.

Other Permits and Approvals: This proposed project is also subject to the following permits, approvals, or regulatory requirements:

- U.S. Army Corps of Engineers: Nationwide Permits #3 (Repair and Maintenance) and #33 (Temporary Construction).
- Regional Water Quality Control Board: standard Section 401 water quality certification, issued November 4, 2003.
- City of Carpinteria: Building permit and compliance with City requirements regarding beach closures, limits on development in Environmentally Sensitive Habitat Areas, and harbor seal protection.

4.0 COASTAL ACT ISSUES

4.1 Marine Resources

Section 30230 of the Coastal Act 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.

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.

The primary potential impacts associated with the piling repairs are disturbance to harbor seals and adverse water quality effects due to pouring concrete within coastal waters.

Marine Mammals: Project activities could adversely affect marine mammals in the vicinity, particularly harbor seals using the rookery and haul out area to the east of the pier. Harbor seals are protected under the federal Marine Mammal Protection Act, which prohibits “take” of marine mammals¹. The seals use the area for hauling out year round, but the area is of particular importance during pupping season from approximately December 1 to May 31 each year and

¹ The definition of “take” under the Act includes intentional or unintentional harassment, any act that could cause injury or death, and any action that changes the behavior of the animal.

during molting season during June and July each year. Seals are more sensitive to disturbance during these periods – during pupping season, the seal pups may be abandoned if the adults are disturbed, and pups may not have gained sufficient skills to survive in the water. During molting season, the seals have less protection from the cold and may need longer periods outside of the water to warm themselves.

The City has adopted several ordinances meant to protect the harbor seal colony, including designating the beach and the adjacent bluffs in the City's General Plan as Environmentally Sensitive Habitat Area, and closing the beach to public access during the December 1 to May 31 pupping season each year to prevent disturbance to the seals (e.g., disruption of pregnant or nursing seals, abandonment of newborn pups, etc.). The closure applies to the beach 750 feet on either side of the seal haulout area, which includes the beach below Casitas Pier. Waters out to 1000 feet offshore are closed to personal watercraft during the same period. The area at the top of the bluff above the pier and rookery area is used for public access and for observing the seals. The seal rookery is actively monitored by Seal Watch, a local volunteer organization that has kept records of seal use at the rookery for over ten years.

To avoid adverse impacts during pupping season, the Applicant has proposed doing the project work outside the December 1st – May 31st closure. **Special Condition 1** reflects this concern and additionally prohibits project activities during both pupping and molting seasons from December 1st to July 31st. This timing restriction will significantly diminish the potential for adverse impacts to the seals during the times of year they are most sensitive to disturbance. However, the seals may use the haul-out area year-round, therefore **Special Condition 2** includes several additional measures to minimize potential disturbance, including requiring the Applicant to train all project personnel on how to avoid marine mammal disturbance, requiring the finished repair work to result in smooth surfaces to avoid harming marine mammals, documenting the interaction of the seals and the project activities, and others. To further ensure the project is carried out in a way to avoid and minimize adverse impacts to seals, **Special Condition 3** requires documentation of project activities and any noted disturbances.

Water Quality and Benthic Habitat: Project activities include preparing the site, jetting sand away from the pilings, and pouring concrete within the water column, any of which could cause exceedances of water quality standards and damage to nearby marine organisms. The Applicant included several measures in the project to avoid and minimize the potential for these impacts to occur, including the following:

- Divers will use a water jet to move sand away from the base of each piling, but the project is in a high-energy environment subject to high levels of sand movement where the resulting turbidity would be temporary and similar to normal conditions at the site.
- The forms used to contain the wet concrete will be of steel, which will not cause adverse water quality effects. The forms will be removed after the concrete has set sufficiently so they will not be in place long enough to corrode.

- To avoid or minimize the movement of wet concrete from the bottom of the forms to the water column, divers will place an initial “lift” of about two feet of concrete and allow it to partially set before filling the remainder of the form. Additionally, divers will place sandbags at the base of the forms to close any gaps between the forms and the substrate. The sandbags will be made of biodegradable burlap.
- Because the specific gravity of concrete is about twice that of seawater, the slow filling of the forms will result in minimal interface with the water column.
- During the concrete pour, divers will use an electronic communication system to maintain voice contact with personnel on the pier, and will observe the level of concrete within the form. Divers will signal the operators to stop pouring before the concrete reaches the top of the form. The forms will be slightly overlength to allow the necessary amount of concrete without overtopping.
- The contractor will use a Baker tank on shore for disposal of water and concrete waste from the tremie hose and pump.

Additionally, the project will be subject to conditions of a Section 401 standard water quality certification issued by the Regional Water Quality Control Board, which includes additional conditions meant to avoid and minimize adverse impacts to water quality. Among them, the certification requires the Applicant to meet applicable water quality standards as described in the Basin Plan. To further ensure adverse impacts to water quality are avoided and minimized, **Special Condition 4** requires the Applicant to remove all project-related debris from coastal waters.

Conclusion:

Based on the reasons above, the Commission finds that, as conditioned, the proposed project will be carried out in a manner that maintains marine resources and sustains the biological productivity of and quality of coastal waters and, therefore, is consistent with Coastal Act Sections 30230 and 30231.

4.2 Spill Prevention and Response

Section 30232 of the Coastal Act 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.

This Coastal Act policy includes two primary requirements – first, that proposed projects include measures to protect against spills; and second, that they include measures for effective containment and cleanup.

Protection against spills: The project activities would occur in and immediately above a sensitive coastal area subject to strong wave action. The project could result in spills from equipment or vehicles on the pier or the nearby parking area.

The Casitas Pier is part of the Applicant's Carpinteria Facility, and as such, is subject to conditions of the Applicant's "Oil Spill Contingency Plan – Carpinteria Facilities and Pipelines" (January 2002), which includes detailed spill prevention and response measures. In addition to the measures included in the facility plan, the Applicant developed the "Casitas Pier Pilings Restoration Oil Spill Contingency Plan" (August 6, 2003, Revision 2) that includes the following specific measures as part of the project:

- The Applicant will conduct daily inspections of the equipment and vehicles for leaks.
- Drip pans will be placed under all fuel-containing equipment and vehicles, and sorbent materials will be kept on hand. Vehicles parked on the pier will be parked over areas with a concrete surface.
- The Applicant will maintain an emergency response trailer with spill cleanup equipment at the parking area adjacent to the pier.
- The project site is approximately one-quarter mile from the equipment yard of its primary spill response contractor, Clean Seas, Inc. The Applicant will ensure that Clean Seas is on stand-by during the project to ensure a quick response, if needed.
- When feasible, fueling will be done in the parking area rather than the pier. When fueling must be done on the pier, it will be subject to a multi-step procedure to minimize the risk of fuel entering coastal waters.

Containment if spills occur: Should a spill occur, it would occur immediately above coastal waters and sensitive nearshore habitat. However, because no equipment containing fuel will be directly in the water, and with the measures described above, any fuel spilled would be on the pier or parking area where the spill response measures could be effectively implemented before fuel reaches the water.

The Commission therefore finds that the proposed development includes necessary measures to prevent spills and to contain those spills if they occur.

Conclusion:

For the reasons above, the Commission finds the project consistent with Section 30232 of the Coastal Act.

4.3 Placing Fill in Coastal Waters

Section 30233 of the Coastal Act states:

(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

(1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.

(2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.

(3) In wetland areas only, entrance channels for new or expanded boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.

(4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

(5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

(6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.

(7) Restoration purposes.

(8) Nature study, aquaculture, or similar resource dependent activities.

The project involves placing approximately 98 cubic yards of fill within nearshore waters. Coastal Act Section 30233 requires that projects involving placing fill in open coastal waters meet three tests – first, that the proposed activity is one of eight categories of uses described in Coastal Act Section 30233(a)(1)-(8); second, that there be no feasible less environmentally damaging alternatives to the fill; and third, that feasible mitigation measures be provided to minimize the project's adverse environmental effects.

- 1) Allowable Use Test: Coastal Act Section 30233(a)(1) allows fill in open coastal waters for expanded coastal-dependent facilities. The purpose of this proposed fill is to repair an existing pier for ongoing vessel access to offshore oil and gas operations. This particular facility is coastal-dependent because there is no location other than the ocean where the applicant can moor vessels providing access to offshore operations. Therefore, the Commission finds that the proposed fill is an allowable use pursuant to Coastal Act Section 30233(a)(1).

- 2) No Feasible Less Environmentally Damaging Alternatives: The second test of Section 30233 requires an assessment of whether there are feasible less environmentally damaging alternatives. Repairing the pilings could be done with no increase in fill if the existing pilings were removed and replaced with new pilings of the same materials and dimensions. However, this method could result in additional water quality concerns, due to the disturbances caused by pulling the existing pilings, and would likely increase the length of time needed to complete the project, thus causing additional disturbance to coastal resources. The pilings are subject to a high degree of scour due to their location in a high-energy surf zone and due to the significant amount of seasonal sand movement in the area, so alternative materials, such as plastic sleeves, are not likely to be as durable as concrete. Additionally, the effects of scour on the plastic would result in plastic residue entering the water, causing adverse water quality and biological effects. If plastic or a similar material was used, it would likely need to be replaced more quickly than concrete, thus causing more frequent adverse effects to coastal resources.

To further ensure the amount and adverse effects of fill are minimized, **Special Condition 3** requires the Applicant to document the “as-built” conditions of the pilings at the end of the project to help determine the long-term effectiveness of the repairs. Based on the above considerations and as conditioned, the Commission therefore finds that there are no feasible less environmentally damaging alternatives to the proposed fill, thus meeting the second test of Coastal Act Section 30233.

- 3) Feasible Mitigation Measures: The third test under section 30233 requires that the project include feasible mitigation measures to minimize adverse environmental effects. In other sections of this report, the Commission has identified several feasible mitigation measures, such as timing restrictions, water quality conditions, and others, that will minimize those effects. By imposing the special conditions described in this report as part of the coastal development permit, the Commission finds that the third test of Coastal Act Section 30233(a) has been met.

Conclusion:

For the reasons above, and as conditioned, the Commission has determined that this coastal-dependent project, as conditioned, has no feasible less environmentally damaging alternatives and includes feasible mitigation measures, and is therefore consistent with Section 30233 of the Coastal Act.

4.4 Public Access

Section 30211 of the Coastal Act 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.

Casitas Pier is leased by the Applicant and used by firms doing oil and gas-related work. Public use is infrequent and is not the primary use of the pier.

Access to the pier is via a service road that leads to a parking area on the coastal bluff overlooking the pier. The oil and gas companies are the primary users of the road and the parking area, although members of the public use them for coastal access, primarily to the bluffs overlooking the seal rookery. The Sealwatch group and the general public use the area immediately to the east of the parking area to observe and document seal use at the rookery.

The project activities will occur largely on and below the pier and in the parking area. These activities are not expected to significantly affect public access, since the public uses the pier infrequently and the project activities will take up only a small part of the parking area, leaving adequate space for members of the public to access the coastal bluff area. During repairs of the pilings closest to shore, the Applicant may post personnel on the beach to direct beach users away from the area; however, this loss of access is expected to be minimal and temporary.

The Commission therefore finds that the proposed development will not adversely affect public access to coastal areas.

Conclusion:

For the reasons above, the Commission finds the project consistent with Section 30211 of the Coastal Act.

4.5 Scenic and Visual Qualities

Section 30251 of the Coastal Act 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.

The proposed project will result in minor and temporary visual effects during construction due to the presence of heavy equipment and construction-related activities on the pier. These project elements will be visible from the beach and nearby coastal bluffs; however, because the construction is temporary and relatively minor, and because the pier is generally subject to

similar equipment and activity, the proposed project will not result in significant adverse impacts to coastal views. The Commission therefore finds that the proposed development will not adversely affect views to and along the scenic coastal area where it is located.

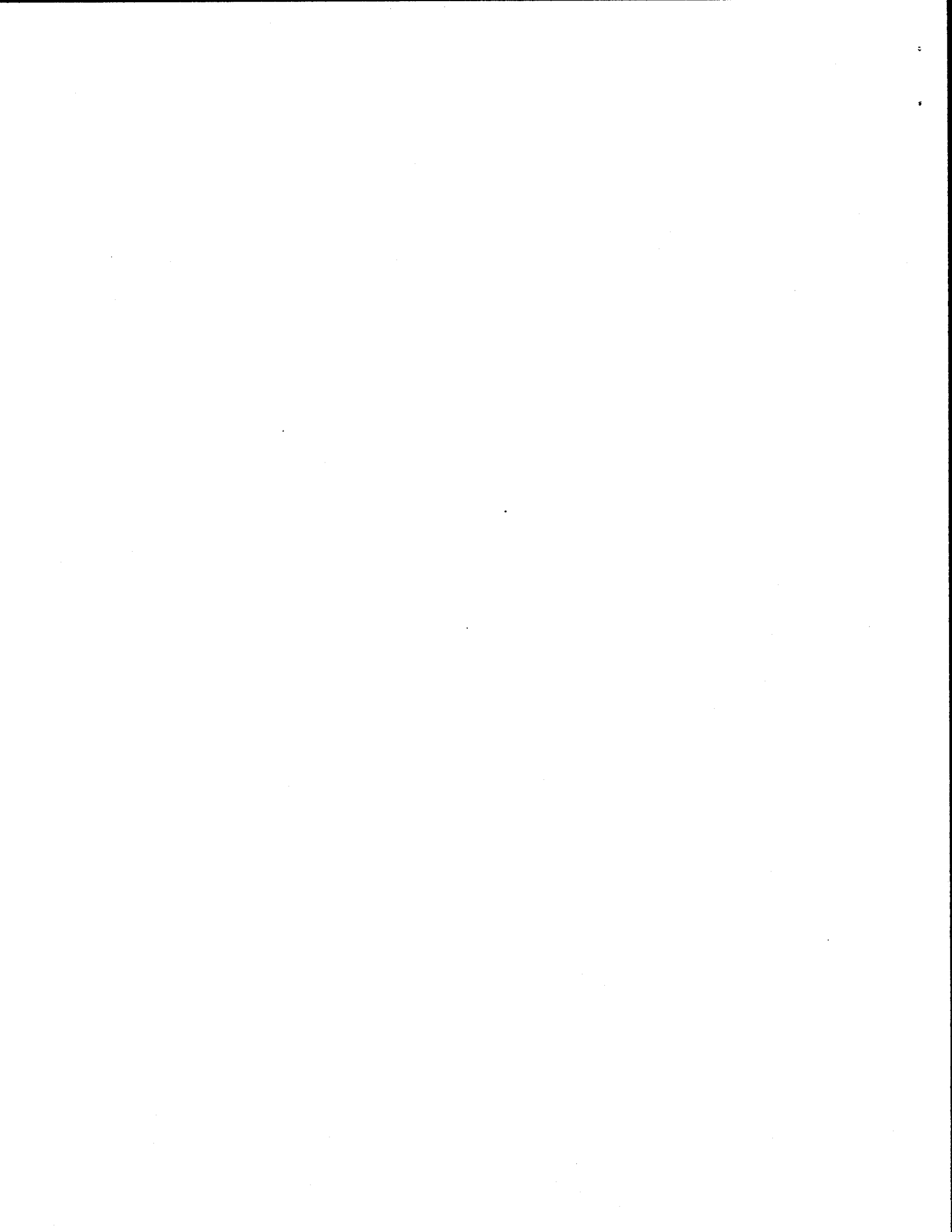
Conclusion:

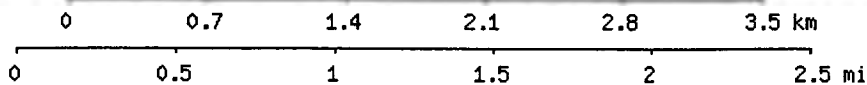
For the reasons above, the Commission finds that, as conditioned, the project is consistent with Section 30251 of the Coastal Act.

5.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 13096 of the Commission's administrative regulations requires Commission approval of CDP 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). The Commission's permit process also has been designated by the State Resources Agency as the functional equivalent of the CEQA environmental impact review process. Section 21080.5(d)(2)(A) of the 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 finds that only as conditioned are there no feasible less environmentally damaging alternatives or additional feasible mitigation measures that would substantially lessen any significant adverse impacts which the project may have on the environment, other than those specified herein. Therefore, the Commission finds that the project, as conditioned, is consistent with the provisions of CEQA.



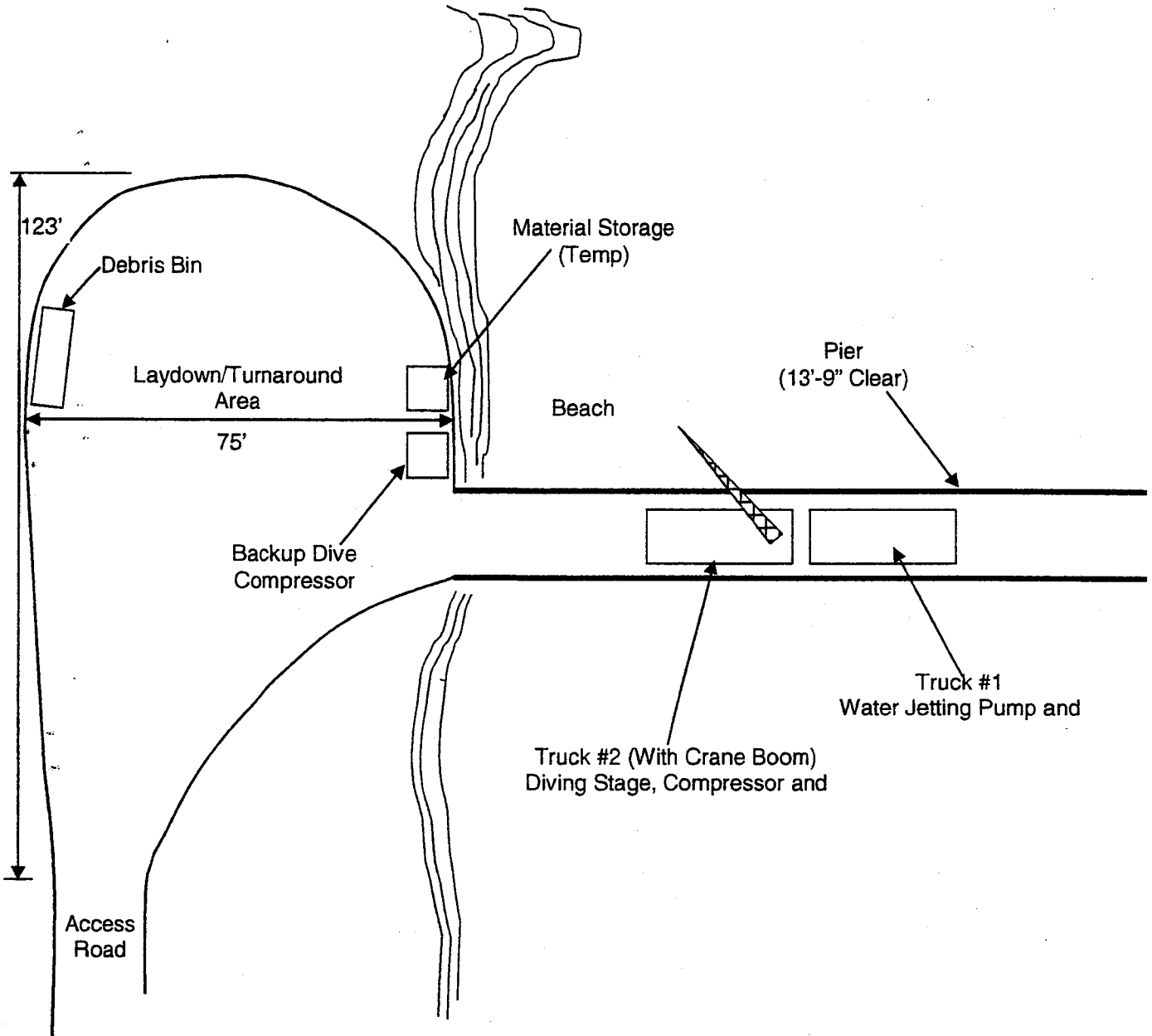


Map center is UTM 11 268497E 3809262N (WGS84/NAD83)
CARPINTERIA quadrangle - TopoZone Pro elevation display
 Projection is UTM Zone 11 NAD83 Datum

EXHIBIT NO. 1
APPLICATION NO.
E-02-019



Casitas Pier Piling Restoration Project Project Description & Scope of Work



← Parking Lot for Water Washout of Concrete Pump Equipment and Hose(s), Location of Washout Water Containment

← Guard Station

Scale: None

EXHIBIT NO. 2
APPLICATION NO.
E-02-019