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9-22-0131 (State Lands Commission)

July 14, 2022

EXHIBITS

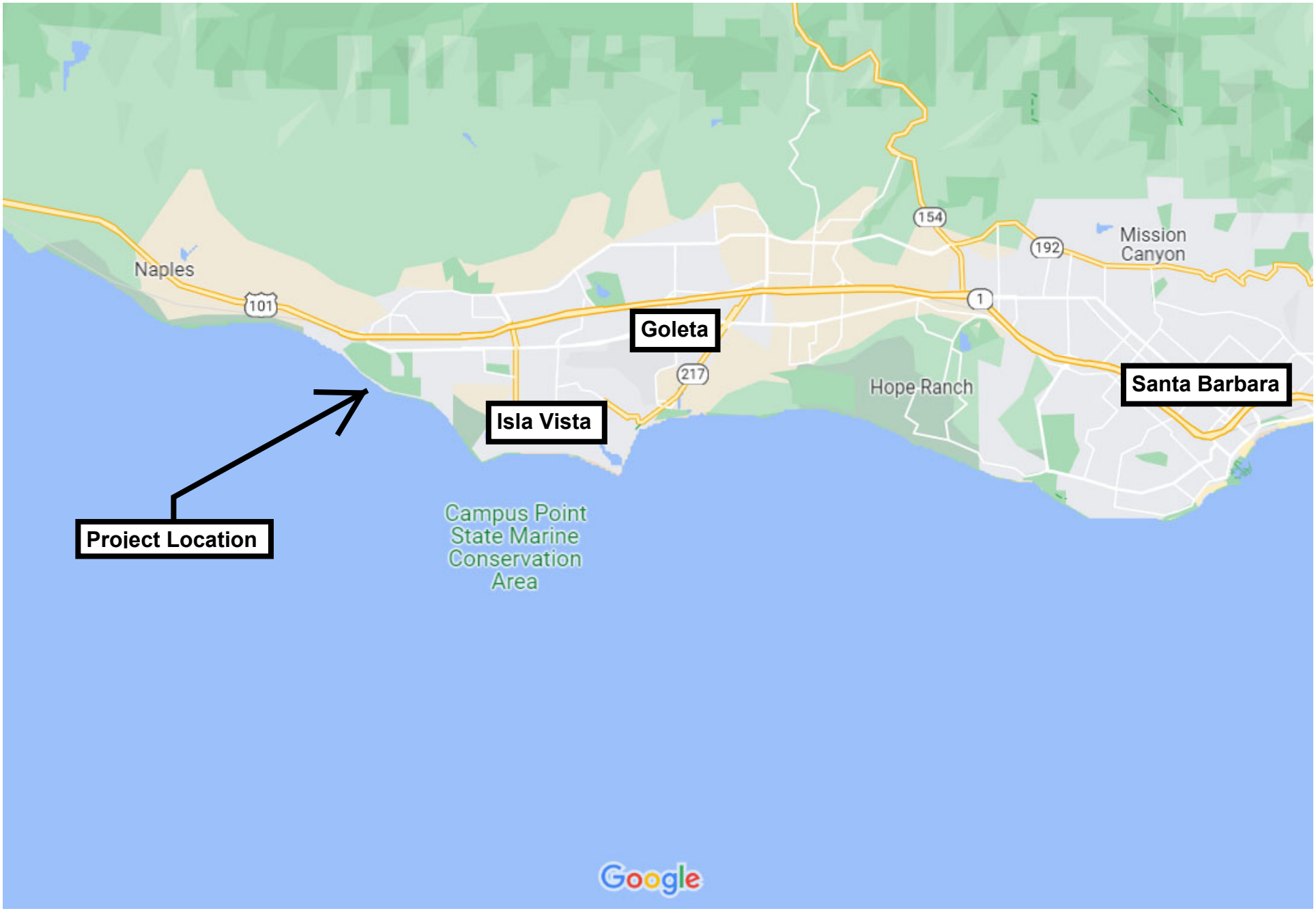

Exhibit 1
CDP Application No. 9-22-0131

Figure 2-1. Project Overview Map

Exhibit 2
CDP Application No. 9-22-0131

Table 7-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Aesthetics					
Short term effects on public views from decommissioning activities (Component 1)	**MM AES-1a. Overnight Storage of Equipment**. Equipment utilized shall be returned to the staging areas at the end of each workday, both for public safety and aesthetic considerations	Observe equipment returned to laydown areas	Obstructed views minimized	CSLC, contractors	Following completion of each workday
	MM AES-1b. Material Removal at Construction Completion. All materials, equipment, and debris shall be removed from the site upon completion of each Project component	Observe all materials and equipment removed from Project work areas	Project areas restored	CSLC, contractors	Following completion Project Component 1
	MM AES-1c. Minimize Night Lighting. When required, lighting shall use the minimum number of fixtures and intensity needed for decommissioning activities. Fixtures shall be focused on work areas and fully shielded to minimize visibility from public viewing areas, wildlife habitats, migration routes, and other sensitive receptors	Observe nighttime lighting for compliance	Lighting and glare minimized	CSLC, contractors	During any nighttime work

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Short term effects on public views from decommissioning activities (Component 2)	**Implement MM AES-1a: Overnight Storage of Equipment** (see above) **Implement MM AES-1b: Material Removal at Construction Completion** (see above) **Implement MM BIO-5a: Coastal Wetlands Mitigation** (see below) **Implement MM BIO-5b: Retain Coastal Wetlands Adjacent to Pier 421-2** (see below)				
Cumulative aesthetic impacts to public views	**Implement MM AES-1a: Overnight Storage of Equipment** (see above) **Implement MM AES-1b: Material Removal at Construction Completion** (see above) **Implement MM AES-1c: Minimize Night Lighting** (see above)				
Air Quality					
Decommissioning-related air pollutant emissions (Component 1)	**MM AQ-1a. Fugitive Dust Control Measures.** The contractors used to conduct decommissioning activities shall implement the following measures when applicable and feasible. • Water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is	Documentation in compliance monitoring sheets	Reduction in fugitive dust	CSLC, contractors	Throughout Component 1 decommissioning activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. • Minimize amount of disturbed area and reduce on-site vehicle speeds to 15 miles per hour or less. • If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. • Gravel pads shall be installed at all access points				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	to prevent tracking of mud onto public roads. • After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. • The contractor shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Santa				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	Barbara County Air Pollution Control District (SBCAPCD) prior to Project initiation.				
	MM AQ-1b. Equipment Exhaust Emissions Reduction Measures. The contractors used to conduct decommissioning activities shall implement the following measures when applicable and feasible. • All portable diesel-powered construction equipment shall be registered with the State's portable equipment registration program OR shall obtain a SBCAPCD permit. • Mobile construction equipment shall comply with the State Regulation for In-Use Off-Road Diesel Vehicles (Cal. Code of Regs., tit. 13, § 2449) to reduce NOx, diesel particulate matter, and other criteria pollutant emissions.	Documentation in compliance monitoring sheets	Reduction in emissions	CSLC, contractors	Throughout decommissioning activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	• On-road vehicles shall comply with the State Regulation for In-Use (On-Road) Heavy-Duty Diesel-Fueled Vehicles (Cal. Code of Regs., tit. 13, § 2025), to reduce diesel particulate matter, NOx and other criteria pollutants. • Off-road and on-road diesel vehicles shall comply with California Code of Regulations, title 13, sections 2449(d)(3) and 2485, limiting engine idling time. • Diesel equipment meeting the California Air Resources Board (CARB) Tier 3 or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible.				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	• On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible. • Diesel powered equipment should be replaced by electric equipment whenever feasible. • Equipment/vehicles using alternative fuels, such as compressed natural gas, liquefied natural gas, propane or biodiesel, should be used on-site where feasible. • Catalytic converters shall be installed on gasoline-powered equipment, if feasible. • All construction equipment shall be maintained in tune per the manufacturer's specifications.				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	• The engine size of construction equipment shall be the minimum practical size. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.				
Decommissioning-related air pollutant emissions (Component 2)	**Implement MM AQ-1a: Fugitive Dust Control Measures** (see above) **Implement MM AQ-1b: Equipment Exhaust Emissions Reduction Measures** (see above)				
Cumulative air quality impacts (Components 1 and 2)	**Implement MM AQ-1a: Fugitive Dust Control Measures** (see above) **Implement MM AQ-1b: Equipment Exhaust Emissions Reduction Measures** (see above)				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Biological Resources					
Disturbance to nesting birds	**MM BIO-1: Avoidance of Active Cliff Swallow Nests**. A cliff swallow protection plan shall be developed prior to Project implementation. The plan shall specify how protection of the species will be implemented, including methods, timing, and monitoring requirements. Requirements shall include, but not be limited to: • Inactive cliff swallow nests shall be removed during the non-breeding season (August 16th through February 14th) prior to the initiation of pier and caisson removal. • Bird exclusion netting shall be installed on the underside of Pier 421-1 to prevent nesting prior to the initiation of pier and caisson removal. The netting shall remain in place, maintained, and not	Adherence to cliff swallow protection plan, including field monitoring requirements	Avoidance of impacts to cliff swallows	CSLC, contractors	During Component 1 Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	removed more than 24 hours before the initiation of removal of Pier 421-1.				
Disturbance to bats using the 421-2 caisson structure	**MM BIO-2: Transitional Bat Habitat.** A bat preclusion plan shall be prepared and implemented prior to and during the 421-2 caisson demolition activities. The plan shall include confirmation surveys of either seasonal or ongoing bat use of the structure and recommendations regarding the timing for installation of preclusion netting at the caisson roost.	Adherence to bat preclusion plan	Avoidance of impacts to bats	CSLC, contractors	Prior to and during 421-2 caisson demolition
Temporary effects of potential hydrocarbon discharge	**Implement MM HAZ-1c: Oil Spill Contingency Plan Implementation** (see below)				
Disturbance of terrestrial and aquatic special-status wildlife species	**MM BIO-3a: Avoidance of Estuarine Waters/Tidewater Goby Relocation**. Use of the alternative beach access route shall be scheduled during periods when the estuary mouth is closed (not outflowing to the Pacific Ocean). If this is not feasible, fish netting (0.25	Biological monitoring during required crossings	Avoidance of impacts to tidewater goby in Bell Canyon Creek	CSLC, contractors	During all Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	inch mesh size) shall be installed across the estuary mouth immediately upstream of the beach access route to isolate the estuary from the beach. A qualified biologist approved by the USFWS to handle tidewater goby shall use seines and dip nets to capture and relocate tidewater gobies from the beach area to upstream of the fish nets. Fish nets shall be removed by the biologist within 24 hours following termination of use of the alternative beach access route				
	MM BIO-3b: CRLF Fencing at the EOF. CRLF exclusion fencing (48 inch Ertec e-Fence, or equivalent) shall be installed along the entire western boundary of the EOF, adjacent to the margin of the riparian vegetation prior to use of the proposed staging area at this location. The bottom of the exclusion fencing shall be secured to the ground by trenching or other means to prevent CRLF from	Documentation and monitoring of fence installation	Avoidance of impacts to CRLF	CSLC, contractors	Prior to and throughout all Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	crawling under the fence. The CRLF exclusion fencing shall remain in place and maintained during all Project-related use of the EOF staging area.				
	MM BIO-3c Environmental Awareness Training. A CSLC-approved biological monitor(s) shall conduct environmental awareness training for all Project personnel to familiarize workers with surrounding common and special-status species and their habitats, applicable regulatory requirements, and measures that must be implemented to avoid or minimize potential impacts to biological resources.	Documentation of Environmental Awareness Training Sign-In Sheet	Training of Project crews	CSLC, contractors	Prior to each Project Component
	MM BIO-3d: Biological Pre-activity Surveys and Monitoring. A CSLC-approved biological monitor shall survey the work areas and access routes for sensitive species or other wildlife that may be present no more than 24 hours prior to the commencement of	Pre-activity survey report(s) Daily Monitoring reports	Avoidance of impacts to special status species during decommissioning activities	CSLC, contractors	Prior to each Project Component

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	Project activities. In addition, the biological monitor shall provide daily biological clearance prior to the start of work and shall always be on-site during Project operations. If at any time during the Project any wildlife species are observed within the Project area, work around the animal's immediate area shall be stopped until the animal leaves on its own volition or work shall be redirected to an area within the Project site that would not impact these species. Work shall resume once the animal is clear of the work area. In the unlikely event special-status species are injured or killed by Project-related activities, the biological monitor shall stop work and notify CSLC and consult with the appropriate agencies to resolve the impact prior to re-starting work in the area.				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	MM BIO-3e: Delineation of Work Limits. Prior to the start of the Project, the Project work areas and access routes shall be clearly flagged to ensure heavy equipment and vehicles stay within the permitted disturbance areas and avoid native vegetation along the access route. Designated equipment staging and fueling areas shall also be delineated at this time.	Photo-documentation within Compliance sheets	Avoidance of areas outside of the designated Project worksite(s)	CSLC, contractors	Prior to each Project Component
Disturbance of marine special-status species	**MM BIO-4: Grunion Spawning Avoidance**. A grunion protection plan shall be developed prior to Project implementation. The plan shall specify how protection of the species will be implemented, including methods, timing, and monitoring requirements. Requirements shall include, but not be limited to: • Project activities that involve equipment activity on the beach shall be scheduled to avoid grunion spawning	Compliance monitoring report and photo-documentation	Avoidance of impacts to grunion spawning area(s)		Prior to Project implementation and during all Project activities within Grunion spawning periods

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	season (March through August) if possible, given other scheduling constraints (winter storm waves, etc.). • If avoiding spawning season is not feasible, a qualified biologist shall conduct an initial presence/absence survey during grunion runs (open and closed season runs) as predicted by the CDFW to document that grunion have not used the site. • If the initial presence/absence survey determines that grunion are spawning at the Project site; a focused survey shall be conducted immediately following the spawning event. During the focused survey, trenching shall be conducted at 3 to 6 foot spacing to determine if grunion spawning was				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	successful and eggs were deposited within the intertidal work area. The trenches shall be excavated approximately 10 inches wide and 3 to 6 inches deep. The trenches shall be located perpendicular to the high-water mark and extend from the highest high tide mark to approximate mean low water. Excavations shall continue until grunion eggs are found or until all trenches are sampled. If grunion eggs are found during focused surveys at the Project site, intertidal work activities in that location shall cease for 10 days to allow for hatching of the eggs during the next high-tide cycle. • Subsequent presence/absence monitoring shall continue during the next spawning period to determine if				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	grunion continue to spawn at the Project site.				
Loss of coastal wetlands (Component 2)	**MM BIO-5a: Coastal Wetlands Mitigation.** A coastal wetlands mitigation plan shall be developed prior to Project implementation. The Plan shall specify how mitigation will be implemented, including site location description, wetland creation or enhancement methods, plant palette, propagule sources, irrigation methods (if needed), maintenance activities, success criteria and monitoring requirements. Requirements shall include but not be limited to: • Coastal wetlands removed from the access roadway as part of Component 2 shall be replaced at a minimum 3:1 ratio (at least 0.32 acre) through a combination of wetland replacement and off-site wetlands creation or enhancement.	Coastal bluff scrub replacement plan documentation and monitoring	Replacement of coastal bluff scrub habitat	CSLC, contractors	Prior to Project implementation and following completion of Component 2

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	• Coastal wetlands replacement shall be included in the coastal bluff scrub replanting area (see **MM BIO-6a**) within the abandoned access roadway and the remaining wetlands creation/enhancement needed to meet the 3:1 ratio shall be conducted off-site.				
	MM BIO-5b: Retain Coastal Wetlands Adjacent to Pier 421-2. A coastal wetlands retention plan shall be developed prior to Project implementation. The Plan shall specify how this measure will be implemented, including materials, methods and integration into the overall decommissioning schedule. The rock and road base fill material comprising the access roadway north of Pier 421-2 shall be left in place or other suitable material placed as needed to maintain the impoundment of golf course	Coastal wetlands retention plan documentation and monitoring	Retention of wetlands	CSLC, contractors	Prior to and during implementation of Component 2

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	irrigation run-off which supports the existing wetlands at this location.				
Loss of terrestrial ESHA/sensitive natural communities	**MM BIO-6a: Coastal Bluff Scrub Replacement.** A coastal bluff scrub replacement plan shall be developed prior to Project implementation. The Plan shall specify how replacement will be implemented, including soil augmentation, planting site preparation, planting methods, plant palette, propagule sources, irrigation methods (if needed), maintenance activities, success criteria and monitoring requirements**.** Coastal bluff scrub removed along the seaward margin of the access roadway shall be replaced at a minimum 2:1 ratio (at least 0.6 acre) through soil augmentation and replanting the remaining surface of the abandoned access roadway with quail bush, coastal golden-bush and other native species characteristic of the bluffs.	Coastal Bluff Scrub Replacement Plan	Success criteria monitoring from Coastal Bluff Scrub Replacement Plan	CSLC, contractors	Prior to and during implementation of Component 2

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	MM BIO-6b: Southern Foredunes Avoidance. A CSLC-approved biological monitor shall be present when heavy equipment or vehicles transit the alternative beach access route and communicate with equipment/vehicle operators to ensure southern foredunes are avoided.	Daily Compliance documentation	Avoidance of southern foredune habitat areas	CSLC, contractors	Throughout Project activities (as utilized)
Cumulative impacts to biological resources (Components 1 and 2)	**Implement MM BIO-1**: **Avoidance of Active Cliff Swallow Nests** (see above) **Implement MM BIO-2: Transitional Bat Habitat** (see above) **Implement MM HAZ-1c: Oil Spill Contingency Plan Implementation** (see below) **Implement MM BIO-3a**: **Avoidance of Estuarine Waters/Tidewater Goby Relocation** (see above) **Implement MM BIO-3b**: **CRLF Fencing at the EOF** (see above) **Implement MM BIO-3c**: **Environmental Awareness Training** (see above) **Implement MM BIO-3d**: **Biological Pre-activity Surveys and Monitoring** (see above) **Implement MM BIO-3e**: **Delineation of Work Limits** (see above) **Implement MM BIO-4**: **Grunion Spawning Avoidance** (see above) **Implement MM BIO-5a**: **Coastal Wetlands Mitigation** (see above) **Implement MM BIO-5b**: **Retain Coastal Wetlands Adjacent to Pier 421-2** (see above) **Implement MM BIO-6a**: **Coastal Bluff Scrub Replacement** (see above) **Implement MM BIO-6b**: **Southern Foredunes Avoidance** (see above)				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Cultural Resources/Tribal Cultural Resources					
Potential impacts to previously undiscovered Cultural or Tribal Cultural resources (Component 2)	**MM CUL-1/TCR-1: Cultural Resources Monitoring.** A Cultural Resources Monitoring Plan (Plan) shall be prepared prior to Component 2 ground disturbing activities. The Plan shall include, but not be limited to, the following measures: • CSLC shall retain a qualified archaeologist and a representative of a California Native American tribe that is culturally affiliated to the Project site to monitor all ground disturbing activities during Component 2. • CSLC shall provide a minimum 5-day notice to the archaeologist and tribal monitor prior to all activities requiring monitoring. • CSLC shall provide the archaeologist and tribal	Cultural Resources Monitoring Plan	Avoidance of disturbance of any found cultural resources	CSLC, contractors	Prior to and throughout Component 2 Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	monitor safe and reasonable access to the Project site. • The Plan shall include guidance on identification of potential cultural resources that may be encountered.				
Potential impacts to Cultural resources (Specifically CA-SBA-71)	**MM CUL-2/TCR-2: Cultural Resources Sensitivity Training**. Prior to Project implementation, a pre-construction cultural resources sensitivity training shall be given by a qualified archaeologist and Native American representative. The purpose of the training will be to educate onsite construction personnel as to the sensitivity of archaeological resources in the area, and specifically avoidance of CA-SBA-71 when utilizing the Bacara Resort fire road access area. The training will also cover the requirements of the Plan identified in **MM CUL-1/TCR-1**, including the possibility of exposing cultural resources, guidance on	Documentation of training	Avoidance of cultural resources	CSLC, contractors	Prior to Project implementation

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	recognizing such resources, and direction on procedures if a find is encountered. CSLC and the Project contractor will instruct all Project personnel that touching, collecting, or removing cultural materials from the property is strictly prohibited. Evidence of compliance with this MM shall be documented within pre-Project compliance documentation materials prior to Project implementation.				
	MM CUL-3/TCR-3: Discovery of Previously Unknown Cultural or Tribal Resources. In the event that potential cultural or tribal cultural resources are uncovered during Project implementation, all earth-disturbing work within 100 feet of the find shall be temporarily suspended or redirected until the approved archaeologist and tribal monitor have evaluated the nature and significance of the discovery. In the event that a potentially significant cultural or tribal cultural	Documentation of Notifications and Treatment Plan (if applicable)	Minimization of impact to discovered resources	CSLC, contractors	Throughout Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	resource is discovered, the Applicant, CSLC and any local, state, or federal agency with approval or permitting authority over the Project that has requested/required notification shall be notified within 48 hours. The location of any such finds must be kept confidential and measures shall be taken to secure the area from site disturbance and potential vandalism. Impacts to previously unknown significant cultural or tribal cultural resources shall be avoided through preservation in place if feasible. Damaging effects to tribal cultural resources shall be avoided or minimized following the measures identified in Public Resources Code section 21084.3, subdivision (b), if feasible, unless other measures are mutually agreed to by the lead archaeologist and culturally affiliated tribal monitor that would be as or more effective. A treatment plan, if needed to address a find, shall be developed				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	by the archaeologist and, for tribal cultural resources, the culturally-affiliated tribal monitor, and submitted to the appropriate tribal representatives and CSLC staff for review, input, and concurrence prior to implementation of the plan. Protection in place of tribal cultural resources shall be prioritized, if feasible; if the archaeologist or tribe determines that damaging effects on the cultural or tribal cultural resource can be avoided in place, then work in the area may resume provided the area of the find is clearly marked for no disturbance. If avoidance in place of tribal cultural resources is infeasible, the treatment plan shall include measures that place priority on Tribal self-determination over collection and curation, including the option to repatriate (rebury) materials nearby at a location of their choosing, and to transfer possession/ownership to the culturally-affiliated Tribe.				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	Title to all archaeological sites, historic or cultural resources, and tribal cultural resources on or in the tide and submerged lands of California is vested in the State and under CSLC jurisdiction. The final disposition of archaeological, historical, and tribal cultural resources recovered on State lands under CSLC jurisdiction must be approved by the CSLC				
	MM CUL-4/TCR-4: Unanticipated Discovery of Human Remains. If human remains are encountered, all provisions provided in California Health and Safety Code section 7050.5 and California Public Resources Code section 5097.98 shall be followed. Work shall stop within 100 feet of the discovery, and both an archaeologist and CSLC staff must be contacted within 24 hours. The archaeologist shall consult with the County Coroner. If human remains are of Native American origin, the County	Documentation of Notifications	Minimization of impacts to human remains	CSLC, contractors	Throughout Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	Coroner shall notify the Native American Heritage Commission within 24 hours of this determination, and a Most Likely Descendent shall be identified. No work is to proceed in the discovery area until consultation is complete and procedures to avoid or recover the remains have been implemented				
Potential for unauthorized collection of artifacts (Components 1 and 2)	**Implement MM CUL-2/TCR-2: Cultural Resources Sensitivity Training** (see above)				
	MM CUL-5/TCR-5: Cultural Resources Protective Fencing (CA-SBA-71). Prior to Project implementation, protective fencing or flagging clearly marking the area surrounding CA-SBA-71 for avoidance shall be installed; this fencing or flagging shall be maintained for the duration of the use of the Bacara Resort fire road	Documentation of Fencing or flagging installation and avoidance of area	Minimization of impact CA-SBA-71	CSLC, contractors	Throughout Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	access area, and no personnel, equipment, refuse, or other materials shall be allowed into the avoidance area at any time.				
Cumulative impacts to cultural resources/ Tribal cultural resources (Components 1 and 2)	**Implement MM CUL-1/TCR-1: Cultural Resources Monitoring** (see above) **Implement MM CUL-2/TCR-2: Cultural Resources Sensitivity Training** (see above) **Implement MM CUL-3/TCR-3: Discovery of Previously Unknown Cultural or Tribal Resources** (see above) **Implement MM CUL-4/TCR-4: Unanticipated Discovery of Human Remains** (see above) **Implement MM CUL-5/TCR-5: Cultural Resources Protective Fencing** (see above)				
Hazards and Hazardous Materials					
Exposure of public or environment to hazardous materials (Component 1)	**MM HAZ-1a: Remedial Action Plan Implementation.** The Remedial Action Plan submitted to the Santa Barbara County Public Health Department, Environmental Health Services Division shall be implemented during Component 1 Project decommissioning activities. The RAP will also be shared with California Department of Fish and	Remedial Action Plan Approval	Minimization of hazardous materials exposure	CSLC, contractors	Prior to and throughout Component 1 Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	Wildlife Office of Spill Prevention and Response (OSPR), RWQCB, and city of Goleta (as applicable) for review and approval prior to the initiation of construction activities. Final approval of the plan shall be under the purview of OSPR, RWQCB, and Santa Barbara County Public Health Department. Upon approval, all contaminated materials shall be removed and disposed of in accordance with procedures described in the RAP. All soil sampling results shall be provided to the Santa Barbara County Public Health Department and city of Goleta immediately upon receiving results.				
	MM HAZ-1b: Hydrocarbon Contaminated Soil Notification(s) and BMPs. Prior to Project activities related to removal of contaminated soil**,** the Air Pollution Control District must be notified as an Air Pollution Control District Permit will be required. In addition,	Notification to APCD	Minimization of Air Quality Impacts	CSLC, contractors	During all Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	the following measures shall be implemented: • Covers on storage piles shall be maintained in place at all times in areas not actively involved in soil addition or removal • Contaminated soil shall be covered with at least 6 inches of packed uncontaminated soil or another TPH-non-permeable barrier such as plastic tarp. No headspace shall be allowed where vapors could accumulate • Covered piles shall be designed in such a way to eliminate erosion due to wind or water. No openings in the covers are permitted • The air quality impacts from the excavation and haul trips associated with removing the contaminated soil must be evaluated and mitigated if				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	total emissions exceed the Air Pollution Control District's construction phase thresholds • During soil excavation, odors shall not be evident to such a degree as to cause a public nuisance • Clean soil must be segregated from contaminated soil				
	MM HAZ-1c: Oil Spill Contingency Plan Implementation. The EOF Facility's existing Oil Spill Contingency Plan (OSCP) and Addendum shall be implemented during all Project activities in the event of a release of oil or contaminants. The OSCP delineates prevention measures including daily inspection of equipment, refueling at designated stations, and secondary equipment containment for equipment to prevent spills. Additionally, the	Copy of OSCP	Spill avoidance and response (if required)	CSLC, contractors	During all Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	onshore work sites shall maintain onsite response equipment to clean up minor spills. In the event of a major spill (greater than five barrels) the OSCP requires utilization of an independent oil spill response contractor (i.e. Marine Spill Response Corporation) to provide secondary cleanup.				
	Implement MM HWQ-1: Storm Water Pollution Prevention Plan (see below)				
Use and transport of hazardous materials during decommissioning activities (Component 1)	**MM HAZ-2 Hazardous Materials Management and Contingency Plan**. A Hazardous Materials Management and Contingency Plan shall be developed and implemented. Measures shall include, but not be limited to, identification of appropriate fueling and maintenance areas for equipment, daily equipment inspection schedule, and reference to the facilities existing spill response plan, and spill response supplies to be maintained onsite.	Copy of Hazardous Materials Management and Contingency Plan. Compliance documentation during construction	Avoidance of hazardous materials exposure to the environment	CSLC, contractors	During all Project activities
Exposure of the public or	**Implement MM HAZ-1a: Remedial Action Plan Implementation** (see above)				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
environment to hazardous materials (Component 2)	**Implement MM HAZ-1b: Hydrocarbon Contaminated Soil Notification(s) and BMPs** (see above) **Implement MM HAZ-1c: Oil Spill Contingency Plan Implementation** (see above) **Implement MM HWQ-1: Storm Water Pollution Prevention Plan** (see below)				
Use of hazardous materials during decommissioning activities (Component 2)	**Implement MM HAZ-2: Hazardous Materials Management and Contingency Plan** (see above)				
Potential cumulative hazardous materials impacts	**Implement MM HAZ-1a: Remedial Action Plan Implementation** (see above) **Implement MM HAZ-1b: Hydrocarbon Contaminated Soil Notification(s) and BMPs** (see above) **Implement MM HAZ-1c: Oil Spill Contingency Plan Implementation** (see above) **Implement MM HWQ-1: Storm Water Pollution Prevention Plan** (see below) **Implement MM HAZ-2: Hazardous Materials Management and Contingency Plan** (see above)				
Hydrology and Water Quality					
Potential water quality impacts during implementation of decommissioning Project (Component 1)	**Implement MM HAZ-1a: Remedial Action Plan Implementation** (see above) **Implement MM HAZ-1b: Hydrocarbon Contaminated Soil Notification(s) and BMPs** (see above) **Implement MM HAZ-1c: Oil Spill Contingency Plan Implementation** (see above) **Implement MM HAZ-2: Hazardous Materials Management and Contingency Plan** (see above)				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Construction-related erosion and sedimentation impacts to marine and onshore water quality (Component 1)	**MM HWQ-1. Storm Water Pollution Prevention Plan.** CSLC shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP), including: • All fueling and maintenance of vehicles and heavy equipment will occur in designated areas at least 50 feet from waterways. Designated areas will include spill containment devices (e.g., drain pans) and absorbent materials to clean up spills • Vehicles and equipment will be maintained properly to prevent leakage of hydrocarbons and other fluids • Any accidental spill of hydrocarbons or other fluids that may occur at the work site will be cleaned immediately. Spill containment devices and	Contractor submittal of the SWPPP to CSLC, observation reports	Minimize erosion, siltation, and turbidity	CSLC, contractors	During all Project activities

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	absorbent materials will be maintained on the work site for this purpose. The Governor's Office of Emergency Services will be notified immediately in the event of a reportable quantity accidental spill to ensure proper notification, clean up, and disposal of waste • Waste and debris generated during construction will be stored in designated waste collection areas and containers away from drainage features, and will be disposed of regularly • Storm water pollution prevention best management practices will be used around the construction area perimeters during construction and around any construction operations that could				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	potentially degrade water quality • Erosion and sedimentation best management practices (e.g., silt fences straw wattles, mulching, and hydroseeding) will be installed properly and maintained regularly. Other best management practices will be installed as necessary and as required by Project permits • Runoff will be conveyed to prevent erosion from slopes and channels and directed to engineered drainage facilities • Disturbed slopes will be re-vegetated with appropriate native vegetation				
Potential water quality impacts during implementation of decommissioning	**Implement MM HAZ-1a: Remedial Action Plan Implementation** (see above) **Implement MM HAZ-1b: Hydrocarbon Contaminated Soil Notification(s) and BMPs** (see above) **Implement MM HAZ-1c: Oil Spill Contingency Plan Implementation** (see above) **Implement MM HAZ-2: Hazardous Materials Management and Contingency Plan** (see above)				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Project (Component 2)					
Construction-related erosion and sedimentation impacts to marine and onshore water quality (Component 2)	**Implement MM HWQ-1: Storm Water Pollution Prevention Plan** (see above)				
Potential for cumulative water quality impacts (Components 1 and 2)	**Implement MM HWQ-1: Storm Water Pollution Prevention Plan** (see above)				
Land Use					
Temporary conflicts with state and local policies	**Implement MM AES-1a. Overnight Storage of Equipment** (see above) **Implement MM AES-1b. Material Removal at Construction Completion** (see above) **Implement MM AES-1c. Minimize Night Lighting** (see above) **Implement MM AQ-1a: Fugitive Dust Control Measures** (see above) **Implement MM AQ-1b: Equipment Exhaust Emissions Reduction Measures** (see above) **Implement MM BIO-1: Avoidance of Active Cliff Swallow Nests** (see above) **Implement MM BIO-2: Transitional Bat Habitat** (see above) **Implement MM BIO-3a: Avoidance of Estuarine Waters/Tidewater Goby Relocation** (see above)				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	Implement MM BIO-3b: CRLF Fencing at the EOF (see above) **Implement MM BIO-3c: Environmental Awareness Training** (see above) **Implement MM BIO-3d: Biological Pre-activity Surveys** (see above) **Implement MM BIO-3e: Delineation of Work Limits** (see above) **Implement MM BIO-4: Grunion Spawning Avoidance** (see above) **Implement MM BIO-5a: Coastal Wetlands Mitigation** (see above) **Implement MM BIO-5b: Retain Coastal Wetlands Adjacent to Pier 421-2** (see above) **Implement MM BIO-6a: Coastal Bluff Scrub Replacement** (see above) **Implement MM BIO-6b: Southern Foredunes Avoidance** (see above) **Implement MM HAZ-1a: Remedial Action Plan Implementation** (see above) **Implement MM HAZ-1b: Hydrocarbon Contaminated Soil Notification(s) and BMPs** (see above) **Implement MM HAZ-1c: Oil Spill Contingency Plan Implementation** (see above) **Implement MM HWQ-1: Storm Water Pollution Prevention Plan** (see above) **Implement MM REC-1: Maximize Beach Access** (see below)				
Recreation					
Temporary loss of recreational access during decommissioning activities (Component 1)	**Implement MM AES-1a: Overnight Storage of Equipment** (see above)				
	MM REC-1: Maximize Beach Access. Pier and caisson work	Compliance documentation	Beach access maintained	CSLC, contractors	Throughout Component 1

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	areas shall be made passable by the public walking along the beach by removing debris to staging/storage areas off the beach and backfilling or placing steel plates over any open excavations at the end of each workday. If these measures are not feasible during periods of high tides or storm conditions, signage and temporary fencing shall be provided to notify the public that passage is not allowed and that alternative beach access locations can be found nearby.				decommissioning activities
Temporary loss of recreational access during decommissioning activities (Component 2)	**Implement MM AES-1a: Overnight Storage of Equipment** (see above)				

Potential Impact	Mitigation Measure (MM)	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Transportation and Traffic					
Component 1 Traffic Safety	**MM T-1. Truck Entrance Signage.** Easily visible signage shall be posted on Hollister Avenue at least 1,000 feet east and west of the EOF driveway to alert motorists of a truck entrance. This signage shall also be required at the Bacara Resort fire road entrance if this secondary access route is used by heavy-duty trucks.	Documentation of appropriate signage	Avoidance of traffic impacts	CSLC, contractors	Prior to Component 1 Project implementation
Component 2 Traffic Safety	**Implement MM T-1. Truck Entrance Signage** (see above)				
Contribution to Cumulative Transportation/ Traffic impacts (Components 1 and 2)	**Implement MM T-1. Truck Entrance Signage** (see above)				

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May 24, 2022

File Ref.: W30159-4

Kate Huckelbridge
Deputy Director of Energy, Ocean Resources, and Federal Consistency
California Coastal Commission
455 Market Street, #228
San Francisco, CA 94105

Subject: Update on the PRC 421 Decommissioning Project

Ms. Huckelbridge,

The State Lands Commission (SLC) values its partnership with the Coastal Commission (Commission) as the state transitions from offshore oil and gas production and addresses the final remnants of that development in the Santa Barbara Channel. In preparing to consider its Coastal Development Permit application for Component 1 of the PRC 421 Decommissioning Project, staff of the SLC were asked to update the Commission on the status of Component 1 and the SLC's efforts to facilitate execution of Component 2, by the local responsible agency, the city of Goleta (City).

Background

In April 2017, Venoco LLC, the lessee of State oil and gas leases off Goleta quitclaimed its offshore leases to the SLC, declared Bankruptcy, and began the process of liquidating. As a result, Venoco's oil and gas infrastructure located both onshore and offshore was deserted by the operator including Platform Holly, the 421 Piers, Line 96, the remnants of the Ellwood Marine Terminal, and extensive networks of underground piping. The bankruptcy and liquidation of Venoco has created numerous jurisdictional, legal, and practical challenges for local and state agencies and private landowners seeking to remediate and decommission derelict infrastructure left by Venoco.

Since 2017, the SLC has stepped up and stepped into the role of remediating that infrastructure on lands within its statutory jurisdiction and within the defined boundaries of previous oil and gas leases issued on the state's mineral interests. The SLC has obtained commitments from ExxonMobil, a prior lessee, to plug the 30 wells on Platform

Holly, 2 wells on the 421 Piers (completed in 2019), and decommission those facilities. Now that well plug and abandonment is underway and nearing completion, the SLC is focusing on facility decommissioning.

The SLC undertook environmental analysis of Component 2 at the request of its partner agencies

In early 2021, SLC staff consulted with staff of the Commission and the City on its plans to undertake California Environmental Quality Act (CEQA) review of the removal of the two caissons and connecting piers within the bounds of former lease, PRC 421 (i.e., Component 1). Removal of the supporting roadway and upland infrastructure was not within SLC's original scope because this infrastructure is located on private lands outside the bounds of the 421 lease. Because of the importance of removing derelict coastal hazards and restoring Haskell's Beach to its natural condition, Commission and City staff urged the SLC to expand the scope of CEQA review to include removal of the roadway (i.e., Component 2). The SLC agreed to this request, understanding that either the city or another public agency with direct jurisdiction would be the lead proponent of the roadway removal and knowing that CEQA review of the larger project would vastly facilitate that undertaking. The SLC also has extensive experience analyzing large, complicated projects where its jurisdictional role in the undertaking is narrow (e.g., SONGS Nuclear Decommissioning Environmental Impact Report (EIR)).

The SLC, Commission, and city of Goleta formed a joint review panel in May 2021 that facilitated active participation in administrative draft review of the EIR, through the CEQA process.

Numerous constraints limited the SLC's authorization to Component 1

On April 26, the SLC certified the EIR, analyzing both Components 1 and 2 for decommissioning. However, jurisdictional, contractual, and funding constraints limited the SLC to only authorize Component 1 of the Project. The two piers and caissons associated with the decommissioning work of Component 1 reside, generally, waterward of the MHTL, were built within the authorizations of Lease PRC 421, and are situated on State sovereign land. The roadway and pipelines that are part of Component 2, along with all other downstream infrastructure owned by Venoco, reside on privately owned uplands whose occupation was possible due to the consent of, or permit by, other landowners and local municipal agencies.

The SLC, as an agency of the State, is limited to act within the bounds granted by the Legislature. As an agent-land manager for the State, the SLC's relevant terrestrial jurisdiction in the Project area is over "all ungranted tidelands and submerged lands owned by the State." (Cal. Pub. Resources Code § 6301). The SLC lacks independent authority to decommission upland infrastructure on private property outside of its narrow ability to condemn lands for purposes outside the scope of the Project. Although the SLC has utilized the access road and operated the EOF since 2017, the occupation has been pursuant to state police powers to prevent public harm from

Hydrogen Sulfide Gas from Platform Holly and monitor the condition of the piers targeted by Component 1. The SLC's need to operate any onshore facilities extinguishes with the plug and abandonment of the platform wells and the completion of Component 1.

Secondly, ExxonMobil committed to undertake Component 1 based on contractual terms in the 1997 lease assignment from ExxonMobil to Venoco. The SLC consented to the assignment on the condition that ExxonMobil remain liable for PRC 421 lease obligations, including removal of the infrastructure within the bounds of the lease area. Because the SLC holds no regulatory authority to order a responsible party to decommission facilities outside the lease area, the scope of ExxonMobil's obligation to the SLC is to the lands formerly under lease, which contain the work under Component 1, but not Component 2.

Finally, funding constraints also limit the SLC to undertaking Component 1 of the Project. Since 2017, the Legislature has appropriated funding for the SLC to operate and maintain facilities needed to plug and abandon the 30 Platform Holly wells and the 2 PRC 421 wells. Component 1 will be undertaken by ExxonMobil, at its expense. Further, no funding has been appropriated to decommission or remove any infrastructure on private uplands. Even if the SLC had funding in its baseline budget to implement Component 2, expending state funds to remove infrastructure and improve private property outside of its jurisdiction and authority would be a gift of public funds in violation of the State Constitution.

However, despite the limitations on SLC directly undertaking Component 2, the chair of the Commission, State Controller Betty Yee, indicated:

> *I can assure you the [SLC] is not turning its back on what is going to continue to happen with respect to [Component 2]. So although our action today is certification of the entire EIR and approval only of Component 1 of the project, I don't believe there's anyone in this room that is looking to end the conversation there. . . Our action here today is by no means the end of the [SLC's] involvement.*
>
> April 26, 2022.

Based on that guidance, staff is working with the city of Goleta and stakeholders to identify grant funding sources for Component 2, and staff continues to facilitate approaches for a proponent to fulfill Component 2 (See further, below).

<u>The SLC seeks approval of Coastal Development Permit (CDP) for Component 1 for immediate public safety and environmental concerns</u>

CDP consideration of Component 1 in July is essential to starting that decommissioning work in 2022. A July consideration and approval of the CDP application allows a project start in mid-late August, while a CDP application consideration in mid-August, while only one month later, likely creates significant project delay. Specifically, an August CDP

would likely delay project start 3-5 weeks after issuance (mid-September to late September). A 30-day lead time is needed to contract and obtain consumables (fuel, personal protective equipment, equipment (some which can be done before the CDP)) and at least 3 weeks, post CDP, is needed to coordinate and mobilize, assuming no significant and unanticipated conditions placed in the CDP, which could cause additional delays. The contractor must perform pre-work biological monitoring and noticing, which must be done in advance of work. The bid packages that just closed have the contractors commencing mobilization only after final permits are in hand, so there are limits to the amount of preparation that can be done until all permits are issued.

Starting Component 1 in 2022 is vital to managing the risk of contamination from a release of oily soil from the fragile caisson walls. A mid- to late September start, due to an August approved CDP, is significant because even an assumed August start, under a July approved CDP, leaves a small window to do the work within biological and permit windows. The riskiest part of the project is preventing water intrusion into the caissons that could cause the release of contaminated soil as the walls are taken down. An August start has much of the soil removal occurring before the King Tide season in early December-January. A late September start puts that soil removal work in the middle of that period, creating higher risks to the caisson structure as it is removed. Beach-side work can only be performed during low-tides which may also cause delays if stormy/winter conditions occur. After mid/late February, nesting season occurs for certain bird species which inhabit areas along the access roadway and may cause issues with final removal work and demobilization. Component 1 is expected to take 5-6 months and a delayed, late-September start would easily push the project into March 2023.

Finally, given the challenges and liability associated with a release of contaminated soil, the contractor may not be comfortable with starting work until Summer 2023 if the project start date is delayed. Staff heard concerns from bidding contractors about the challenges of containing the caisson soil during demolition and the risk of water intrusion from wave action. The winning contractor (when selected) using its engineering judgment may feel it too risky to start the project in late September, in lieu of 2023. Although it is certainly possible to start in 2023, and perhaps in the springtime, most permits assume an August-late February work window and would need a variance or be reissued, and other limitations such as the bird nesting and grunion spawning seasons would need to be avoided.

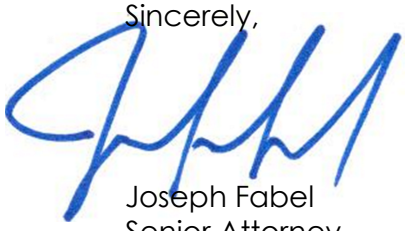
<u>The City and SLC have partnered to facilitate Component 2.</u>

Since April 26, 2022, SLC and City staff have developed a preliminary framework for facilitating Component 2 and assigned a joint working group towards implementation. The greatest hurdle is funding for overall project costs estimated to reach $5 million. In May, the working group met with the State Coastal Conservancy and Ocean Protection Council to explore grant funding options for coastal resiliency projects.

Because Component 2 meets the goals of resiliency, facilitates managed retreat, and will result in habitat restoration, it appears to be a good candidate for grant funding. The working group will submit formal applications for grant funding in early June and are awaiting further instructions from the awarding agencies. Assuming funding is in place, the framework envisions that the City will be the lead proponent, with the SLC providing staffing resources for permit preparation. Contractor procurement will align based on each agencies relative position to contract as efficiently as possible. In addition, the City is negotiating with the land owner, Sand Piper Golf Course, as to its participation in the process. The Commission will be a permitting agency for Component 2. The most optimistic goal is for Component 2 to commence in 1Q 2023, near the completion of Component 1.

Again, SLC staff values the Commission's partnership, from initial consultation, EIR development, and permit issuance, and we look forward to moving forward with this important project. If you have any questions please feel free to contact me at joseph.fabel@slc.ca.gov or at (916) 574.1964.

Sincerely,



Joseph Fabel
Senior Attorney

Addendum to the Ellwood Facilities Oil Spill Contingency Plan

EXXONMOBIL PRC 421 PIERS DECOMMISSIONING PROJECT

April 2021

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Exhibit 5
CDP Application No. 9-22-0131

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1.0 PROJECT DESCRIPTION AND EVALUATION

The California State Lands Commission (CSLC) is planning to decommission the California State Lease PRC 421 pier structures and caissons that supported wells 421-1 and 421-2 in the coastal tidelands area of Goleta, California (see Figure 1).

FIGURE 1 - PRC 421 Piers and Access Road, Goleta, CA

Both oil wells were plugged and abandoned to the surface by CSLC in 2019. It should be noted that before, during and following the abandonments, releases of oil were observed from a natural seep on the west side of the 421-2 pier.

During the well abandonments, approximately 60 soil samples were collected at seven (7) locations within caisson 421-1 and twelve (12) locations within caisson 421-2. Soil samples were analyzed for a suite of metal, volatile and semi-volatile organic compounds, chlorinated compounds, and hydrocarbon compounds. Only hydrocarbon compounds were found to be at elevated concentrations. Elevated concentrations of Total Petroleum Hydrocarbons (TPH) were found at each of the nineteen sample points with concentrations as high as 69,000 milligrams per kilogram.

A pilot soil removal project was completed on the 421-2 pier in September 2020 to test different removal techniques whereby the top 3' of caisson fill was removed. As part of this effort, five test holes were dug using the Hydro-Ex vacuum recovery equipment to a depth of approximately 3 feet below the base of the primary excavation (a total of 6 feet below the original 421-2 soil elevation). The soils encountered were hydrocarbon stained to varying degrees, but for the most part had significant hydrocarbon impacts especially on the eastern side of the caisson. Within test hole #2, a small amount of free oil was observed.

Based on the above, there is a possibility of a hydrocarbon release from within the 421 caissons during the decommissioning process. **The worst-case discharge of oil during this project is anticipated to be less than 1 barrel.**

2.0 POTENTIAL OIL SPILL SOURCES

There are no large volume sources associated with this Project that are capable of a large uncontrolled oil release. Sources of oil or other hazardous materials could include the following:

- Natural seep near and on the western side of the 421-2 caisson and associated sheen on the water in this general area.
- Accidental dropping of oil-contaminated soil onto the beach or into the water during the removal process from the caissons.
- Breaching of caisson walls by sea water and subsequent run-off as the caisson walls are removed.
- Oil release from roll off bins along the access road while hauling the contaminated caisson soil off site.
- Leakage or spillage of fuel, hydraulic oils or lubricants from the equipment used during decommissioning activities.

3.0 SPILL RESPONSE

The containment, recovery, and cleanup strategies to be employed in a possible project release are as follows:

3.1 CONTAINMENT

Containment of the natural seep(s) and associated sheen is not contemplated nor considered a “spill” for the purposes of this addendum. Note that it is unknown if such seeps occur under the enclosed caissons and may present as the caissons are removed.

Considering the small volume of the worst-case discharge, the limited, finite source of hydrocarbons, (impacted soil within the caissons, hydraulic oil and diesel from equipment) and the dynamic site conditions, the best course of action will be to have continuous onsite monitoring and onsite equipment staging for primary response. During the caisson removal at low tide events, consideration should be given to deploying boom around the work area.

The onshore OSRO for the 421 and EOF Facilities is Patriot Environmental. Patriot is capable of mobilizing and responding to an onshore and surf zone spill, if required. MSRC may be activated if needed for any near shore impacts from a release from the 421 caissons. Contractual agreements are found in Section G of the Ellwood OSCP.

3.2 RECOVERY AND CLEANUP

Site response equipment to be available for both onshore and surf zone responses is detailed in Table 3-1 below. The onsite shore response team will respond to clean-up oil before it reaches the water.

Note: If conditions become greater than the onsite spill response team can handle such as adverse weather conditions, etc., additional onshore and offshore spill response resources will be activated through the Ellwood Emergency Action Plan and as detailed in the Ellwood Facilities Oil Spill Contingency Plan.

3.3 INITIAL NOTIFICATIONS AND RESPONSE ACTIONS

Initial notifications and response actions are described in Section 2.2 of the Ellwood Emergency Action Plan and Facilities Oil Spill Contingency Plan. The Project team supervisors will immediately notify the Beacon West EOF Person in Charge (PIC) in the event of any spill onshore or release to the water in accordance with the Ellwood Emergency Action Plan and Oil Spill Contingency Plan.

ALL on site contractors are responsible for maintaining a vigilant watch for releases of any magnitude and detailed records of the incident (or observations of natural seepage). The oil spill response contractor is responsible for immediate clean-up of oil that gets on the beach or is released anywhere else within the job site.

The onsite contractor is designated as the primary responders and are trained to respond to any oil releases rapidly and effectively. The Team is supervised by the Contractor Supervising Manager (or other appointed supervisor) and consists of select employees from the contractor's personnel.

3.4 ONSITE/NEARBY RESPONSE EQUIPMENT

The Project will have personnel on site to monitor the area in the event of a release. Immediate onsite response equipment will be available from a spill trailer. The table below lists response equipment available during this project. Note that additional onshore and offshore spill response resources are available as described in Section F of the Ellwood OSCP.

Table 3-1 Onsite Equipment Available for Spill Response

Item	Quantity	Location
Bales of Sorbent Pads	15 (100 pads per bale)	Response Vessels/Trailer
Bales of Sorbent Boom	15 (40' per bag)	Response Vessels/Trailer
Bales of Sorbent Oil Snare	15 (100' per bale)	Response Vessels/Trailer
Boom Containment	400 feet	Response Vessels
Fuel spill kit	One per vessel/Trailer	Response Vessels/Trailer
DOT drums	10	Response Vessels/Trailer

4.0 PROTECTION OF THE ENVIRONMENT FROM PROJECT WASTE

Refer to the Ellwood EAP and OSCP (Appendix N) regarding waste handling.

5.0 OIL SPILL REPORT FORMS

Refer to the Ellwood EAP and OSCP (Appendix C) for required forms.

LEGEND:
- Survey Boundary
- Wetlands

MAP EXTENT:

0 40 80
FEET

Source: Esri Online 'Clarity' Basemap
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
Notes: This map was created for informational and display purposes only.

padre associates, inc.
ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

PROJECT NAME: ELLWOOD FIELD STATE LEASE PRC 421
SANTA BARBARA COUNTY, CA

PROJECT NUMBER: 2102-0251

DATE: March 2022

COASTAL WETLANDS MAP
(1 OF 2)

FIGURE 4.3-4

Z:\GIS Projects\GIS_Map\Map Projects\Ellwood Field State Lease 421\Wetland Map.mxd 3/30/2022

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LEGEND:
- Survey Boundary
- Wetlands

MAP EXTENT:

0 40 80
FEET

Source: Esri Online 'Clarity' Basemap
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
Notes: This map was created for informational and display purposes only.

padre associates, inc.
ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

PROJECT NAME: ELLWOOD FIELD STATE LEASE PRC 421
SANTA BARBARA COUNTY, CA

PROJECT NUMBER: 2102-0251

DATE: March 2022

COASTAL WETLANDS MAP
(2 OF 2)

FIGURE 4.3-5

Z:\GIS Projects\GIS_MapMap Projects\Ellwood Field State Lease 421\Wetland Map.mxd, 3/30/2022

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Figure 4.3-1. Vegetation Map (1 of 3)

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Figure 4.3-2. Vegetation Map (2 of 3)

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Figure 4.3-3. Vegetation Map (3 of 3)

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Figure 4.13-1. Recreational Areas in the Project Vicinity

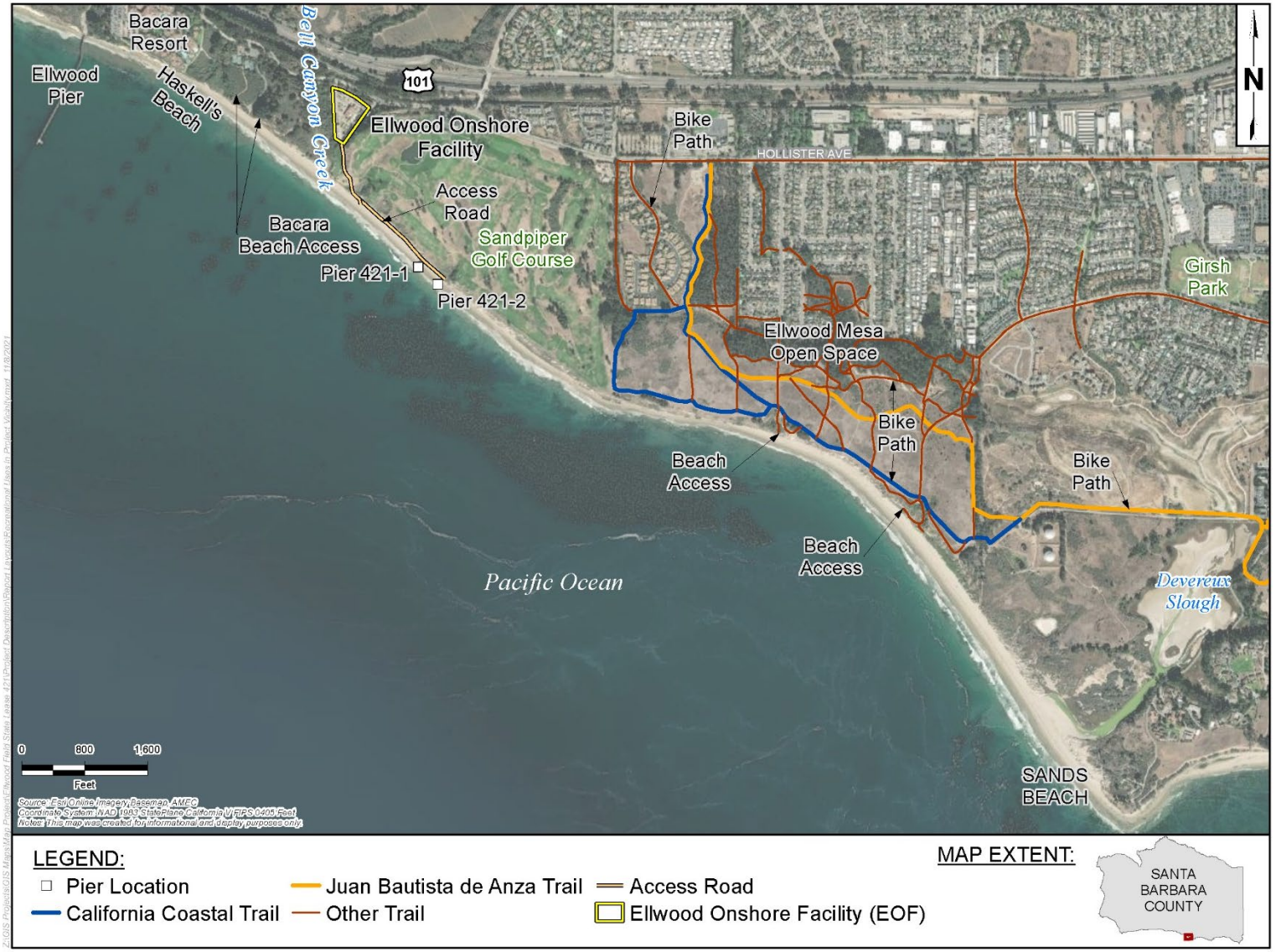

Exhibit 8
CDP Application No. 9-22-0131