# SANTA BARBARA COUNTY
# BOARD AGENDA LETTER

Clerk of the Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101
(805) 568-2240

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| **Agenda Number:** | |
| **Prepared on:** | January 5, 2005 |
| **Department Name:** | Planning and Development |
| **Department No.:** | 053 |
| **Agenda Date:** | January 18, 2005 |
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**TO:** Board of Supervisors

**FROM:** Valentin Alexeeff, Director of Planning and Development

**STAFF CONTACT:** Luis Perez, Energy Specialist, 568-2034
Nicole Horn, Planner, 568-2042

**SUBJECT:** Arguello Alcatraz Creek Emergency Permit, 04EMP-00000-00006

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**Recommendation:** That the Board of Supervisors receive the Director's report regarding an Emergency Permit issued to Arguello Inc. for the installation of temporary erosion control facilities to protect the bluff above the beach and divert streamflow from Alcatraz Creek away from Arguello's forebay, located within the Shell Gaviota Terminal facility at 16899 Hwy 101 in the Third Supervisorial District.

**Alignment with Board Strategic Plan:** The recommendation is primarily aligned with Goal II: A safe and healthy community in which to live, work and visit.

**Executive Summary and Discussion:** Pursuant to Section 35-171 of Article II of the County's Zoning Ordinance, when an Emergency Permit is issued, the Director of the Planning and Development Department must report the nature of the emergency and the work involved to the Board of Supervisors in writing. The Director issued an Emergency Permit to Arguello Inc. on December 20, 2004 for work necessary to prevent the shutdown of Arguello's desalination unit due to heavy run-off and sedimentation flowing from Alcatraz Creek over and into the forebay structure. Shutdown of the desalination unit could lead to platform shutdown and the ensuing potential risks associated with these events. This notification fulfills the ordinance requirement.

*Background Information*

A wildfire in June 2004 burned most of the hillside above the Gaviota Terminal, leaving very little vegetation in the watershed above the facility. Two creeks (Cementario to the west and Alcatraz to the east) cross the terminal and empty into the ocean less than 500 feet apart where the terminal abuts the beach.

Heavy rains on October 26, 2004 caused substantial sedimentation of the creeks. The damage occurred within a matter of about two hours. The creekbed and the ravine landward of the culvert rapidly filled with sediment. The high flow generated sufficient energy to erode the fill material above the beach (which is also the vehicle access to the beach area below the facility) back by about ten feet. Sediment entrained in the water was deposited into the Arguello forebay and entered the forebay sump, stopping the seawater intake pumps and shutting down the desalination system at the Arguello Gaviota Oil Heating Facility. Two pumps (a working pump and standby) are normally available to pump from the forebay. Both failed when they became clogged and damaged by sediment. Only one pump is currently operational. A second pump is being repaired.

The desalination system is essential for the operation of the Arguello Inc. facilities and offshore platforms. Failure of the pumps would cause a shutdown of the facility and three offshore oil platforms within two days.

*Summary of the Emergency Repair Strategy*

Arguello Inc. will install temporary reinforced concrete barriers and rock rip rap to protect the bluff above the beach and to divert streamflow over the fill above the culvert and away from the forebay. Initially, no attempt to remove sediment from the creekbed is proposed. It is doubtful that such efforts will be effective to maintain drainage since heavy siltation will continue to occur through the current rainy season and, most likely, for one or two seasons following.

When streamflow and sedimentation have returned to more normal levels it will then be appropriate to clear the streambed of debris and return the culvert to normal operation. The repair involves installation of:

- rock rip rap to protect the slope above the beach; and
- a concrete apron between the lip of the ravine and the rip rap slope to redirect flow away from the forebay.

For a more specific description of the emergency work, please refer to the attached permit.

*Analysis of Potential Environmental, Safety and Health Issues*

In order to ensure the protection of the health and safety of the public and the preservation of the environment, Arguello is required to maintain the safe operation of its facilities, which includes restoration work in the event of upset conditions. This emergency action undertaken by Arguello is permitted under Article II, which recognizes that certain actions warrant immediate, special consideration in order to lessen or remediate an emergency.

Impacts to off-site and nearby environmental resources due to the emergency work have been mitigated by the imposition of permit conditions (see attached permit). Therefore, the project is consistent with resource protection policies. However, staff will review any environmental or other impacts that may occur during the follow-up discretionary permit process required under Section 35-171.5.2 of Article II. Additional conditions may be imposed at that time.

This project will require standard discretionary project review, including environmental review, resulting in the issuance of a Coastal Development Permit and potentially a Final Development Plan subject to the regulations of Division 9, Section 35-184. Arguello must apply for such permits within 30 days from the date this emergency permit was issued.

*Other Agency Approval*

Staff coordinated with the California Coastal Commission (CCC) on the design of the repair project. In turn, the CCC issued an emergency permit dated December 28, 2004 for that portion of the slope protection work within the Commission's jurisdiction. The State Lands Commission (SLC) also issued a letter of authorization for repair work on the beach.

**Fiscal and Facilities Impacts:** Fees associated with County incident response and follow-up for this emergency are reimbursed by Arguello Inc. (recently purchased by Plains Exploration and Production Company) pursuant to their cost-reimbursement agreement with the County. This effort is part of the Permitting and Compliance budget for the Energy Division as delineated on page D-300 of the County's FY 04-05 budget book. Specifically, Fund 0001, Program 5010, Project CEFC. The project causes no fiscal or facilities impacts to the County.

**Concurrence:** California Coastal Commission and the California State Lands Commission

**Attachments:** Emergency Permit, 04EMP-00000-00006 issued December 20, 2004

# EMERGENCY PERMIT (Coastal)

**Case No.**: 04EMP-00000-00006 **Planner**: Erik Nagy **Initials**___
**Project Name**: Arguello Alcatraz Creek Spillway Erosion Control Project
**Project Address**: 16899 Highway 101, Gaviota CA 93117
**A.P.N.**: 081-130-060

Planning and Development (P&D) grants final approval and intends to issue this Emergency Permit for the development described below, based upon the required findings and subject to the attached terms and conditions. If you have questions regarding this Emergency Permit please contact the planner at (805) 568-2040.

**PERMIT ISSUANCE DATE**: December 20, 2004

**PERMIT EXPIRATION DATE**: January 20, 2005

**PROJECT DESCRIPTION SUMMARY**: See Attached

**PROJECT SPECIFIC CONDITIONS:**
See Attached

**TERMS OF PERMIT ISSUANCE:**

**1. Posting Notice.** A weather-proofed copy of this Emergency Permit, with Attachments, shall be posted by the Applicant in three (3) conspicuous places along the perimeter of the subject property. At least one copy of the permit shall be visible from the nearest street. This Permit shall be posted within one working day of the issuance of the permit and shall remain posted until the emergency work has been completed.

**2. Date of Permit Approval/Issuance.** This Permit shall be deemed effective on the date identified above.

**3. Time Limit.** The emergency permit shall expire 30 days after the issuance of such permit unless otherwise stated in the Emergency Permit. In addition, the applicant will be required to apply for the permits (e.g., discretionary or ministerial) that would otherwise be required within 30 days of issuance of this emergency permit.

**NOTE: This Emergency Permit does not allow construction or use outside of the project description, or terms or conditions; nor shall it be construed to be an approval of a violation of any provision of any City Policy, Ordinance or other governmental regulation.**

**OWNER/APPLICANT ACKNOWLEDGMENT:** Undersigned permittee acknowledges receipt of this permit and agrees to abide by all terms and conditions thereof.

_____/_____
___
Print Name Signature Date

**EMERGENCY PERMIT ISSUANCE BY**:

_____/_____
Director, Planning and Development Department Date

# ATTACHMENT A: PROJECT SUMMARY

## Arguello Alcatraz Creek Spillway Erosion Control Project

### *Background*

A fire in June 2004 burned most of the hillside above the Gaviota Terminal, leaving very little vegetation in the watershed above the facility. Two creeks (Cementario to the west and Alcatraz to the east) cross the terminal and empty into the ocean less than 500 feet apart where the terminal abuts the beach. Heavy rains on October 26, 2004 caused substantial sedimentation of the creeks. Cementario Creek is outside the area of terminal activities. Alcatraz Creek passes through the active portion of the terminal and near facilities essential to operations for the Arguello Inc. Gaviota Oil Heating Facility.

Alcatraz Creek was channelized in the early 1900s with a brickwork channel. The brickwork includes an approximately 100 foot long culvert under fill at the downstream end that discharges just above the beach to the ocean. The fill over the culvert is approximately five to ten feet deep and vehicle access to lower portions of the facility is via a graded dirt road over the fill. There is a ravine landward of the upstream entrance to the culvert above the fill. Prior to the recent rain, the ravine was approximately 100 to 150 feet long (north to south), 50 feet wide, and ten to fifteen feet deep.

With the passage of time, the brick channel through the upland portions of the facility above the culvert has partially filled with sediment upon which cat tails, willows, and other riparian vegetation have become established. The former brick creek channel within the middle portion of the facility is now nearly filled with sediment and vegetation. In periods of low flow, the creek remains confined within the channel. In periods of heavy flow, it has typically overflowed in the middle of the property and followed the low relief both within and outside the creekbed before re-entering the channel about 2/3 of the way through the facility. The flow re-enters the brick channel above another culvert bridge over which the access road to the lower (seaward) portions of the facility runs. The creek flows under the culvert bridge after which it enters the above-mentioned ravine before passing through the seaward culvert to the ocean. The ravine passes between pylons supporting the railroad trestle that crosses the facility and both creeks. From shortly above the access road culvert bridge to the seaward brick culvert, the channel has historically remained relatively free of sediment and vegetation, apparently because this portion of the creekbed has a greater slope.

Excursions of the creek have occurred during heavy rains in past years, but these have been intermittent, temporary, and have not caused erosion that threatens critical facilities or equipment. However, during the second substantial rain of the season on October 26, 2004, soil eroded from the hillsides above the Gaviota Terminal and completely filled the creekbed and ravine, restricting flow through upstream drainage culverts and plugging the brick culvert at the downstream end with sediment and debris. When the ravine between the two landward and seaward culverts filled with sediment, the creek overflowed the filled area adjacent to the beach. Significant erosion of the bluff occurred at the beach end of the fill where the overflow spilled down the slope to the beach, cutting back into the slope and undermining the perimeter fence. Water and mud also spread to the Arguello Inc. forebay facilities adjacent to the culvert mouth.

The Arguello Inc. forebay facilities include electrical equipment, piping, and pumps for the salt water intake to the Arguello Inc. desalination plant. A foot or more of sediment was deposited in the forebay area and some spilled into the

forebay sump where the sea water intake pumps are situated. The pumps ceased to function and required emergency repairs due to the sediment. Also, critical electrical equipment is housed in one of the areas threatened by sediment build-up and creekflow.

### *Summary*

The damage occurred within a matter of about two hours. The creekbed and the ravine landward of the culvert filled with sediment very rapidly. The high flow generated sufficient energy to erode the fill material above the beach (which is also the vehicle access to the beach area below the facility) back by about ten feet. Sediment entrained in the water was deposited into the Arguello Inc. forebay and entered the forebay sump, stopping the seawater intake pumps and shutting down the desalination system at the Arguello Inc. Gaviota Oil Heating Facility. Two pumps (a working pump and standby) are normally available to pump from the forebay. Both failed when they got clogged and seriously damaged by sediment. Only one pump is currently operational. A second pump is being repaired, but special non-corrosive bearings have not been received as of November 29, 2004.

The desalination plant provides water for boiler feed, NOx control water injection into turbine generators for emission control, utility water, and fire water for both the Gaviota Oil Heating Facility, and the Gaviota Terminal (operated by Shell Pipeline Co.) across Highway 101. The desalination system is essential for the operation of the Arguello Inc. facilities and offshore platforms. Failure of the pumps would cause shutdown of the facility and three offshore platforms within a maximum of two days.

### *Conclusions*

Based on the above observations, future rains of similar intensity will likely cause similar erosion until the hillsides above the facility in the creek drainage stabilize with vegetation growth. It is difficult to predict how long it will be before such stabilization occurs, but it will likely take two or more years for adequate vegetation to become established. If intense rains occur prior to that time and cause further erosion of only minimally established vegetation cover, revegetation may take longer. Partially established vegetation could again be washed away, returning the hillsides to a highly erodable state which will take correspondingly longer to stabilize.

The operation of facilities essential for Arguello Inc. operations was seriously impaired by the flooding. The bluff face above the beach eroded back about ten feet during the most intense rain period. The erosion exposed the ocean discharge end of the historic brick culvert under the fill at the downstream end of Alcatraz Creek and undercut the perimeter fence for the facility where the water spilled over the bluff. Facility security was compromised and the access road on the fill over the culvert was damaged and vehicle access to the lower facility was temporarily prevented. Comparable disruptions of facility operations can be expected in future similar rain events until hillside erosion rates return to more normal levels.

It is therefore apparent that a protective strategy is necessary to control future erosion. It also would not appear to be prudent at this time to attempt to restore the creekbed to its pre-flood state since future flooding will almost certainly refill the creekbed and ravine until the volume of sediment coming down the creek subsides.

### *Proposed Emergency Repair Strategy*

Arguello Inc. is to install temporary erosion control facilities to protect the bluff above the beach and to divert streamflow over the fill above the culvert and away from the forebay. Initially, no attempt to remove sediment from the creekbed is proposed. It is doubtful that such efforts will be effective to maintain drainage since heavy siltation will continue to occur through the current rainy season and, most likely, for one or two seasons following.

When streamflow and sedimentation have returned to more normal levels it will then be appropriate to attempt to clear the streambed and return the brick culvert to normal operations. Arguello Inc. will routinely consult with the permitting agencies to keep them abreast of sedimentation levels and to obtain joint agreement among all parties as to when it will be appropriate to attempt more permanent restoration of creek flow through the culvert. It is difficult to predict ahead of time when stream sediment will return to normal levels, so it is not appropriate to commit to a specific timeframe at this time.

The repair involves installing rip rap to protect the slope above the beach along with a concrete apron between the lip of the ravine and the rip rap slope protection to contain future overflow in a concrete channel directed away from the forebay and ensure that water spills only where the slope is protected by rip rap above the beach. There is already rip rap protecting the forebay area, but it does not extend as far west as the location of the recent new erosion. The proposed rip rap addition will function as an extension of the existing rip rap farther west by approximately 50 feet. This will protect the Arguello Inc. forebay and forestall erosion of the fill above the beach.

The following steps are involved:

1. Grade, fill, and compact eroded area above the beach to 2:1 slope approximating pre-flood contours while avoiding damage to historic culvert mouth.
2. Lay nonwoven heavy (1#/yd2) geotextile over fill to prevent fines from filtering into rock face.
3. Apply .75 foot thick bedding layer of #3 class rock (1# to 50# wt.) using Method B placement (dump from truck and grade to depth) on top of geotextile.
4. Apply second 2.5 foot thick layer of facing class rock (200# avg. wt., 1 to 1.5 ft diameter) using Method B over bedding layer.
5. Apply final top armor layer 5 feet thick of .5 ton to 1 ton (50% each size) angular quarry stone rock using Method A (laying each rock individually so it contacts at least three adjacent rocks).
6. Grade area between former ravine and top of rip rap to consistent slope to direct creek flow away from forebay and toward area protected by rip rap. Width of channel to be minimum ten feet and depth 1 ½ to 2 feet with 1:1 to 1.5:1 side slope and area sloped to permit vehicles to cross the channel and access the lower facility.
7. Protect graded channel with 4 inch concrete reinforced with rebar on 18 inch centers on a perpendicular grid – concrete to extend over the top of the rip rap to ensure that flow is directed over rock facing.
8. Install 3 foot square rock-filled gabions as needed above rim of former ravine (above buried inlet to brick culvert) to confine flow and direct to concrete channel area.

Approximately 150 cubic yards of cut and fill may be necessary to create the slope for step 1. There will be little disturbance of vegetation since most was displaced when the slope eroded during the storm or was burned last June.

## *Additional Information*

Based on advice that the California Coastal Commission's jurisdiction related to the project includes and extends seaward from where the rip rap will be constructed, and a request for more detail regarding the operations and equipment necessary to construct the rip rap, the following additional information is provided:

- Approximately 45 cubic yards of slope fill material will be required, not including the additional rock forming the rip rap structure itself.
- Approximately 65 cubic yards of cobble/sand will be excavated from the beach area to enable the toe of the slope reinforcement to be placed sufficiently deep to resist undermining and wave erosion.
- Sand and cobble excavated from the beach will be stockpiled on the level area above the slope to the beach, away from possible wave erosion.
- The sand/cobble will be returned to the beach following installation of the reinforcement and placed over the reinforcement to return the beach to a natural appearance.
- An excavator and front end loader will be operated on the beach to excavate material and place the reinforcing rock.
- The excavator and loader will be stored off the beach within the Gaviota Terminal facility when not operating on the beach.
- Impermeable plastic barriers will be placed under the stored equipment to prevent fuel, fluid, or lubricant leaks from contacting the ground.
- The hydraulic, lubricant, and fuel tanks, hoses, and connections will be inspected daily prior to operation to ensure that no leakage occurs. Any leaks so identified will be repaired prior to operation on the beach.

# ATTACHMENT B: FINDINGS OF APPROVAL

The Director of Planning and Development may grant an Emergency Permit upon reasonable terms and conditions, including an expiration date and a requirement for subsequent discretionary and ministerial permits, as required by the Article II Coastal Zoning Ordinance, if the Director finds that:

*A. An emergency exists and requires action more quickly than provided for by the procedures for permit processing, and the action will be completed within 30 days unless otherwise specified by the terms of the permit;*

The emergency response to the flooding damage requires immediate action in order to protect the forebay structure and prevent further potential damage from winter storms. Processing of the normally required permits would delay prompt response. The emergency action will take less than 30 days to be completed, and it will be monitored to assure project completion with minimal impacts to the surrounding environment. Follow-up permits pursuant to the Article II Coastal Zoning Ordinance will be required to validate the emergency work.

*B. Public comment on the proposed emergency action has been reviewed; and*

This emergency permit, as well as any and all follow up permits, will be noticed according to the permit procedures outlined in Article II of the Coastal Zoning Ordinance, thus allowing opportunity for public comment. In addition, the Emergency Permit will be posted at three conspicuous locations along the perimeter of the property. The Ordinance does not require public noticing before emergency actions can begin.

*C. The action proposed is consistent with the requirements of the Comprehensive Plan and Zoning Ordinance.*

The primary goal of the Comprehensive Plan is to safely protect, maintain and restore the environment, including both the natural and man-made environment. In order to ensure the protection of the health and safety of the public and the preservation of the environment, Arguello is required to maintain the safe operations of all its facilities, which includes restoration work in the event of upset conditions. The County's Zoning Ordinance was established to set standards for orderly development that provides for the protection of the health and safety of the general population. The emergency action taken by Arguello is permitted under Article II, which recognizes that certain actions warrant immediate, special consideration in order to lessen or remediate an emergency. Article II also provides that the emergency action will be subject to the normal restrictions imposed under the Zoning Ordinance within a reasonable amount of time.

Impacts to off-site resources from emergency work will be mitigated by the imposition of permit conditions. The project is found consistent with resource protection policies since all feasible mitigation has been incorporated into the project. The Director will review the project more carefully during the discretionary permit review and impose additional conditions, as necessary.

# ATTACHMENT C: CONDITIONS OF APPROVAL

Standard Conditions

1. The Emergency Permit shall expire 120 days after the issuance of such permit. In addition, the applicant shall apply for the permits (discretionary and ministerial) that are otherwise required within 30 days of issuance of this emergency permit. All information required for a complete application shall be provided within 30 days of this Emergency Permit. The application for a regular permit shall include dismantlement of the temporary structures, restoration of the upstream areas, restoration of the creek bed to its original level, and return the brick culvert to normal operations.

2. This Emergency Permit is based upon and limited to compliance with the Project Description, as described in Attachment A of this Emergency Permit, and conditions of approval. Construction shall follow the plans attached to this permit as provided by the applicant. Arguello shall not deviate from the project description, exhibits or conditions unless such deviation is reviewed and approved by the Director of Planning and Development and determined to be in conformity with this permit. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above described approval will constitute a violation of the permit.

   The grading, development, use and maintenance of the property, the size, shape, arrangement and location of structures, staging areas, and restoration areas, and the protection of resources shall conform to the project description as described in Attachment A and the conditions of approval. The property or any portions thereof shall be sold, leased or financed in compliance with this project description and the approved conditions. All plans shall be submitted to the Director for review and approval.

3. Arguello shall defend, indemnify and hold harmless the County or its agents, officers and employees from any claim, action, or proceeding against the County or its agents, officers or employees, to attack set aside, void or annul, in whole or in part, the County's approval of the Emergency Permit. In the event that the County fails promptly to notify the applicant of such claim, action, or proceeding, or that the County fails to cooperate fully in the defense of said, this condition shall thereafter be of no further force or effect.

4. In the event that any condition imposing a fee, exaction, dedication or other mitigation measure is challenged by the project sponsors in an action filed in a court of law or threatened to be filed therein which action is brought within the time period provided for by law, this approval shall be suspended pending dismissal of such action, the expiration of the limitation period applicable to such action, or final resolution of such action. If any condition is invalidated by a court of law, the County shall review the entire project and substitute conditions may be imposed.

5. The authorization conferred by this emergency permit to conduct the activities described in the application shall expire 30 days from the date of permit issuance unless, at least 72 hours before that date, the applicant applies for and the Director of Planning and Development grants for good cause, an extension of that expiration date.

6. The applicant shall not deviate from the operations, timing, or sequence of operations specified in the application unless and until authorized by the Director of Planning and Development.

7. Prior to any project activities authorized under this permit, Arguello shall secure all other necessary federal, state and local permits needed for this project. All work performed shall be in accordance with the requirements of all other applicable federal, state and local agency codes and regulations.

8. The Director of Planning and Development may order an immediate suspension of all or part of the work authorized under this permit if the Director determines that such action is necessary to avoid or mitigate significant impacts to health and safety or the environment. Additional conditions may be imposed to mitigate such impacts.

Special Conditions

9. Conditions of both Arguello's permit (85-FDP-032) and Shell's Gaviota Terminal permit (86-FDP-090) are hereby incorporated by reference.

10. At least seven days before starting work at the project site, Arguello shall provide for review and approval by Energy Division staff the construction schedule. This same information shall also be provided to all other affected federal, state and local agencies. A pre-construction meeting with the County EQAP monitor, construction contractor, and representatives of other affected agencies shall be conducted to review all applicable permit conditions and the above construction schedule, as appropriate.

11. No more than 48 hours before starting work at the project site and again within one week of completing project work, the County EQAP monitor shall photograph the project area, including the bluff face and beach, and shall describe in writing the condition of existing landforms and vegetation.

12. The EQAP monitor shall maintain a daily log that includes both written and photographic descriptions of project activities and any observed or potential effects of the project on shoreline habitat. For any adverse impacts caused by project activities, the monitor shall note in the log the date, time, location, size and area of impact, the activity contributing to the damage or destruction, and any corrective actions taken. The log shall also include descriptions of any spills, releases, or debris that affect coastal waters and the beach area along with a description of the measures taken to address these events. The monitor shall send each day's log via facsimile or e-mail to the Energy Division. Within thirty days of project completion, and no later than February 28, 2005, Arguello shall submit to the Energy Division a written report summarizing the above information and the pre- and post-construction photographs.

13. Environmental monitoring of the project shall be conducted by the County's EQAP monitor, a Native American archaeological monitor, and other applicable parties as deemed necessary by the EQAP monitor and/or Energy Division staff.

14. All feasible measures shall be taken to achieve 100% containment of the concrete and other similar materials used during the project as well as any water exposed to those materials. All excess materials not needed for the project and all water exposed to the concrete shall be removed from the project area and properly disposed of offsite. A vacuum truck shall be on site at all times during operations involving these materials.

15. This emergency permit does not authorize harassment, disturbance, or other forms of "take" of marine mammals.

16. Night lighting shall be minimized to the maximum extent feasible to reduce potential impacts to wildlife while maintaining safe work conditions. The lighting shall be focused so as to illuminate work underway and/or equipment requiring overnight monitoring. Lighting shall be maintained at a level that allows for safe work operations and effective equipment monitoring.

17. During the project, Arguello shall have at the project site spill response equipment that may be needed to immediately respond to the maximum credible spill, including, at a minimum, 5 bags of sorbent pads (for a total of 200 feet), 20 sandbags, and shovels. If there is a spill or hazardous material release (including oil, fuel, other petroleum products, or any hazardous chemicals), Arguello shall immediately contact the Energy Division and shall provide via facsimile the daily log that fully describes the incident.

18. Equipment shall not be refueled on the beach or in the bluff area. All refueling shall occur within the Gaviota Terminal facility to avoid any impacts to marine resources from fuel spills.

19. Best Management Practices (BMPs) for construction activities contained in the California Storm Water Best Management Practices Handbook (March 1993) or other BMPs shall be implemented to minimize erosion and limit sedimentation of receiving waters. At a minimum, erosion control measures shall be implemented to prevent siltation from stockpiled material and minimize fugitive dust.

# ATTACHMENT D: PROJECT PLANS