

W 18a

ADDENDUM TO COMMISSION PACKET FOR ENERGY, OCEAN RESOURCES, and FEDERAL CONSISTENCY

For Wednesday, November 13, 2013

Item No. W18a

LCP-4-STB-13-0215-2

Public Utilities Natural Gas Storage

- Staff Report Modification
- Ex Parte Communications
- Correspondence

CALIFORNIA COASTAL COMMISSION

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SAN FRANCISCO, CA 94105-2219
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W18a

November 8, 2013

TO: Coastal Commissioners and Interested Parties

FROM: Alison Dettmer, Deputy Director
Kate Huckelbridge, Analyst

SUBJECT: Addendum to Staff Report for Local Coastal Program (LCP) Amendment No. LCP-4-STB-13-0215-2, County of Santa Barbara.

This addendum includes one minor revision to the staff report and ex parte disclosures and correspondence received regarding the proposed amendment to Santa Barbara County's LCP. This revision does not change staff's recommendation that the Commission approve the proposed amendment as submitted.

Staff recommends modifying the staff report as shown below in ~~strikeout~~/underline:

Page 1, 2nd paragraph, last sentence, make the following change:

The subject LCP Amendment was filed on September 20, 2013. The Commission has until November 129, 2013 to act on this Implementation Plan Amendment.

EX PARTE COMMUNICATIONS

FORM FOR DISCLOSURE OF EX PARTE COMMUNICATIONS

Name or description of project: LCP Amendment W 18a La Goleta Gas Storage **Santa Barbara County LCP Amendment No. LCP-4-STB-13-0215-2 (Public Utilities Natural Gas Storage)**

Date and time of receipt of communication: October 29, 2013 5:00- 5:20 pm

Location of communication: Santa Barbara

Type of communication (letter, facsimile, etc.): Telecon

Person(s) initiating communication: Michael Gray, resident

He doesnt feel the right questions are being asked. The economic justification is not sufficient. The Board of Supervisors abandoned the claim made at the Planning commission that there would be a benefit to the ratepayers. His math says that the 'benefit' would be a one time savings of 50 cents to a dollar. Disagrees with public benefit justification for override of Class I visual impact.

Disagrees that there is a public benefit at all. There is no evidence of need for storage.

Disagrees with risk analysis, doesn't want to live next to a gas plant with potential for fireball when he doesn't see any benefit to the public.

This is near the airport, sits on top of a 200 foot bluff, a tall rig with a bright light which will be visible from Goleta Beach as well as from neighbors' property and even 101

If there were a real need for the project, he would not object.

The CDP for the project was approved, but it cannot be appealed until after the LCP amendment is certified. So an appeal will be coming. 900 residents signed a petition against this.

Discussed that the proposed finding was for consistency with visual resources policy; staff report does not address analysis under 30260.

Discussed that he cannot explain why, if this is the only site in the County that this ordinance might apply to, the County changed the language from applicability to this one property, to a permitted use for any property owned by a public utility.

Jana Zimmer
Date 10/29/13

CORRESPONDENCE

Huckelbridge, Kate@Coastal

From: max golding <maxgolding1@gmail.com>
Sent: Wednesday, October 30, 2013 1:08 PM
To: Huckelbridge, Kate@Coastal
Subject: My opposition to SoCal Gas Goleta Project

Hi Kate,

I'm emailing to voice my opposition to the SoCal Gas project in Goleta. My position is that this is a precedent setting project for the gas (and oil) industry to continue exploring and extracting more gas and oil to burn in our region. What is particularly concerning is the 15.4 billion barrels of oil beneath the Monterey shale formation - obviously not gas, but relevant in the bigger picture of an industry-wide West Coast strategy this well interconnected industry (coal, oil and gas - bedfellows) has in mind, and has had for several years. (Part of that strategy has been freely distributed climate change denial *textbooks* called The Mad, Mad World Of Climatism, which may have been delivered to where you work? Many government and NGO offices have received this book out of nowhere, with seemingly no purpose.)

You can see from [this article in the Wall Street Journal](#), that very wealthy and powerful people are watching in particular the Santa Maria Energy project to model its winning strategies if it does crack through California climate change regulations - which the industrialists openly despise. SME is not SoCal Gas, but there are connections and I'll lay them out for you.

SoCal Gas company and Sempra Energy have had in the last few years their top executives also on other enormous energy company boards such as Halliburton. Halliburton is responsible for as we all know, highly controversial mercenary activities in Iraq. Arguably as unethical, they slipped legislation amendments into the Clean Water and Air Act that made fracking exempt from any regulatory oversight whatsoever on the federal level -- and this was a pre-emptive strategy ensuring investors' assurance of the safety of investing in gas and oil fracking from the opposite coast to here, which is why we're hearing so much about fracking in our own state now. Both onshore and offshore.

I believe the fossil fuel industry's tactics in general, are to use seemingly smaller, "local" companies (which are actually connected to enormously powerful multinationals that control much of our federal politics through campaign buy-outs mostly with Republicans but with several Democrats as well) to use areas like ours as testbeds to larger projects by setting precedent to be used by lawyer-like experts in testimony before boards like yourselves. And they work extremely successfully. To my understanding you've pretty much already approved of this project, without so much as asking the local community how it feels about this being done in their backyard. The corporate > people rights model is practically drilled into your heads before the battle even begins at times. They continue setting precedent after precedent to make this seem normal, curbing any criticisms about the overall ethicality of this process.

I know that when you look at EIR ppms and ppbs and you're just doing what the state has asked you to do - to say yes or no to questions pertaining to regulatory standards - you find what I am telling you irrelevant, or even conspiracy-theory-esque.

But there's not much else I can do since I have only enough money for rent, food, medicine, bike repairs, and paying off college loans. SoCal Gas et al, in comparison...

Another point. I assume SoCal Gas has used its parent company, Semptra Energy's massive marketing budget to have contact with each of the Coastal Commissioners, giving pre-arguments and PR bullet points in favor of the safety and economic viability of the project. I assume they've gone so far as to say this project is inevitable because energy demand for this particular resource is rising and if we don't drill here we'll have to import from elsewhere. In other words, it would be unethical for YOU to say no to the project. Does this fit what their contact with you was like?

When you consider how much money these people have to sit around in rooms and craft these arguments, and that those of us who oppose these projects have no money, often multiple jobs (like myself), and may be part-to-full-time activists working on OTHER projects to oppose or support, there is NO even playing field.

The communities impacted by these projects have no rights in this game. And each time a board of commissioners in some or other locus of power ignores the peoples' concerns by citing the regulation compliance standards of the company, corporate rights over human rights wins. You are the only way in this situation to restore democracy to what it should be, which is defending the concerns of the people who live boring, menial, difficult lives near or in relative poverty. You can help SoCal Gas, Semptra Energy, and the web of other oil and gas companies remain in the top bracket of income levels, flying on private jets and paying off politicians to block climate and other progressive legislation FOR the flying of those jets. You can believe those menial everyday people need gas and oil for survival, but you damn well know those technologies are only the dominant ones for energy at this time because of these company executives' political power and the uneven playing field between energy industries. Please fight to make the playing field more even - give voice to the people and turn down the volume on the industry whose agenda is for a greedy few in the facetious name of the "energy demanding" many.

Thanks for reading!

Max Golding
Santa Barbara
(Goleta resident for 7 years prior)

Kate Huckelbridge
California Coastal Commission
Energy, Ocean Resources & Federal Consistency Division

November 6, 2013

RE: SANTA BARBARA COUNTY LOCAL COASTAL AMENDMENT # LCP-4-STB-13-0215-2

Dear Kate Huckelbridge,

I spoke with you on the phone recently about the California Coastal Commission's (CCC) staff report regarding the proposed amendment change which would allow, if granted, Southern California Gas to drill for natural sweet gas at their La Goleta Storage Field.

I am opposed to the amendment change. I live at Rancho Goleta Mobile Home Park adjacent to the proposed drilling site. You may not know that most of the residents at Rancho Goleta are also opposed. Many of us, as well as many other residents of Santa Barbara County, wrote letters and attended the hearings and spoke against the change and SoCal's permission to drill. I also personally delivered a petition of 900 signatures to the Santa Barbara Planning Department from SB County residents in opposition to the project. (I have a copy if you would like to see it).

My concerns, and those of many others, are focused on the La Goleta Storage Field's proximity to the Goleta Slough (a wildlife estuary), Goleta Beach, UCSB, the Santa Barbara Airport, our residential park and agricultural land. A well-used bike path (Obern Trail), used by walkers and cyclists (many of whom commute to and from UCSB), goes along the SoCal property for some distance. Also, the property is near the More Ranch Fault. Drilling in this unstable geological area affords potential danger to human and animal life if it sets off an earthquake. Drilling has not occurred in the area, except injection wells, for decades. Now, with increased human populations, the hazard becomes more real.

The SB Planning Department, the Board of Supervisors and the public were assured in the EIRs and the hearings by staff reports and the industry that all of the above concerns were of "Less Than Significant Impact" and were able to be mitigated. I disagree. The noise and dust from construction will affect nesting birds, butterflies, wildlife habitation and those of us who live close by. Water use will double during construction and drilling which will stress a condition of drought that experts say is likely to get worse.

The one factor which was deemed only "temporary" that could not be mitigated is the proposed drilling tower which will be lit up day and night. This tower on the bluff will be

seen from the much used recreational area of Goleta Beach and the surrounding area. It will be an eyesore for visitors coming and going by plane as well as by those of us on the ground.

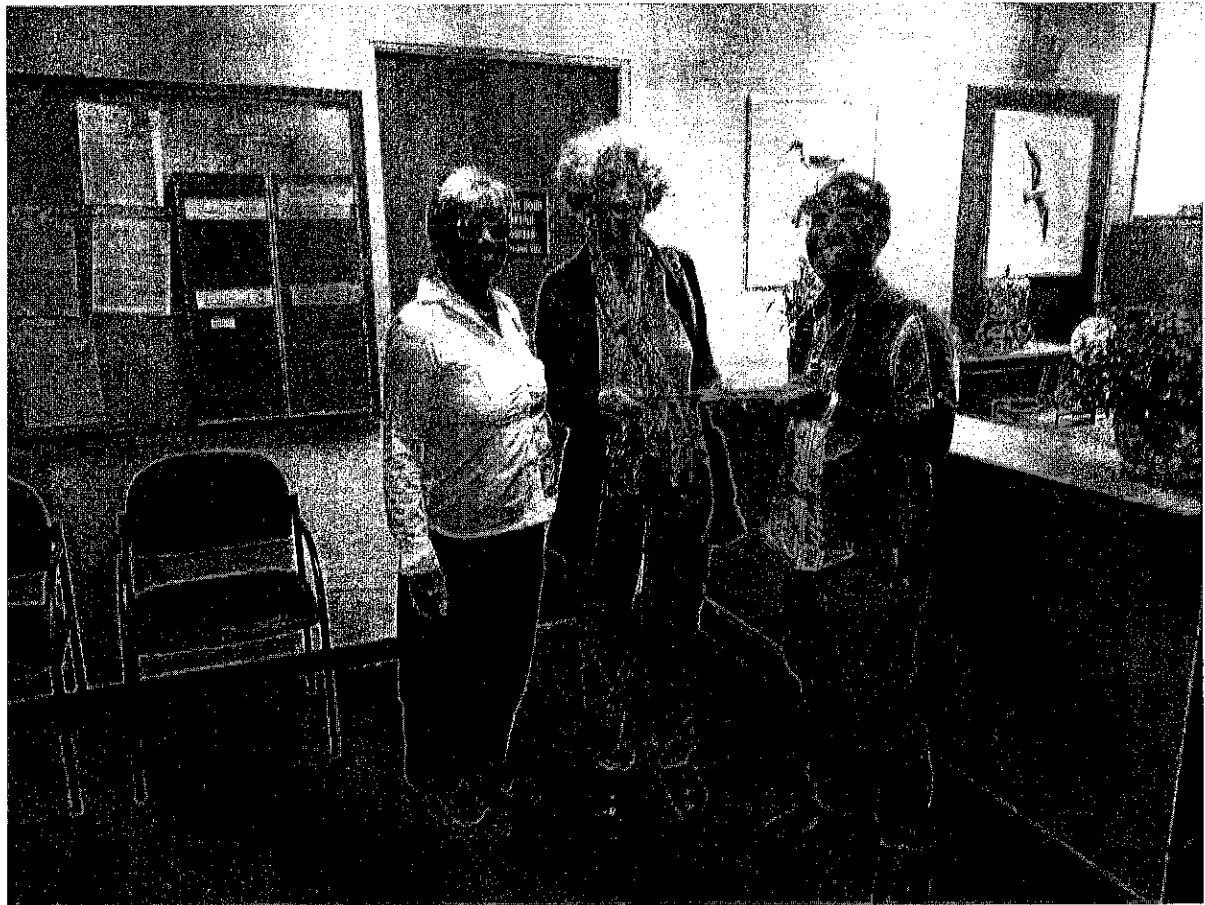
The California Coastal Commission's mission is to "Protect and Conserve" the natural resources of California's beautiful coast. I urge you and the other commissioners to review carefully the irreparable damage approving this amendment potentially will do to our fragile coastline. This amendment is not just for SoCal drilling. It will open the door to the possibility of other drilling along the coast by other companies in the future.

Please vote NO to this amendment change.

Thank you for your consideration,

Naneki Elliott
805-845-6024

Photo: Delivering Online and Personally Gathered Petition Signatures June 3, 2013



Huckelbridge, Kate@Coastal

From: Naneki Elliott <naneki88@gmail.com>
Sent: Wednesday, November 06, 2013 4:49 PM
To: Huckelbridge, Kate@Coastal
Subject: Tapping Reserves; Hitting Nerves - YouTube

Dear Kate Huckelbridge,

I sent you a letter today which you kindly responded to regarding the proposed Santa Barbara County Amendment change.

I have attached a 12 minute video which was created by students of an environmental film class this summer at UCSB. The students approached us about the issue of proposed drilling at the La Goleta Storage Facility by SoCal Gas. I think you might find it interesting.

Most sincerely,

Naneki Elliott

http://m.youtube.com/watch?feature=youtu.be&v=VQuCcshF0I4&desktop_uri=%2Fwatch%3Fv%3DVQuCcshF0I4%26feature%3Dyoutu.be

Sent from my iPad

LAW OFFICES OF
BARBER & GRAY
125 E. VICTORIA STREET, SUITE F
SANTA BARBARA, CALIFORNIA 93101
TELEPHONE (805) 965-4407
michaelhallgray@gmail.com

November 6, 2013

Commissioners
California Coastal Commission
Re: Santa Barbara County Local Coastal Program Amendment No LCP-4-STB-134-0215-2
Agenda Item W18a November Meeting

Dear Coastal Commissioners:

The proposed amendment to the IP/CZO of the certified LCP is not in conformance with and not adequate to carry out the provisions of the LUP.

Your staff report (B. Public Participation, page 4) does not mention that at the Santa Barbara County Planning Commission hearing on the amendment a petition of more than 900 residents was submitted in opposition to this project. It does not mention that at the Planning Commission hearing and again at the Board of Supervisors hearing, there was a substantial number of speakers (so many that the time allotment for the speakers was very limited) all of whom spoke against the project. The only speakers who spoke in favor of the project were representatives from the applicant and county staff.

It is an undisputed fact that the United States has huge gas reserves and that there is currently stored more than two trillion cubic feet of natural gas in this country. The applicant's parent company, Sempra Energy, exports natural gas out of the United States. This project, according to your staff report, will expand storage of natural gas by an insignificant "1 to five billion cubic feet." There was no evidence presented to the County of Santa Barbara either in writing or in the form of oral testimony that there are any doubts or questions about the reliability or the availability of natural gas sufficient to meet the local and regional demand for natural gas. Nevertheless, the County found that the amendment was in the interest of the general community welfare.

The proposed IP Amendment would allow SoCal Gas to seek a coastal development permit to undertake exploration and production activities at the La Goleta storage site which would further industrialize the California coastline.

Section 30253 of the Coastal Act (incorporated in the County's LUP under Policy 1-1) states (e) that new development should protect special communities and neighborhoods that are popular visitor destination points for recreational uses. This development would allow an unsightly drilling rig which would be seen from a very popular bicycle path used by hundreds of people each day and by users of the very popular Goleta beach. The applicant's property is adjacent to both the bike path and the beach. The drilling rig would be almost two hundred feet high and placed on top of a bluff which is also about two hundred feet high. Because the drilling rig is in the flight path of the Santa Barbara Airport, it would be required to have warning lights shining from it twenty-four hours a day. This development is not consistent with Section 30253 of the Coastal Act.

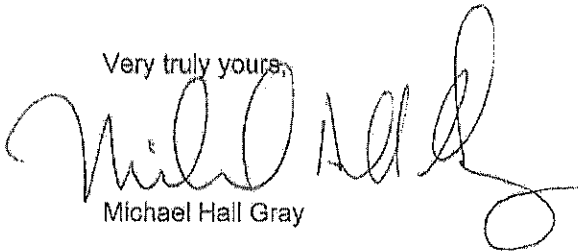
Section 30251 of the Coastal Act (incorporated in the County's LUP under Policy 1-1) states that the "scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance". The drilling rig allowed under this amendment is inconsistent with the Coastal Act and, in

fact, was found to be a class 1 impact in the EIR which was written for SoCal Gas. There are no mitigation measures available. This development is not consistent with Section 30251 of the Coastal Act.

Section 30232 of the Coastal Act (incorporated in the County's LUP under Policy 1-1) provides for protection against spillage of hazardous substances, but, as the staff report notes "accidental release of a hazardous substance is a serious concern". Oil and gas accidents happen frequently. The protocols staff mentions in their report to you regarding protection against release of hazardous substances are worthless without strong enforcement. As a resident who lives near-by, I can never be free from worry about a possible catastrophe at this site such as happened in San Bruno, California. I am not asking that the current activities on the site be eliminated but I am asking that they not be increased, especially since there seems to be no benefit to the public from this development. As it is now, my wife and I can feel the vibrations for the current injection process from the site in our home. This development is not consistent with Section 30232 of the Coastal Act.

I previously submitted letters to the Santa Barbara County Planning Commission and to the Santa Barbara County Board of Supervisors. For these reasons mentioned in those letters and for the reasons state above the Commission ought to find that the proposed IP/CZO is inconsistent with LUP policies and should deny the request to amend the IP/CZO.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael Hall Gray", written over a horizontal line.

Michael Hall Gray

MHG: ez

945 Ward Drive, Spc. 36
Santa Barbara, CA 93111

RECEIVED

NOV 07 2013

CALIFORNIA
COASTAL COMMISSION

November 4, 2013

Kate Huckelbridge,
California Coastal Commission,
Energy, Ocean Resources & Federal Consistency Division,
45 Fremont, Suite 2000,
San Francisco, CA 94105-2219

RE: Santa Barbara County Local Coastal Program Amendment No. LCP-4-STB-13-0215-2

Dear Ms. Huckelbridge,

Because the California Coastal Commission, (CCC), will soon be addressing a Southern California Gas Company, (SoCal Gas), plan to drill for natural gas on a coastal bluff close to my home, I would like to have the opportunity to express my thoughts and angst about the proposed development. I know that the CCC's mission and Coastal Act #30106 is in place to "Protect and Conserve" the land, water use and natural resources of California's coastal zone, and I hope that by enclosing a photograph of my coastal community of two hundred homes, plus illustrations of possible impoundments used to store hazardous natural gas wastewater will correlate with Coastal Act #30106 aversion to "Grading, removing, dredging, mining, or extraction of any materials: change in the diversity or intensity of use of land."

The enclosed photograph shows our lakeside community just walking distance to Goleta Beach. Behind the houses in the picture is a PUBLIC bike path for RECREATIONAL biking, walking, hiking, birding, plus a pathway to the University of California, Santa Barbara, Goleta Beach and the Pacific Ocean. The Atascadero Creek is by the side of the PUBLIC bike and pathway, and this creek is used by RECREATIONAL kayakers to reach the Pacific Ocean in minutes. (Coastal Act Section 30253 "Protect special communities and neighborhoods that are popular visitor destination points for RECREATIONAL uses.")

The trees in the picture's background are above the creek and they are part of SoCal Gas property. It is difficult to see in the photograph that SoCal Gas property is actually on a very high bluff that is approximately 200 feet tall. This fact is very important when considering the plan is to have a 172 foot drilling rig placed on top of the bluff. When night lighting is added to the equation, the gas enhancement project will be lit up like a Christmas tree for all to see for miles. This is not taking into account how the whole bluff will also be ablaze with lighting for the night workers and the aircraft descending and ascending from the nearby runway at Santa Barbara Airport.

When the Santa Barbara Planning and Development Agency held a public hearing to a packed room, a gentleman spoke to the Aesthetics/Visual Resources, Page 52, Final EIR Report, SoCal Gas Project. 4.1. This man was a close neighbor to SoCal Gas on the northern-eastern side, and he reported that when he went to his mailbox at night, he could read the time on his wrist watch because of SoCal Gas night lighting for its workers. The photo simulations of the drilling rig at night, (Final EIR May 2013 Figure 4.1-13) doesn't agree with his experience.

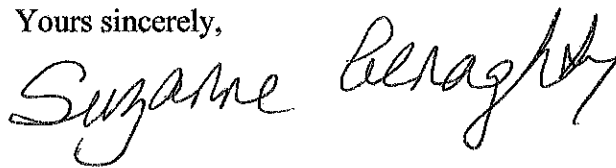
Considering "Visual Resources" in Coastal Act Section 30251 wherein "to protect views" and "minimize the alteration of natural land forms," This is important.. Not only will the coastal bluff be illuminated, but also the planned storage of hazardous chemical waste be an eyesore with the illumination. First time and returning air travelers to beautiful Santa Barbara will be getting their first and last impressions of the "American Riviera" with the sights of chemicals stored on-site in hazardous material storage areas. One area, according to the SoCal Final EIR has a moat!. I am enclosing illustrations of three hazardous material storage areas that might resemble a moat.

In summary, I am very upset and anxious about living in a proposed "Liquid Gas Explosion Safety Hazard Area" and losing my idyllic coastal life-style, because SoCal would like to get a permit to explore and drill for a small amount of natural gas, when there is no evidence that our local and regional area has even a worry of a shortage, and according to the U.S. Energy Information Administration "North America leads the world in production of natural gas."

Moreover, SoCal Gas has plans to divide profits between its shareholders and rate payers. That is calculated to mean a one dollar one-time customer saving!

Please examine SoCal Gas' proposition and decide that the negatives to our coastline and it's inhabitants is not worth opening a "Pandora's box."

Yours sincerely,

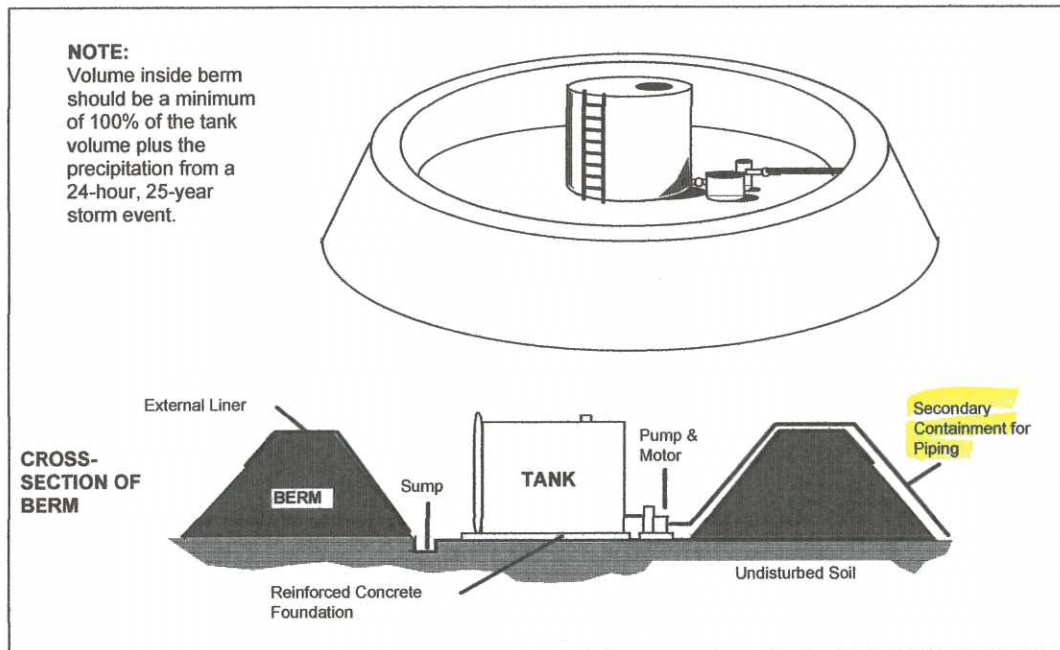
A handwritten signature in cursive script, reading "Suzanne Geraghty". The signature is written in dark ink and is positioned to the right of the typed name.

Suzanne Geraghty.





Figure 2
ABOVEGROUND TANK WITH EXTERNAL LINER
 (adapted from OSWER Directive 9483.00-1)

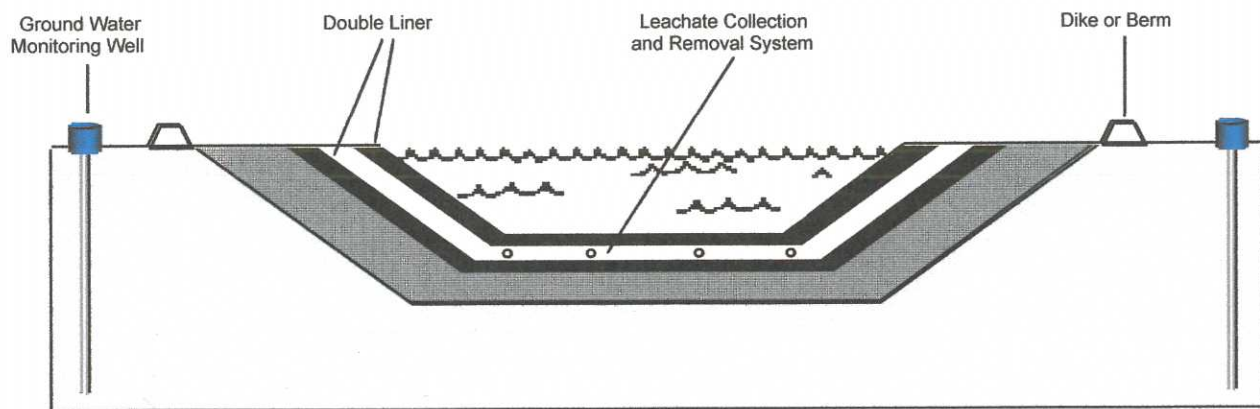


Vault

In a vault system (Figure 3), the hazardous waste tank rests in an underground chamber usually constructed with concrete floors and walls and an impermeable cover. A closed aboveground building that houses a hazardous waste tank may also be considered a vault for purposes of secondary containment. Because of the inherently porous nature of concrete, the primary building material for vaults, these units must have a waterproof exterior and be lined inside with a leak-proof sealant. To further minimize contact with moisture, tanks inside vaults should rest on cradles or saddles, rather than on the vault floor. Tanks in these units may also be surrounded with backfilled earthen materials. Although filling the vault with soil precludes visual inspection of the hazardous waste tanks, the backfill can lend structural support to the unit and tanks and prevent the explosion of any ignitable wastes that may leak from the tank. Vault requirements are found in §264/265.193(e)(2).

The double liner system consists of a top liner to prevent migration of hazardous constituents into the liner and a composite bottom liner consisting of a synthetic geomembrane and three feet of compacted soil material. The unit must also be equipped with an LCRS, which also serves as the leak detection system. The LCRS, along with the leak detection system drainage layers, must be designed with a bottom slope of at least one percent, be made of materials chemically resistant to the wastes placed in the unit, and be able to remove the liquids at a specified minimum rate. The LCRS itself must be designed to collect liquids in a sump and subsequently pump out those liquids. In addition to the performance and design requirements, the LCRS must be located between the liners immediately above the bottom composite liner, enabling the LCRS to collect the largest amount of leachate, while also representing the most efficient place to identify leaks. These MTRs are depicted in Figure 1 using a cross-section of a surface impoundment.

Figure 1
CROSS-SECTION OF A SURFACE IMPOUNDMENT AND
ITS MINIMUM TECHNOLOGICAL REQUIREMENTS



A surface impoundment must also be designed to prevent the flow of liquids over the top of an impoundment (or overtopping) and ensure the structural integrity of any dikes. Also, §264.222 requires that the owner or operator establish a site-specific leachate flow rate, called the action leakage rate (ALR), to indicate when each regulated unit's system is not functioning properly.

None of these technologies will be effective if the impoundment is installed improperly or constructed of inferior materials. To ensure that a surface impoundment meets all technical criteria, EPA requires a construction quality assurance (CQA) program. The CQA program requires a CQA plan that identifies how construction materials and their installation will be monitored and tested and how the results will be documented (§264.19). The CQA program is developed and implemented under the direction of a registered professional engineer, who must also certify that the CQA plan has been successfully carried out and that the unit meets all specifications before any waste is received.

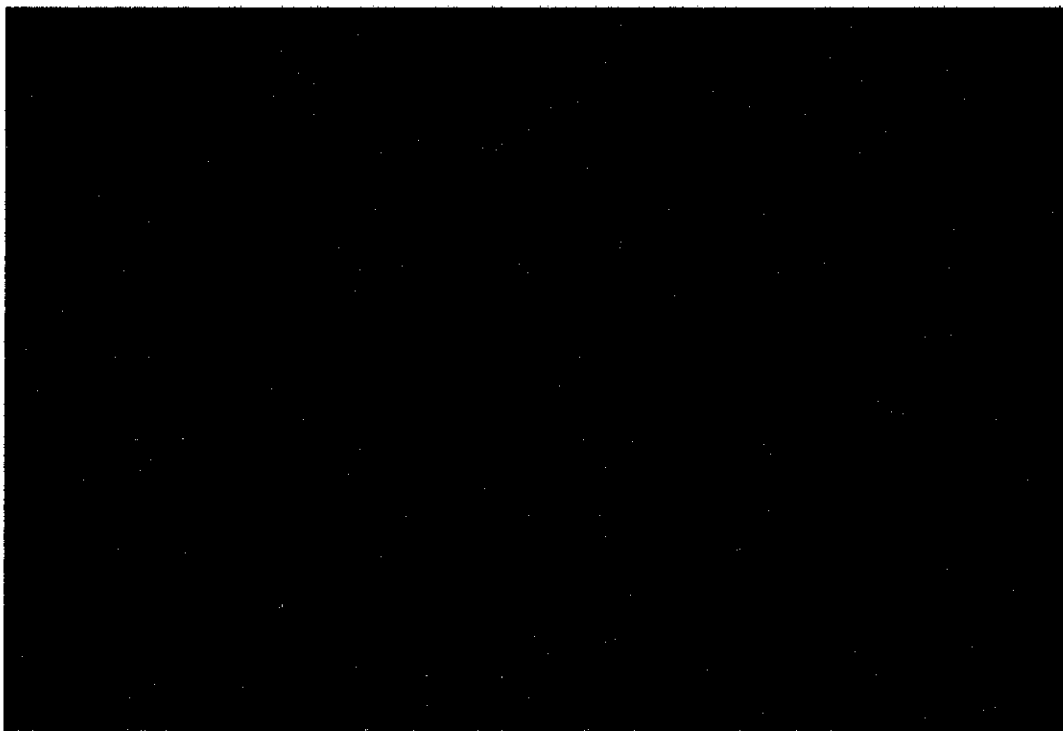


Figure 4.1-13 Baseline photo from Goleta Beach Pier looking northeast at night.



Figure 4.1-14 Photo simulation of Chase & Bryce 3/Todd 1 & 2 drilling rig from Goleta beach pier looking northeast at night.

Huckelbridge, Kate@Coastal

From: rhin <sundayd999@aol.com>
Sent: Thursday, November 07, 2013 5:22 PM
To: Huckelbridge, Kate@Coastal
Subject: Santa Barbara county Local Coastal Amendment #LCP-4-STB-13-0215-2

Donna Hummer
945 Ward Dr. #162
Santa Barbara, CA 93111

805 455 1444

Hello Ms. Kate Huckelbrigde,

My letter will be short as fellow residents of Rancho Goleta have written in depth their concerns of a possible change to the Land Coastal Amendment {LCP} no exploratory drilling. I do agree that the safety of our neighborhood, the bird habitat and the coast is in danger here. It seems the Coastal commission's reasoning for the limited drilling and no further exploratory drilling came from a place of understanding how much the coastline and it inhabitants could or could not withstand.

I am hoping that the coastal commission has the same concerns for the coast, the wildlife and all of us today. It is disheartening that seemingly only the large gas company and it's abundance of power and money is honored. There is no need for expansion of this site. From what I learned at the meeting with the county and city board about this new amendment, the researcher's, the oil companies outside consultants and the oil employee's stated that this oil is for export.

Please take our environment and it's residents of the Goleta coastline's safety to heart.

Thank you for your consideration, Donna Hummer

PS: I have added the San Bruno pipeline explosion for a safety check reminder for those at upcoming Nov 12th meeting.

2010 San Bruno pipeline explosion



2010 San Bruno pipeline explosion



Remains of a portion of the natural gas pipeline after

the explosion.

Date Thursday, September 9, 2010
Time 18:11 UTC-7
Location San Bruno, California
United States

 37.622524°N
Coordinates 122.441903°WCoordinates: 
37.622524°N 122.441903°W

Casualties

Fatalities: 8

Injured: 58

[1][2][3]

The **2010 San Bruno pipeline explosion** occurred at 6:11 pm PDT on September 9, 2010, in San Bruno, California, a suburb of San Francisco, when a 30-inch (76 cm) diameter steel natural gas pipeline owned by Pacific Gas & Electric exploded in flames in the Crestmoor residential neighborhood 2 mi (3.2 km) west of San Francisco International Airport^[4] near Skyline Boulevard and San Bruno Avenue.^[5] The loud roar and shaking led some residents of the area, first responders, and news media to initially believe that it was an earthquake or that a large jetliner had crashed. It took crews nearly an hour to determine it was a gas pipeline explosion.^[6] As of September 29, 2010, the death toll was eight people.^[7] The U.S. Geological Survey registered the explosion and resulting shock wave as a magnitude 1.1 earthquake.^{[8][9]} Eyewitnesses reported the initial blast "had a wall of fire more than 1,000 feet high".^[10]

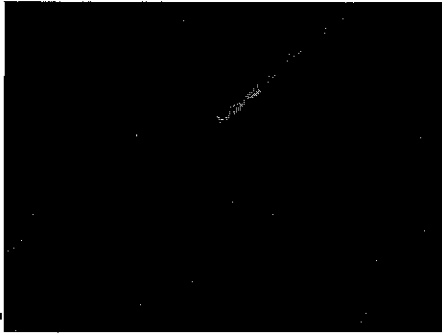
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Explosion and fire

At 6:11:12 pm PDT on September 9, 2010, a huge explosion occurred in the Crestmoor residential neighborhood of San Bruno, near Skyline Boulevard and San Bruno Avenue.^[8] This caused a fire, which quickly engulfed nearby houses. Emergency responders of San Bruno and nearby cities soon arrived at the scene and evacuated surrounding neighborhoods. Strong winds fanned the flames, hampering extinguishment efforts.^[11] The blaze was fed by a ruptured gas pipe, and large clouds of smoke soared into the sky. It took 60 to 90 minutes to shut off the gas after the explosion, according to San Bruno Fire Chief Dennis Haag.^[12] The explosion and the resulting fire leveled 35 houses and damaged many more. Three of the damaged houses, deemed uninhabitable, were torn down in December, bringing the total to 38. About 200 firefighters battled the eight alarm fire that resulted from the explosions.^{[13][14]} The explosion excavated an asymmetric crater 167 feet (51 m) long, 26 feet (7.9 m) wide^[15] and 40 feet (12 m) deep along the sidewalk of Glenview Drive in front of 1701 Earl Avenue (a corner house), but many of the destroyed homes were eastward in the 1600 block of Claremont Drive.^[12]

Sorry, your browser either has JavaScript disabled or does not have any supported player.
You can download the clip or download a player to play the clip in your browser.

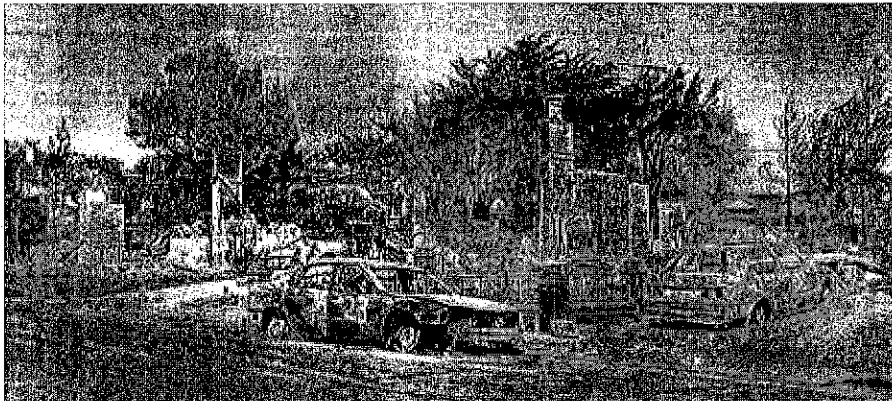


The neighborhood continued to burn into the night even after the exploding gas main had been shut off. The fire continued to burn for several hours after the initial explosion. The explosion compromised a water main and required firefighters to truck in water from outside sources. Firefighters were assisted by residents who dragged fire hoses nearly 4,000 feet (1,200 m) to working hydrants.^[16] Ordinary citizens drove injured people and burn victims to the hospital. Mutual aid responded from all over the Bay Area, including the California Department of Forestry and Fire Protection who sent 25 fire engines, 4 airtankers, 2 air attack planes, and 1 helicopter.^[17] The fire was only fifty percent contained by 10 pm PDT and continued to burn until about 11:40 am PDT the next day.^{[18][19]}

As of September 29, 2010, the death toll was eight people.^[2] Among the eight deaths was 20 year old Jessica Morales, who was with her boyfriend, Joseph Ruigomez, at the epicenter of the fire (his home) on the corner of Earl Ave. Despite his proximity to the epicenter of the fire, Mr. Ruigomez survived but spent nearly five months recovering in the St. Francis Hospital Burn Center. Two other people at the Claremont address close to the explosion were among those killed: Jacqueline Greig, 44, and her daughter Janessa Greig, 13. Greig worked for the California Public Utilities Commission, in a small unit that advocates for consumer rights pertaining to natural gas regulations. She had spent part of the summer evaluating PG&E's expansion plans and investment proposals to replace out-of-date pipelines.^{[20][21]} Also killed in the blast were Lavonne Bullis, 82, Greg Bullis, 50, and Will Bullis, 17.^[22]



View of the fire on Sep. 9, 2010 at 11:31 pm PDT



Destruction after fire and explosion in San Bruno

Huckelbridge, Kate@Coastal

From: Inga Dora Bjornsdottiri <bjornsdottiri@gmail.com>
Sent: Thursday, November 07, 2013 9:59 PM
To: Huckelbridge, Kate@Coastal
Subject: Social drilling in Goleta

I would like to raise my voice and express my opposition to SoCal Gas Company 's demands to drill for gas and expand its storage space on its property in Goleta. There are several reasons why: this site is close to the major recreational beach in Goleta, close the densely populated neighborhoods and UCSB campus. It is a risky polluting operation and will be of no benefit to the public, but detrimental to the environment.

Sincerely yours,

Inga Dora Bjornsdottir

925W. Campus Lane,
Goleta, CA. 93117

Sent from my iPad

Madlyn Monchamp
945 Ward Drive, Space 6
Santa Barbara, CA 93111

November 7, 2013

Kate Huckelbridge
Energy, Ocean Resources and Federal Consistency Division
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

FAX 415-904-5400 kate.huckelbridge@coastal.ca.gov

RE: Santa Barbara County LCP Amendment No. LCP-4-STB-13-0215-2
(Public Utilities Natural Gas Storage)

Ms. Kate Huckelbridge,

I am opposed to Santa Barbara County's request to amend the Implementation Plan/Coastal Zoning Ordinance portion of its certified Local Coastal Program to allow drilling for natural gas at the Southern California Gas LaGoleta Storage Facility.

The SoCal Gas LaGoleta Storage Facility occupies land off Patterson Avenue on More Ranch Road. The parcel of land in question, along with adjacent parcels of their land, is directly bordered by the Pacific Ocean, and the Goleta Slough and Atascadero Creek. Their underground high pressure gas lines run from the facility on More Ranch Road and under Route 217 to feed a storage area along Sand Spit Road. I believe 5 different creeks run into the Goleta Slough.

From their EIR, 40 special status species reside in the area permanently or for at least a portion of their life cycle. This parcel is home to racoons, coyotes, fox, opossum, owls, hawks, birds, and other wildlife. It is an established home to Monarch butterflies during their migration.

Their EIR states "botanical and wildlife surveys were conducted in a 29-acre area including and surrounding the construction footprint area." The area of the LaGoleta facility is 147 acres, which makes their 29-acre survey lack credibility. (4.4-1)

If you look at the Biological Resources chart everything is "less than significant with mitigation" or "less than significant" or "no impact". Really? Certainly not in the view of the wildlife.

I questioned the SB Planning Department regarding the amount of trees that SoCal has cut down and was sent a report done by Rincon Consultants which I will attach to this letter. Rincon, on August 29, 2013 reported "within the identified area" cleared vegetation included shrubs, and perennial and annual herbaceous materials. Under Tree Removal, 2 mature eucalyptus trees (approximately 50-100 feet in height) 1 Avocado tree, (approximately 15-25 feet in height), and approximately 44 mature Myoporum trees (approximate heights between 10-30 feet), and the loss of some crowns of eucalyptus trees. Rincon also noted approximately 25 large cut tree stumps which they determined were felled many years prior to issuance of the CDPs. All this may or may not be legal but the loss of this vegetation has potential impact to wildlife.

The EIR also states that nesting activity was not observed at the project site. That would depend on when SoCal chose to investigate nesting activity. For 20 years I have observed nesting hawks on the SoCal property with their fledglings feeding for months on end. This year for the first time I did not observe this. The Black Shouldered Kite is a resident of the SoCal property and has been for years. Maybe I am just unlucky but this year I did not observe the "Holy Ghost" hovering over his SoCal domain. The hooting of the owl is not heard as often as in the past. Two or three weeks ago along the bike path a large owl was observed sitting in the same spot in a tree all day for 2 days, the third day he was found at the bottom of the tree, dead. I wonder what caused his death.

Dust, night lighting, noise, fencing and human presence will have a devastating affect on migrating wildlife using the area for roosting, foraging, and resting during their migration as this area has been programmed into their DNA as a safe refuge. For centuries this parcel has been nearly free of daily human activity. If drilling is allow, that safe refuge will change dramatically with 50-75 temporary work contractors during construction of new buildings and the drilling operation, and the vehicle traffic from these new employees.

This is a 5-year project to drill 4 wells, and if a zoning change is allowed, the EIR is so written that SoCal could continue to get permits to drill additional new wells. It is all about if they find a plentiful supply of natural gas and if it is profitable to continue to drill. It may be a disaster for the wildlife and the surrounding communities but profitable for a multi-national company. Will you protect the profits of the gas industry or protect wildlife and our citizens.

"The proposed project would require 45 truck trips to transport natural gas liquids to a processing facility in Oxnard. Currently, SoCal Gas transports approximately 20 trucks per year of natural gas liquids from the La Goleta facility to Oxnard." That is 45 truck trips of toxic material off SoCal's property, down Patterson Avenue and onto Highway 101 through the city of Santa Barbara, Summerland, Ventura, and Oxnard. The EIR states, "The probability that an accident which produces a spill would cause a fatality or injury due to the released material is a function of the distance to populations from the accident site, as well as the density of other vehicles on the roadway." Now consider the route these trucks would take and that Route 101 is our only way south out of Santa Barbara.

Please review the charts mentioned below and decide the result a disaster at the SoCal facility would have on the homes in the surrounding area. Rancho Goleta is a 200 home mobile home park, there are another 100 residents on the opposite side of SoCal on Anderson Lane, and other streets off Patterson Avenue.

Figure 4.9-2. Proposed Project Worst-Case Hazard Zones and Accident Occurrence Rates
Figure 6.3-1 Consolidated Alternative Worst-Case Hazard Zones and Accident Occurrence Rates

Please review the comments and responses in 11.2 as well. And there are so many others from the surrounding areas who are against this project but feel that the people responsible for the welfare of the public and the environment always do what big business wants to the detriment of the public. I am counting on the Coastal Commission to do the right thing and protect the environment.

There was no testimony from Santa Barbara Planning or SoCal that stated a need for an increase in gas storage. The EIR states that they have 21.5 Billion Cubic Feet of stored gas. The EIR states that SoCal expects to get up to 3 to 5 Billion cubic feet of natural gas from this proposed drilling project. The Coastal Commission is being asked to change the established zoning code for such a relatively small amount of natural gas? Somewhere I read that the U.S. has 2 trillion cubic feet of stored gas. It has also been widely reported that the United States extracts more natural gas than it uses and that the natural gas industry has petitioned the state of Louisiana to build facilities to export natural gas from the United States. Do we destroy our environment to make additional profit for the gas industry.

NOISE 4.12

I live at Rancho Goleta Mobile Home Park across Atascadero Creek from SoCal's LaGoleta facility. I am concerned the effects noise from 24/7 drilling will have on my life, the lives of surrounding home owners, and on the wildlife. From the edge of the Rancho Goleta property I could throw a baseball and touch the SoCal property. In fact, SoCal may well own the property adjacent to Rancho Goleta and the land the bike path is on and as there is an abandon SoCal gas distribution line on our side of the Atascadero Creek. That is how close we are to this site. And there are homes on the other side of the SoCal facility that are nearly as close to their property. Because of all the trees that have been removed, we can see building(s) on the SoCal property.

The EIR says "Based on the Veneklasen noise study, current noise levels at the Rancho Goleta Mobile Home Park (Site 2) and the Caird Barn (Site 3), with the existing facility operations, are well below the County's 65 dB(A)" That may be, but the addition of construction noise and noise from the 24/7 drilling will increase the noise level, and dramatically during nighttime hours.

The Santa Barbara Airport is located less than ½ mile from SoCal's property and from Rancho Goleta and does generate airplane noise but very rarely during the night. The noise from a drilling operation going continuously 24/7 for 89 days in Phase I, and for 24/7 in Phase 11 for 68 days is insane.

The EIR also says "Because of the difference in technical requirements and resulting continuous schedule, this noise section evaluates noise from well drilling separately from the other construction activities. This sub-section evaluates all construction activity noise *except* drilling, the subsequent sub-section evaluates drilling noise. It is not necessary to evaluate the combined impact of the construction and drilling noise because these operations would not occur concurrently or would be separated by approximately 2,000 feet. Thus, any combined construction noise would be negligible." I strongly disagree. This additional drilling noise level added to any other noise will be very noticeable and impact all life.

Then there is the risk of chronic health problems from air pollution and stress, ex-ordinary water use by SoCal for drilling in our area dealing with little rain and a lowering water table, the likely increase in our water rates, the impact of nighttime drilling and nighttime lighting on people and wildlife. Will we set aside all these concerns in an effort to increase the wealth of the gas industry?

I am deeply concerned about this project and I urge the California Coastal Commission to carefully review this EIR. I feel the Santa Barbara Planning Department and Southern

Page 4 of 4

California Gas Company has under estimated the dangers and consequences of this project. In the 1930s and 1940s there was no Coastal Commission to protect our environment. I understand that after the oil spill disaster in the 60s the California Coastal Commission was formed and charged with protecting California's natural resources. The property that SoCal now owns was deemed a gas storage facility and not zoned for drilling. I pray that the members of the California Coastal Commission will vote NO on amending any change to the zoning.

Sincerely,

Madlyn Monchamp

attachment 1

letter from Rincon Consultants

SANTA BARBARA COUNTY LCP Amendment No. LCP-4-STB-13-0215-2

Maureen Shields
945 Ward Drive #35
Santa Barbara, CA 93111

California Coastal Commission
C/O Kate Huckelbridge
Energy, Ocean Resources and Federal Consistency Division

I'm a resident of Rancho Goleta Mobile Home Park directly across the creek from So cal gas facility "La Goleta" where the above amendment would allow new Drilling for gas exploration.

I'm against this project !

I've spoken out at the Planning Commission as well as the Board of Supervisors to no avail. You are my last hope.

Right now the project is planned for five years. However, it may go on forever once the green light is on.

I'm concerned for my health and safety but more importantly the effect this project will have on the environment and the future generations to come.

It's simple, leave the gas where it is now. In the future, there may be a gas shortage, then the Project can be re-visited.

The plans call for the bike path to be closed intermittently. The bike path is used daily by many for work and school.

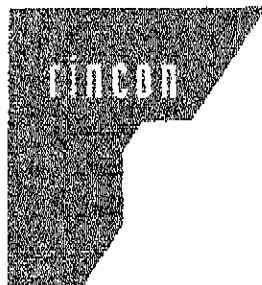
The Drilling rig (lighted 24/7) will sit atop the bluffs overlooking the Ocean and will be seen from all sides, the beach, the freeway, the airport side, not to mention numerous houses to be effected. What about low flying planes during foggy days. This all adds up to ruining my quality of life and the peaceful existence I now enjoy in retirement.

I remember in the 1960's When the Coastal Commission was started. We had a small house, our first being recently married, in Manhattan Beach, CA. We wanted to add on as our family was growing and we could not get the permits we wanted because of Coastal Commission rules. We gave up and moved.

What has happened in the last fifty years to the Coastal Commission that they would now allow this type of project right next to the Ocean and A Wildlife habitat. An area that is now peaceful, clean and a jewel of Santa Barbara County.

Please DO NOT let this Amendment Pass. Let us keep the area as pristine as possible.

Sincerely,
Maureen Shields



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Ventura, California 93003

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Fax 644 4240

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www.rinconconsultants.com

August 29, 2013
Project Number: 5755-00464

James Chuang
Environmental Specialist/Land Planner
SoCalGas Environmental Services
555 W. 5th Street GT16G3
Los Angeles, CA 90013
Via email: wchuang@sempraulilities.com

Subject: Vegetation Compliance Assessment for the Southern California Gas Company La Goleta Storage Facility, Goleta, Santa Barbara County, California

Dear Mr. Chuang:

This letter provides the results of a vegetation compliance assessment conducted for the Southern California Gas Company (SoCalGas) La Goleta Storage Facility, in Goleta, Santa Barbara County, California. The purpose of assessment was to determine if vegetation management activities conducted within the California Coastal Commission's (CCC) retained jurisdictional lands located east and south of Atascadero Creek were conducted compliant with Coastal Development Permit (CDP) #E-11-031, which was issued on March 9, 2012. The assessment area also included the main access roadway (i.e. Jungle Road) on lands under the jurisdiction of the County of Santa Barbara (CDP #08CDH-00000-00038, issued October 14, 2011) that were specifically located between the southeastern boundary of the CCC retained jurisdictional lands and the facility's main office building.

Background

Vegetation management activities authorized under the CCC CDP included those associated with two main sets of activities, including 1) pipeline maintenance activities associated with required hydraulic testing on Line 5026 and Line 159, which are used to transport natural gas at the facility (completed); and, 2) a five-year Vegetation and Pipeline Management Plan, which allows ongoing required maintenance and repair of pipelines and other equipment within the facility for a period of five years. Implementation of both sets of activities included clearing vegetation adjacent to SoCalGas facilities, including pipelines, wells, valves, other appurtenances, field electrical system equipment, fences, gates, staging areas, and roadways, to ensure pipeline integrity and to comply with access and safety requirements. The County CDP authorizes vegetation management activities under the five-year Vegetation and Pipeline Management Plan. Vegetation management activities authorized under the CCC CDP also include those associated with restoration efforts that have been conducted as onsite compensatory mitigation pursuant to the CCC approved Native Vegetation Restoration Plan (Sage Institute, Inc., 2012).

Methodology

The site assessment was conducted between 0715 and 0915 hours on August 26, 2013 by Rincon Consultants Senior Biologist Jennifer Turner. During the site assessment, Ms. Turner walked and drove the survey area such that complete visual coverage of the facility within the identified areas was obtained. The location, type, and extent of vegetation trimming and/or removal were documented within the survey area. Impacts to trees located along the main access roadway and along the south side of Atascadero Creek were specifically assessed. In areas where vegetation removal activities had



occurred in close proximity to Atascadero Creek, the extent of existing visual screening afforded to neighboring properties from remaining vegetation was also assessed.

Findings

Vegetation within CCC retained jurisdictional lands was observed to have been cleared to ground level within 10 feet of the SoCalGas facilities identified within the CDP. Vegetation was also observed to have been removed within an approximately 1.3 acre area located within CCC retained jurisdiction lands immediately west of SoCalGas site Chase Bryce 1 and between Jungle Road and Atascadero Creek. This site has been identified for restoration efforts specifically associated with the onsite compensatory mitigation under the restoration plan. Vegetation management activities in County lands within the survey area were observed to have been contained to areas located within 10 feet of the edge of Jungle Road and a secondary spur road that leads to the northwest and is located near the eastern edge of the survey area. Vegetation trimmed beyond 10 feet was minimal and specifically limited to large tree branches that were cut in accordance with standard tree trimming practices so that the health and stability of the tree was retained and/or improved, and to maintain safety standards.

Cleared vegetation included trees (described in more detail below), shrubs, and perennial and annual herbaceous materials. Both native and non-native vegetation within 10 feet of facilities was removed as part of the vegetation management activities, while only non-native vegetation had been trimmed or removed within the restoration area. Cut material was observed to have been chipped and spread along the pipeline corridors and access roadways, or had been hauled away for disposal. No native vegetation greater than 6 inches in diameter at breast height was observed to have been removed and/or trimmed. No below ground clearing of root zones was observed (i.e. only above-ground vegetation was disturbed).

(3¹) Tree Removals. A total of two mature eucalyptus (approximately 50 – 100 feet in height) and one avocado tree (approximately 15 – 25 feet in height) were removed during approved vegetation management activities since issuance of the CDPs. One eucalyptus was located within CCC lands near the junction of Jungle and Bluff Roads (east of SoCalGas site ED1), and was removed due to its declining health and stability and related safety concerns. The second eucalyptus was located on County lands on the south side of Jungle Road near the junction of Jungle Road and the secondary spur road, and was removed due to its conflict with a SoCalGas facility (i.e. growing into and damaging the perimeter fence). The avocado tree, which was located on the east side of the spur road near its northern terminus, was removed due to its conflict with access road improvements. All three of these non-native trees were cut to near ground level, with the majority of the fallen material removed from the area.

Approximately 44 mature Myoporum trees (non-native) with average heights between 10 – 30 feet have also been removed within the approximately 1.3 acre restoration site since issuance of the CCC CDP. Removal of the trees occurred during site preparation activities associated with implementation of the restoration plan. All trees were cut to near ground level, with the fallen material removed from the area.

During the assessment, approximately 25 large tree stumps were also documented along the north and south sides of Jungle Road near the boundary of CCC retained and County jurisdictional lands. The felled remains of these trees (eucalyptus) have been primarily left in place along the roadway edges and adjacent areas. Based on the deteriorated condition of the stumps, it was determined that all 25 trees were downed many years prior to issuance of the subject CCC and County CDPs.

Timing. Beginning on February 29, 2012, Rincon Consultants was retained by SoCalGas to provide survey and monitoring services for the Line 5026 and Line 159 hydraulic testing project and the five-year Vegetation and Pipeline Management Plan, which includes the restoration efforts associated with implementation of the Native Vegetation Restoration Plan. Through these efforts, Rincon has observed and documented that vegetation management efforts within the survey area were not initiated until

March 26, 2012. Since that time, Rincon has conducted pre-construction and compliance monitoring for the majority of the vegetation clearance activities within the survey area. Areas for which Rincon conducted pre-construction clearance surveys, but were not specifically present for during vegetation removal efforts, have been observed and assessed for compliance with the CDPs during subsequent site visits.

Summary and Conclusions

Based on our previous survey and monitoring efforts, and as confirmed by our recent site visit, it is our professional opinion that vegetation management and restoration activities that impacted vegetation within the survey area have been conducted in compliance with the CCC and County CDPs. In addition, based on our recent site visit, it does not appear that any vegetation has been trimmed or removed from areas not authorized under these permits.

Tree removals during vegetation management activities have been limited to the three individual trees noted above. Due to their location and the amount of vegetation (including other mature trees) located in proximity to them and between adjacent lands, the individual loss of these trees is unlikely to be specifically notable from lands located north and/or west of Atascadero Creek. Tree removals during restoration activities include approximately 44 individuals within the approved restoration site. Due to the presence of a significant amount of vegetation within this area, it is likely that only the loss of the crowns of some of these trees is notable from adjacent lands located north of Atascadero Creek.

Approximately 25 large tree stumps are located along the north and south sides of Jungle Road near the boundary of CCC retained and County jurisdictional lands. Due to the removal of herbaceous vegetation within 10 feet of the roadway during vegetation management activities, and the general lack of understory vegetation and soil mounds between the roadway and Atascadero Creek and a more limited number of mature trees naturally occurring within this area, a number of these old, cut stumps are likely visible from lands located directly adjacent to and north of the facility. Based on the conditions of these stumps and the downed materials, it is our professional opinion that these trees were all felled many years prior to issuance of the CDPs.

Please contact me at 805/644-4455 ext. 43 if you have any questions or require additional information regarding the assessment or this report.

Sincerely,
RINCON CONSULTANTS, INC.

Jennifer M. Turner
Jennifer M. Turner, MS
Senior Biologist / Project Manager

cc: Dennis Lowrey, SoCalGas
Edward Wiegman, SoCalGas

ENVIRONMENTAL LAW

November 8, 2013

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

By email to kate.huckelbridge@coastal.ca.gov

**RE: Santa Barbara County Local Coastal Program Amendment No. LCP-4-STB-13-0215-2;
Exploration and Production of Natural Gas at La Goleta Storage Field**

Dear Chair Shallenberger and Honorable Members of the Commission,

This letter is submitted on behalf of Goleta Against Drilling ("GAD-NO"), a group of concerned citizens in Goleta who are working to protect the environment from the adverse effects of the Southern California Gas Company La Goleta Storage Field Enhancement Project.

The proposed amendment to Santa Barbara County's Local Coastal Program ("LCP") would explicitly allow exploration and production of natural gas at the La Goleta site, and development including drilling and operation of natural gas wells for production and the construction and operation of supporting equipment such as pipelines and processing facilities. (Staff Report, p. 7.)

For the reasons discussed below, the proposed Implementation Plan ("IP") amendment is *inconsistent* with the County's LCP and applicable policies of the Coastal Act with respect to the protection of coastal resources. Accordingly we respectfully request that the Commission *deny* the proposed amendment.

1. Lack of Information Necessary to Determine LCP Consistency

The proposed amendment effectively applies only to Southern California Gas Company's La Goleta site, and would significantly expand the allowed industrial uses and development on the site. (Staff Report, p. 5.) The La Goleta site is a largely undeveloped 147-acre bluff-top open-space, located on a coastal marine terrace, immediately down-coast from Goleta County Beach Park which caters to 1.5 million visitors each year. (Final Environmental Impact Report 10EIR-00000-00001 ("FEIR"), pp. 3-7, 4.14-1.) The site includes prime soils, Farmland of State Importance and Farmland of Unique Importance (FEIR pp. 4.2-2 – 4.2-3), and two-thirds of the site is currently farmed (FEIR p. 4.4-4). The Project site is bordered on the north by Atascadero Creek, the Atascadero Creek bike path (a Class I bike path also known as the Obern trail), and the Rancho Goleta Mobile Home Park. (FEIR p. 4.12-7.) Mapped ESHA, monarch butterfly sites, and wetlands all exist on the site. (Staff Report, p. 7.) The site is immediately above the Goleta Slough and near the confluence of Atascadero and Maria Ygnacio creeks. (See FEIR p. 3-7.)

Whether or not the site-specific proposed IP amendment is consistent with the County's LCP requires an analysis of whether the site is suited for the use and expanded level of development allowed given

its location and constraints. Unfortunately, critical information concerning the resource constraints of the site is missing from the Staff Report, as is an analysis of whether or not mitigation measures are capable of avoiding sensitive coastal resources and achieving consistency with the County's LCP.

In some cases, such as consistency with agricultural resource policy, a consistency analysis is simply absent. (See section 3, below.) In other cases, the Staff Report bases its consistency determination largely on the unsubstantiated assumption that application of existing LCP policies to the Coastal Development Permit ("CDP") will adequately protect coastal resources. For example, in the context of consistency with the biological resource policies of the County's LCP, the Staff Report acknowledges:

The[] activities [allowed by the proposed amendment] are likely to include surface disturbance, excavation, night-lighting, glare, noise, and dust that could result in direct or indirect impacts to biological resources (i.e., wildlife, vegetation, wetlands and ESHA). In addition, storm-water runoff or project-related activities could degrade the water quality of ground and/or surface waters in the project vicinity.

(Staff Report, p. 7.) The Staff Report however merely assumes the "policies included in the County's LCP ensure that appropriate siting guidelines, standard mitigation measures . . . would be required to protect biological resources at the La Goleta site", and that "[g]iven the large amount of acreage available at the La Goleta storage site, it is likely that it would be possible to site exploration and production wells such that impacts to ESHA, wetlands and other biological resources from construction and operation of gas exploration and/or production wells area avoided." (Staff Report pp. 7-8.) The Staff Report includes no facts or analysis to support a conclusion that in fact mitigation measures are capable of protecting these resources sufficiently such that the proposed amendment may be found consistent with the LCP's biological resource protection policies.

The Staff Report employs a similar approach with respect to hazards. (See section 4, below.)

Unless and until Staff affirmatively determines that mitigation measures are capable of avoiding impacts to sensitive coastal resources including agricultural and biological resources, the Commission lacks substantial evidence for finding the proposed amendment consistent with the LCP.

2. The Project Is Inconsistent with Coastal Act Section 30251 and LCP Policy 4-4

Coastal Act section 30251, incorporated into the County's LCP under LCP Policy 1-1, provides:

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.

LCP Policy 4-4 provides:

In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.

The drilling rig is highly visible from Goleta Beach Pier, both during the day and at night (*See Exhibit 1, FEIR Figures 4.1-12 and 4.1-14, Photo simulations of drilling rig from Goleta Beach Pier looking northeast.*) Atascadero Creek runs along the northern and western property boundaries (*id.*) and the Atascadero Creek Bikeway (aka the Obern Trail) is a Class I bikeway running along the entire northern boundary of the Project site. The FEIR unfortunately includes no visual simulation of the Project from the Atascadero Creek bike path. (Exhibit 1, FEIR Figure 4.1-2, Photo Simulation Locations.) The drilling rig is also highly visible from surrounding neighborhoods. (*See Exhibit 1, FEIR Figure 4.1-18, photo simulation of drilling rig from Patterson Road looking southwest.*) The FEIR included no photo simulation from La Goleta Mobile Home Park, the nearest residential community to the Project site. (*See Exhibit 1, FEIR Figure 4.1-2.*)

Recent vegetation clearing onsite, including the removal of mature trees (*see Exhibit 2, Rincon Vegetation Compliance Assessment*) has exacerbated visual impacts of the Project from the North (Atascadero Creek bike path, La Goleta Mobile Home Park) by reducing vegetative screening along the site's northern and northwestern boundaries.

Despite generally understating impacts due to the lack of adequate photo simulations and accounting for recent vegetation clearance, the FEIR nonetheless concludes:

“Because of its visibility from public viewing points, including Goleta Beach and the ocean, and its incompatibility with the scenic character of the area, the drilling rig would create a significantly adverse aesthetic impact. Because of the size of the drilling rig, the requirement for night lighting, and the specific duration and location of the rig, as necessitated by the well drilling project, there is no means of mitigating this impact to below levels of significance, Class I (Impact Aest-1).”

(FEIR p. 4.1-2 (emphasis added)). Contrary to this conclusion in the FEIR, the Staff Report hinges its conclusion of consistency with visual resource policies on the *temporary* nature of the drilling rig. (Staff Report, p. 11 (“Although there is no mitigation measure available to address this impact, the impact would be temporary.”) However, while the drilling rig would be present on the site for approximately 89 days during the first year of the project, and approximately 68 days during the second year, these are mere approximations - there is no actual limitation in the proposed mitigation

measures that limits this duration. Moreover, the “presence of a workover rig at the new well locations potentially could result in adverse visual impacts.” (FEIR p. 4.1-2.)

Given that the drilling rig will be present on the site for a large portion of years 1 and 2, and potentially more than the 89 and 68 days estimated, and that the well workover rig will also contribute to visual impacts, the Commission must not rely on these impacts being “temporary” as a basis for concluding that the Project complies with Coastal Act section 30251 and LCP Policy 4-4.

3. The Project Is Inconsistent with LCP Agricultural Resource Protection Policy

Coastal Act section 30241, incorporated into the County’s LCP under LCP Policy 1-1, provides that the “maximum amount of prime agricultural land shall be maintained in agricultural production”, and Coastal Act section 30242 provides that “[a]ll other lands suitable for agricultural use shall not be converted to non-agricultural uses” unless specific conditions are met.

The Project site is adjacent to and functionally a part of the “Patterson Agricultural Block”, one of only two blocks of urban farmland in the Eastern Goleta Valley. Class II prime soils are the most common soil class on site (FEIR p. 4.2-1) and the site includes both Farmland of Statewide Importance, and Farmland of Unique Importance (FEIR p. 4.2-3.) Two-thirds of the site is currently farmed. (FEIR p. 4.4-4.) The Project will permanently convert 2.5 acres of agricultural land to non-agricultural use, and an additional 4.3 acres will be temporarily affected during construction. (FEIR p. 4.2-4.) The Project will remove 2.4 acres of mature plantings. (*Id.*)

These these uncontroverted facts demonstrate the Project’s inconsistency with LCP agricultural resource protection policy, however the Staff Report does not even mention agricultural resources or applicable agricultural resource policies, and includes no analysis of whether the Project can be found in compliance with Coastal Act sections 30241 and 30242. This is a serious failure, demonstrating that the Commission lacks sufficient information to find this Project consistent with the LCP.

4. The Project Is Inconsistent with LCP Hazards Policy

Section 30253 of the Coastal Act, incorporated into the County’s LCP under LCP Policy 1-1, requires that new development “[m]inimize risks to life and property in areas of high geologic, flood, and fire hazard”, “[a]ssure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability . . .” and “[w]here appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.” LCP Policies 3-13, 3-14, and 3-17 protect against alteration of the existing landscape. (*See* Staff Report, pp. 8-9.)

Facts included in the FEIR demonstrate the project’s incompatibility with these policies. For example, the FEIR discloses that “[t]he project site is located within a seismically active region and is in direct proximity to the potentially active More Ranch Fault. Strong ground shaking from activity along any

of a number of local faults has a high probability to occur at the project site during the operational life of the project.” (FEIR p. 4.8-2.) The FEIR also explains that “[d]uring construction, earthwork activities would have the potential to create unstable earth conditions, such as unstable trench walls and differential settlement of trench backfill material. Although the slightly undulating terrain across the site is not susceptible to landsliding, the subject parcel is located along a coastal bluff, which maybe subject to slope failure” (FEIR p. 4.8-2).

Moreover, with respect to vibration, the FEIR states “[d]uring project construction activities, vibration from drilling rig equipment may cause a temporary increase in vibration levels. Drilling activities would be temporary, lasting approximately 92 days during Phase I and 68 days during Phase II, and would occur at least 600 feet from the nearest sensitive receptors.” (FEIR p. 4.8-4.) And while the FEIR notes that CZO section 35-88.4 provides that vibrations shall not be perceptible at or beyond the property line (FEIR p. 4.11-3), the FEIR also includes numerous public comment letters from residents who live near the Project site, describing vibration that they experience currently from existing operations (*see e.g.* FEIR pp. 11.2-13, 11.2-31, 11.2-51, 11.2-65.) Increased vibration levels, associated noise impacts, and impacts from other hazards will similarly affect users of the Atascadero Creek bike path, and may affect the 1.5 million annual users of Goleta Beach Park, in addition to wildlife. The popular public recreational facilities and creek and slough habitats that surround the project site are special communities and visitor destination points that demand protection (Coastal Act section 30253 (e).)

The Staff Report acknowledges that each phase of development “has the potential to adversely impact the geologic stability of a site, contribute to flood or fire hazard, or significantly alter the existing landscape.” (Staff Report, p. 9.) Similar to the approach to biological resources (see section 1, above) however, the Staff Report relies on the assumption that existing LCP policies would protect against these types of impacts (*see* Staff Report, pp. 9-10.) The Staff Report includes no analysis of whether mitigation measures are capable of achieving consistency with LCP hazards policy, and adequately protecting special communities and popular visitor destination points.

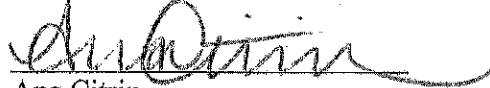
5. Conclusion

For reasons discussed above, the proposed amendment is inconsistent with the County’s LCP. Moreover, the small amount of natural gas and increment of additional storage is simply not worth the sustained impacts to coastal views from a popular public beach and bike path, loss of agricultural land and active agriculture, threats to ESH, and risks to the geologic integrity of the site. **Accordingly we respectfully request that you deny the proposed IP amendment.**

If the Commission believes the Project potentially has merit, we respectfully urge you to deny the amendment at this time to prevent it being deemed approved, but direct the County to resubmit its request, and request that Commission Staff thoroughly analyze whether given the site’s constraints, mitigation measures are adequate, or whether LCP conflicts are the unavoidable result of allowing the proposed use and development allowed by the amendment at the La Goleta site.

Sincerely,

LAW OFFICE OF MARC CHYTILO

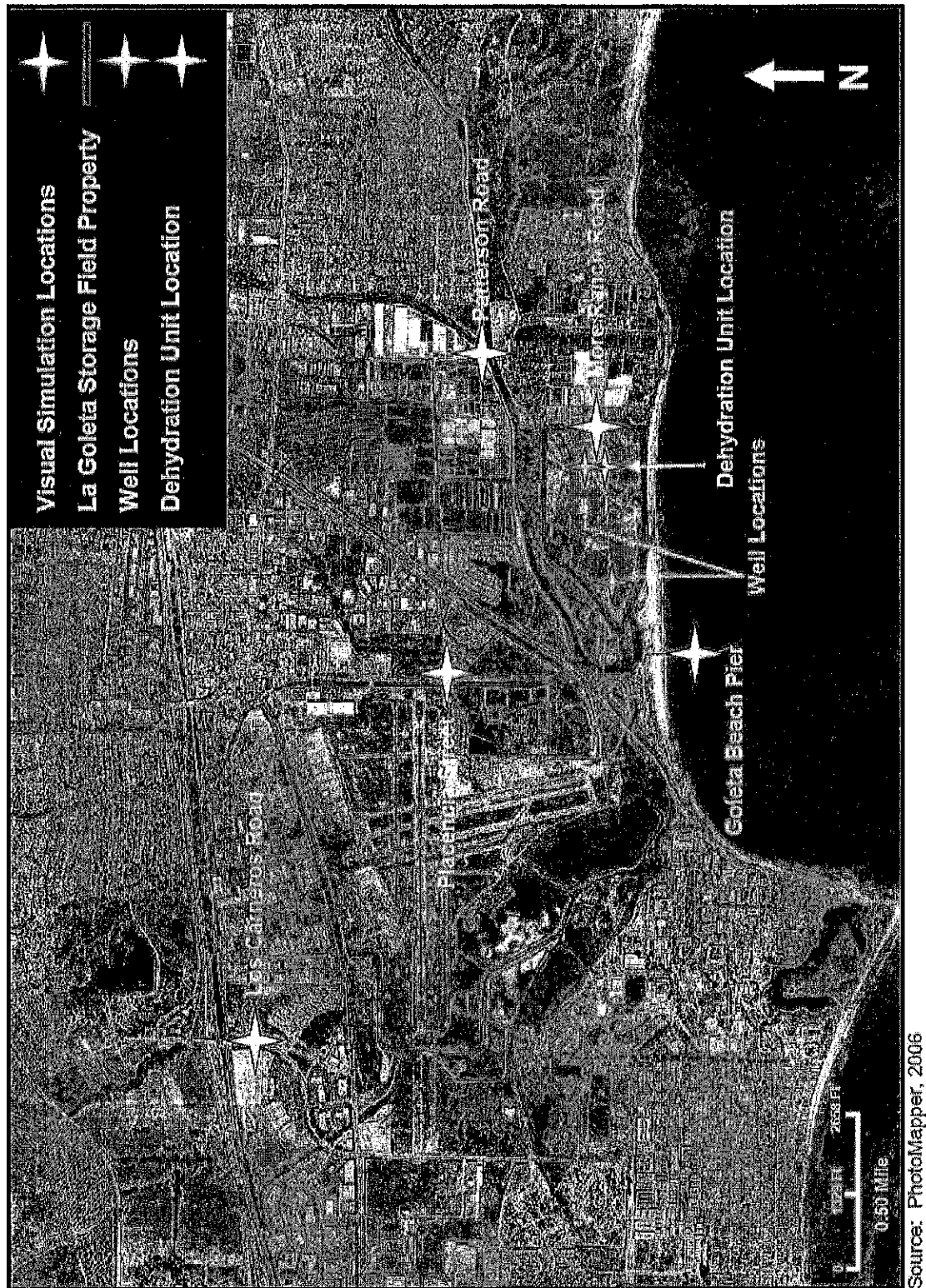
A handwritten signature in dark ink, appearing to read 'Ana Citrin', written over a horizontal line.

Ana Citrin
For GAD-NO

Exhibit 1: Selected pages from 10EIR-00000-00001

Exhibit 2: Rincon Vegetation Compliance Assessment (August 29, 2013)

Figure 4.1-2 Photo Simulation Locations



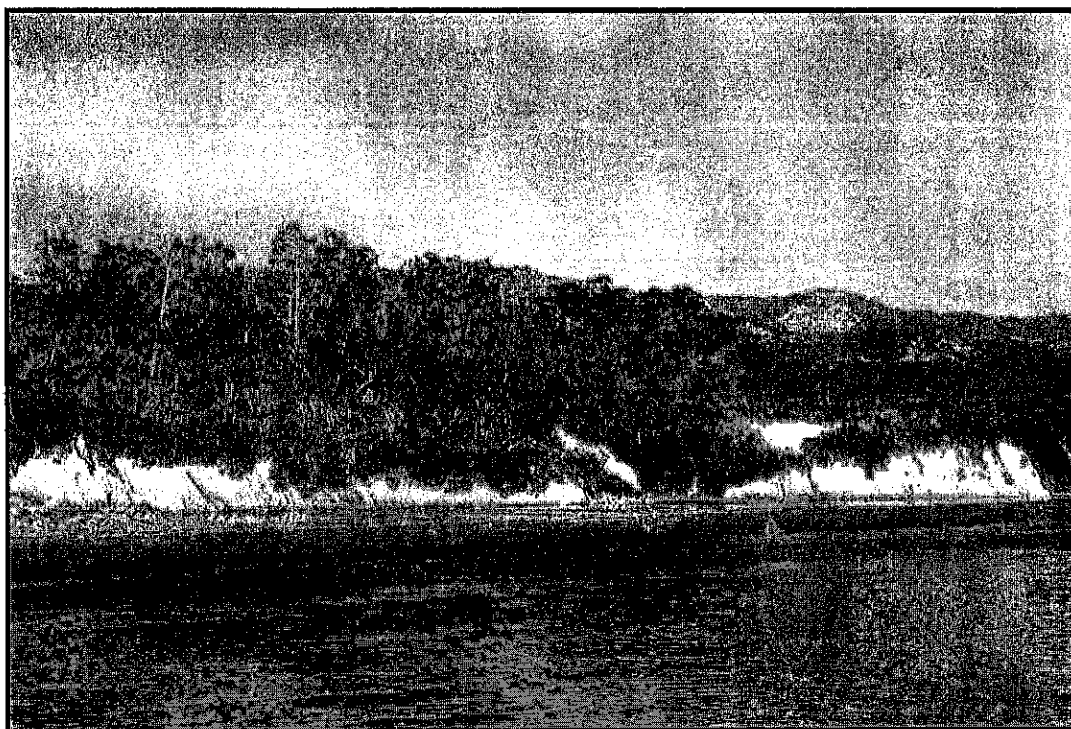


Figure 4.1-11 Baseline photo from Goleta Beach Pier looking northeast.

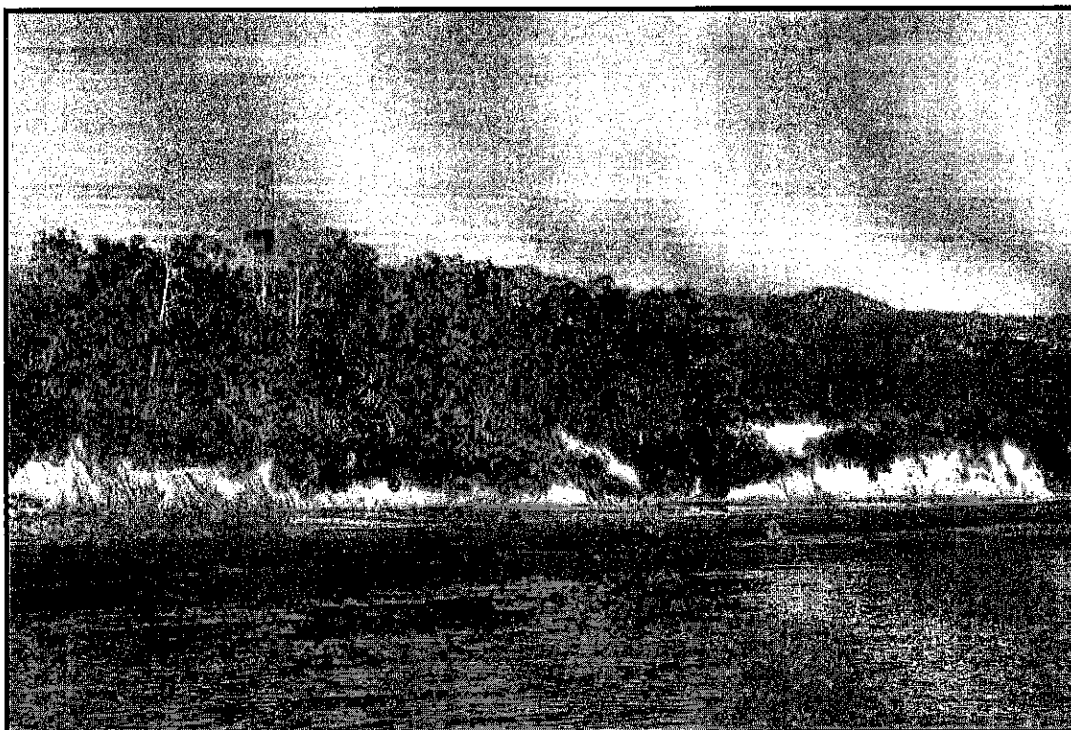


Figure 4.1-12 Photo simulation of Chase & Bryce 3/Todd 1 & 2 drilling rig from Goleta Beach Pier looking northeast.



Figure 4.1-13 Baseline photo from Goleta Beach Pier looking northeast at night.

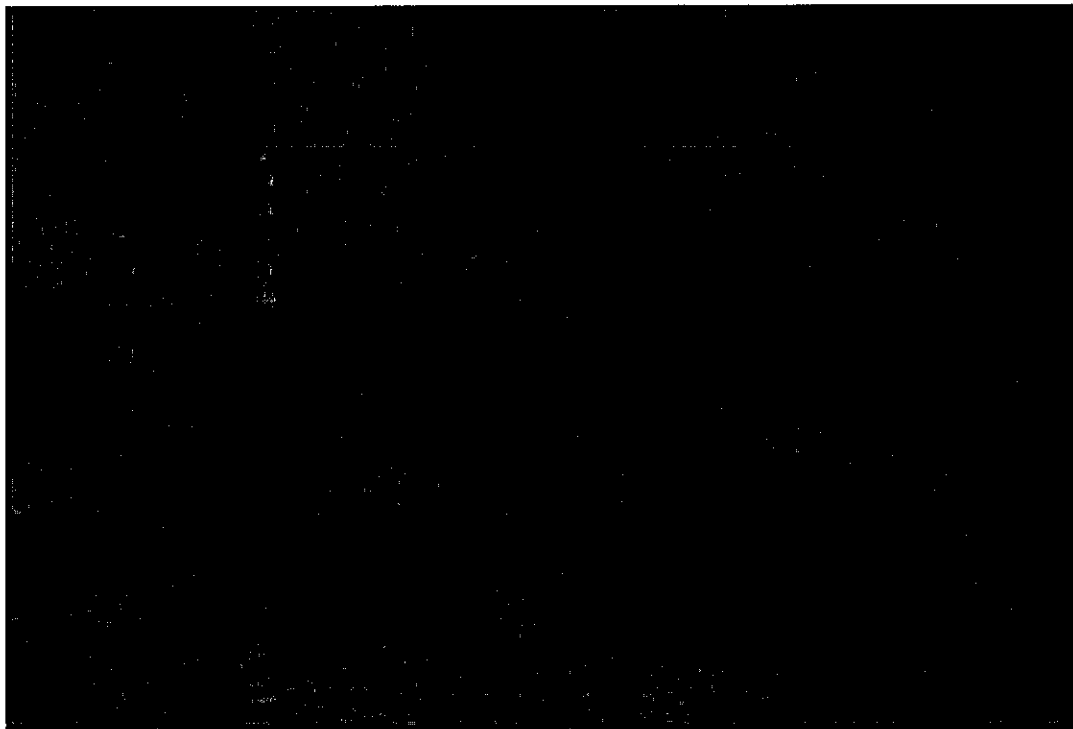


Figure 4.1-14 Photo simulation of Chase & Bryce 3/Todd 1 & 2 drilling rig from Goleta beach pier looking northeast at night.



Figure 4.1-15 Baseline photo of project area from property boundary at More Ranch Road (at break in windrow) looking west.

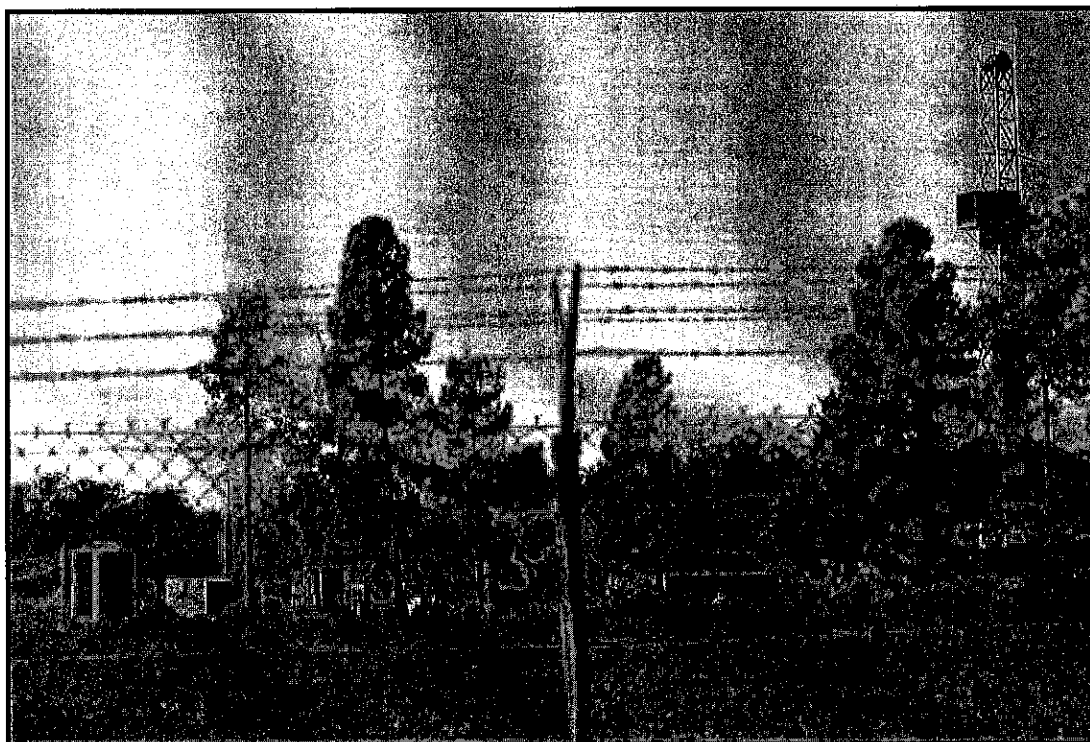


Figure 4.1-16 Photo simulation of More 6 drilling rig at More Ranch Road (with dehydration facility at left) looking west.

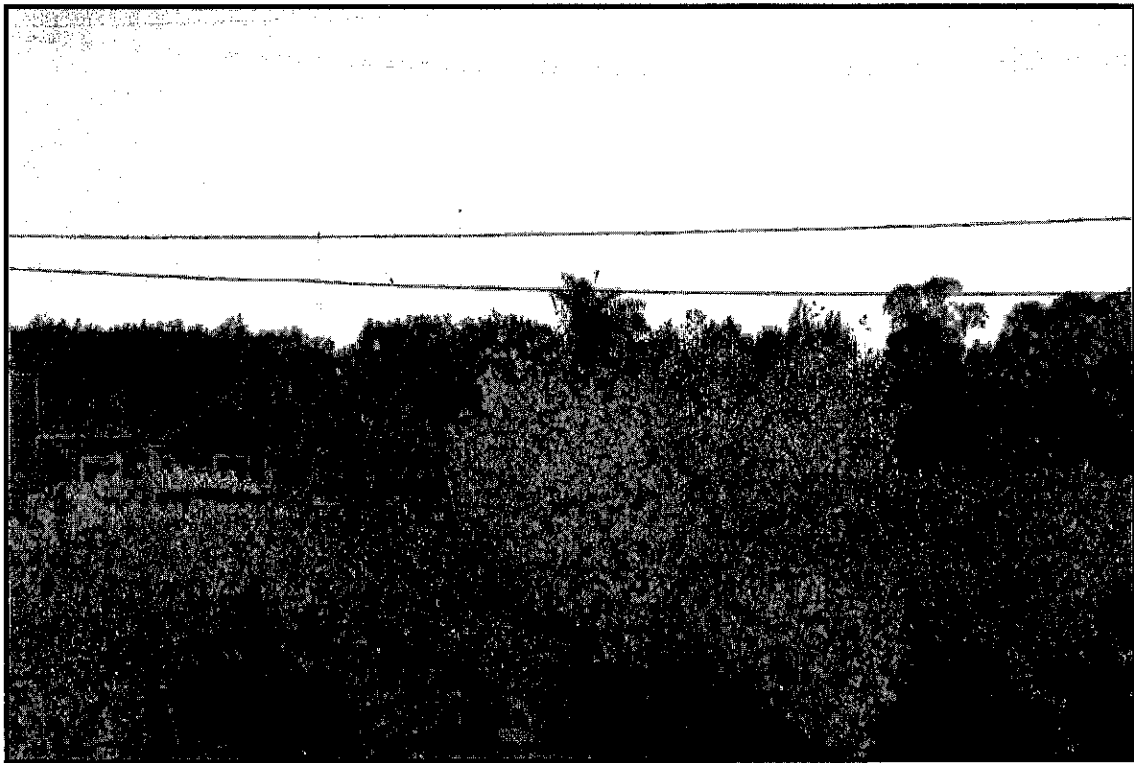


Figure 4.1-17 Baseline photo from Patterson Road looking southwest.

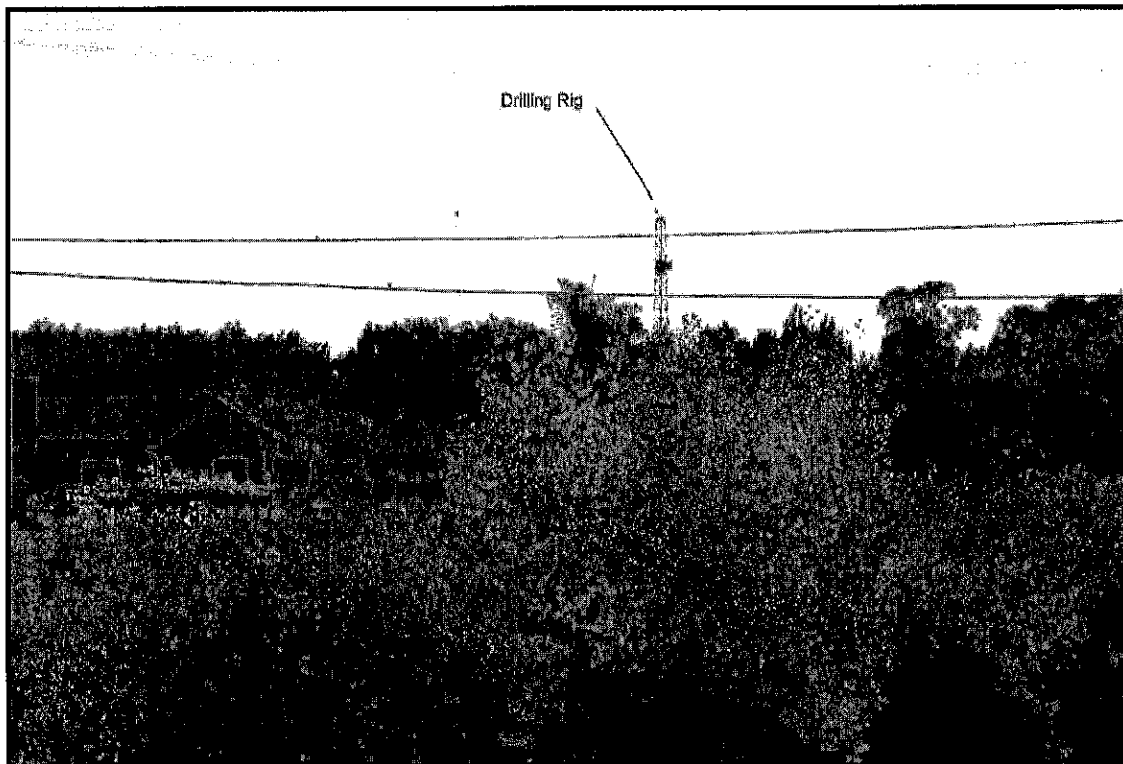


Figure 4.1-18 Photo simulation of More 6 drilling rig from Patterson Road looking southwest.



Rincon Consultants, Inc.

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Ventura, California 93003

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August 29, 2013

Project Number: 5755-00464

James Chuang
Environmental Specialist/Land Planner
SoCalGas Environmental Services
555 W. 5th Street GT16G3
Los Angeles, CA 90013
Via email: wcchuang@semprautilities.com

Subject: Vegetation Compliance Assessment for the Southern California Gas Company La Goleta Storage Facility, Goleta, Santa Barbara County, California

Dear Mr. Chuang:

This letter provides the results of a vegetation compliance assessment conducted for the Southern California Gas Company (SoCalGas) La Goleta Storage Facility, in Goleta, Santa Barbara County, California. The purpose of assessment was to determine if vegetation management activities conducted within the California Coastal Commission's (CCC) retained jurisdictional lands located east and south of Atascadero Creek were conducted compliant with Coastal Development Permit (CDP) #E-11-031, which was issued on March 9, 2012. The assessment area also included the main access roadway (i.e. Jungle Road) on lands under the jurisdiction of the County of Santa Barbara (CDP #08CDH-00000-00038, issued October 14, 2011) that were specifically located between the southeastern boundary of the CCC retained jurisdictional lands and the facility's main office building.

Background

Vegetation management activities authorized under the CCC CDP included those associated with two main sets of activities, including 1) pipeline maintenance activities associated with required hydraulic testing on Line 5026 and Line 159, which are used to transport natural gas at the facility (completed); and, 2) a five-year Vegetation and Pipeline Management Plan, which allows ongoing required maintenance and repair of pipelines and other equipment within the facility for a period of five years. Implementation of both sets of activities included clearing vegetation adjacent to SoCalGas facilities, including pipelines, wells, valves, other appurtenances, field electrical system equipment, fences, gates, staging areas, and roadways, to ensure pipeline integrity and to comply with access and safety requirements. The County CDP authorizes vegetation management activities under the five-year Vegetation and Pipeline Management Plan. Vegetation management activities authorized under the CCC CDP also include those associated with restoration efforts that have been conducted as onsite compensatory mitigation pursuant to the CCC approved Native Vegetation Restoration Plan (Sage Institute, Inc., 2012).

Methodology

The site assessment was conducted between 0715 and 0915 hours on August 26, 2013 by Rincon Consultants Senior Biologist Jennifer Turner. During the site assessment, Ms. Turner walked and drove the survey area such that complete visual coverage of the facility within the identified areas was obtained. The location, type, and extent of vegetation trimming and/or removal were documented within the survey area. Impacts to trees located along the main access roadway and along the south side of Atascadero Creek were specifically assessed. In areas where vegetation removal activities had



occurred in close proximity to Atascadero Creek, the extent of existing visual screening afforded to neighboring properties from remaining vegetation was also assessed.

Findings

Vegetation within CCC retained jurisdictional lands was observed to have been cleared to ground level within 10 feet of the SoCalGas facilities identified within the CDP. Vegetation was also observed to have been removed within an approximately 1.3 acre area located within CCC retained jurisdiction lands immediately west of SoCalGas site Chase Bryce 1 and between Jungle Road and Atascadero Creek. This site has been identified for restoration efforts specifically associated with the onsite compensatory mitigation under the restoration plan. Vegetation management activities in County lands within the survey area were observed to have been contained to areas located within 10 feet of the edge of Jungle Road and a secondary spur road that leads to the northwest and is located near the eastern edge of the survey area. Vegetation trimmed beyond 10 feet was minimal and specifically limited to large tree branches that were cut in accordance with standard tree trimming practices so that the health and stability of the tree was retained and/or improved, and to maintain safety standards.

Cleared vegetation included trees (described in more detail below), shrubs, and perennial and annual herbaceous materials. Both native and non-native vegetation within 10 feet of facilities was removed as part of the vegetation management activities, while only non-native vegetation had been trimmed or removed within the restoration area. Cut material was observed to have been chipped and spread along the pipeline corridors and access roadways, or had been hauled away for disposal. No native vegetation greater than 6 inches in diameter at breast height was observed to have been removed and/or trimmed. No below ground clearing of root zones was observed (i.e. only above-ground vegetation was disturbed).

Tree Removals. A total of two mature eucalyptus (approximately 50 – 100 feet in height) and one avocado tree (approximately 15 – 25 feet in height) were removed during approved vegetation management activities since issuance of the CDPs. One eucalyptus was located within CCC lands near the junction of Jungle and Bluff Roads (east of SoCalGas site ED1), and was removed due to its declining health and stability and related safety concerns. The second eucalyptus was located on County lands on the south side of Jungle Road near the junction of Jungle Road and the secondary spur road, and was removed due to its conflict with a SoCalGas facility (i.e. growing into and damaging the perimeter fence). The avocado tree, which was located on the east side of the spur road near its northern terminus, was removed due to its conflict with access road improvements. All three of these non-native trees were cut to near ground level, with the majority of the fallen material removed from the area.

Approximately 44 mature Myoporum trees (non-native) with average heights between 10 – 30 feet have also been removed within the approximately 1.3 acre restoration site since issuance of the CCC CDP. Removal of the trees occurred during site preparation activities associated with implementation of the restoration plan. All trees were cut to near ground level, with the fallen material removed from the area.

During the assessment, approximately 25 large tree stumps were also documented along the north and south sides of Jungle Road near the boundary of CCC retained and County jurisdictional lands. The felled remains of these trees (eucalyptus) have been primarily left in place along the roadway edges and adjacent areas. Based on the deteriorated condition of the stumps, it was determined that all 25 trees were downed many years prior to issuance of the subject CCC and County CDPs.

Timing. Beginning on February 29, 2012, Rincon Consultants was retained by SoCalGas to provide survey and monitoring services for the Line 5026 and Line 159 hydraulic testing project and the five-year Vegetation and Pipeline Management Plan, which includes the restoration efforts associated with implementation of the Native Vegetation Restoration Plan. Through these efforts, Rincon has observed and documented that vegetation management efforts within the survey area were not initiated until



March 26, 2012. Since that time, Rincon has conducted pre-construction and compliance monitoring for the majority of the vegetation clearance activities within the survey area. Areas for which Rincon conducted pre-construction clearance surveys, but were not specifically present for during vegetation removal efforts, have been observed and assessed for compliance with the CDPs during subsequent site visits.

Summary and Conclusions

Based on our previous survey and monitoring efforts, and as confirmed by our recent site visit, it is our professional opinion that vegetation management and restoration activities that impacted vegetation within the survey area have been conducted in compliance with the CCC and County CDPs. In addition, based on our recent site visit, it does not appear that any vegetation has been trimmed or removed from areas not authorized under these permits.

Tree removals during vegetation management activities have been limited to the three individual trees noted above. Due to their location and the amount of vegetation (including other mature trees) located in proximity to them and between adjacent lands, the individual loss of these trees is unlikely to be specifically notable from lands located north and/or west of Atascadero Creek. Tree removals during restoration activities include approximately 44 individuals within the approved restoration site. Due to the presence of a significant amount of vegetation within this area, it is likely that only the loss of the crowns of some of these trees is notable from adjacent lands located north of Atascadero Creek.

Approximately 25 large tree stumps are located along the north and south sides of Jungle Road near the boundary of CCC retained and County jurisdictional lands. Due to the removal of herbaceous vegetation within 10 feet of the roadway during vegetation management activities, and the general lack of understory vegetation and soil mounds between the roadway and Atascadero Creek and a more limited number of mature trees naturally occurring within this area, a number of these old, cut stumps are likely visible from lands located directly adjacent to and north of the facility. Based on the conditions of these stumps and the downed materials, it is our professional opinion that these trees were all felled many years prior to issuance of the CDPs.

Please contact me at 805/644-4455 ext. 43 if you have any questions or require additional information regarding the assessment or this report.

Sincerely,
RINCON CONSULTANTS, INC.

Jennifer M. Turner, MS
Senior Biologist / Project Manager

cc: Dennis Lowrey, SoCalGas
Edward Wiegman, SoCalGas

Huckelbridge, Kate@Coastal

From: Kristine Ollikkala <sowelu@silcom.com>
Sent: Sunday, November 10, 2013 7:09 PM
To: Huckelbridge, Kate@Coastal
Subject: Amendment to allow drilling - La Goleta

Dear Ms. Huckelbridge:

I am opposed to the amendment under consideration to allow the county of Santa Barbara to amend the County's Local Coastal Plan ("LCP") to allow exploration and production of natural gas at the La Goleta site. The amendment would allow drilling and operation of natural gas wells for production, and construction and operation of supporting equipment including pipelines and processing facilities. This development has no benefit other than enriching the Gas Company, while increasing the amount of noise, pollution, potential damage from accidents and infringement upon our basic right of quiet enjoyment of our homes without threat of industrial negligence.

New natural gas exploration and drilling is not appropriate for the La Goleta site, which is adjacent to a heavily used beach park and public bike trail. The amendment does not protect these popular recreational destination points, in conflict with section 30253 of the Coastal Act (incorporated into the County's LCP).

The amendment is inconsistent with LCP visual resource protection policy. The new drilling rig (with mandatory night lighting due to the airport) would compromise public views to and along the coast from Los Carneros Road, Goleta Beach including the fishing pier, the ocean, and surrounding residential streets including Patterson Road, Placencia Street, and More Ranch Road. The County's Environmental Impact Report found significant and unavoidable visual impacts associated with the drilling rig, even though it is not permanent.

The amendment is inconsistent with LCP agricultural resource protection policy. The site is currently farmed, includes prime soils and important farmland, and is among the precious few properties in active agriculture in the Goleta Valley. The Commission must consider whether the amendment complies with LCP agricultural resource protection policy. The Staff Report failed to discuss this important issue.

The amendment is inconsistent with LCP hazards policy. Exploration and drilling will potentially affect the geologic stability of the site, contribute to flood and fire hazards, and carries the risk of accidental release of hazardous materials. The project will increase vibration and noise impacts currently experienced near the site.

The amendment is inconsistent with LCP biological resource protection policy. The project site is adjacent to sensitive slough and creek environments, and supports ESHA, monarch butterfly sites, and wetland habitats. The Staff Report merely assumes these resources can be adequately avoided by applying existing LCP policies to the coastal development permit with no site-specific analysis. The Commission cannot find that the amendment is consistent with the LCP without an analysis of whether mitigation can adequately protect biological resources.

There is no substantial public benefit from allowing natural gas exploration and drilling at the La Goleta site. The project would produce a relatively insignificant amount of natural gas and add a small increment of additional storage capacity to the site. This small benefit is simply not worth compromising the integrity of our coastal resources including recreational areas, natural habitats, and agricultural land.

PLEASE DENY THIS AMENDMENT!

Cordially,
Kristine Ollikkala
945 Ward Dr. #69
Goleta, CA 93111

Huckelbridge, Kate@Coastal

From: Brifred@aol.com
Sent: Monday, November 11, 2013 2:54 PM
To: Huckelbridge, Kate@Coastal
Subject: Santa Barbara County LCP amendment

To: Kate Huckelbridge
RE: Proposed amendment to Santa Barbara LCP -4-STB-13-0215-2
So Cal Gas La Goleta expansion

As a resident of the adjacent Rancho Goleta Mobile Home park, I am strongly opposed to this expansion for many reasons; ecological, safety and nuisance as well as lowering my property values do to increased noise and vibration 24 hours a day

New natural gas exploration and drilling is not appropriate for the La Goleta site, which is adjacent to a heavily used beach park and public bike trail. The amendment does not protect these popular recreational destination points, in conflict with section 30253 of the Coastal Act (incorporated into the County's LCP).

The amendment is inconsistent with LCP visual resource protection policy. The new drilling rig (with mandatory night lighting due to the airport) would compromise public views to and along the coast from Los Carneros Road, Goleta Beach including the pier, the ocean, and surrounding residential streets including Patterson Avenue, Ward Drive, and Anderson Lane. The County's Environmental Impact Report found significant and unavoidable visual impacts associated with the drilling rig, even though it is not permanent.

The amendment is inconsistent with LCP agricultural resource protection policy. The site is currently farmed, includes prime soils and important farmland, and is among the precious few properties in active agriculture in the Goleta Valley. The Commission must consider whether the amendment complies with LCP agricultural resource protection policy. The Staff Report failed to discuss this important issue.

The amendment is inconsistent with LCP hazards policy. Exploration and drilling will potentially affect the geologic stability of the site, contribute to flood and fire hazards, and carries the risk of accidental release of hazardous materials. The project will increase vibration and noise impacts currently experienced near the site.

The amendment is inconsistent with LCP biological resource protection policy. The project site is adjacent to sensitive slough and creek environments, and supports ESHA, monarch butterfly sites, and wetland habitats. The Staff Report merely assumes these resources can be adequately avoided by applying existing LCP policies to the coastal development permit with no site-specific analysis. The Commission cannot find that the amendment is consistent with the LCP without an analysis of whether mitigation can adequately protect biological resources.

There is no substantial public benefit from allowing natural gas exploration and drilling at the La Goleta site. The project would produce a relatively insignificant amount of natural gas and add a small increment of additional storage capacity to the site. This small benefit is simply not worth compromising the integrity of our coastal resources including recreational areas, natural habitats, and agricultural land.

PLEASE DENY THIS AMENDMENT!

Thank You,
Brian Frederick
945 Ward Dr. #74
Santa Barbara, Ca 93111

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800



W18a

October 24, 2013

To: Commissioners and Interested Persons

From: Alison Dettmer, Deputy Director
Kate Huckelbridge, Energy, Ocean Resources and Federal Consistency Division

Subject: Santa Barbara County Local Coastal Program Amendment No. LCP-4-STB-13-0215-2

Santa Barbara County is requesting an amendment to the Implementation Plan/Coastal Zoning Ordinance (IP/CZO) portion of its certified Local Coastal Program (LCP) to allow exploration and production of native natural gas at natural gas storage facilities in the Public Utilities (PU) zone district for the purpose of expanding natural gas storage capacity.

The County submitted the subject LCP amendment to the Coastal Commission ("Commission") on July 22, 2013 as part of a package of three amendments. The amendment package was deemed incomplete on August 16, 2013. On September 20, 2013, staff received a letter from the County separating the Public Utilities Natural Gas Storage Ordinance Amendment, Ordinance No. 4860, from the other two amendment applications. The subject LCP Amendment was filed on September 20, 2013. The Commission has until November 12, 2013 to act on this Implementation Plan Amendment.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends that the Commission, after public hearing, **approve** proposed LCP Amendment No. LCP-4-STB-13-0215-2 as submitted.

The County proposes this amendment to its Implementation Plan in support of the Southern California Gas Company's ("SoCal Gas") efforts to expand natural gas storage capacity at the La Goleta storage facility. The amendment would allow exploration and production of native natural gas but only in a very narrow context. Exploration or production of natural gas would only be allowed at natural gas storage facilities that are owned and operated by a public utility. The La Goleta storage facility is currently the only facility in this category, and the County has stated that it does not anticipate approving any additional facilities of this type. Furthermore, exploration and production of native natural gas would be allowed only when the purpose of these activities is to expand natural gas storage capacity.

The standard of review for the proposed amendment to the IP/CZO of the certified LCP is the Land Use Plan (LUP) portion of the certified Santa Barbara County LCP. The Commission must determine if the proposed amendment is in conformance with, and adequate to carry out, the provisions of the LUP. The County's LUP contains numerous policies that protect coastal resources and would apply to any development approved under the proposed amendment. These policies cover siting and design of new development; protection of biological resources, including ESHA, wetlands and stream corridors; protection of visual resources; siting and design to minimize risks from geologic and other hazards; protection against release of hazardous substances, protection of archeological and cultural resources; and other topics. In addition, all Chapter 3 policies of the Coastal Act have been incorporated in their entirety in the certified County LUP as guiding policies. Staff's analysis shows that the proposed IP/CZO would allow a limited expansion of industrial uses at a site currently used for industrial purposes, and that the amendment is consistent with and adequate to carry out the provisions of the County's LUP with respect to the protection of coastal resources.

Thus, staff recommends that the Commission **approve** the amendment as submitted by the County.

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APPENDICES

Appendix A – Substantive File Documents

Appendix B – County of Santa Barbara LUP policies related to biological resources

EXHIBITS

Exhibit 1 – Santa Barbara County Ordinance 4811

Exhibit 2 – Map of Biological Features at the La Goleta storage facility

I. PROCEDURAL ISSUES

A. STANDARD OF REVIEW

Pursuant to Section 30513 and 30514 of the Coastal Act, the Commission may only reject zoning ordinances or other implementing actions, as well as their amendments, on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. The Commission shall take action by a majority vote of the Commissioners present.

B. PUBLIC PARTICIPATION

Section 30503 of the Coastal Act requires public input in the preparation, approval, certification and amendment of any LCP. The County held a series of public hearings regarding the proposed amendment (Department of Planning and Development hearings on 3/18/10, 6/30/11 and 1/23/13, County Planning Commission hearing on 6/5/13, and Board of Supervisors hearing on 6/25/13) and written and verbal comments were received from the members of the public regarding the amendments. The hearings were noticed to the public consistent with the requirements in Section 13515 of Title 14 of the California Code of Regulations (“14 CCR”). Notice of the subject amendment has been distributed to all known interested parties.

C. PROCEDURAL REQUIREMENTS

Pursuant to 14 CCR Section 13551 (b), the County, by resolution, may submit an LCP amendment that will either require formal local government adoption after the Commission approval, or is an amendment that will take effect automatically upon the Commission's approval pursuant to Public Resources Code Sections 30512, 30513, and 30519. The Santa Barbara County Board of Supervisors submittal ordinance states that the “ordinance and any portion of it approved by the Coastal Commission shall take effect and be in force 30 days from the date of its passage or upon the date that it is certified by the Coastal Commission pursuant to California Public Resources Code 30514, whichever occurs later...” Thus, if the Commission approves the amendment as submitted, it will become effective 30 days from the date of the Commission hearing. If the Commission approves this amendment with additional modifications, the County must act to accept the certified suggested modifications within six months from the date of Commission action in order for the amendment to become effective (14 CCR §§ 13544, 13555(b), and Section 13542(b)). Pursuant to 14 CCR Section 13544, the Executive Director shall determine whether the County's action is adequate to satisfy all requirements of the Commission’s certification order and report on such adequacy to the Commission. If the Commission denies the LCP amendment without also approving suggested modifications, the amendment is not adopted, and no further action is required by either the Commission or the County.

II. MOTION AND RESOLUTION

Following public hearing, staff recommends that the Commission adopt the following resolution and findings.

Motion:

I move that the Commission reject the Implementation Program/Coastal Zoning Ordinance Amendment (LCP-4-STB-13-0215-2) for the County of Santa Barbara as submitted.

Staff recommends a **NO** vote. Following this staff recommendation will result in failure of this motion and certification of the IP/CZO Amendment as submitted and the adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby certifies the Implementation Program/Coastal Zoning Ordinance Amendment (LCP-4-STB-13-0215-2) for the County of Santa Barbara as submitted and adopts the findings set forth below on grounds that the Implementation Program and Coastal Zone Ordinance, as amended, conforms with and is adequate to carry out the provisions of the certified Land Use Plan, and certification of the Implementation Program/Coastal Zone Ordinance Amendment will meet the requirements of 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 Implementation Program/Coastal Zoning Ordinance Amendment on the environment, or 2) there are no further feasible alternatives and mitigation measures that would substantially lessen any significant adverse impacts on the environment that will result from certification of the Implementation Program/Coastal Zoning Ordinance Amendment.

III. FINDINGS ON APPROVAL

The following findings support the Commission's approval of the LCP amendment as submitted. The Commission hereby finds and declares as follows:

A. AMENDMENT DESCRIPTION

Santa Barbara County is requesting an amendment to the IP/CZO portion of its LCP to allow exploration and production of native natural gas in order to expand gas storage capacity at facilities owned and operated by a public utility. Currently, this section of the code applies only to Southern California Gas Company's La Goleta storage site. The ordinance also explicitly prohibits hydraulic fracturing (or "fracking") for exploration or production of native gas.

The County proposes the following changes to the Coastal Zoning Ordinance:

Section 35-88.4.5 (Permitted Uses). ~~On the Pacific Lighting property in Goleta,~~
Underground gas storage and related facilities, i.e., compressor stations, gas wells and pipelines, owned and operated by a public utility and subject to the provisions of Section 35.88-11.

Section 35.88.11 (*Underground Gas Storage*). The provisions of this section shall apply to the fixed surface installation of facilities designed, constructed, installed and maintained primarily for the injection, storage and withdrawal of natural gas in and from sub-surface strata including the drilling of new wells and the reconditioning of existing wells, exploration and production, without the use of hydraulic fracturing, of native sweet gas for the purpose of expanding natural gas storage capacity, and structures, facilities and operations incidental thereto. For the purpose of this subsection, native sweet gas is defined herein as produced gas that contains no more than four parts per million of hydrogen sulfide.

Section 35.88.11.1. The provisions of DIVISION 9 – OIL AND GAS FACILITIES shall not apply to underground gas storage or related facilities used solely for such purposes.

B. BACKGROUND ON PROPOSED CHANGES

The Southern California Gas Company (“SoCal Gas”) proposed this LCP amendment in conjunction with its application to the County for a coastal development permit for the La Goleta Storage Field Enhancement Project. The purpose of this project is to expand the storage capacity at the La Goleta Storage Field by approximately 1 to five billion cubic feet. To accomplish this, SoCal Gas would drill two gas production wells into known natural gas reservoirs and two exploration wells into other areas believed to contain recoverable quantities of gas. The gas would be extracted, treated and delivered to SoCal Gas customers over an approximately five-year period. When the reservoirs are sufficiently depleted, they would be converted to storage use. The County’s approved LCP does not currently allow natural gas exploration and production activities in the Public Utility (PU) zone district that applies to the La Goleta Storage Field, thus necessitating an LCP amendment to ensure the project is consistent with the County’s LCP.

If approved, the proposed amendment would explicitly allow exploration and production of native natural gas at underground natural gas storage facilities operated by a public utility in the PU zone. Such exploration and production activities would only be allowed, however, for the purpose of expanding natural gas storage capacity. Currently, SoCal Gas’s La Goleta storage field is the only underground natural gas storage field in the County, and there are no other proposals for natural gas production and storage, or rezones to the PU zone district pending or foreseen. The California Public Utilities Commission (CPUC) has authorized these activities. In its administrative findings approving the proposed LCP amendment, the County found that implementing the CPUC’s approval by approving the proposed LCP amendment would “provide for a long-term increase in the reliability and availability of natural gas to help meet the local and regional demand for natural gas...” These benefits were a key component in the County’s conclusion that the proposed amendment was in the interest of the general community welfare.

If the Commission approves this LCP amendment, staff anticipates that the County will issue a Notice of Final Action (NOFA) for its approval of a coastal development permit for SoCal Gas’s La Goleta Storage Field Enhancement Project shortly thereafter. Upon receiving the NOFA from the County, staff will open the appeal period for the County’s approval of this project.

C. CONSISTENCY ANALYSIS

The standard of review for the proposed amendment to the IP/CZO of the certified LCP is whether it would be in conformance with and adequate to carry out the provisions of the County's LUP. The proposed amendment's consistency with the certified LUP is detailed below. All Chapter 3 policies of the Coastal Act have been incorporated in their entirety in the certified Santa Barbara County LUP as guiding policies pursuant to Policy 1-1 of the LUP.

1. Biological Resources

The County's LCP contains numerous policies designed to protect ESHA and other biological resources, wetlands, and watersheds (see Appendix B). The policies include protection for critical bird and butterfly habitat during both construction and operation of industrial uses, buffer requirements for wetlands, water quality controls, and protections for areas of native vegetation and stream corridors. In addition, the LCP contains policies that minimize erosion and protect the water quality of groundwater basins, streams and wetlands.

The proposed IP amendment would allow natural gas exploration and production activities by public utilities at underground natural gas storage sites. The type of development allowed by the proposed amendment would include drilling and operation of natural gas wells for production and the construction and operation of supporting equipment such as pipelines and processing facilities. These activities are likely to include surface disturbance, excavation, night-lighting, glare, noise, and dust that could result in direct or indirect impacts to biological resources (i.e., wildlife, vegetation, wetlands and ESHA). In addition, storm-water runoff or project-related activities could degrade the water quality of ground and/or surface waters in the project vicinity.

Currently, the La Goleta storage site is the only natural gas storage site in the County. The 147-acre site includes mapped Environmentally Sensitive Habitat Areas (ESHA) along Atascadero Creek on the north side of the site and along the coastal bluff at the mouth of Goleta Slough on the south side of the site (see Figure 1). In addition, the site contains a small oak grove and a 0.52 acre freshwater wetland near the southern entryway to the site. The site also contains two monarch butterfly sites although significant numbers of butterflies have not been observed at this site since 1990-1991. A biological analysis by Padre Associates, Inc. indicated that although several species of special-status plants have a potential to exist at the site, that potential is low, and none of these species were found on the site during biological surveys conducted in 2007 and 2008. This analysis also included a list of approximately 40 special status wildlife species with a potential to occur in the region. Most of these species have a low probability of occurring on the site. Several bird species, including the loggerhead shrike, the burrowing owl, California horned lark, Belding's savannah sparrow, grasshopper sparrow, and the great blue heron, have a moderate to high potential to use the site for foraging. Nesting activity, however, was not observed at the site and is not likely due to a lack of nesting habitat.

The proposed IP Amendment would allow SoCal Gas to seek a coastal development permit to undertake sweet gas exploration and production activities at the La Goleta storage site. The County (or the Commission if the CDP were appealed) would be required to apply all of the LCP's ESHA and biological resource protection policies to any such proposed development. Given the large amount of acreage available at the La Goleta storage site, it is likely that it would

be possible to site exploration and production wells such that impacts to ESHA, wetlands and other biological resources from construction and operation of gas exploration and/or production wells are avoided. The policies included in the County's LCP ensure that appropriate siting guidelines, standard mitigation measures, such as comprehensive pre and post-construction biological surveys, biological monitoring, adequate buffers, construction timing requirements to avoid bird breeding season, construction best management practices, etc. would be required to protect biological resources at the La Goleta site.

Although the proposed IP amendment would allow gas exploration and drilling at a site where such activities are currently not allowed, all existing LCP policies protecting biological resources will continue to apply to any proposed development at this site. Thus, the Commission finds that the proposed IP/CZO amendment conforms to the LUP policies that require development to be sited and designed to avoid impacts to environmentally sensitive habitat area.

2. Hazards

Section 30253 of the Coastal Act states (incorporated in the County's LUP under Policy 1-1):

New development shall do all of the following:

- (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
- (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*
- (c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.*
- (d) Minimize energy consumption and vehicle miles traveled.*
- (e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.*

The applicable sections of Section 30262 of the Coastal Act state (incorporated in the County's LUP under Policy 1-1):

- (a) Oil and gas development shall be permitted in accordance with Section 30260, if the following conditions are met:*
 - (1) The development is performed safely and consistent with the geologic conditions of the well site.*
 - (2) New or expanded facilities related to that development are consolidated, to the maximum extent feasible and legally permissible, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts*

...

(5) The development will not cause or contribute to subsidence hazards unless it is determined that adequate measures will be undertaken to prevent damage from such subsidence.

LUP Policy 3-13:

Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.

LUP Policy 3-14:

All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

LUP Policy 3-17:

Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized immediately with planting of native grasses and shrubs, appropriate nonnative plants, or with accepted landscaping practices.

They County's LUP requires that new development minimize risks to life and property from geologic, flood and fire hazards. It also requires consolidation of oil and gas facilities, minimization of landscape alteration, and requirements to ensure geologic stabilization.

The type of development allowed by the proposed LCP amendment is likely to include drilling of one or more wells, extraction and processing of native natural gas, conversion of production wells into injection wells, and integration of the well and reservoir into the natural gas storage operations. Each of these phases of development has the potential to adversely impact the geologic stability of a site, contribute to flood or fire hazard, or significantly alter the existing landscape.

The County's LUP includes several policies designed to protect against these types of impacts, and these policies will apply to any development proposed after approval of this IP amendment. In addition, although not included in the LUP, the County has established Public Safety Thresholds that determine if the safety risks of a project are significant. Any development put forward under the proposed amendment would be required to demonstrate consistency with the hazard policies discussed above as well as perform a risk assessment to quantify the hazard risk

and determine if it reaches significant levels. If the County determined that a proposed project did not minimize risks to life and property or take all necessary measures to ensure geologic stability, it could not approve the project.

In addition to the protections included in the LUP, the proposed amendment limits the type of development that could be allowed, resulting in additional protection from impacts associated with hazards. For example, the proposed amendment prohibits the extraction of “sour” gas, which is natural gas with concentrations of hydrogen sulfide greater than four parts per million. This avoids the potential public health and environmental hazards associated with processing sour gas. Furthermore, drilling of new wells would not be permitted unless the applicant’s facility is maintained primarily for the injection, storage and withdrawal of natural gas, and exploration and production activities are pursued for the sole purpose of expanding natural gas storage capacity. Limiting natural gas exploration and production in this manner is consistent with the County’s policies requiring consolidation of oil and gas development which minimizes the public’s exposure to hazards from these types of facilities. Finally, the proposed amendment prohibits the use of hydraulic fracturing for this type of development, thus avoiding any potential impacts to the geologic stability of the site from this activity.

Therefore, the Commission finds that the proposed IP/CZO amendment conforms to the LUP policies that require development to minimize geologic and other hazards, as any development that could be approved after certification of this IP Amendment would still need to meet all of the hazard minimization and avoidance policies of the LCP.

3. Visual Resources

Section 30251 of the Coastal Act states (incorporated in the County’s LUP under Policy 1-1):

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.

LUP Policy 4-2:

All commercial, industrial, planned development and greenhouse projects shall be required to submit a landscaping plan to the County for approval.

LUP Policy 4-4:

In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character

of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.

The proposed amendment would allow development that would involve the temporary installation of one or more drilling rigs, the permanent installation of one or more wells, associated pipelines and processing equipment, such as a dehydration unit, and the occasional temporary installation of one or more workover rigs. Each of these elements has the potential to result in adverse impacts to visual resources in the project vicinity.

The County LCP includes several policies that protect visual resources. In addition, Policy 1-1 incorporates the scenic and visual quality protections included in the Coastal Act. This policy ensures that any development in the County's coastal zone, including development that would be allowed after certification of the proposed amendment, would need to be sited and designed to protect scenic coastal views and to be visually compatible with the character of the surrounding area. The LCP includes additional policies that require development to conform to the character of the existing community and to submit a landscaping plan to the County for approval. These protective policies ensure that any new development that could be authorized after certification of the IP Amendment will not cause significant impacts to the visual resources of coastal Santa Barbara County.

The most significant visual resource impact anticipated from the type of project that could be approved after certification of this IP amendment is the presence of a drilling rig. A typical drilling rig includes a 133-foot mast and a 21-foot high substructure, for a total of 154 feet. However, some drilling rigs have substructures that measure up to 39 feet high, for a total of 172 feet. To conform to Federal Aviation Authority (FAA) regulations, a structure of this height would have to be lighted at night to ensure aircraft safety. A drilling rig that stands 154-172 feet tall would almost certainly be visible from surrounding land uses. At the La Goleta storage field, which is the only site affected by this IP Amendment, a drilling rig would be visible from portions of Highway 101, Goleta Beach and Goleta Beach Pier and surrounding residential streets. Although there is no mitigation measure available to address this impact, the impact would be temporary. For example, to extract native gas from the La Goleta storage field, as proposed by SoCal Gas, drilling rigs would be present for approximately 89 days during the first year of the project, and approximately 68 days during the second year of the project. The severity of this impact would also be highly dependent on the surrounding vegetation, especially tall trees, and the presence of other tall structures, including transmission or radio towers.

The other elements of natural gas production development – gas wells, pipelines and processing equipment – are not likely to result in adverse impacts to coastal visual resources. The proposed amendment would only allow new gas wells and associated equipment on natural gas storage sites. Thus, new wells would be drilled on existing industrial sites, where it is likely that gas wells and some ancillary equipment already exist. In addition, the County's policies require that permitted development be visually compatible with the character of the surrounding area. This is often accomplished by requiring that equipment and facilities be screened from adjacent areas with landscaping and painted to be compatible with the surrounding landscape. Pipelines can also be buried or screened, thus minimizing impacts to visual resources.

Thus, for the reasons stated above, the Commission finds that the proposed IP/CZO amendment conforms to the LUP policies that require development to protect coastal visual resources.

4. Hazardous Substance Release

Section 30232 of the Coastal Act states (incorporated in the County's LUP under Policy 1-1):

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 clean up facilities and procedures shall be provided for accidental spills that do occur.

LUP Policy 6-9:

Applicants for oil and gas processing facilities shall prepare and keep updated emergency response plans to deal with the potential consequences of hydrocarbon leaks or fires. These emergency response plans shall be approved by the County's Emergency Services Coordinator and Fire Department.

As for any type of hydrocarbon extraction, accidental release of a hazardous substance is a serious concern. The proposed amendment specifically states that hydraulic fracturing (i.e., "fracking") will not be permitted during exploration and production of native gas and that "sour" gas or gas with a hydrogen sulfide concentration greater than four parts per million, will not be extracted. These two measures reduce the risk of a hazardous substance release due to development that could be approved after certification of this IP Amendment. There is still a risk, however, of a release of natural gas or other hydrocarbon compounds during well drilling, well blowouts, pipe or valve failures, storage tank leaks and processing equipment failures associated with new development allowed by the proposed amendment.

The County's LUP contains policies that require an applicant proposing development at an oil and gas processing facility have protocols in place to protect against the release of hazardous substances and maintain updated emergency response plans, approved by the Emergency Services Coordinator and the Fire Department, that describe procedures and equipment to be used in the event of an accidental spill. In the case of the La Goleta storage field, any new development proposed would be integrated into existing safety systems in place at the La Goleta field and an updated emergency response plan would be submitted.

Therefore, the Commission finds that the proposed IP/CZO amendment conforms to the LUP policies that protect against the release of hazardous substances.

5. Archeological and Cultural Resources

Section 30253 of the Coastal Act states (incorporated in County's LUP under Policy 1-1):

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

LUP Policy 6-17:

When feasible, pipelines shall be routed to avoid important coastal resources, including recreation, habitat, and archaeological areas.

LUP Policy 6-18:

For pipeline segments passing through important coastal resource areas, including recreation, habitat and archaeological areas, the segment, in the case of a break, shall be isolated by automatic shutoff valves.

LUP Policy 10-2:

When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.

LUP Policy 10-3:

When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.

LUP Policy 10-4:

Off-road vehicle use, unauthorized collecting of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.

LUP Policy 10-5:

Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

The development allowed by the amendment has the potential to adversely impact archeological or cultural resources. However, any project proposed to the County must adhere to several policies in the County's LCP that protect these resources. Policy 10-2 requires that projects be sited to avoid impacts to identified archeological or cultural resources. If these resources cannot be entirely avoided, the County can require reasonable mitigation measures in accordance with the guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission. In addition, Policy 10-5 requires that Native Americans be consulted if significant archeological or cultural sites could be affected. With these policies in place, any development allowed under the proposed amendment will be required to incorporate adequate mitigation measures to ensure the protection of archeological and cultural resources.

For these reasons, the Commission finds that the proposed IP/CZO amendment conforms to the LUP policies that require protection of archeological and cultural resources.

IV. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The Coastal Commission's review and development process for LCPs and LCP amendments has been certified by the Secretary of Resources as being the functional equivalent of the environmental review required by CEQA. Local governments are not required to undertake environmental analysis of proposed LCP amendments, although the Commission can and does use any environmental information that the local government has developed. CEQA requires that alternatives to the proposed action be reviewed and considered for their potential impact on the environment and that the least damaging feasible alternative be chosen as the alternative to undertake.

In this case, Santa Barbara County, acting as the lead agency, adopted an Environmental Impact Report (EIR) that examined the environmental impacts associated with the proposed IP amendment and SoCal Gas's proposed project to expand the storage capacity at the La Goleta storage field.

This report has discussed the relevant coastal resource issues with the proposal. All public comments received to date have been addressed in the findings above. All above findings are incorporated herein in their entirety by reference.

The proposed project is not anticipated to have a significant adverse impact on the environment. As such, there are no additional feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse environmental effects which approval of the amendment would have on the environment within the meaning of CEQA. Thus, the proposed amendment will not result in any significant environmental effects for which feasible mitigation measures have not been employed consistent with CEQA Section 21080.5(d)(2)(A).

APPENDIX A

Substantive File Documents

Santa Barbara County, July 2013 Local Coastal Program Amendment Submittal STB0MAJ-1-13, Volume 3.

Final Environmental Impact Report, Southern California Gas Company La Goleta Storage Field Enhancement Project. May 2013. Prepared by the Santa Barbara County Planning and Development Department. (Santa Barbara County EIR No. 10EIR-00000-00001)

Appendix B: County of Santa Barbara LUP policies related to biological resources

General

Section 30231 of the Coastal Act states (incorporated in the County's LUP under Policy 1-1):

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, minimizing alteration of natural streams.

LUP Policy 1-2:

Where policies within the land use plan overlap, the policy which is most protective of coastal resources shall take precedence.

LUP Policy 2-11:

All development, including agriculture, adjacent to areas designated on the land use plan or resources maps as environmentally sensitive habitat areas, shall be regulated to avoid adverse impacts on habitat resources. Regulatory measures include, but are not limited to, setbacks, buffer zones, grading controls, noise restrictions, maintenance of natural vegetation, and control of runoff.

LUP Policy 6-4:

Upon completion of production, the area affected by the drilling, processing, or other related petroleum activity, shall be appropriately contoured, reseeded, and landscaped to conform with the surrounding topography and vegetation.

LUP Policy 6-17:

When feasible, pipelines shall be routed to avoid important coastal resources, including recreation, habitat, and archaeological areas.

LUP Policy 6-18:

For pipeline segments passing through important coastal resource areas, including recreation, habitat and archaeological areas, the segment, in the case of a break, shall be isolated by automatic shutoff valves.

ESHA

Section 30240 of the Coastal Act states (incorporated in the County's LUP under Policy 1-1):

- (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.*
- (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 such areas, and shall be compatible with the continuance of such habitat areas.*

LUP Policy 6-3:

All oil and gas development in areas designated as environmentally sensitive habitats in the land use plan shall be subject to environmental review.

LUP Policy 9-1:

Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat area shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All development plans, grading plans, etc., shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could adversely impact an environmentally sensitive habitat area may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.

LUP Policy 9-4:

All permitted industrial and recreational uses shall be regulated both during construction and operation to protect critical bird habitats during breeding and nesting seasons. Controls may include restriction of access, noise abatement, restriction of hours of operations of public or private facilities.

LUP Policy 9-22:

Butterfly trees shall not be removed except where they pose a serious threat to life or property, and shall not be pruned during roosting and nesting season.

LUP Policy 9-23:

Adjacent development shall be set back a minimum of 50 feet from the trees.

LUP Policy 9-26: (White-tailed kite)

There shall be no development including agricultural development, i.e., structures, roads, within the area used for roosting and nesting.

LUP Policy 9-28:

Any development around the nesting and roosting area shall be set back sufficiently far as to minimize impacts on the habitat area.

LUP Policy 9-36:

When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees

Wetlands/Streams

Section 30233(a) of the Coastal Act states (incorporated in the County's LUP under Policy 1-1):

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 on existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.*
- (3) 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.*
- (4) 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.*
- (5) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.*
- (6) Restoration purposes.*
- (7) Nature study, aquaculture, or similar resource dependent activities.*

LUP Policy 9-9:

A buffer strip, a minimum of 100 feet in width, shall be maintained in natural condition along the periphery of all wetlands. No permanent structures shall be permitted within the wetland or buffer area except structures of a minor nature, i.e., fences, or structures necessary to support the uses in Policy 9-10. ... [Policy 9-10 pertains to light recreation, education, scientific uses].

LUP Policy 9-13:

No unauthorized vehicle traffic shall be permitted in wetlands and pedestrian traffic shall be regulated and incidental to the permitted uses.

LUP Policy 9-14:

New development adjacent to or in close proximity to wetlands shall be compatible with the continuance of the habitat area and shall not result in a reduction in the biological productivity or water quality of the wetland due to runoff (carrying additional sediment or contaminants), noise, thermal pollution, or other disturbances.

LUP Policy 9-38:

No structures shall be located within the stream corridor except: public trails, dams for necessary water supply projects, flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development; and other development where the primary function is for the improvement of fish and wildlife habitat. Culverts, fences, pipelines, and bridges (when support structures are located outside the critical habitat) may be permitted when no alternative route/location is feasible. All development shall incorporate the best mitigation measures feasible.

Water Quality

LUP Policy 3-18:

Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained on-site whenever possible to facilitate groundwater recharge.

LUP Policy 3-19:

Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

LUP Policy 6-15:

Herbicides shall not be used during pipeline construction and sidecasting of soil may be restricted, when deemed necessary by removal of excess soil to an approved dumping site after the excavation has been backfilled and compacted.

LUP Policy 6-16:

The pipeline shall be sited and constructed in such a manner as to inhibit erosion.

EXHIBIT 1

ORDINANCE NO. 4860

AN ORDINANCE AMENDING ARTICLE II, THE SANTA BARBARA COUNTY COASTAL ZONING ORDINANCE, OF CHAPTER 35, ZONING, OF THE COUNTY CODE BY AMENDING DIVISION 4, ZONING DISTRICTS, TO REVISE EXISTING REGULATIONS REGARDING THE USE OF PU-ZONED PROPERTY FOR PUBLIC WORKS UTILITIES AND PRIVATE SERVICE FACILITIES.

Case No. 08ORD-00000-00018

The Board of Supervisors of the County of Santa Barbara ordains as follows:

SECTION 1:

DIVISION 4, Zoning Districts, of Article II, the Santa Barbara County Coastal Zoning Ordinance, of Chapter 35, Zoning, of the Santa Barbara County Code, is amended to amend Section 35-88.4.5, of Section 35-88.4, Permitted Uses, of Section 35-88, PU - Public Works Utilities and Private Services Facilities, to read as follows:

5. Underground gas storage and related facilities, e.g., compressor stations, gas wells and pipelines, owned and operated by a public utility and subject to the provisions of Section 35-88.11.

SECTION 2:

DIVISION 4, Zoning Districts, of Article II, the Santa Barbara County Coastal Zoning Ordinance, of Chapter 35, Zoning, of the Santa Barbara County Code, is amended to amend Section 35-88.11, Underground Gas Storage), of Section 35-88, PU - Public Works Utilities and Private Services Facilities, to read as follows:

Section 35-88.11 Underground Gas Storage

The provisions of this section shall apply to the fixed surface installation of facilities designed, constructed, installed and maintained primarily for the injection, storage and withdrawal of natural gas in and from sub-surface strata including the drilling of new wells and the reconditioning of existing wells, exploration and production, without the use of hydraulic fracturing, of native sweet gas for the purpose of expanding natural gas storage capacity, and structures, facilities and operations incidental thereto. For the purposes of this subsection, native sweet gas is defined herein as produced gas that contains no more than four parts per million of hydrogen sulfide.

1. The provisions of DIVISION 9 - OIL AND GAS FACILITIES shall not apply to underground gas storage or related facilities used solely for such purposes.
2. The landscaping requirements set forth in Section 35-88.10 shall not apply to underground gas storage or related facilities.
3. Derricks and major items of equipment shall be soundproofed in accordance with applicable safety regulations and standards.
4. Fixed equipment shall be fenced and screened and the site landscaped in a manner approved by the Planning Commission.
5. Permanent structures and equipment shall be painted a neutral color so as to blend in with natural surroundings.

6. Reasonable fire-fighting equipment shall be maintained on the premises at all times during drilling operations.
7. Except in an emergency, no materials, equipment, tools or pipe shall be delivered to or removed from the site between the hours of 7 p.m. and 7 a.m. of the following day.
8. All roads shall be paved with asphaltic concrete and parking areas may be surfaced with gravel.
9. Within 120 days after the drilling of each well has been completed, the derrick and all other drilling equipment shall be removed from the site.
10. All lights shall be shielded so as not to directly shine on adjacent properties.

SECTION 3:

All existing indices, section references, and figure and table numbers contained in Article II, the Santa Barbara County Coastal Zoning Ordinance, of Chapter 35, Zoning, of the County Code, are hereby revised and renumbered as appropriate to reflect the revisions enumerated above.

SECTION 4:

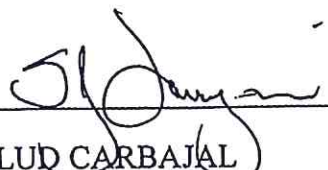
Except as amended by this Ordinance, Division 4 of Article II, the Santa Barbara County Coastal Zoning Ordinance, of Chapter 35, Zoning, of the County Code, shall remain unchanged and shall continue in full force and effect.

SECTION 5:

This ordinance and any portion of it approved by the Coastal Commission shall take effect and be in force 30 days from the date of its passage or upon the date that it is certified by the Coastal Commission pursuant to California Public Resources Code 30514, whichever occurs later; and before the expiration of 15 days after its passage, it, or a summary of it, shall be published once, together with the names of the members of the Board of Supervisors voting for and against the same in the Santa Barbara News-Press, a newspaper of general circulation published in the County of Santa Barbara.


PASSED, APPROVED AND ADOPTED by the Board of Supervisors of the County of Santa Barbara, State of California, this 25th day of June 2013, by the following vote:

AYES:	Supervisor Wolf, Supervisor Farr, Supervisor Adam, and Supervisor Lavagnino
NOES:	None
ABSTAINED:	None
ABSENT:	Supervisor Carbajal


SALUD CARBAJAL
Chair, Board of Supervisors
County of Santa Barbara

ATTEST:

CHANDRA L. WALLAR
Clerk of the Board of Supervisors

By 
Deputy Clerk

APPROVED AS TO FORM:
DENNIS A. MARSHALL
County Counsel


By 
Deputy County Counsel

EXHIBIT 2

