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STAFF REPORT: REGULAR CALENDAR

Application No.:	**9-13-0344**
Applicant:	**Southern California Gas Company**
Location:	La Goleta Natural Gas Storage Facility, west of State Highway 217, east of Moffett Place and north of Sandspit Rd., Goleta, Santa Barbara County (see Exhibits 1 and 2)
Project Description:	Conduct the second phase of a pipeline maintenance project consisting of removing 41 wooden pipeline supports and installing 24 new steel and concrete supports along existing above-ground pipelines.
Staff Recommendation:	Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

The Southern California Gas Company (SCG) is required to maintain the safety of its existing natural gas pipelines. The support structures for three existing above-ground natural gas pipelines inside the La Goleta Natural Gas Storage Facility in unincorporated Santa Barbara County and near the La Goleta slough are degraded and need to be replaced to ensure the long-term safety of these pipelines (see Exhibits 1 and 2). SCG therefore proposes to remove 41 wooden pipeline supports and install 24 new steel and concrete supports along the existing above-ground pipelines (see Exhibit 3). The entire project area is considered wetland habitat and

is either within or directly adjacent to areas designated by the County as Riparian Corridor and Environmentally Sensitive Habitat (see Exhibit 7).

The project consists of repair and maintenance activities. Under Coastal Act Section 30610 and the Commission's regulations, a permit is required for repair and maintenance activities that occur in or near environmentally sensitive habitat (ESHA) or in or near coastal waters. For such activities, the Commission reviews the proposed repair and maintenance activities for Coastal Act consistency, but not the underlying existing development (e.g., the existing pipelines).

Key Coastal Act Issues: These Findings evaluate the proposal for consistency with relevant Coastal Act policies, including:

- **Environmentally Sensitive Habitat Areas (ESHA):** The project is located in ESHA near the Goleta Slough (see Exhibits 4 and 7), which provides important habitat for numerous wildlife and plant species. Project activities will result in the removal of native soil and vegetation to install the proposed piers. However, this area is already highly disturbed due to existing development and permitted maintenance activities associated with CDP E-11-031. Indirect impacts from erosion will be minimized through Best Management Practices. **Special Condition 1** will protect the ESHA against any significant disruption of habitat values by requiring SCG to avoid construction during the bird nesting season to the maximum extent feasible. As conditioned, the project is not expected to significantly degrade ESHA.
- **Wetlands:** The project is expected to permanently impact between 85 and 462 ft^2 of wetland habitat (see Exhibits 4 and 5). **Special Condition 2** requires SCG to submit to the Executive Director for review and approval a wetland restoration plan that assures mitigation for the loss of wetland habitat at a 4:1 ratio. With implementation of this condition in place, the proposed repair and maintenance project is consistent with the Coastal Act's wetland policy.
- **Spill Prevention and Response:** Proposed project activities would occur near coastal waters. SCG will implement spill protection and response measures included in the project-specific Spill Prevention and Response Plan (see Appendix A) to reduce the potential for spills and provide adequate response should spills occur.
- **Archaeological Resources:** Although areas to be excavated as part of the project's activities are not believed to contain archaeological resources, the project area includes several known archaeological sites. SCG will minimize the effects of potential archaeological disturbances by conducting excavations pursuant to County guidelines, which include monitoring by an approved archaeologist and Native American consultant, "stop work" upon detection, and investigations as needed to determine the significance of any identified sites.
- **Hazards:** The proposed project could adversely impact the stability of the site and stability of existing infrastructure. SCG will implement the recommendations in the geotechnical report written by Globus Engineering and dated January 29, 2013, thus minimizing the risk of geologic and other hazards.

Staff Recommendation: Staff recommends the Commission **conditionally approve** the proposed project.

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APPENDICES

EXHIBITS

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit Application No. 9-13-0334 subject to the conditions set forth in the staff recommendation.*

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

Resolution:

The Commission hereby approves Coastal Development Permit 9-13-0334 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment**. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

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

4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

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

III. SPECIAL CONDITIONS

This permit is subject to the following special conditions:

1. **Protection of Environmentally Sensitive Habitat Areas.** All project activities shall occur outside of the bird breeding season (February 15 through August 31) to the maximum extent feasible. If project activities do occur between February 15 and August 31, SCG's biologist will conduct nesting surveys in the project area. If breeding is observed or active nests located, no project activities shall occur within 300 feet (500 feet for raptors) of such nests until any young birds have fledged and left the area.

2. **Wetland Mitigation**. Within 90 days after the completion of project construction activities, the SCG shall submit to the Executive Director for review and approval a wetland restoration plan that assures mitigation for the loss of wetland habitat at a 4:1 ratio. This plan shall include:
   (a) Documentation of the total areal extent of permanent wetland impacts associated with project activities
   (b) Identification of a restoration site in the vicinity of the project site
   (c) A description of restoration activities including specific methodologies for invasive species removal and native vegetation planting. The plan shall require the use of local container stock in place of seed or non-local sources, whenever possible.
   (d) Interim and final performance criteria for each of the three years of post-planting site monitoring that reflect a goal of achieving 90 percent vegetative cover of the restoration site with native species.
   (e) A monitoring plan that describes the type of monitoring activities that will be used to assess whether SCG is meeting the required wetland restoration performance criteria.
   (f) An adaptive management plan that includes contingency measures in case performance criteria are not achieved
   (g) A timeline for restoration implementation, monitoring and reporting activities

   Compliance with this plan shall include annual monitoring and reporting to the Executive Director for three years. If at the completion of the three year monitoring and reporting period (dated from the completion of planting activities), the Executive Director determines that the performance criteria described within the plan have not been met, SCG shall submit, within 120 days of the Executive Director's determination, a new Restoration and Monitoring Plan for Executive Director review and approval.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

The Southern California Gas Company (SCG) is required by the United States Department of Transportation to maintain the safety of its existing three natural gas pipelines inside the La Goleta Natural Gas Storage Facility in unincorporated Santa Barbara County and near the Goleta Slough located west of State Highway 217, east of Moffett Place and north of Sandspit Road (see Exhibits 1 and 2). Several wood pilings that support the pipelines are severely degraded and at risk of failure (see Exhibit 6). Failure of a support piling could compromise the integrity of the pipeline itself and result in the release of natural gas to the surrounding habitats. The Goleta Slough area contains environmentally sensitive habitat areas, wetlands, coastal waters, and other sensitive coastal resources including significant acreage designated as Riparian Corridor and Environmentally Sensitive Habitat (see Exhibit 7). A release of natural gas into these sensitive habitats could be devastating to the plants and wildlife protected by the area's ESHA status.

SCG is implementing a pipeline safety improvement program in two phases. The Commission authorized the first phase under CDP E-12-006 that included soil sampling and analysis at nine locations along the existing pipelines to determine if the surrounding soils were stable enough to allow the replacement of the existing wooden support pilings with steel pilings. The work was completed at the end of 2012 and a geotechnical report was issued by Globus Engineering in January of 2013. In this application, SCG proposes to remove 41 existing wooden support structures and install 24 new steel and concrete support structures. The new supports will be embedded to a depth of 15 to 40 feet (depending on the depth to mean sea level and/or bedrock) and installed an average of 30 feet apart (see Exhibit 3). Two piers will be drilled on either side of the pipeline at each location and then connected with a 15 foot cast-in-place concrete support perpendicular to the pipeline. Once the new supports are installed, the above-grade portions of the old wooden supports will be removed.

SCG will use one of four types of piles for each support, depending on the soil conditions and the accessibility of construction equipment. These pile types include (1) helical piles, (2) mini-piles with cast-in-place construction, (3) drilled piers with wet construction, and (4) larger drilled piles with a steel hollow structural section cross-beam. The first three types of piles have a diameter of 18 inches. The larger drilled pile has a diameter of 42 inches. Drilled piers with wet construction is the preferred pile type, but the actual pile type will be determined in the field depending on the size of the equipment needed to install the piles and access to the site. SCG will drill up to four test piles before the installation of the 24 support piles. The total area of impact will range from 85 ft^2 to 462 ft^2 depending on the type of pier used. Spoils from the drilled piers will be disposed of offsite.

Once these new piers are installed, SCG will remove 41 of the old wooden piers (see Exhibit 3). Only the above grade portion of the piers will be removed to avoid soil disturbance. A backhoe or sideboom will be used to support the section of pipeline where the old supports are being removed. The wooden cross beam will be unbolted and removed and then a chainsaw will be used to cut the piers off level with the existing grade.

Construction equipment and vehicles will be staged on existing paved or gravel roads and will remain at least 50 feet from the banks of Atascadero Creek. Construction equipment may include a limited access auger, a concrete truck, a box truck, crew trucks, a pump truck, a vacuum truck, a water storage tanker, a welding machine, a generator, a small boom truck, a dump truck and small mechanical hand tools. The potential area of temporary disturbance from construction equipment and crews comprises approximately 15,360 ft^2 in the area immediately surrounding the existing pipelines. The construction window is approximately 40 days.

B. JURISDICTIONAL BACKGROUND

The project site is located within two different jurisdictions. A small portion of the site is within the certified LCP jurisdiction of the County of Santa Barbara, for which the County has coastal development permit issuing authority. The majority of the site is located within the Coastal Commission's retained jurisdiction.

Section 30601.3 of the Coastal Act provides that when a project requires a coastal development permit from a local government with a certified Local Coastal Program and the Coastal Commission, a single, consolidated coastal development permit for the entire project may be processed by the Coastal Commission if the applicant, the Commission, and local government agree to that process. On June 23, 2014, the County of Santa Barbara agreed to a consolidated permit under Section 30601.3 of the Coastal Act. The applicant also agreed to a consolidated permit for the portions of the project within the County's jurisdiction.

Thus, while the proposed project spans two different jurisdictions, the Commission is authorized, based on the consolidated permit process in Section 30601.3 to review the entire project for consistency with the Chapter 3 policies of the Coastal Act, with the County's LCP used for guidance.

C. OTHER AGENCY APPROVALS

California Department of Fish and Wildlife (CDFW)

SCG filed for a Stream Bed Alteration Agreement from the CDFW on May 27, 2013, which is being processed concurrently with this application.

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

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

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

> *Notwithstanding any other provision of this division, no coastal development permit shall be required pursuant to this chapter for the following types of development and in the following areas: . . .*
>
> *(d) Repair or maintenance activities that do not result in an addition to, or enlargement or expansion of, the object of those repair or maintenance activities; provided, however, that if the commission determines that certain extraordinary methods of repair and maintenance involve a risk of substantial adverse environmental impact, it shall, by regulation, require that a permit be obtained pursuant to this chapter.*

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

> *For purposes of Public Resources Code section 30610(d), the following extraordinary methods of repair and maintenance shall require a coastal development permit because they involve a risk of substantial adverse environmental impact:…*
>
> *(3) Any repair or maintenance to facilities or structures or work located in an environmentally sensitive habitat area, any sand area, within 50 feet of the edge of a coastal bluff or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams that include:*
> *(A) The placement or removal, whether temporary or permanent, of rip-rap, rocks, sand or other beach materials or any other forms of solid materials;*
> *(B) The presence, whether temporary or permanent, of mechanized equipment or construction materials.*
>
> *All repair and maintenance activities governed by the above provisions shall be subject to the permit regulations promulgated pursuant to the Coastal Act, including but not limited to the regulations governing administrative and emergency permits. The provisions of this section shall not be applicable to methods of repair and maintenance undertaken by the ports listed in Public Resources Code section 30700 unless so provided elsewhere in these regulations. The provisions of this section shall not be applicable to those activities specifically described in the document entitled Repair, Maintenance and Utility Hookups, adopted by the Commission on September 5, 1978 unless a proposed activity will have a risk of substantial adverse impact on public access, environmentally sensitive habitat area, wetlands, or public views to the ocean.*…(emphasis added)

Although the proposed repair and maintenance activities will not add to or enlarge the subject pipelines, the proposed work involves placing construction materials, removing and placing solid materials, and the temporary use of mechanized equipment, all within 50 feet of ESHA. The proposed repair project therefore requires a coastal development permit under CCR Section 13252.

In considering a permit application for a repair or maintenance project pursuant to the above-cited authorities, the Commission reviews whether the proposed method of repair or maintenance

is consistent with the Chapter 3 policies of the Coastal Act. The Commission's evaluation of such repair and maintenance projects does not extend to an evaluation of the conformity with the Coastal Act of the underlying existing development.

E. ENVIRONMENTALLY SENSITIVE RESOURCES

Section 30240 of the Coastal Act states:

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

Section 30107.5 states:

> *"Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.*

Proposed project activities would occur in and near Goleta Slough, an area that consists largely of ESHA as defined by both the Coastal Act and the County LCP (see Exhibit 7). Specifically, the western project area, to the west of Ward Memorial Blvd., is located in wetlands, portions of which are considered ESHA and portions of which are not ESHA. The eastern project area, to the west of Ward Memorial Blvd, is located in wetlands and is designated entirely as ESHA (see Exhibits 4 and 5). Portions of the project area are also immediately adjacent to Atascadero Creek. Because the project consists of repair and maintenance of existing facilities, some of which are located in ESHA, there are no alternative locations for the project that could entirely avoid ESHA.

For the first phase of this project, SCG conducted a jurisdictional delineation study to determine the extent of wetlands and sensitive wildlife and plant species at the project site and to assess potential impacts to these resources from the proposed project. The study identified several plant and wildlife species listed as endangered, threatened, candidate or rare pursuant to the state Endangered Species Act, as well as several sensitive species with the potential to occur at the project site. However, none of these species were observed during field surveys at the proposed project sites. The survey concludes that only four plant and two wildlife species have a low or low-to-moderate potential to occur in the project area.

Although the majority of the project site is identified as ESHA, the vegetation at most of the sampling sites is highly disturbed due to existing development and ongoing maintenance activities associated with the existing pipelines. On March 9, 2012, the Commission approved

CDP E-11-031, authorizing SCG to conduct vegetation clearing within 10 feet of existing pipelines at 36 sites within SCG's La Goleta Storage Facility. These vegetation maintenance activities satisfy pipeline safety requirements of the U.S. Department of Transportation (pursuant to 49 C.F.R. Part 192). Under E-11-031, SCG was required to mitigate these impacts through restoration of various types of habitat (i.e., coastal scrub upland, wetland, riparian, etc.) at a 1:1 mitigation ratio. To comply with the conditions of E-11-031, SCG submitted a Native Vegetation Restoration Plan to Commission staff in March of 2012. SCG submitted the first year restoration monitoring report in November of 2013. The entire proposed project site is included in this approved vegetation maintenance area.

Potential impacts from proposed project activities fall into two categories: direct impacts from pier installation and removal activities and indirect impacts from erosion, noise and staging of equipment. Impacts from pier installation will involve the permanent removal of soil and surface vegetation. The total area of impact from the installation of 24 piers will range from 85 ft^2 to 462 ft^2 depending on the type of pier used. Impacts from above-ground removal of the existing wooden piers are expected to be very minor and do not include ground disturbance activities. Installation of the new piers will permanently displace a small area currently designated as ESHA. However, this area is already subject to regular vegetation removal and other maintenance activities and is considered highly disturbed. Impacts from the proposed project will not adversely affect non-wetland ESHA above and beyond the impacts permitted under E-11-031 (wetland impacts are discussed further in Section F). Furthermore, through approval of E-11-031, the Commission has already analyzed impacts to this vegetation and required SCG to mitigate these impacts with restoration of native habitat. To further minimize impacts to sensitive species, SCG's biologist will inspect the construction area within ten days prior to the start of construction to flag any sensitive plant species for avoidance. In addition, given the small impact footprint and the high degree of existing disturbance, it is unlikely that project activities would affect any listed or sensitive wildlife species in the surrounding area.

In addition to direct impacts to ESHA from removal of vegetation and soil, the proposed project could cause adverse impacts to ESHA from erosion, noise from construction equipment and staging. To minimize impacts to Atascadero Creek and surrounding wetland ESHA from erosion, SCG has proposed the following Best Management Practices:

- Preservation of existing vegetation to the maximum extent possible to stabilize the soil
- Use of geotextiles, mats, plastic covers and/or gravel bags to cover any soil stockpile within 72 hours of a forecasted rain event.
- Use of silt fencing and fiber rolls to intercept slow flows from a rain event.

With these measures in place, erosion from the site will be controlled, thus minimizing potential impacts to Atascadero Creek from excessive sedimentation.

Noise from equipment used to drill the piers is also of potential concern. Most of the project activities will be conducted by a truck-mounted drill rig, although it is likely that a limited-access drill rig will also be used at certain locations. Noise from these types of equipment is relatively low (similar to a truck with a diesel engine) and will be short in duration, and thus is not expected to result in adverse impacts to surrounding wildlife. Furthermore, this area, although

designated as ESHA, is highly disturbed and is subject to routine maintenance activities, including the use of motorized vegetation removal equipment. Thus, native wildlife is likely to be accustomed to occasional periods of elevated noise. To further reduce the potential for impacts to sensitive species within ESHA areas, the Commission is requiring in **Special Condition 1** that SCG perform all construction activities outside of the bird breeding and nesting season (February 15 to August 31), to the extent feasible. If construction activities do occur between February 15 and August 31, SCG's biologist will conduct nesting surveys in the project area. If breeding is observed or active nests located, no project activities shall occur within 300 feet (500 feet for raptors) of such nests until any young birds have fledged and left the area. With these measures in place, and given the relatively low level of noise and the short duration of construction activities, impacts to ESHA from construction-related noise are expected to be minor.

Impacts from staging drilling and other construction equipment on the adjacent paved road or shoulder are expected to be negligible. In some cases, construction equipment may need to be moved off the road and/or shoulder. However, according to the site's biological survey, these areas are located in sand flats that are mostly devoid of vegetation, with only a few scattered clumps of non-native grasses. Thus, although off the paved road, staging at these sampling sites is not expected to result in adverse impacts.

As described above, the proposed project is repair and maintenance of an existing pipeline. Thus, although, non-resource dependent development is proposed in ESHA, there are no alternative methods of accomplishing the proposed repair and maintenance project that will avoid ESHA, and the Commission is only able to review the method by which SCG carries out repair and maintenance. The Commission has conditioned the project to ensure that the method of repair and maintenance used by SCG limits impacts to ESHA to the maximum extent feasible and that the project will not significantly degrade ESHA. The repair and maintenance project is therefore consistent with Coastal Act Section 30240.

F. WETLANDS

Coastal Act Section 30233 states in relevant part:

> *(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:*
>
> *(1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.*
>
> *(2) Maintaining existing, or restoring previously dredged depths 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.

The excavation, removal, or any other artificial disturbance of any sediment or soil in a wetland constitutes "dredging" and is therefore subject to the policies of Coastal Act Section 30233.

The entire project site is classified as a wetland based on the presence of at least one of three wetland indicators: wetland hydrology, wetland vegetation or hydric soils (see Exhibit 5). Project-related dredging activities are expected to result in the loss of between 85 and 462 ft^2 of wetland habitat. The project also has the potential to temporarily impact up to 15,360 ft^2 of wetland habitat.

Projects that include dredging of wetlands must meet the three tests of Coastal Act Section 30233(a). The first test requires that the proposed activity fit into one of seven categories of uses enumerated in Coastal Act Section 30233(a)(1-7). However, in this case, because the Commission is solely reviewing the method by which the applicant executes the repair and maintenance activities, the first test under Section 30233(a) is not applicable. The second test requires that there be no feasible less environmentally damaging alternative. The third and final test mandates that feasible mitigation measures be provided to minimize the project's adverse environmental effects.

As discussed in Section A of this report, the work proposed is to replace the existing dilapidated wooden supports for SCG's existing pipelines. Allowing the existing wooden supports to remain in place increases the risk of a pipe breach associated with the failure of one or more supports. Even a small leak of hazardous materials would have significant adverse impacts on the surrounding wetlands and ESHA. Therefore, avoiding the work, or the "no project" alternative, is not an environmentally preferable option. In addition, because the proposed work involves repair and maintenance of existing infrastructure, there are no alternative locations for the project that could entirely avoid wetlands or ESHA. Finally, the proposed piers will minimize the impact footprint within the wetlands to the maximum extent possible while ensuring the supports are adequate to support the existing pipeline. Thus, there is no feasible less environmentally damaging alternative and the Commission finds this project consistent with the second test of Coastal Act Section 30233(a).

The final test requires that feasible mitigation measures be provided to minimize the project's adverse effects. The proposed project is expected to permanently impact between 85 and 462 ft^2 of wetland habitat. To mitigate this impact, SCG proposes to restore degraded wetland habitat on a nearby site at a 1:1 ratio. Wetland restoration would occur at a site adjacent to an existing SCG wetland restoration site and would include removal of non-native plants and planting native vegetation, consistent with ongoing restoration efforts at the adjacent site (see Exhibit 8). Although the Commission typically requires a 4:1 mitigation ratio for wetland mitigation, SCG here proposes a 1:1 mitigation ratio only due to the heavily disturbed nature of the impacted wetlands. Given the small area of impact and SCG's proposal to restore wetland habitat adjacent to a larger restoration site, the Commission believes that mitigation in the form of restoration instead of wetland creation is appropriate in this case. However, the Commission has consistently required a 4:1 wetland mitigation ratio regardless of the degree of disturbance of the impacted wetland. Given the extensive loss of wetland habitat in the project vicinity, even a very small loss of remaining wetland habitat can have significant adverse ecological consequences that extend outside the impact area. Furthermore, the lag time between project-related wetland impacts and a fully functioning wetland restoration project results in a temporal loss of wetland function that must be accounted for. Thus, the Commission is requiring in **Special Condition 2** that SCG mitigate wetland impacts at a 4:1 ratio. Special Condition 2 requires SCG to submit a wetland restoration plan to the Executive Director for review and approval within 90 days of completion of project activities. This plan must include: (1) documentation of the total areal extent of permanent wetland impacts associated with project activities, (2) identification of a restoration site in the vicinity of the project site, (3) a description of restoration activities, (4) interim and final wetland performance criteria, (5) a monitoring plan, (6) an adaptive management plan, and (7) a timeline for restoration implementation, monitoring and reporting activities. With this condition in place, SCG will be required to fully mitigate any permanent impacts to wetland habitat.

The proposed project could also result in temporary impacts to up to 15,360 ft^2 of wetland habitat due to dust and noise from construction equipment, staging of equipment and the presence of construction personnel. However, this area in completely contained within the vegetation management area described in E-11-031 that is the subject of vegetation removal and other pipeline maintenance activities. These maintenance activities are similar or potentially more severe than the temporary impacts anticipated under the proposed project. CDP E-11-031 required SCG to submit a native vegetation restoration plan that mitigates for impacts to ESHA and wetlands from these maintenance activities. SCG submitted this plan in March of 2012 and has completed the first year of monitoring for the restoration project. Thus, under E-11-031, SCG is already mitigating for the types of impacts in the project area that are expected from the proposed project, and additional mitigation for temporary wetland impacts is unnecessary.

Consequently, the Commission finds that the third and final test of Coastal Act Section 30233(a) is also satisfied and the proposed project, with the inclusion of **Special Condition 2**, is consistent with Section 30233 of the Coastal Act.

G. SPILL PREVENTION AND RESPONSE

Coastal Act Section 30232 states:

> *Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.*

This Coastal Act policy requires protection against spills of hazardous substances and effective management of spills should they occur. The most likely project-related spill scenario would be a release of fuel from construction equipment. A worst case spill under this scenario would be approximately 75 gallons. Although no pipeline work is proposed, it is also possible that project activities could result in an accidental breach of the existing natural gas pipelines, resulting in a release of natural gas into the surrounding environment.

SCG has a Spill Prevention Plan for the La Goleta Natural Gas Storage Facility. In addition, in August 2012, Psomas, on behalf of SCG, prepared a project-specific Spill Prevention and Response Plan (Plan). The Plan requires all vehicle and equipment to be inspected for leaks prior to commencement of project activities and requires refueling to occur on paved surfaces and to include spill control such as fuel pans, sandbags and/or absorbent materials. In addition, SCG is required to have immediately available an estimate of the worst-case release and spill cleanup kits sufficient to cleanup any potential spill available onsite at all times. The Plan also includes procedures to be followed in the event of a spill including notification requirements, contact information for agency personnel, and a designated person to implement protocols and make the necessary contacts.

With implementation of SCG's Spill Prevention and Response Plan, the Commission finds that the proposed project will be carried out in a manner that protects against spills of hazardous substances and provides for effective containment and cleanup should a spill occur and is therefore consistent with Coastal Act Sections 30232.

H. ARCHAEOLOGICAL RESOURCES

Coastal Act Section 30244 states:

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

The location of the La Goleta Facility is within the historic territory of the Chumash and includes several known archaeological sites containing human remains, stone artifacts, tools, and other materials. An archeological survey conducted on September 7, 2011 indicated that several archaeological sites are near, but outside, of areas that would be excavated during project activities. To minimize impacts from potential archeological disturbances, SCG proposes to have all excavation and other earthmoving activities monitored by an archeologist and a Native American consultant who meets the requirements for County of Santa Barbara cultural resource monitors as outlined in the County's Archeological Guidelines. Prior to work at each excavation site, the archeologist will train workers on how to recognize archeological resources and what

steps to take should any archeological resources be discovered. If archeological remains are discovered, all work in the area will stop immediately and will be restarted only after the significance of the remains is analyzed and the necessary investigation completed by the archeologist and the Native American consultant in compliance with the County's Archeological Guidelines. SCG will notify the Executive Director at the commencement of any investigation associated with project activities and provide results of the investigation within 30 days of completion. With implementation of the above measures, the Commission finds that the proposed project will be carried out in a manner that is protective of archaeological resources that may be encountered during project activities and is therefore consistent with Coastal Act Section 30244.

I. HAZARDS

Section 30253 of the Coastal Act states in part:

> *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.*

The proposed project includes ground disturbance and structural activities that have the potential to adversely impact the stability of the site and stability of the existing infrastructure. The purpose of the proposed project is to replace dilapidated pipeline supports to ensure the long-term integrity of the existing pipeline. Compromised stability of the site or of the pipelines themselves could result in a release of hazardous materials into surrounding ESHA and wetlands.

SCG hired Globus Engineering to conduct a geotechnical evaluation of the site and the proposed project and to make recommendations on project alternatives, design parameters, construction methods and monitoring. This report included collecting and analyzing soil samples as permitted under the first phase of this project (CDP E-12-006). The resulting report notes that the "site is considered to be somewhat difficult for foundation construction and it will require some additional effort compared to conventional foundation design and construction." Site constraints include existing fills, high groundwater level, potential for liquefaction, limited access to pier locations, and soil corrosivity.

To address these constraints, the Globus report includes a series of recommendations on site preparation, fill and backfill, temporary excavations and pile foundations that are designed to ensure the structural stability of the new supports and thus, the existing pipelines. The different types of piles that may be used as part of the project, described in the project description, are included in the Globus report and are designed to give SCG flexibility to respond to local soil conditions while still ensuring a functional and stable support system. Dr. Mark Johnsson, the Commission's geologist, reviewed the Globus report and agreed with the findings and recommendations included therein. As part of the project description, SCG has agreed to follow

the recommendations included in the Globus report. With implementation of the measures recommended in the Globus report, the Commission finds that the proposed project will be carried out in a manner that minimizes the risk of geologic and other hazards and is consistent with Section 30253 of the Coastal Act.

J. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

The proposed development has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including conditions addressing biological resources, fill of wetlands, oil spill prevention and response, cultural resources and hazards will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and is consistent with the requirements of the Coastal Act to conform to CEQA.

Appendix A: Substantive File Documents

California Coastal Commission, Staff Report for CDP E-11-031: Southern California Gas Company Pipeline Maintenance and Vegetation Management Activities at La Goleta Natural Gas Storage Facility. Hearing Date: March 9, 2012.

Globus Engineering, Inc. Report: Geotechnical Investigation, Proposed Pipe Supports, Goleta, California, For The Southern California Gas Company. Job No. 0525, January 29, 2013.

Southern California Gas Company, Coastal Development Permit application and accompanying documents, initially submitted May 28, 2013.

Southern Calirofnia Gas Company, email communications to Kate Huckelbridge on 3/7/2014, 6/9/2014, 7/21/2014, 7/22/2014, 7/23/2014, and 7/24/2014.

Southern California Gas Company, Response to Notices of Incompleteness, submitted October 11, 2013 and February 11, 2014.

Sage Institute, La Goleta Natural Gas Storage Facility Pipeline Maintenance and Vegetation Management Project Native Vegetation Restoration Plan, March 15, 2012.

Spill Prevention and Response

1. SPILL PREVENTION PROCEDURE

1.1. Spill Prevention Methods

1.1.1. Daily Equipment Inspection

All equipment, material, and vehicles to be used for construction activities shall be inspected for oil, fuel, or hazardous substance leaks prior to the day activities. This inspection shall take place within paved areas of the La Goleta. Facility

All inspection areas shall have sufficient controls to contain any leaks that may occur. Construction Best Management Practices for spill control will be implemented by having spill control (i.e. sandbags, absorbent materials) and cleanup kits onsite.

1.1.2. Refueling

All refueling of equipment and vehicles will occur on paved areas of the La Goleta Facility to the extent feasible. Field refueling will have spill control (i.e. fuel trays, sandbags, absorbent materials) and cleanup kits onsite.

The total amount of fuel onsite for project activities shall be estimated and available to the onsite safety personnel/project manager to allow for the worst case scenario if a release of fuel occurs.

2. RESPONSE PROCEDURE

2.1. Release Initial Response

As soon as a release is identified, the first steps to take are as follows:

STEP 1: SAFETY - Be Safe: If a release is identified, immediately assess the situation and ensure your safety and the safety of others.

STEP 2: ISOLATE - Isolate the incident to keep others away from the release area using, e.g., cones, barricades, caution tape or the positioning of a vehicle to block spill/release area from access.

Emergency Containment: If possible, and if you have proper training and personal protective equipment (PPE), stop the flow of the spill. Contain/dike the release (e.g., using absorbent or dirt) prior to internal notification only if it can be done quickly and will not significantly delay notification.

STEP 3: NOTIFY -

- If the incident requires emergency responders (fire or ambulance), e.g., there is an injury requiring emergency medical support, a fire or explosion has

occurred or fire department response is needed to assist with incident control, **immediately call 911**.

- o If the release or spill does not require emergency responders, but triggers the need to notify agencies, The On-site representatives for Environmental or Safety will provide agency notifications if required. On-site personnel have been designated as Gary Rohrer and Dave Vasquez. Environmental Services Department staff can also provide support on the incident.

  - ☐ Any spill, release or discharge of the following substances in a quantity greater than that shown in the table below:

Name	Quantity
Herbicides; Insecticides; Rodenticides	1 pint
Pesticides	1 gallon
Corrosives - pH less than 4, greater than 11	1 pint
Ignitables/Flammables - flash point less than 140 degrees F	1 gallon
Petroleum oil	42 gallons
Epoxy paint or glue	1 quart
Zinc chromate paint	1 pint
Mercury	1" diameter drop
Chlorinated solvents	1 gallon
Toxic gases (H_2S greater than 10 ppm, chlorine & ammonia)	100 cu. ft.
Any hazardous waste, i.e., waste oil, waste solvents or pipeline liquids	1 gallon

2.2. Immediate Notification

2.2.1. A company is required to "***immediately***" report a release or threatened release that meets or triggers reporting criteria, that is, as soon as the company has knowledge of the release. This 'clock' begins when the first employee of the company has knowledge of the release. Although immediate is not specifically defined by statute, it is very important not to delay initiating the reporting process.

2.3. Federal, State and Local Notification Requirements

2.3.1. Overview: There are numerous laws, regulations and ordinances that define the requirement to notify agencies when a release or threatened release of a hazardous substance, hazardous material or hazardous waste occurs. Reporting may be triggered by many factors including; the source of a release, impact of the release (where it travels to), permit condition under which the release occurred or other situations. Reporting may also be required even if no release has occurred, but a potential for a release to occur exists. Some incidents require local, state and federal reporting. Most incidents require contacting multiple agencies.

2.3.2. Federal Requirements: Federally regulated hazardous substances include hundreds of chemicals that if released into the environment in any amount

equal to or exceeding their established reportable quantity (RQ) over a 24-hour period require agency notification. The key requirements for emergency release reporting are codified in the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) and the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA). Federal triggers require notification to the National Response Center (NRC) and the state and local emergency planning committees (SEPC/LEPC) which is the California Emergency Management Agency (Cal EMA), formerly known as the California Office of Emergency Services (OES) and the local lead agency for emergency notification, most often the Certified Unified Program Agency (CUPA). Additionally, if a CERCLA RQ is met or exceeded, a notice to potential injured parties must be published in a local newspaper that services the affected area. (42 USC 96111(g)).

2.3.3. State Requirements**:** The state of California reporting requirements are more stringent than federal requirements because the state of California does not use federal reporting quantities (RQs) for their reporting triggers. For California, all releases or spills of a **hazardous material** that could reasonably be believed to pose a significant or potentially significant hazard to human health & safety, property or the environment must be reported. The definition of hazardous material includes hazardous substances and hazardous waste.

2.3.4. Local Requirements**:** The local lead agency for emergency notification is the Certified Unified Program Agency (CUPA), Administering Agency (AA) or Participation Agency (PA) depending on your location. Local requirements for notification may vary, so it is important to check if your CUPA has specific guidelines for emergency notification. Local storm water ordinances may also have specific reporting triggers and timeline requirements.

2.3.5. Project Plan or Permit Requirements: Project plans or operation permits may also include notification requirements specific to the work activities.

2.4. Who to Notify

2.4.1. State and Local Agencies**:** At a minimum for non-emergency threatened or actual reportable releases, two calls need to be made for all California reportable releases. When a *reportable* release or threatened release is identified, you must ***immediately*** notify:

- the California Emergency Management Agency (Cal-EMA), formerly known as, Office of Emergency Services (OES), and
- the local Certified Unified Program Agency (CUPA).

2.4.2. National Reporting Center (NRC)**:** If a release meets or exceeds a federal threshold or reportable quantity (RQ) or creates an oil sheen in a waterway or is $\geq$ 42 gal of petroleum to land, also ***immediately*** notify the National Reporting Center (NRC) in addition to Cal-EMA (formerly OES) and the CUPA.

2.4.3. Additional Agencies: The agencies listed above must always be called for a reportable release or threatened release. Additional agencies may also require notification.

2.4.4. Documentation of Calls: The Field Environmental Representative making the agency call should document all notification information: the agency(ies), individual(s) name(s) and their title(s) notified, time and date each notification was made.

2.4.5. What Information to Provide Agencies

For reportable incidents, provide the following information to the agencies. Be sure that statements are accurate and if there are details or information that is not known, it is OK to say that you don't know.

- ☐ Identify your Company, your name and your call back number
- ☐ Exact incident location, date and time of the release or threatened release
- ☐ Material released and estimated quantity (if known, report is chemical is extremely hazardous)
- ☐ Description of event (what happened)
- ☐ If waterway or stormdrain was impacted
- ☐ Any injuries / fatalities / evacuations
- ☐ Other Agencies notified / agencies on scene

Additionally, for reports to the NRC (federal), the following information is also required:

- ☐ The medium impacted by the release (air, water, soil)
- ☐ Duration of the release
- ☐ Proper precautions to take and known or anticipated health risks

(Be sure to ask the agency representative for their incident number (if assigned by the agency). This number should be referenced if updates are provided on the incident or any reports are provided.)

2.4.6. Agency Telephone Numbers Reference

Agency contact numbers are listed on the Environmental Services' intranet site.

2.4.7. Verbal Updates to the OES

The FER making agency notification may not have all the information about a release or incident when the first, immediate notification is made to the agencies (Cal-EMA, formerly known as OES, and the CUPA). It is best to make the initial verbal notification ***immediately*** when a reporting trigger is

met, then follow up when more information is obtained or there is a significant change to the information you initially provided. It is OK to say 'unknown.' Examples for when to provide Cal-EMA an update includes; significant change in the volume of the release, updates to the source or cause, and if waterways become impacted. The incident number should be referenced when updates are made to the Cal-EMA. The National Response Center (NRC) does not accept verbal or written updates.

2.5. Written Incident Follow Up Report To Agency(ies)

2.5.1. Many reportable releases require a written follow up report, but not all. Written follow up requirements to multiple agencies may also be triggered by facility or programmatic permits. Due dates for these reports vary depending on incident type and applicable permits. Environmental Services and the SE Environmental Law Dept. should be contacted to identify if they need to review the incident written follow-up report(s) prior to submittal to an agency. Written follow-up reports include, but are not limited to:

2.5.1.1. Hazardous Material: For any federal reportable quantity release of a hazardous material, a written report must be submitted to the Cal-EMA using the OES Form 304 'as soon as practicable.' The EPA Enforcement Response Policy for Sections 304, 311 and 312 of EPCRA and Section 103 of CERCLA provides guidance that 'as soon as practicable' is **within 7 days of the release**. The Form 304 fulfills EPCRA and CERCLA reporting requirements. The Cal-EMA/OES Form 304 is not required to be completed for California-only reportable releases and petroleum-related releases. If a federal RQ is exceeded for a listed EPCRA and/or CERCLA substance, the Cal-EMA/OES Form 304 should be completed as soon as practicable or no more than **7 days** of occurrence per the EPA Enforcement Response Policy. A copy of the Cal-EMA/OES Form 304 is also required to be sent to the local CUPA. The Cal-EMA/OES Form 304 must be used and is available electronically on the Environmental Services' website (link to electronic Cal-EMA/OES Form 304).

2.5.1.2. Transportation Related: For a release of any Department of Transportation (DOT) Hazardous Material that occur during transport of the hazardous material/waste, a Hazardous Materials Incident Report must be submitted to the DOT within 30 days of the incident. There are some incident conditions that require a written report to DOT even though no release occurred, e.g., serious damage to a cargo tank. (49 CFR 171.16)

2.5.1.3. Permit Related: If an environmental permit exists for a facility, project or location where a release or spill occurs, then additional permit-related follow-up reports may be required as specified in the permit conditions.

3. Project Personnel

3.1. Environmental Compliance Contact Information

- James Chuang, Environmental Specialist/Land Planner (213) 248 1566
- Seth Rosenberg, Environmental Specialist/Archeologist (213) 500 4568

3.2. Project Construction Team

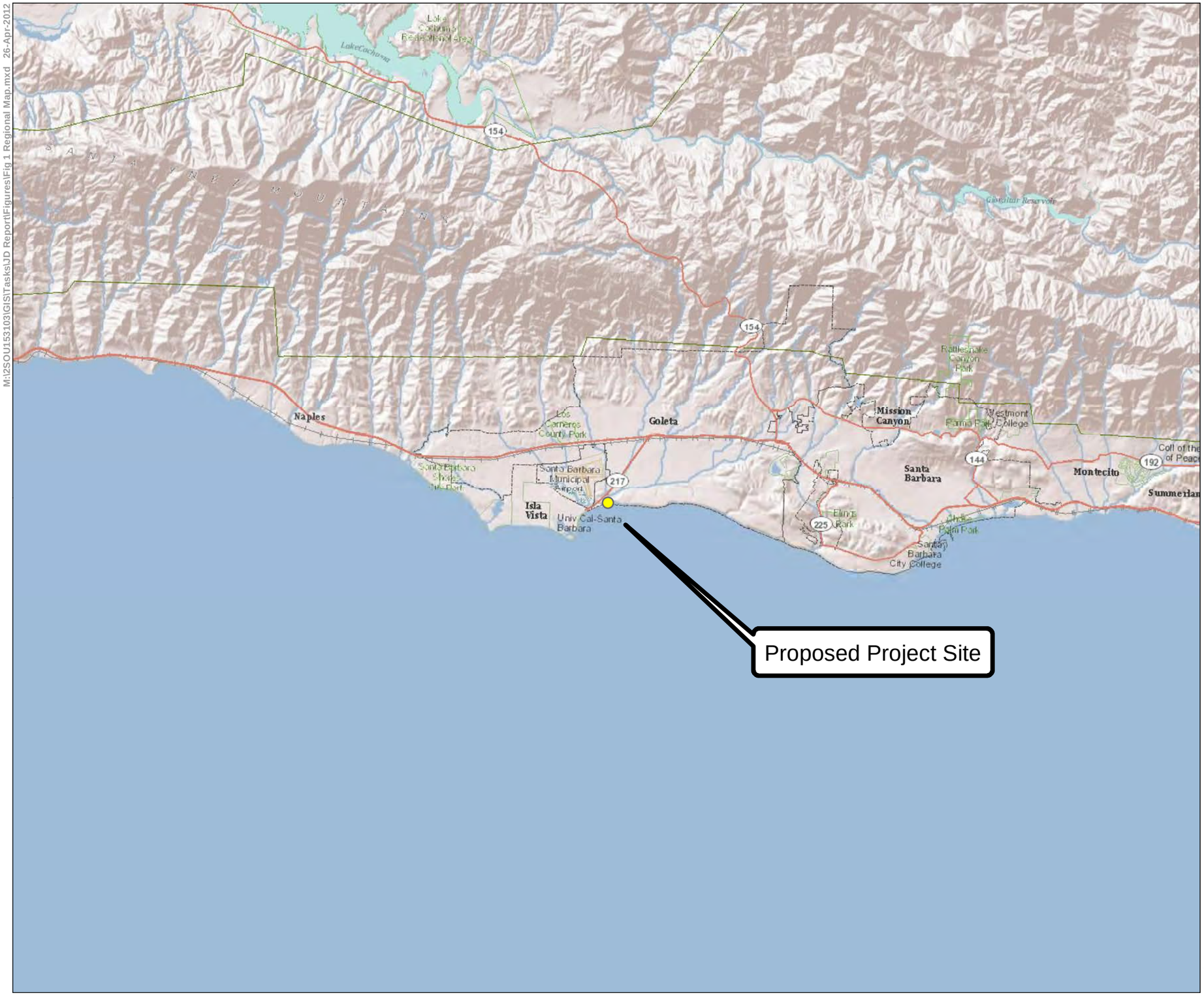
- Noelle Gutierrez, Project Manager, Transmission (213) 435 9477
- Erica Chabot, Engineer, Gas Engineering (213) 244 5012
- Glenn La Fevers, Station Ops. Mgr. Goleta Storage, (805) 681 8068
- Bob Hilty, Station Ops Supv. Goleta Storage, (805) 681-8064
- Todd Tuttle, Station Maint. Supv. Goleta Storage, (805) 901-7188
- Dennis Lowrey, Techl Advr Goleta Storage, (805).681.8072
- Damian Hernandez, Techl Spec, Goleta Storage, (805) 797-1456

3.3. Agency Contacts

- Kate Huckelbridge, California Coastal Commission (415) 904 5200
- Bruce Henderson, Army Corps of Engineers Regulatory (805) 585 2140
- Kylie Hensley, Central Coast Regional Water Quality Control Board (805) 549 3876

M:\2SOU153103\GIS\Tasks\JD Report\Figures\Fig 1 Regional Map.mxd 26-Apr-2012

Southern California Gas Company
Coast 10 20617 L247, 159 and 128 Pipeline
Soil Sampling Project
Goleta, CA



Legend

- Proposed Project Site
- County Boundary

N

1 0.5 0 1 2 3 4 5 Miles

Regional Map

PSOMAS

Figure 1

Exhibit 1

M:\2SOU153103\GIS\Tasks\JD Report\Figures\Fig 2 Project Vicinity Map.mxd 19-Sep-2012

Note: The area outlined in yellow farthest to the east was included in the project footprint for Phase 1 of the project, but is not included in Phase 2.

Southern California Gas Company
Coast 10 20617 L247, 159 and 128 Pipeline
Soil Sampling Project
Goleta, CA

Legend

Project Area

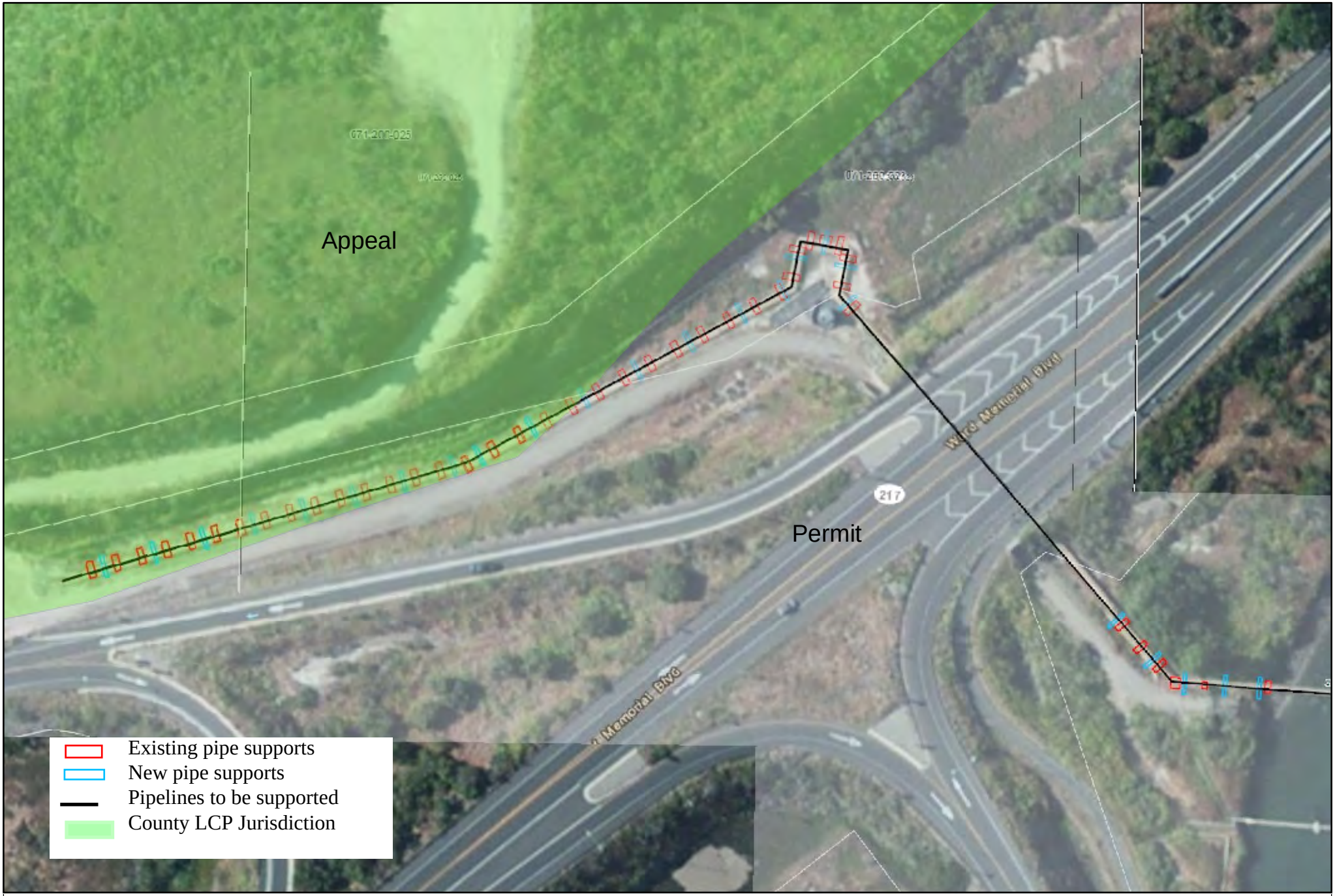
N

0 0.1 0.2 0.3 0.4 Miles

Project Vicinity Map

PSOMAS Figure 2

Exhibit 2



Goleta Pipe Support Project

0 60 120 240 Feet

0 15 30 60 Meters

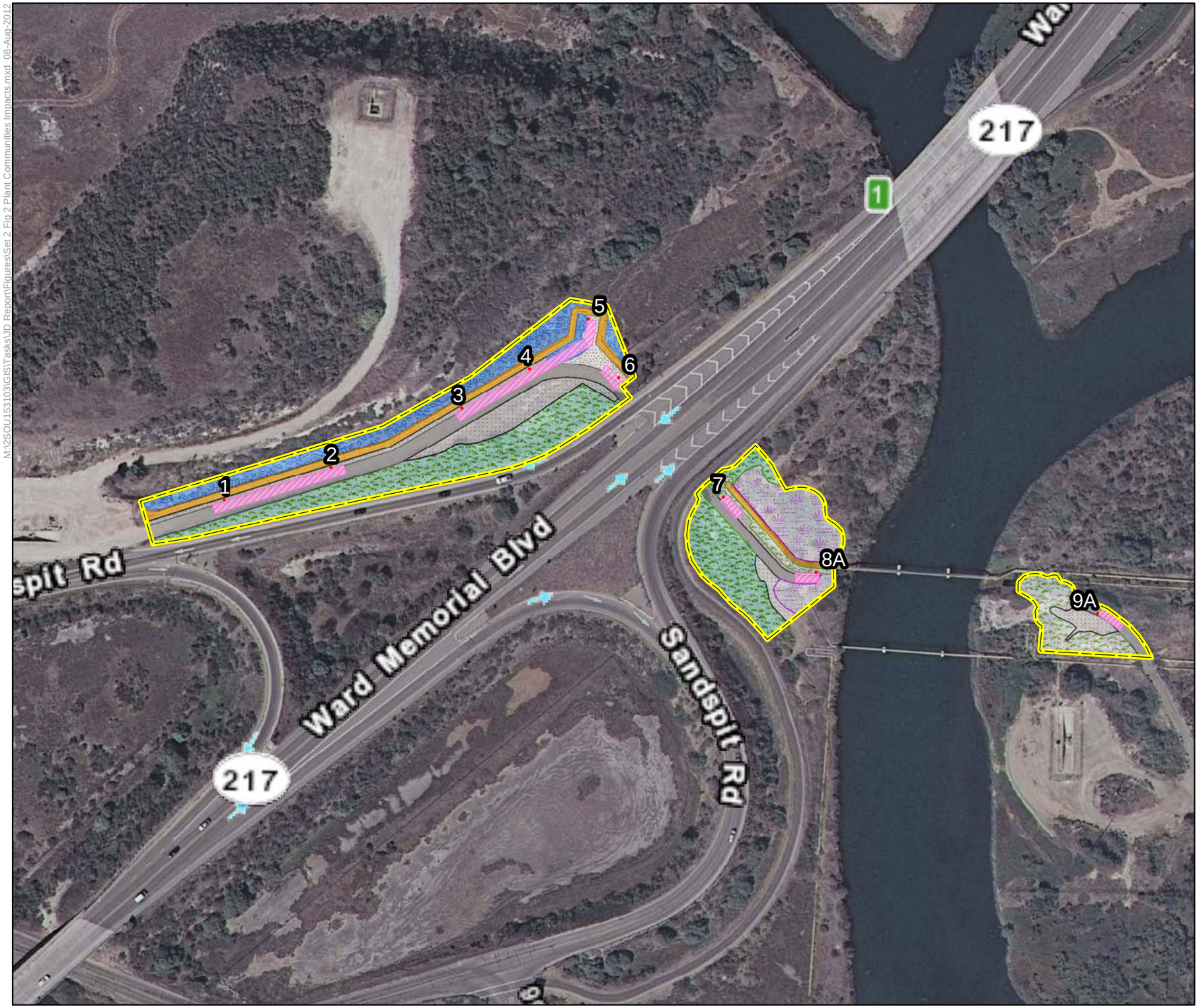
N

Southern California Gas Company
A Sempra Energy utility

This map is intended for reference use only. Not to exact scale.

Exhibit 3

M:\2SOU153103\GIS\Tasks\3D Report\Figures\Set 2 Fig 2 Plant Communities Impacts.mxd 08-Aug-2012



Southern California Gas Company
Coast 10 20617 L247, 159 and 128 Pipeline
Soil Sampling Project
Goleta, CA

Legend

- Marsh
- Coyote Brush Scrub
- Disturbed Coyote Brush Scrub
- Mixed Riparian / Coyote Brush Scrub
- Sand Flats
- Disturbed Habitat
- Developed
- Pipeline
- Staging Area
- Borings - 2 sqft (Labeled "1", "2", etc)

N

0 150 300 Feet

1 inch = 125 feet

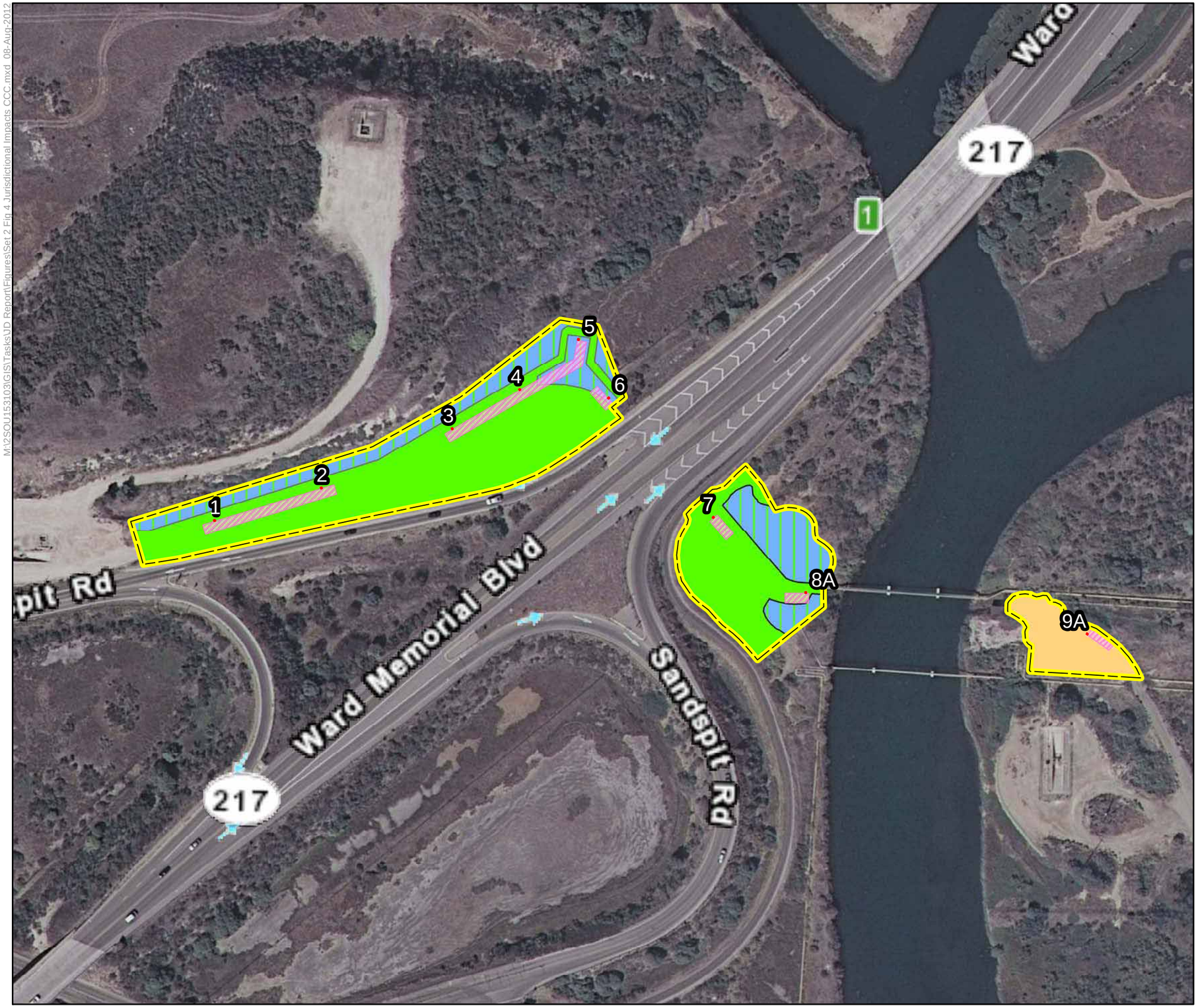
Plant Communities Impacts

PSOMAS Figure 2

Exhibit 4

Note: The area outlined in yellow farthest to the east was included in the project footprint for Phase 1 of the project, but is not included in Phase 2.

M:\2SOU153103\GIS\Tasks\JD Report\Figures\Set 2 Fig 4 Jurisdictional Impacts CCC.mxd 08-Aug-2012



Southern California Gas Company
Coast 10 20617 L247, 159 and 128 Pipeline
Soil Sampling Project
Goleta, CA

Legend

- Coastal Commission
- ACOE & Coastal Commission
- Non Jurisdictional
- Staging Area
- Borings - (Labeled "1", "2", etc)

N

0 150 300 Feet

1 inch = 125 feet

CCC Jurisdictional Area = 91,090 sq ft / 2.09 ac
Non-Jurisdictional Area = 9,311 sq ft / 0.21 ac
Project Area = 100,401 sq ft / 2.30 ac
Eight Boring Locations inside CCC = 34 sq ft

Jurisdictional Impacts: Coastal Commission

PSOMAS

Figure 4

Exhibit 5

Note: The area outlined in yellow farthest to the east was included in the project footprint for Phase 1 of the project, but is not included in Phase 2.

Exhibit 6: Image of existing failing wooden supports.

1	College Site
2	Line 80 Above Ground
3	Miller Site - Kill Header
	Miller Site - Meters
	Miller Site - Kill Header
4	Miller Site Rd. to CB #2
5	Chase Bryce 2 Well Site
6	Miller Site Road to Highway Lines 128, 159, 247
7	Miller Site Rd: Hwy to Slough
8	Pipelines Across Slough
9	Miller 5 Well Site
10	Miller 5 Well Site
11	Edwards 1 Well Site
12	Edwards 1 Rd: to Miller 5
13	Edwards 1 Pipe: Well to Valve
14	Edwards 1 Pipe: Valve to L-159
15	Bluff Road - Hill Side
16	Line 247 & Line 128
17	L-159: Slough to 1st Rd
18	L-159: 1st Rd. to Jungle Rd.
19	Chase Bryce 1 Well Site
20	Chase Bryce 1 Road
21	Jungle Road CB 1 to Ed 1
22	Jungle Road CB 1 to Plant
23	Dehy & Compressor Area
	Well Sites on Main Site
	Field Pipe on main Site
24	More 2 Well Site
25	Roads on Main Site
	Main Road to Plant
	Main Road East Side Drain
	Main Road West Side Drain
26	Drainage Area
27	South Side Road Drain
28	Tank Farm
29	Tank Farm Road
30	Tank Farm Path
31	Tank Farm Path - Out of Fence
32	Perimeter Fencing
33	Tree Line - East Prop. Line
34	Tree Line - North Prop. Line
35	Tree Line - Bluff
36	More Ranch Road

Fairview

Fowler James Fowler

William Moffett

Moffett

Riparian Corridor and ESH

Butterflies

Sandspit

Ward Memorial

Exhibit 7

Storage Facility

Heron Rookery

Riparian Corridor & ESH

Monarch Butterfly ESH
- only applies to vegetated areas

Approximate Property Boundary

0 600

Feet

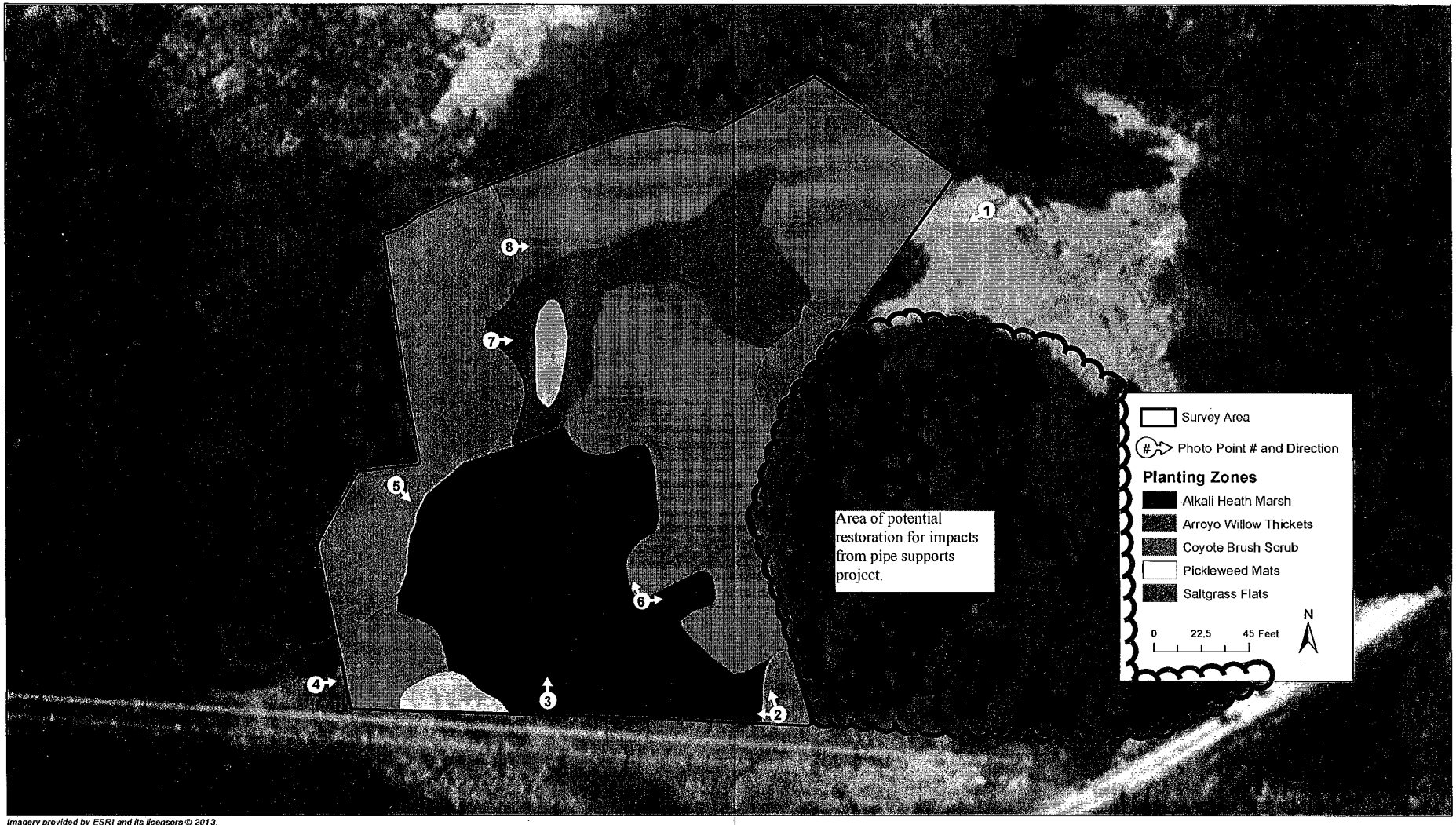
Figure 2: Location of Survey Areas

Geograpic Services - GIS
Southern California Gas Co.
Date Created: August 26, 2010
Author: Jonathan Rubin

Y:\Maps_Folder\Environmental\Goleta\Goleta_ESHareas11x17.mxd

The Gas Company
A Sempra Energy utility

ATTACHMENT B



Planting Plan Habitat Zone

Figure 3

Southern California Gas Company

Exhibit 8