

CALIFORNIA COASTAL COMMISSION

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY DIVISION
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SAN FRANCISCO, CALIFORNIA 94105-2219
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W12

Prepared July 03, 2019 (for the July 10, 2019 Hearing)

To: Commissioners and Interested Parties
From: Alison Dettmer, Deputy Director
Subject: **Energy, Ocean Resources and Federal Consistency Division Deputy Director's Report for July 2019**

The following coastal development permit (CDP) waivers, immaterial CDP amendments, CDP extensions, emergency CDPs, and negative determinations for the Energy, Ocean Resources and Federal Consistency Division are being reported to the Commission on July 10, 2019. Pursuant to the Commission's procedures, each item has been appropriately noticed as required, and each item is also available for review at the Commission's office in San Francisco. Staff is asking for the Commission's concurrence on the items in the Energy, Ocean Resources and Federal Consistency Division Deputy Director's report, and will report any objections received and any other relevant information on these items to the Commission when it considers the report on July 10th.

With respect to the July 10th hearing, interested persons may sign up to address the Commission on items contained in this report prior to the Commission's consideration of this report. The Commission can overturn staff's noticed determinations for some categories of items subject to certain criteria in each case (see individual notices for specific requirements).

Items being reported on July 10, 2019 (see attached)

Emergency Permits

- G-9-19-0029, Casitas Pier Emergency Repair Project (Casitas Pier, Southern Terminus of Dump Road in Carpinteria)

Negative Determinations and No Effect Letters

Administrative Items for Federal Consistency Matters

- **ND-0018-19, Bureau of Land Management, Action: Concur, 6/26/2019**
Bureau of Land Management (BLM) Central Coast Resource Management Plan Amendment, Oil and Gas activities in Central CA Counties

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**EMERGENCY PERMIT**

Issue Date: June 21, 2019
Emergency Permit No. G-9-19-0029

APPLICANT:

Chevron U.S.A Inc.
3916 State Street
Santa Barbara, CA 93105
Attn: Aly Hakam

VIA EMAIL: Rebecca.Trujillo@chevron.com; keith.wenal@beacon-west.com

LOCATION OF EMERGENCY

Casitas Pier; southern terminus of Dump Road in the City of Carpinteria, County of Santa Barbara (Figures 1 and 2).

EMERGENCY WORK

Chevron seeks approval to repair failed structural pile 11B on the upcoast side of the Casitas Pier causeway, approximately 300 feet offshore of landfall. Repairs may also be needed for piles 11A, 8B and 9A pending further inspection.

Equipment will be staged at a designated onshore staging area (Figure 2) and on the pier at two work locations: an area on the offshore side of the damaged pier causeway and an area on the nearshore side of the damaged pier causeway (Attachment 1.B). Divers, riggers, and project specific equipment will perform pier support operations from the causeway during pile inspection and repairs.

Upon completion of the inspection operation, the temporary support jacks will be installed extending from below the existing bents to the seafloor at bents 10A and 10B to allow subsequent repair work at bent 11. A support beam will be installed above the damaged bent, spanning from bents 10 to 12, and bent 11 will be lifted with a hydraulic ram to the as-built elevation. A temporary support jack will be installed at bent 11 adjacent to pile 11B as an added means of support during repair, and adjacent to 11A if required.

To complete repairs, divers will remove debris and damaged pile material and excavate around the existing pile stub to allow a repair overshot to overlap the existing pile stub. Excavation will occur by moving seafloor material surrounding the temporary support jacks with a water jet and the existing pile with diver-held water jet, hydroblaster, educator, and hydraulic tools. Removal of sediment inside the 24-inch steel pipe annulus will be achieved using a wash-over technique to facilitate placement of the new pile over the existing pile stub.

The overshot pile will be guided over the top of the remaining pile stub while seawater is pumped down the pile as it settles into the seabed. Once in position, welders will connect the replacement

pile top to the existing upper section of pile welded below the pile cap. Divers will install a geotextile membrane (filter fabric) doughnut around the overshot and secure it to the overshot with banding and to the seafloor with sand/cement bag weights.

Divers will install annulus cementing plumbing on the side of the newly installed pile to allow the annular space between the old pile stub (on the inside) and the newly installed overshot and pile to be cemented via pumping. The geotextile membrane and full perimeter sand/cement bag weights, in combination with the concrete admixtures, are anticipated to prevent cement from escaping into the water, and divers will monitor the cementing operation. Once the concrete has cured, all installation aids (including the temporary hydraulic jacks), plumbing, and other debris will be removed, and equipment will be demobilized.

The concrete mix design is low water content with 7-inch slump and includes an anti-washout admixture designed for underwater placement to minimize cement separation from the constituents. In addition, mix design provides a 2.5-hour initial set duration and a 4000-psi compressive strength within 5 days. A geotextile membrane (doughnut shaped) will surround the overshot and be fixed and sealed to the overshot as low as practical and to the seabed. The seabed seal will use the outer circumference of the membrane which will be held in position over the work area by placement of temporary sand/cement sand bags. The perimeter bags will be continuous in an overlapping configuration near the outer perimeter of the membrane.

The cement pumping operation will be monitored by a diver. The diver will be in direct communication with topside supervision throughout the concrete pumping operation and will be instructed to provide notification to cease pumping operations if leakage is evident. In the event of a leak, topside personnel will immediately curtail pumping operations for a minimum of two hours while the concrete mix reaches its initial set. To ensure that the concrete is set, a concrete test specimen will be obtained from the concrete pump and placed in a 1 quart opentop container. The test specimen will be immersed in a 5-gallon bucket of ambient temperature seawater and checked every 15 minutes until it has set. If a leak occurs and operations are curtailed the pumping operations may resume once the test specimen reaches initial set.

Pumping would resume utilizing a "tremie" pipe via the secondary "tremie" access port in the overshot. The cementing operation will be resumed using the same procedures to monitor for leakage and curtail operations as identified above.

If the pile inspection at Piles 11A, 8B and 9A identifies that repair is required, the repair will be performed either by removing and replacing the existing encasement or by utilizing the overshot method outlined above for pile 11B. Since these piles have not collapsed, it is probable that, if necessary, the pile can be repaired via encasement removal and replacement.

Activities in the water will not be conducted during rain events or on any day for which the National Weather Service has predicted a 25% or more chance of at least 0.1 inch rain in 24 hours (Predicted Rain Event)

Background: The Casitas Pier (Pier) is owned by the City of Carpinteria and leased to Chevron U.S.A. Inc. (Chevron) which, subject to said lease, operates and maintains the Pier. The Pier is

located in offshore tidelands, owned and governed by the City of Carpinteria. The Pier was built in the mid to late-1960s and extends approximately 720 feet from shore (Figures 1 and 2). The onshore uplands, adjacent to the Pier, are owned by Chevron. Support piles under the pier causeway provide structural support to the pier and enable safe transfer of personnel and equipment between the shoreline and working portion of the pier where equipment and materials are transferred between the pier and vessels.

Based on a recent inspection and subsequent engineering, there is a failed pile (pile 11B) located in bent 11 approximately 300 feet offshore of landfall. Consequently, the causeway deck sections between bents 10 and 12 have been deemed unsafe for personnel or equipment transfer and the facility is considered at risk of structurally failing. In addition, piles 8B and 9A located shoreward of bent 11 are in an undocumented condition. Pending a diver inspection, repairs to these piles may also be necessary.

Pier operations are currently suspended due to safety concerns. This emergency project is required to stabilize the causeway and repair Pile 11B (and potentially piles 11A, 8B and 9A if damaged) which will eliminate the risk of the overstressed sections falling into the ocean.

This letter constitutes approval of the emergency work Chevron has requested be done at the location listed above. The activities authorized by this emergency permit include only those necessary to respond to an unexpected occurrence that poses an immediate threat to the environment and public safety. The proposed activities require immediate action to prevent loss or damage to life, health, property, or essential public services pursuant to 14 Cal. Admin. Code Section 13009, and there is insufficient time to process the proposed activities for a regular coastal development permit.

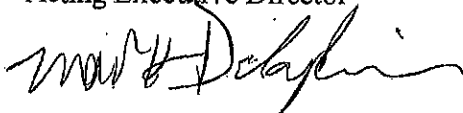
The Executive Director of the California Coastal Commission hereby finds that:

- (a) An emergency exists that requires action more quickly than permitted by the procedures for administrative or ordinary coastal development permits, and that the development can and will be completed within 30 days unless otherwise specified by the terms of this Emergency Permit; and,
- (b) Public comment on the proposed emergency development has been reviewed if time allows.

The emergency work is hereby approved, subject to the conditions listed on the attached pages.

Sincerely,

John Ainsworth
Acting Executive Director



By: Alison Dettmer, Deputy Director

Enclosure: Acceptance Form

CONDITIONS OF APPROVAL:

1. The enclosed Emergency Permit Acceptance form must be signed by the PERMITTEE and returned to our office within 15 working days. The work authorized by this permit must be completed within 30 days of the date of this permit, which shall become null and void unless extended by the Executive Director for good cause.
2. Only work specifically described in this permit and in the applicant's application, submitted on June 11, 2019 is authorized. Those activities are those associated with:
 - Removal of damaged section of collapsed Pile 11B
 - Installation of temporary hydraulic jack supports on and under the causeway to increase load capacity
 - Installation of a replacement pile that uses the existing pile stub in conjunction with an overshot on the replacement pile and a concrete filled overlap annuli to serve as the structural connection for the bottom of the replacement pile.
 - If necessary, repair of pilings 11A, 8B and 9A using the method described above or by removing and replacing the existing encasement.
 - Removal of all construction equipment and debris and restoration of the seafloor to initial conditions.
3. The applicant recognizes that the emergency work is considered temporary until a regular coastal development permit permanently authorizing the work is approved. A regular permit would be subject to all of the provisions of the California Coastal Act and may be conditioned accordingly.
4. In exercising this permit, the applicant agrees to hold the California Coastal Commission harmless from any liabilities for damage to public or private properties or personal injury that may result from the project.
5. This permit does not obviate the need to obtain necessary authorizations and/or permits from other agencies, including but not limited to the U.S. Army Corps of Engineers, Central Coast Regional Water Quality Control Board, and the City of Carpinteria.
6. Within 60 days of issuance of this Emergency Permit, or as extended by the Executive Director through correspondence, for good cause, the applicant shall submit a complete follow-up Coastal Development Permit (CDP) that satisfies the requirements of Section 13056 of Title 14 of the California Code of Regulations. If the Executive Director determines that the follow-up CDP application is incomplete and requests additional information, the applicant shall submit this additional information by a certain date, as established by the Executive Director.
7. Failure to submit a complete follow-up CDP Application that complies with the above condition or to comply with all terms and conditions of the required follow-up CDP, including any deadlines identified therein, will constitute a knowing and intentional violation of the Coastal Act and may result in formal enforcement action by the Commission or the Executive Director. This formal action could include a recordation of a Notice of Violation on the applicant's property; the issuance of a Cease and Desist Order and/or a Restoration Order; imposition of administrative penalties for violations involving public access; and/or a civil lawsuit, which may result in the imposition of monetary penalties, including daily penalties of up to \$15,000 per

violation per day, and other applicable penalties and other relief pursuant to Chapter 9 of the Coastal Act. Further, failure to follow all the terms and conditions of this Emergency Permit will constitute a knowing and intentional Coastal Act violation.

8. The applicant shall conduct all repair work outside the seal pupping season (December 1 to May 31).
9. The applicant shall implement marine mammal monitoring in accordance with the Marine Wildlife Protection and Training Plan provided with the permit application, including:
 - a. Worker training prior to start of work.
 - b. Monitoring and reporting of the work by NOAA-approved monitor(s).
 - c. Notification of regulatory agencies in the event that project-related activities result in significant adverse disturbances to marine mammals as determined by the designated marine mammal monitor.
 - d. Communication and coordination with City of Carpinteria, Coastal Commission, and other agencies as appropriate (e.g., California Department of Fish and Wildlife, National Marine Fisheries Service).
10. The applicant shall implement the following water quality best management practices:
 - a. No construction is planned onshore near the bluff, beach or pier/bluff transition. Onshore staging will be limited to the designated site within the Carpinteria Production Facility (CPF); this area is managed under the CPF facility-wide Stormwater Pollution Prevention Plan (SPWPP). If staging is required outside of this designated area, then silt fences, or equivalent apparatus, will be installed at the perimeter of the construction site to prevent construction-related runoff and/or sediment from entering waters of the State to the maximum extent feasible.
 - b. All pier repair project work will take place during daylight hours. The pier is illuminated 24 hours a day for normal pier activity and use. Additional project lighting of the beach and water area is prohibited.
 - c. Construction (including but not limited to construction activities, and materials and/or equipment storage) is prohibited outside of the defined construction, staging, and storage areas.
 - d. Project equipment washing, and/or refueling, will only take place at the staging area.
 - e. All materials will be properly stored and contained so that these products will not spill or otherwise enter the coastal environment.
 - f. Equipment washing, refueling, and/or servicing will not take place over the water.
 - g. Good construction site housekeeping controls and procedures will be maintained, including:
 - i. Immediate clean-up of all leaks, drips, and other spills.
 - ii. Covering materials including exposed piles of soil and wastes.
 - iii. Disposal of all wastes properly.
 - iv. Placement of trash receptacles on site and covering open trash receptacles during wet weather.
 - v. Remove all construction debris from the site.

11. The applicant shall implement the Santa Clara Unit Oil Spill and Gas Contingency Plan including:
 - a. Daily inspections of the equipment and vehicles for leaks.
 - b. Use of drip pans and sorbent materials on hand; vehicles parked over areas with a concrete surface.
 - c. Emergency response trailer with spill cleanup equipment located at an immediately adjacent facility.
 - d. Spill response vessel and shoreline response equipment immediately available.
 - e. Fueling of the pier crane and forklift performed in accordance with the existing Casitas Pier Fueling Procedure; other project-related equipment to be refueled in the staging area.
12. The applicant shall implement the following additional project-specific measures minimize the potential for water quality impacts:
 - a. Due to the temporary nature of the project, marine coatings shall not be used.
 - b. No refueling of equipment will occur without adequate containment and spill response equipment.
 - c. Pollution from stormwater runoff from equipment stored on the pier will be prevented by maintaining equipment regularly and having equipment-specific containments when appropriate.
 - d. No equipment containing any petroleum products is permitted to enter the water.
 - e. Work crews will be briefed on the importance of observing the appropriate precautions/BMP's and reporting any accidental spills.
 - f. Construction contracts will contain appropriate penalty provisions, sufficient to offset the cost of retrieving or cleaning up improperly contained foreign materials.



Figure 1. Location Map

 $1 \text{ in} = 0.33 \text{ miles}$ 

Chevron U.S.A

Chevron U.S.A
Casitas Pier Emergency Repair Project

Source: [1] World Imagery, ESRI, 2015. [2] National Geographic World Map, 12/11/2013.

June 2019

Attachment 1.A Casitas Pier Emergency Work Locations - Bents 8 through 11, Downcoast Side



Attachment 1.A Casitas Pier Emergency Work Locations - Bents 8 through 11, Upcoast Side





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EMERGENCY PERMIT ACCEPTANCE FORM

Emergency Permit No. _____

Instructions: After reading the attached emergency permit, please sign this form and return within 15 working days from the permit's date.

I hereby understand all of the conditions of the emergency permit being issued to me and agree to abide by them. I understand that the emergency work is temporary and regular coastal development permit is necessary to make the project permanent.

Date of Signing

Signature of Property Owner or Authorized Representative

Name

Address

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June 26, 2019

Ben Blom
Central Coast Field Manager
Bureau of Land Management
940 2nd Ave.
Marina, CA 93933

Re: **ND-0018-19** Bureau of Land Management, Negative Determination, Proposed Resource Management Plan Amendment (RMPA) and Final Environmental Impact Statement (FEIS) for Oil and Gas Leasing and Development, Central Coast Counties

Dear Mr. Blom:

The Bureau of Land Management (BLM) has submitted the above-referenced negative determination for the above referenced Resource Management Plan Amendment, the purpose of which is to “determine which BLM-managed lands or subsurface Federal minerals are open or closed to oil and gas leasing, based on the BLM’s 2015 Reasonably Foreseeable Development (RFD) Scenario” (See Attachment 2). Under this Scenario, future oil and gas leasing and development could occur in the following Central Coast Field Area counties: Alameda, Contra Costa, Fresno, Monterey, San Benito, San Mateo, and Santa Clara Counties. Because a small percentage of these areas are within the coastal zone, we requested in a May 22, 2019, letter to you that BLM comply with Coastal Zone Management Act’s federal consistency procedures requiring consultation with the Commission with respect to oil and gas leasing and development in areas where coastal resource effects could occur.

As your negative determination, Plan Amendment, and FEIS indicate, most of the anticipated future oil and gas leasing and development would be located far from the coastal zone, and the likelihood of activities potentially affecting the coastal zone are very low. Accordingly, your determination concluded: “Therefore, new leasing and/or future development in the coastal zone is not reasonably foreseeable and a consistency determination is not needed.” Your letter also commits, as our letter and subsequent telephone communications requested, that the Commission staff be notified in the event any future oil and gas leasing or

development were to be contemplated in areas where coastal effects could be generated. Your determination also therefore stated: "To further the BLM's goals for interagency coordination and public involvement, the Central Coast Field Office will provide formal notification to the California Coastal Commission for any future proposals for leasing or development in areas where coastal effects could be foreseeable."

As we informed you in our above-referenced letter, the Commission and staff have undergone four federal consistency reviews for Oil and Gas Leasing activities in the Los Padres National Forest, all four of which were submitted to us by the U.S. Forest Service. Through these reviews (Consistency Determinations CD-028-85, CD-065-84, and CD-048-83, and Negative Determination ND-058-85), we concurred with the determinations after commitments were made by the Forest Service that assured our ability to review any future activity with potential coastal zone resource effects. As noted above, BLM has made similar commitments that will provide us with notice and assurance of the ability to conduct future federal consistency reviews for any activity affecting the coastal zone. This commitment will continue to afford us the opportunity to assure that future activities would not adversely affect public access and recreation, sensitive habitats, air and water quality, or other coastal zone resources. These review procedures would supplement the measures already included in BLM's RMPA for imposing lease stipulations (including but not limited to Controlled Surface Use, Timing Limitations/Seasonal Restrictions, and/or No Surface Occupancy Stipulations), and as further described in Appendix C of the RMPA,¹ as well as the other review procedures that would be in place as described in Appendix J of the RMPA.²

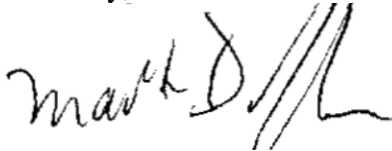
Under the federal consistency regulations, a negative determination can be submitted for an activity "which is the same as or similar to activities for which consistency determinations have been prepared in the past." We **agree** with BLM's determination that the proposed activities, with the commitments for future coordination, combined with the low likelihood of activities affecting or within the coastal zone occurring, is similar to previous Commission and Commission staff concurrences with the above-described U.S. Forest Service consistency and negative determinations (Consistency Determinations CD-028-85, CD-065-84,

¹ https://eplanning.blm.gov/epl-front-office/projects/lup/67003/172414/209587/Appendix_C_Central_Coast_Oil_and_Gas_Stipulations_and_Mitigation.pdf

² https://eplanning.blm.gov/epl-front-office/projects/lup/67003/172421/209594/Appendix_J_Regulatory_Environment.pdf

and CD-048-83, and Negative Determination ND-058-85). We therefore concur with your negative determination made pursuant for 15 CFR Section 930.35 of the NOAA implementing regulations. Please contact Mark Delaplaine at (415) 904-5289, if you have any questions regarding this matter.

Sincerely,

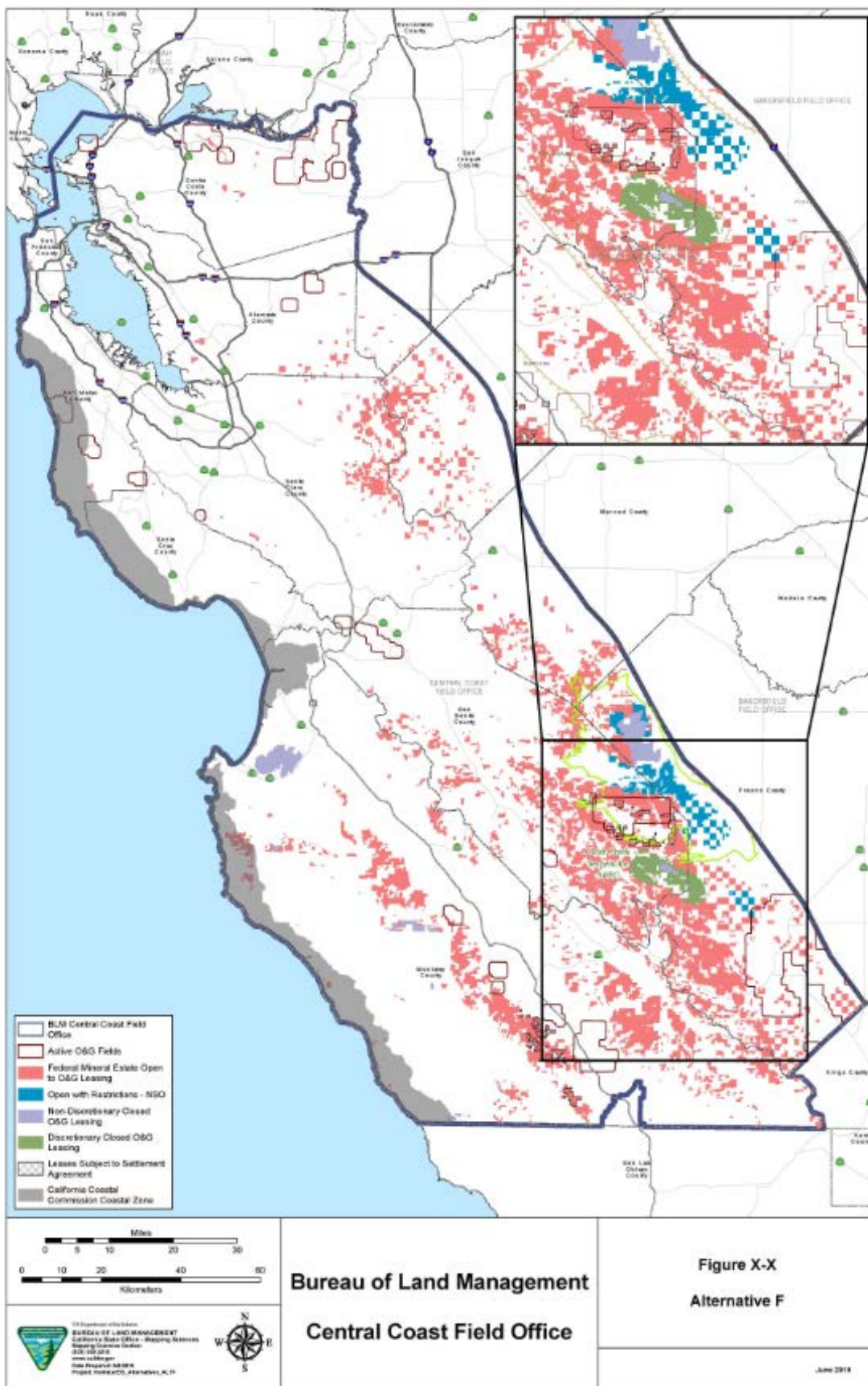
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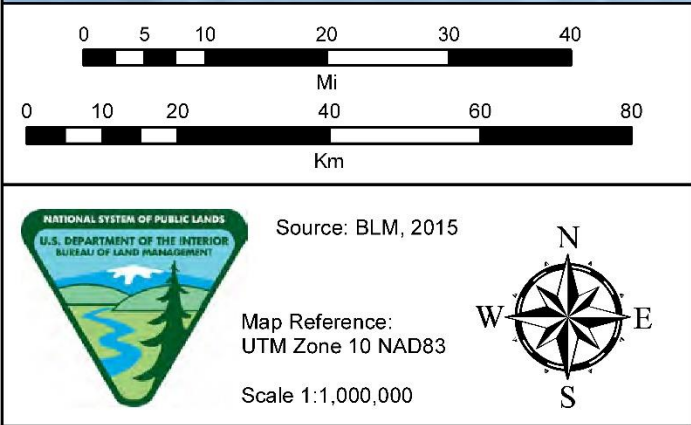
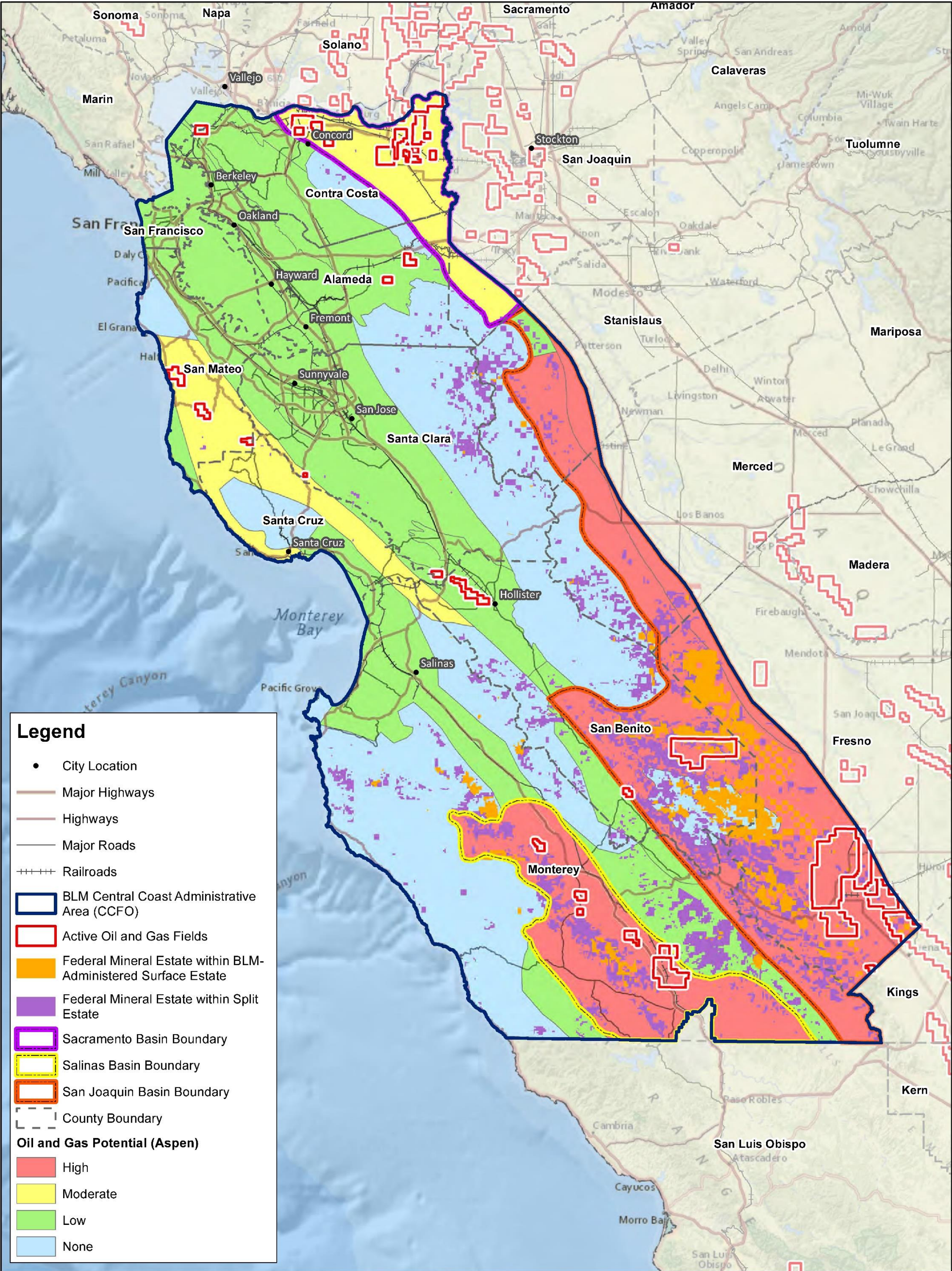
(for) JOHN AINSWORTH
Executive Director

Attachments:

- 1) BLM Map Showing Coastal Zone, and Alternative F (the "Preferred" Alternative)
- 2) FEIS/RMPA Figure 5-1: Reasonable Development Scenario

cc: North Central Coast District
Central Coast District





BUREAU OF LAND MANAGEMENT
CENTRAL COAST FIELD OFFICE

Figure 5-1
Reasonably Foreseeable
Oil and Gas
Development Potential

Date: December 2016