

CALIFORNIA COASTAL COMMISSION

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Th8a

July 13, 2022

TO: Coastal Commissioners and Interested Parties

FROM: John Ainsworth, Executive Director
Cassidy Teufel, Senior Environmental Scientist
Wesley Horn, Environmental Scientist

SUBJECT: Addendum to Staff Report for Coastal Development Permit No. 9-22-0131, California State Lands Commission (CSLC).

This addendum hereby incorporates into the staff recommendation for agenda item Th8a (CDP No. 9-22-0131) and into the pertinent Coastal Commission findings otherwise set forth in the June 30, 2022 staff report, the following changes or additions to the findings. In responding to verbal comments received provided by the City of Goleta (City), Commission staff hereby revises the staff report and, thereby, its proposed Commission findings. This addendum also provides an update on Commission staff's coordination with the Santa Ynez Band of Chumash Indians following publication of the staff report.

I. CHANGES TO THE STAFF REPORT

The following are revisions to the text of the staff report and recommendation. Proposed deletions are marked with ~~striketrough~~ text and additions are marked with underlined text.

a) Revised text in the first paragraph starting on page 1:

The California State Lands Commission (CSLC) requests approval of a Coastal Development Permit (CDP) to remove two of the remaining oil production structures at the former State Oil and Gas Lease PRC (Public Resource Code)-421, associated with the Ellwood Oil Field development that occurred along the Northern Santa Barbara Channel Coast from the late 1920s to 1990s. The structures proposed for removal include two caisson and pier structures referred to as Pier 421-1 and Pier 421-2, located mostly on State tide and submerged lands below the bluffs of the Sandpiper Golf Course in the Haskell's Beach area of the City of Goleta (**Exhibit 1**)...

b) Revised text in the second paragraph on page 2:

The primary staging site for construction equipment and materials would be within an existing easement area adjacent to the western fence line of the EOF. A temporary

construction ramp would be placed over a gently sloped section of the rock revetment in order to allow heavy equipment access to the beach, thus eliminating the need to cross the Bell Canyon Creek outfall or the Platform Holly production lines. An existing access road near the Bacara Resort to the west would serve as an alternative staging site that would only be used as necessary, such as to facilitate installation of the temporary construction ramp and for overflow storage of debris bins and construction equipment while continuing to maintain emergency vehicle access. Use of the alternate staging area would only take place when the mouth of the Bell Canyon Creek outfall is closed and if use of the site can occur without adversely affecting public beach access and recreation activities¹. Equipment would be removed from the beach and returned to the EOF staging area or pier access roadway at the end of each workday as well as during high tides.

- c. Insert footnote at the bottom of page 2:

¹ The alternative access area is included within the scope of development approved by the Commission pursuant to CDP 4-16-0479. The two projects would be coordinated to help ensure that no adverse impacts to coastal access and recreation occur. For example, if the access and recreation plan required as part of CDP 4-16-0479 results in this alternative access area being open for coastal access and recreational use, it would not be available for alternative staging as proposed.

- d) Revised text in second paragraph on page 9:

The California State Lands Commission (CSLC) requests approval of a Coastal Development Permit (CDP) to remove two of the remaining oil production structures at the former State Oil and Gas Lease PRC-421, associated with the Ellwood Oil Field development that occurred along the Northern Santa Barbara Channel Coast from the late 1920s to 1990s. The structures proposed for removal include two caissons and piers referred to as Pier 421-1 and Pier 421-2, located mostly on State tide and submerged lands below the bluffs of the Sandpiper Golf Course in the City of Goleta, California, and extending offshore to a water depth of approximately 50 feet (**Exhibit 2**)...

- e) Revised text in last full paragraph on page 11:

As described in the EIR and in a letter from CSLC staff to Commission staff dated May 24, 2022 (**Exhibit 4**), implementation of Component 2 is complicated by funding availability and site ownership. The decommissioning activities associated with Component 1, as part of the proposed project, are all located mostly below the mean high tide line within the jurisdictional area of CSLC, while Component 2 includes removal and restoration activities within an area mostly above the mean high tide line and outside of the PRC 421 lease area. As explained in further detail in its letter, it is CSLC's stated intent to work with the City of Goleta (City), the private property owners of the EOF and the Sandpiper Golf Course, and other stakeholders to identify funding sources and facilitate approaches for completing Component 2. Inclusion of Component 2 in the scope of the EIR significantly enables this process.

- f) Revised text in the third paragraph on page 12:

The Bacara Resort fire road access to the west of the EOF has been identified as an alternative staging site that would only be used as necessary, such as to facilitate installation of the temporary construction ramp and for overflow storage of debris bins and construction

equipment while continuing to maintain emergency vehicle access (**Exhibit 2**). Movement between the alternate staging area and the project site would require passing in front of the mouth of the estuary; however, use of the alternate staging would only take place when the estuary mouth is closed and if use of the site can occur without adversely affecting public beach access and recreation activities². Existing and proposed temporary construction fencing would delineate known wetland areas, the Bell Canyon Creek riparian habitat corridor and other sensitive habitat areas prior to construction to protect these habitats during construction activities.

g) Insert footnote at the bottom of page 12:

² The alternative access area is included within the scope of development approved by the Commission pursuant to CDP 4-16-0479. The two projects would be coordinated to help ensure that no adverse impacts to coastal access and recreation occur. For example, if the access and recreation plan required as part of CDP 4-16-0479 results in this alternative access area being open for coastal access and recreational use, it would not be available for alternative staging as proposed).

h) Revised text in the fourth full paragraph on page 15:

City of Goleta

According to the applicant, the City of Goleta and CSLC have a 2018 Memorandum of Understanding (MOU) regarding the management and oversight of the legacy Ellwood facilities, including the PRC 421 piers and caissons, for the eventual decommissioning of these facilities in the interest of public health, safety, and the environment. Guided by the MOU, the City coordinated with CSLC and CCC staff as part of a Joint Review Panel during the preparation of the EIR. The City determined that no separate local zoning permit is required for the proposed decommissioning. However, additional City permits (e.g., encroachment permit, haul permit, etc.), bonding and traffic control measures for the use of City streets will likely still be required.

i) Revised text in the last full paragraph on page 33:

The proposed project involves removal of two former oil production piers on the shoreline of the City of Goleta, on the sandy beach below the coastal bluffs of the Sandpiper Golf Course. The two piers are situated mostly below the mean high tide line, extending out into state waters approximately 120 feet from their connection point with the existing wooden seawall that, together with the existing rock revetment, armors much of this shoreline area to provide protection for the access road. The intent of the project is to remove the deteriorating pier infrastructure that poses an environmental and public health and safety risk, and would not result in the construction of any new structures or the expansion of the existing shoreline protective devices.

II. CORRESPONDENCE RECEIVED FROM TRIBES

As discussed in Section H of the staff report, Commission staff conducted outreach via both mail and email to the Tribes previously identified by CSLC during the CEQA process. Staff received a request for formal consultation from the Santa Ynez Band of Chumash Indians on June 27, 2022, just before publication of the staff report. The Tribe noted the importance of

nearby cultural resources and requested that the Commission ensure monitoring and consultation occur throughout the project and allow for adequate input on restoration and access issues. Commission staff responded to the Tribe by offering a consultation meeting with the Tribe and with staff of the CSLC, if the Tribe preferred a joint meeting. Commission staff and the Tribe were unable to meet before the staff report was published.

Following publication of the staff report Commission staff continued to coordinate with the Tribe on setting up a consultation meeting to discuss the concerns raised by the Tribe in the letter. On July 10, 2022, the Tribe responded via email that it had reviewed the staff report and it was in agreement with the staff recommendation.