SANTA BARBARA COUNTY PLANNING COMMISSION
Staff Report for E&B Natural Gas Pipeline Project

Hearing Date: September 9, 2015
Staff Report Date: August 20, 2015
Case Nos.: 14DVP-00000-00018 & 15RZN-00000-00007
Environmental Document: 15NGD-00000-00007

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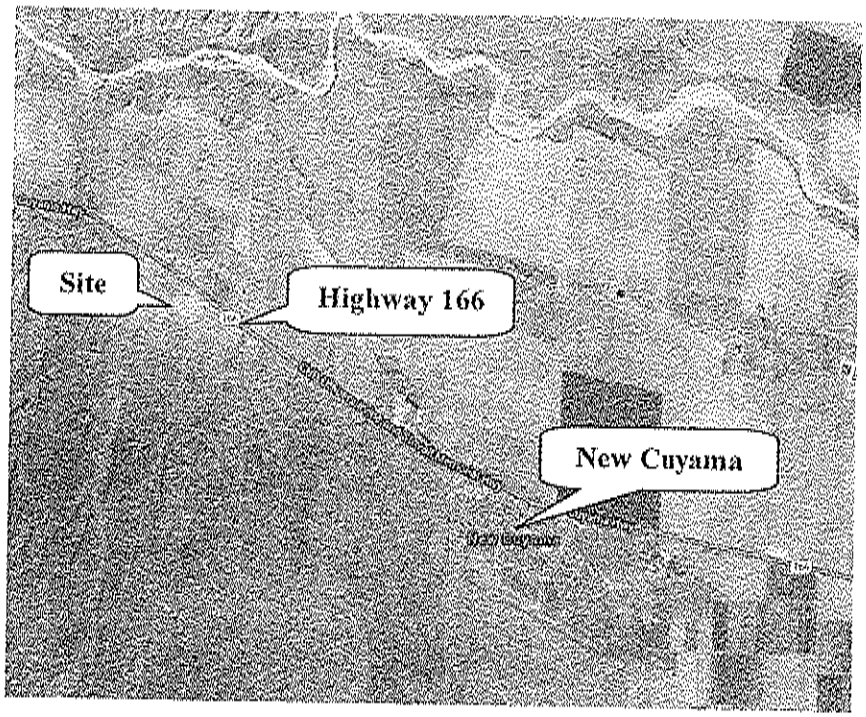


This site is identified as Assessor Parcel Number 147-030-025, approximately 2.0-miles northwest of New Cuyama, 0.7-miles east of the intersection of Aliso Canyon Road and State Highway 166, Cuyama Valley area, First Supervisorial District.

Application Complete: December 31, 2014
Processing Deadline: 60 days from adoption of MND

1.0 REQUEST

Hearing on the request of Robert Booher, agent for the applicant, E&B Natural Resources (E&B), to consider Case No. 14DVP-00000-00018 [application filed on October 7, 2014], for approval of a Development Plan in compliance with Section 35.82.080 of the County Land Use

and Development Code (LUDC), on property zoned U (Unlimited Agriculture), to construct and operate an above-ground natural gas pipeline (1,125-feet); and to

Consider Case No. 15RZN-00000-00007, proposing to rezone one lot (10.47 gross acres) from Unlimited Agriculture, 10 acre minimum lot area (U) under Zoning Ordinance No. 661 to Agriculture II, 40-acre minimum lot area (AG-II-40) in compliance with Chapter 35.104 of the LUDC; and to

Adopt the Mitigated Negative Declaration (15NGD-00000-00007) pursuant to the State Guidelines for Implementation of the California Environmental Quality Act. As a result of this project, significant but mitigable effects on the environment are anticipated in the following categories: Aesthetic/Visual Resources, Air Quality, Biological Resources, Cultural Resources, and Noise. The application involves AP No. 147-030-025, located approximately 0.7-miles east of the intersection of Aliso Canyon Road and State Highway 166, in the Cuyama Valley area, First Supervisorial District.

The MND and all documents may be reviewed at the Planning and Development Department, 123 East Anapamu Street, Santa Barbara.

2.0 RECOMMENDATION AND PROCEDURES

Follow the procedures outlined below and recommend that the Board of Supervisors approve Case Nos. 14DVP-00000-00018 and 15RZN-00000-00007 marked "Officially Accepted, County of Santa Barbara (September 9, 2015) County Planning Commission Attachments A-E", based upon the project's consistency with the Comprehensive Plan and based on the ability to make the required findings.

Your Commission's motion should include the following:

1. Recommend that the Board of Supervisors make the required findings for approval of the project specified in Attachment A of this staff report, including California Environmental Quality Act (CEQA) findings.

2. Recommend that the Board of Supervisors adopt the Mitigated Negative Declaration (15NGD-00000-00007 included as Attachment C) and adopt the mitigation monitoring program contained in the conditions of approval.

3. Recommend that the Board of Supervisors approve the project (14DVP-00000-00018) subject to the conditions included as Attachment B.

4. Adopt the resolution in Attachment E of this staff report recommending that the Board of Supervisors adopt an ordinance and approve a rezone (15RZN-00000-00007), changing the zone district on the subject parcel from Unlimited Agriculture (Ordinance 661) to AG-II-40 (County Land Use and Development Code).

Refer back to staff if the Commission takes other than the recommended action for appropriate findings and conditions.

3.0 JURISDICTION

1. Case No. 14DVP-00000-00018. The Review Authority table in Section 35.82.080.B.3 of County Land Use and Development Code (LUDC) identifies that Development Plans which are outside of the review authority of the Planning Director and Zoning Administrator are under the authority of the Planning Commission. Therefore, the Planning Commission is the decision maker for the proposed Development Plan.

2. Case No. 15RZN-00000-00007. The County Planning Commission reviews the consistency rezone for a recommendation to the Board of Supervisors based on Section 35.80.020.A of the LUDC, which states that the Planning Commission shall make a recommendation to the Board of Supervisors for a final decision on the rezone. LUDC Section 35.104.050.A.1 requires the Planning Commission to hold at least one noticed public hearing on the proposed rezone. LUDC Section 35.104.050.A.2 states that the Planning Commission's recommendation on the proposed rezone shall be transmitted to the Board of Supervisors in the form of a written recommendation. LUDC Section 35.104.050.B.1 requires the Board of Supervisors to hold a public hearing and take final action on the matter.

Pursuant to LUDC Section 35.80.020.B, when two or more discretionary applications are submitted that relate to the same development project and the individual applications are under the separate jurisdiction of more than one decision-maker, all applications for the project shall be under the jurisdiction of the decision-maker with the highest jurisdiction. Since the Board of Supervisors is the County decision-maker with the highest jurisdiction, the Planning Commission shall make an advisory recommendation to the Board of Supervisors on the project, which will act as the final decision-maker.

4.0 ISSUE SUMMARY

E&B Natural Resources is proposing the project to re-establish a previously existing pipeline connection between its Russell Ranch field facility and its South Cuyama gas plant. Currently, gas produced at the Russell Ranch facility is disposed of by re-injecting the gas into the oil-bearing formation below ground. Instead, E&B proposes to install a pipeline connection between the two facilities, allowing it to process the gas at the South Cuyama Gas Plant and sell the final product to the local utility company. There would be no other changes to their current operations.

Both the construction and operation of the new pipeline connection pose little environmental and safety impacts, and those impacts are mitigated to a level of insignificance through project design features and mitigation measures. Once pipeline construction is completed, there will be no perceptible changes to the existing operations of the Russell Ranch and South Cuyama facilities.

Originally, the pipeline was to be located outside of an existing pumping station facility on Highway 166 and buried adjacent to an existing fence line surrounding the facility. After the MND was circulated for public review, E&B revised the project to relocate the pipeline within the gated facility. Under the current project, the proposed pipeline would remain adjacent to the fence line but would be located inside of the facility footprint and placed above-ground. Aside from the Santa Barbara County Air Pollution Control District, no public comments were received on the project Mitigated Negative Declaration.

Relocating the project within the Cuyama Pumping Station facility changed the project parcel to one zoned as U (Unlimited Agriculture) under outdated Zoning Ordinance 661. The subject Consistency Rezone is required by the County for all projects which occur on parcels zoned "U". Rezoning the subject parcel from U under Ordinance 661 to AG-II-40 under the Santa Barbara County Land Use and Development Code (LUDC) would assist in the implementation of a uniform and up-to-date zoning ordinance throughout the inland area. Future development and uses on this parcel would be subject to the permitting requirements contained within the LUDC for AG-II zoned property. The proposed rezone would not change the Comprehensive Plan land use designation of the land, which is Agricultural, A-II, 40 acre minimum parcel size.

5.0 PROJECT INFORMATION

5.1 Site Information

The project site is located approximately 2.0-miles northwest of New Cuyama and 0.7-miles east of the intersection of Aliso Canyon Road and State Highway 166, Assessor's Parcel Number 147-030-025, First Supervisorial District. The following table summarizes information about the project location below:

Site Information	
Comprehensive Plan Designation	Inland, Rural, A-II, 40-acre minimum parcel size
Ordinance, Zone	Zoning Ordinance No. 661, U (Unlimited Agriculture), 10-acre minimum parcel size
Site Size	10.47-acres
Present Use & Development	Pipelines, crude oil storage and shipping
Surrounding Uses/Zone(s)	*North:* AG-II-100, U (Unlimited Agriculture), agriculture, cattle grazing, State Highway 166 *South:* AG-II-100, cattle grazing *East:* AG-II-100, cattle grazing, State Highway 166, Recreation/Open Space, Unlimited Agriculture, Residential (RES), New Cuyama Urban Area *West:* AG-II-100, agriculture, cattle grazing, State Highway 166
Access	State Highway 166
Other Site Information	Oil Industry Overlay, Scenic Corridor Overlay

Site Information	
Public Services	Water Supply: None Sewage: None Fire: Santa Barbara County Fire Protection District, Station #41 Police Services: County Sheriff Other: Cuyama Joint School District (40, 42, 56)

5.2 Setting

The project site is located in the Cuyama Valley approximately 2.0-miles northwest of the town of New Cuyama in a rural area characterized by agricultural lands. The project site consists of an existing oil and gas storage facility located adjacent to State Highway 166. Topography within the project site is relatively flat and consists of loose gravel and soils which are heavily compacted due to regular vehicle use and maintenance within the facility. A small residential community of three homes is located further north of the project site, on the northern side of the highway. Surrounding areas on the west, south, and east consist of rural, undeveloped agricultural lands which have historically been used for oil production and livestock (cattle) grazing. The project site is located within areas classified as prime soil (Class 2). A prehistoric archaeological site is located within the project vicinity and outside of the gated facility.

The project site is characterized by the Cuyama Pumping Station (PS), a square-shaped facility surrounded on all four sides by a 6-foot high chain-link fence (See Attachment D; Site Plan). An existing interior access road runs parallel to the fence line outside of the facility. State Highway 166 is located directly adjacent to the northeastern side of the facility and provides direct access to a gated entrance.

The project site contains little to no vegetation due to frequent vehicle use and maintenance of the facility. No native trees are present within the proposed project site. Some non-native annual and perennial grassland habitat is present within a 500-foot buffer outside of the facility, though there is evidence of past disturbance (plowing). Vegetated areas surrounding the project site are comprised mainly of red-stemmed filaree (*Erodium cicutarium*). No suitable nesting, breeding, or foraging habitat for special-status species is located within the project site. Special-status wildlife species that could potentially occur in the project site or its vicinity include: Blunt-nosed lizard, San Joaquin kit fox, giant kangaroo rat, prairie falcon, Kern primrose sphinx moth.

No surface bodies, including wetlands, riparian areas, vernal pools, ponds, springs, streams, or other sensitive habitats are located in the project area. A designated U.S.G.S. blue line creek (Bitter Creek; Stream/River-intermittent), is located approximately 630-feet west of the project site. North of Bitter Creek, the Cuyama River winds along the foot of the mountains.

5.3 Description

E&B Natural Resources (E&B) has requested a to consider Case No. 14DVP-00000-00018 [application filed on October 7, 2014], for a Development Plan in compliance with Section 35.82.080 of the County Land Use & Development Code (LUDC), on property zoned U (Unlimited Agriculture) to allow for construction and operation of an above-ground natural gas pipeline (1,125-feet) located approximately 0.7-miles east of the intersection of Aliso Canyon Road and State Highway 166 in the Cuyama Valley; and to consider Case No. 15RZN-00000-00007, proposing to rezone one lot (10.47 gross acres) from Unlimited Agriculture, 10 acre minimum lot area (U) under Zoning Ordinance No. 661 to Agriculture II, 40-acre minimum lot area (AG-II-40) in compliance with Chapter 35.104 of the LUDC.

The proposed pipeline would be approximately 1,125-feet in length and placed above-ground on sleepers within the existing Cuyama Pumping Station (PS) facility, located between the State-Designated Russell Ranch Oilfield and South Cuyama Oilfield. The pipeline would connect two existing pipelines (3- and 8-inches) and transport natural gas from E&B's existing Russell Ranch Field facility to its existing South Cuyama Gas Plant for processing and sale. The proposed project would replace E&B's current practice of disposing of excess natural gas by reinjection at its Russell Ranch Field facility. The entire length of the inter-field pipeline between the Russell Ranch Oilfield and the South Cuyama Oilfield would be comprised of existing, previously abandoned pipelines except for the 1,125-foot segment of new pipeline.

The pipeline would be located within the Cuyama PS facility and parallel to an existing fence surrounding the northwest and southwest sides of the facility. The pipeline would tie-in to E&B's existing 3-inch pipeline on the south and existing 8-inch pipeline on the north. Once connected, an existing 8-inch pipeline would transport natural gas from E&B's Russell Ranch Field facility to the new pipeline at the Cuyama PS, and an existing 3-inch pipeline would then transport the gas directly to the South Cuyama Gas Plant. The new line would be 3-inches in diameter, except for a 100-foot segment where it would be 8-inches to tie-in to the existing 8-inch line.

The inter-field pipeline would require upgrades to existing equipment at the Russell Ranch Field facility (located in San Luis Obispo County) and installation of new equipment at the Cuyama PS and South Cuyama Gas Plant facilities. Within the PS facility, a set of pig launcher and receiver valves, two tie-in points to connect the new pipeline to the existing 3-inch and 8-inch lines, a basket strainer, and associated piping would be installed. The valves would be surrounded by steel posts (4.0-feet in height) and would cover a permanent footprint of approximately 196-square feet (8.5-ft width by 23-ft length). A new dual-purpose isolation valve and gas meter would be installed at the Gas Plant, which would enable E&B to perform maintenance and monitoring activities over the pipeline. A new condensate drop-out (a pressure vessel used to prevent pipeline debris from collecting) and associated piping would be installed adjacent to the Gas Plant, where the existing 3-inch pipeline to existing infrastructure.

Upon completion of construction activities, the following permanent equipment would be installed: 3-inch coated steel schedule 40 pipeline, 8-inch coated steel schedule 40 pipeline, pig launcher and receiver valves, tie-in points, 4-foot high steel posts surrounding the valves, condensate drop-out, basket strainer, gas meter, and associated piping. The valves would be installed at the start, end, and connection points of the inter-field line and would allow for pipeline shutdown in case of an emergency, isolation of leaks, and use of smart pigs to clean and maintain the entire length of the inter-field line. All pipelines, valves, and fittings would be tested and proven safe to operate before they are put into service. E&B would implement the following measures to ensure the safe condition and operations of the inter-field pipeline: Cathodic protection to prevent corrosion; hydro-testing of the line to detect for leaks; a Supervisory Control and Data Acquisition (SCADA) system to actively monitor pipeline conditions; pigging operations to clear pipeline debris and detect for anomalies; flow meters to control balance; and other measures to prevent and monitor existing corrosion.

No grading is proposed. However, the project would involve minor amounts of excavation for the proposed tie-in points. Project activities, including staging and storage of construction-related vehicles and equipment, would occur within previously disturbed areas (an existing oil and gas facility) which are clear of vegetation and subject to regular vehicle use and maintenance. No habitat disturbance or removal is proposed.

Regional access to the project site would be provided by Highway 166. The project site is surrounded by an existing chain-link fence and would continue to be gated (to prevent public access) during construction activities.

The property is comprised of 10.47-acres (APN 147-030-025). The parcel is zoned U (Unlimited Agriculture) and is located approximately 0.7-miles east of Aliso Canyon Road and south of Highway 166 in the Cuyama Valley area, First Supervisorial District. The project would rezone the subject parcel from the zone district U under Zoning Ordinance 661 to the current AG-II-40 zoning district under the County Land Use and Development Code (LUDC). The proposed consistency rezone would increase the minimum lot size from 10 acres to 40 acres, which would be consistent with the existing land use designation of the parcel, A-II, 40 acre minimum parcel size, under the County's Comprehensive Plan. The subject parcel is zoned for agricultural uses and would remain zoned for agricultural uses.

5.4 Background Information

The facility was previously operated by the Plains All American Pipeline (PAAPL) Company as a Pumping Station (PS). It is currently being operated by E&B Natural Resources (E&B) as a storage and shipping facility for crude oil production. Development within the project site is limited to equipment associated with oil and gas operations, including a crude oil tank, three water storage tanks, a Lease Automatic Custody Transfer (LACT) unit, and a truck loading rack with associated piping. A 10 to 12-foot segment of the existing 8-inch pipeline is located above-ground just outside of the northwestern corner of the facility and adjacent to State Highway 166. The existing 3-inch pipeline extending from the South Cuyama field is buried at the midway point along the

southwestern side of the facility. The proposed pipeline would be placed above-ground and located within the facility and parallel to the fence line which surrounds the north- and southwest sides of the facility.

E&B Natural Resources (E&B) operates oil and gas development in the Russell Ranch and South Cuyama Oilfields, which are separated by a distance of approximately three miles. Crude oil was first discovered in Cuyama in the Russell Ranch Oilfield in 1948. Historic production from the Russell Ranch field included up to 21,000 barrels of oil per day and up to 6.5 million cubic feet of gas per day. Initially, field gas was processed at a gas plant (Plant #9) at the Russell Ranch field facility and excess gas was re-injected into the producing formation. When Plant #9 could no longer accommodate the large amounts of gas production from the Russell Ranch field, excess gas was transported via a historical inter-field pipeline to the South Cuyama gas plant (Plant #10) for processing and sale. The Gas Plant was permitted in 1988 to process natural gas under Conditional Use Permit 87-CP-095, which reflects the Gas Plant's historic role as the central gas processing facility in the Cuyama Valley. When crude oil and gas production from the Russell Ranch field decreased, the inter-field pipeline was no longer used and excess produced gas was re-injected at the Russell Ranch site instead. The proposed project would reinstate this historical practice on a smaller scale.

The South Cuyama gas plant is currently operating well below its capacity and is capable of processing increased amounts of natural gas. No additional processing equipment would be required at either of E&B's facilities. The Gas Plant is designed to process up to 6.5 million standard cubic feet (MMSCF) of produced natural gas per day. It currently processes approximately 0.6 MMSCF per day, which is less than one-tenth of the designed processing capacity. The increased amount of natural gas from Russell Ranch would be approximately 0.8 MMSCF per day, which would bring the total processing rate of the Gas Plant to 1.4 MMSCF. Thus, the Gas Plant would be processing slightly over 20% of its design capacity under the proposed project.

Regulatory Authority

Several regulatory bodies share regulatory authority over the pipeline to ensure its safe condition and operation, including the Santa Barbara County Planning and Development Department, the County Petroleum Unit, and the U.S. Department of Transportation Pipeline Hazardous Materials Safety Administration (PHMSA). PHMSA has regulatory authority over the pipeline pursuant to federal laws, including the Natural Gas Pipeline Safety Act of 1968. The County Petroleum Unit has authority to monitor the condition of the pipeline and order necessary repairs pursuant to Chapter 25, Section 25-28 of the Santa Barbara County Code. The County Planning and Development Department also has monitoring authority over the pipeline to ensure compliance with the project description condition included in the project conditions of approval in Attachment B, which the County evaluated under the California Environmental Quality Act (CEQA) and serves to address public safety and environmental impacts. Finally, the project would be subject to safety monitoring and oversight by the County System Safety Reliability

Review Committee (SSRRC) to the extent that it affects operations at the South Cuyama Gas Plant.

6.0 PROJECT ANALYSIS

6.1 Environmental Review

A Mitigated Negative Declaration (MND) (15NGD-00000-00007) was prepared to analyze the environmental impacts of the proposed project under the requirements of the California Environmental Quality Act (CEQA). The Draft MND was circulated through the State Clearinghouse for public review from March 31, 2015 through April 30, 2015. Aside from the Santa Barbara County Air Pollution Control District, no written comments on the Draft MND were received.

After the MND was circulated for public review, the Applicant revised the project slightly to relocate the pipeline alignment along the inside of the Cuyama Pumping Station (PS) facility fence line and bring the pipeline above-ground. The project originally proposed to bury the pipeline outside of the Cuyama Pumping Station facility. Under the current project, the pipeline would remain adjacent to the north- and southwest sides of the facility, but would now be placed above-ground and located within the fence line of the facility. This change in location necessitated the proposed consistency rezone, which is also now discussed in the MND. Other minor changes to the project include installation of associated above-ground equipment (basket strainer, condensate drop out, gas meter) and using a small segment of 8-inch pipeline to connect to the existing 8-inch line. Under the revised project, all project components would be above-ground and located entirely within the facility. All other aspects of the project would remain the same. Relocating the project within the facility would ensure 24-hour security for pipeline operations, confine project activities to previously disturbed areas within the gated facility, and reduce environmental impacts associated with construction activities. The MND has been revised to reflect these minor changes. There are no new impacts, nor any increase in existing impacts, associated with these minor changes.

The Draft MND identified five Class II (less than significant with mitigation) impacts in the following areas: Aesthetic/Visual Resources, Air Quality, Biological Resources, Cultural Resources, and Noise. Class II impacts were primarily related to construction activities: temporary impacts to the aesthetic character of the project area during construction; long-term impacts to the aesthetic character of the area from above-ground equipment within public view; temporary impacts to air quality from dust resulting from earth-moving activities; potential mortality or injury to wildlife species as a result of earth-moving activities or use of vehicles/equipment; temporary disturbance to wildlife species from noise; potential disturbance to a known archaeological site in close vicinity to the project site from earth-moving activities, use of vehicles/equipment, staging, stockpiling, parking, construction workers/contractors outside of the project site; and potential disturbance to residential community in the project vicinity from construction-related noise. All other impacts were considered to be Class III (adverse but not significant). The Mitigated Negative Declaration is included as Attachment C.

While the above conclusions remain the same, the proposed final MND discusses how potential impacts would be reduced since the revised project limits project activities to the fenced facility and eliminates the need for grading. The project description has also been modified slightly to include safety measures that would be implemented to maintain the safe condition and ongoing operation of the inter-field pipeline.

6.2 Comprehensive Plan Consistency

REQUIREMENT	DISCUSSION
Land Use Element **Historical/Archaeological Sites Policy 2:** When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.	**Consistent:** A known prehistoric archaeological site (CA-SBA-3679) is located within close proximity to the project site. However, no archaeological resources were encountered within the original pipeline alignment (existing roadway) outside of the facility during a Phase I archaeological survey performed by Archaeologist David Brunzell (BCR Consulting LLC) on May 15, 2014. The Phase I survey covered the current location of the pipeline inside of the Cuyama Pumping Station facility. No archaeological or cultural sites are located on the project parcel. The pipeline would be placed above-ground and pipeline installation would not involve any grading activities. In addition, all project activities, including staging of construction-related vehicles and equipment, would occur within the facility fence line. The existing chain-link fence surrounding the facility would provide a buffer between project activities and the archaeological site (CA-SBA-3679). The project would involve minor excavation of the tie-in points. Upon finding of a potential resource, work in the vicinity would halt and would not resume until the find is evaluated and treated according to the Santa Barbara County's Archaeological Guidelines (Condition 19 of Attachment B). The proposed consistency rezone is an administrative action that would not result in physical changes to the site or impacts to cultural resources. Based on the foregoing, the project is consistent with this policy.

REQUIREMENT	DISCUSSION
Land Use Element Visual Resource Policy 2: In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.	**Consistent:** The proposed project would include an above-ground pipeline (1,125-feet), two tie-in points, pig launcher/receiver valves, a condensate drop-out, and a basket strainer. These structures would be limited to 4-feet in height and would not intrude into the skyline from public viewing places. The proposed structures would be located within an existing oil and gas facility which contains above-ground equipment much larger in size. The equipment would also be screened by an existing chain-link fence surrounding all sides of the facility. Painting the proposed structures natural colors to match surrounding areas (Condition 3 of Attachment B) would ensure that above-ground project equipment is compatible with the surrounding natural environment. The proposed consistency rezone is an administrative action that would not result in physical changes to the site or impacts to visual resources. Based on the foregoing, the project is consistent with this policy.
Safety Element Gas Pipeline Safety Policy 3-A: New pipelines, or existing pipeline relocations, shall be routed to avoid significant risk to populated areas where feasible. New pipelines, or existing pipeline relocations, shall also be routed to prevent significant risk to highly sensitive land uses as defined in this chapter, unless the risk can be rendered insignificant via other measures.	**Consistent:** The proposed pipeline route would be located within an existing oil and gas facility in Cuyama Valley, a rural area. Surrounding areas are sparsely populated and used primarily for cattle grazing. A small residential development is located within 1,600-feet of the project site on the northern side of State Highway 166. The project would be located nearly 2.0-miles northwest of the town of New Cuyama, which has the highest population in the Cuyama Valley area. The pipeline does not pose any safety risks to these surrounding areas. As discussed in Section 4.9 of the Mitigated Negative Declaration (Attachment C), and hereby incorporated by reference, the entire length of the low-pressure inter-field pipeline would be tested prior to operation, and subject to periodic maintenance inspections by the Santa Barbara County

REQUIREMENT	DISCUSSION
	Petroleum Unit to ensure safe operations, pursuant to Chapter 25 (Petroleum Code), Section 25-28 of the Santa Barbara County Code. E&B would also implement safety features to ensure the safe condition and operations of the inter-field pipeline, including cathodic protection to prevent corrosion, hydro-testing of the line prior to operation to detect for leaks, installation and use of a Supervisory Control and Data Acquisition (SCADA) system to actively monitor pipeline conditions, pigging operations to clear pipeline debris and detect for anomalies, flow meters to control balance, and other measures to prevent and monitor corrosion in the existing portions of the line. Risk of upset would be minimal because the pipeline would transport dry (non-liquid) gas. In addition, routing the pipeline within the facility would provide the valves with constant security (24-hours per day, 7 days per week). Based on the foregoing, the project is consistent with this policy.
Safety Element Gas Pipeline Safety Policy 4-A: In a manner consistent with applicable law, the County shall condition discretionary land-use approvals of new gas pipelines to require safe design, including technology to prevent failure and reduce the consequences of failure. Examples include proven controls for preventing internal and external corrosion and fractures; proven leak detection; safe venting systems; appropriate capabilities for shutting the pipeline down and isolating the pipeline leak; and effective, public warning systems.	**Consistent:** The proposed project would include construction of dual purpose pig launcher and receiver valves at each of the pipeline connection points, which would allow for pipeline shutdown, isolation of pipeline leaks, and maintenance activities with the use of smart pigs, which are specialized devices that detect for potential leaks, corrosion, and scale, and identify areas on the pipeline that may need maintenance work. Pigs can also perform hydrostatic testing to maximize operating conditions and quality control. In addition, the following safety features would be implemented to ensure the safe condition and operations of the inter-field pipeline: Cathodic protection to prevent corrosion, hydro-testing of the line prior to operation to detect for leaks, installation and use of a Supervisory Control and Data Acquisition (SCADA) system to actively monitor pipeline conditions, pigging operations to clear pipeline

REQUIREMENT	DISCUSSION
	debris and detect for anomalies, flow meters to control balance, and other measures to prevent and monitor corrosion in the existing portions of the line. Before the pipeline is put into service, the entire length of the line would undergo a hydrostatic test to ensure line integrity, and all of the valves and fittings would be tested and proven safe to operate. The pipeline would be held to current industry standards and subject to periodic safety inspections by the Santa Barbara County Petroleum Unit, which has monitoring authority under Chapter 25 (Petroleum Code), Section 25-28 of the Santa Barbara County Code. The pipeline would be subject to periodic tests and inspections as required by the Petroleum Unit to ensure the reliability of the system,. Based on the foregoing, the project is consistent with this policy.
Safety Element Gas Pipeline Safety Policy 4-B: The County shall condition discretionary land-use approvals of new or substantially upgraded gas pipelines to require a Safety Inspection, Maintenance, Quality Assurance Program or similar mechanism to ensure adequate inspection (including smart pigs), maintenance, and other operating procedures. Any such mechanism shall meet the approval of County permitting agencies prior to commencement of pipeline operations and provide for systematic updates also subject to County approval. **Safety Element Gas Pipeline Safety Policy 4-C:** For pipelines associated with new production of natural gas, the County shall require feasible operating methods for reducing the hazard along the pipeline corridor that are commensurate with the level of risk.	**Consistent:** The proposed project would include construction of dual purpose pig launcher and receiver valves where the new line would connect to the existing 3- and 8-inch pipelines and where the existing 3-inch line would feed into the South Cuyama Gas Plant. The valves would allow for pipeline shutdown, isolation of pipeline leaks, and use of smart pigs to monitor pipeline integrity and ensure safe operations. The new pipeline would only comprise a segment (1,125-ft) of the overall, inter-field pipeline between E&B's existing Russell Ranch field facility and its existing South Cuyama gas plant. As discussed in Section 4.9 of the project Mitigated Negative Declaration (MND) (15NGD-00000-00007) and hereby incorporated by reference, there is a low risk for safety impacts based on the structural integrity of the pipeline. Prior to being put into service, the entire length of the pipeline and all fittings and valves would be tested and determined safe for operation by the Santa Barbara County Petroleum Unit, which has

REQUIREMENT	DISCUSSION
	monitoring authority over the pipeline pursuant to Chapter 25 (Petroleum Code), Section 25-28 of the Santa Barbara County Code. E&B would also implement several safety measures as described above to ensure the safe condition and operations of the entire inter-field pipeline. The pipeline would be held to current industry standards and subject to oversight by the County Petroleum Unit, which has monitoring authority under Chapter 25 (Petroleum Code), Section 25-28 of the Santa Barbara County Code. The entire inter-field pipeline between E&B's Russell Ranch and South Cuyama facilities would be monitored by the U.S. Department of Transportation Pipeline Hazardous Materials Safety Administration (PHMSA), which has jurisdiction over natural gas pipelines under the Natural Gas Pipeline Safety Act of 1968. The pipeline would also be subject to tests and inspections as required by the Petroleum Unit to ensure the reliability of the system, pursuant to Section 25-28 of Chapter 25. In addition, project components associated with the gas plant would be monitored under the Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP) for E&B's South Cuyama Gas Plant as an addition to its operations. The current Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP) for the Gas Plant would be modified to include any and all operational changes which result from receiving and processing natural gas production from E&B's Russell Ranch field facility. The SIMQAP is a dynamic plan which is typically modified to address these types of minor operational changes. Operational changes and updates to the SIMQAP resulting from the proposed pipeline would be monitored by the System Safety and Reliability Review Committee (SSRRC) (See Condition 21 of Attachment B). Based on the foregoing, the project is consistent with this

REQUIREMENT	DISCUSSION
	policy.
Safety Element Gas Pipeline Safety Policy 5-D: New pipelines, or relocation of existing pipelines, shall include measures to clearly warn outside parties about the presence of a gas pipeline, including proper marking of the right-of-way with signage and use of brightly colored warning tape approximately one foot above buried pipelines where feasible.	**Consistent:** The new pipeline would be placed above-ground and located within an existing, fenced oil and gas facility. The presence of the pipeline would be clearly visible to third parties. Based on the foregoing, the project is consistent with this policy.

6.3 Zoning: Land Use and Development Code Compliance

Development Plan (14DVP-00000-00018): The proposed pipeline project is governed by and consistent with the County Land Use and Development Code (LUDC) and subject to the requirements of Section 35.52.080 (Oil and Gas Pipelines- Inland area).

Consistency Rezone (15RZN-00000-00007): Approval of the proposed consistency rezone would amend the current zoning of Unlimited Agriculture under the outdated Ordinance 661 to AG-II-40 (Agricultural, 40 acre minimum parcel size) under the current Santa Barbara County Land Use and Development Code (LUDC). Any future development on the subject parcel would be subject to all applicable provisions in the LUDC.

6.3.1 Compliance with Land Use and Development Code Requirements

LUDC Section 35.52.040.B. Oil and gas development is a permitted use in the AG-II zone district pursuant to Section 35.52.040.B (Table 2) of the LUDC.

LUDC Section 35.52.080.B. Section 35.52.080.B of the LUDC applies to oil and gas pipelines in the inland area, and includes standards for pipeline location and operation. The proposed project would be in compliance with the required development standards of Section 35.52.080.B, as outlined below.

I. ***Standards applicable to pipeline operations.*** *The following standards shall apply to pipeline projects:*

a. ***Zone regulations not applicable.*** *The regulations in Article 35.2 (Zones and Allowable Land Uses), for the applicable zones in which oil and gas pipelines are allowed, shall not apply to the oil and gas pipelines. See Table 5-2 (Allowed Uses and Permit/Plan Requirements for Energy Facilities in the Oil and Gas Area) above.*

b. ***Delivery hours.*** *Except in an emergency, materials, equipment, tools, or pipes shall not be delivered to or removed from a pipeline construction site through*

streets within a residential zone between the hours of 9 p.m. and 7 a.m. of the next day.

No streets within a residential zone would be used to access the project site. Pipeline construction hours, including deliveries to and removals from the construction site, would be restricted to 7:00 AM to 4:00 PM (See Condition 20 of Attachment B).

c. ***Post-installation requirements.*** *After completion of back filling and compacting of the pipeline ditch, the site shall be returned to grade where practical and the excess soil shall be removed to an appropriate disposal site.*

The proposed pipeline would be placed above-ground. No grading is proposed. Following project construction, all work areas, including the surface of the road and adjacent areas, would be restored to pre-construction conditions with respect to grade. This development standard is included in the project description, which is hereby incorporated by reference (See Attachment C).

d. ***Drainage.*** *During construction of the pipeline, there shall not be permanent blocking of surface drainages.*

No surface drainages would be blocked during project construction. Following project completion, the project site would be restored to its pre-construction condition with respect to contour and grade.

e. ***Location of pipeline corridor.*** *A pipeline corridor shall be sited so as to avoid significant impacts to resources (e.g., aquatic habitats, and archaeological areas) to the maximum extent feasible.*

The pipeline corridor would be sited in a location which would avoid environmental impacts associated with construction. As discussed in more detail in Sections 4.4 and 4.5 of the MND, and hereby incorporated by reference, the pipeline corridor would be sited to avoid significant impacts to biological resources and archaeological resources, respectively. These conditions are contained in Attachment B of this Staff Report dated August 20, 2015, and hereby incorporated by reference (Conditions 6- 20).

f. ***Spills.*** *Where pipeline segments carrying hydrocarbon liquids pass through sensitive resource areas (e.g., aquatic habitats) as identified by the project environmental review, provisions identified in the environmental review shall be applied to minimize the amount of liquids released in the sensitive areas in the event of a spill. The potential for damage in those areas shall be minimized by considering spill volumes, duration, and trajectories in the selection of a pipeline corridor. In addition, appropriate measures for spill containment and cleanup*

(e.g., catch basins to contain a spill) shall be included as part of the required emergency response plan.

The proposed pipeline would comprise a relatively small segment (1,125-ft) of an existing inter-field pipeline that would transport natural gas from the Russell Ranch Oilfield to the South Cuyama Gas Plant. As discussed in Section 6.2 of this Staff Report dated August 20, 2015, and hereby incorporated by reference, the project would not result in a spill of hydrocarbon liquids in the event of a pipeline leak or rupture, since it would only transport dry (non-liquid) gas. Furthermore, the proposed pipeline segment would not pass through any sensitive resource areas.

g. ***Burial within corridor.*** *Permits for new pipeline construction shall require engineering of pipe placement and burial within a corridor to minimize incremental widening of the corridor during subsequent pipeline projects, unless the proposed route is determined to be unacceptable for additional pipelines.*

The project would not include burial of a new pipeline within a corridor; rather, the proposed 1,125-foot line would be located within an oil and gas facility. The remainder of the existing lines which reach to E&B's Russell Ranch and South Cuyama facilities is buried consistent with this development standard. However, this development standard does not apply to the new, above-ground pipeline.

As discussed in Section 6.2 of this Staff Report dated August 20, 2015, and hereby incorporated by reference, E&B owns and operates all oil and gas development in the Cuyama Valley area, including the Russell Ranch and South Cuyama Oilfields. The project would re-establish a historical, inter-field connection between E&B's two facilities by connecting to two, existing pipelines. There is no present, anticipated, or reasonably foreseeable need for additional pipelines in the area as there are no other potential oil and gas operators in the Cuyama Valley area. Given the lack of need by other users and the historical connection between E&B's Russell Ranch and South Cuyama field operations, it is unlikely that additional pipelines would be constructed within the same corridor. However, although no oil and gas development projects in the area are currently proposed or anticipated in the future, the proposed pipeline is appropriately sized for current and potential future gas production in the Cuyama Valley area.

2. ***Additional development standards as deemed necessary by Commission.*** *In addition, the following standards may be applied to the extent deemed necessary by the Commission:*

a. ***Performance security.*** *A performance security shall be provided in an amount sufficient to ensure completion of requirements of the approved revegetation and restoration plan and shall be released upon satisfactory completion.*

The proposed pipeline would be placed above-ground within an oil and gas facility which is highly compacted from regular vehicle use and maintenance. The project would not involve any grading. There is little to no vegetation present within the facility, nor is there any suitable habitat for special-status plant species (See Section 4.4 of Attachment C). Given the highly disturbed nature and lack of vegetation within and surrounding the site, a revegetation and restoration program would not apply to the project.

b. ***Inspection of disturbed areas.*** *Disturbed areas shall be jointly inspected by the applicant and staff 12 months after completion of construction to assess the effectiveness of the revegetation and restoration program. This inspection shall continue on an annual basis to monitor progress in returning the site to pre-construction conditions or until additional monitoring is not deemed necessary by the Department. Inspection results shall be submitted annually to the Department, and additional treatment of the site shall be applied as deemed necessary by the Department.*

As explained above, the proposed pipeline would be constructed above-ground within previously disturbed areas and would not result in additional disturbance. A revegetation and restoration program would not apply to the project.

c. ***Visual compatibility.*** *Above-ground sections of the pipeline and related facilities, excepting those installed on a temporary basis for a testing period not to exceed 12 months, shall be visually compatible with the present and anticipated surroundings by use of any or all of the following measures where applicable: buffer strips; depressions, natural or artificial; screen planting and landscaping continually maintained; and camouflage and/or blending colors.*

Proposed above-ground equipment would be limited to a natural gas pipeline (1,125-feet), two tie-in points, pig launcher/receiver valves, a condensate drop-out, a gas meter, and a basket strainer. All project components would be located within an existing oil and gas facility which contains processing equipment much larger in size. The new equipment would be screened by a 6-foot high chain-link fence surrounding all sides of the facility. As discussed in Section 4.1 of the MND, and hereby incorporated by reference, requiring above-ground structures to be painted with natural colors (Condition 3 of Attachment B) and the project site to be cleared of debris after construction (Condition 4 of Attachment B) would ensure that above-ground structures would be visually compatible with the present and anticipated surroundings. The proposed consistency rezone is an administrative action that would not result in any physical development or associated visual impacts.

d. ***Noise.*** *Proposed facilities shall be designed and housed so that the noise*

generated by the facilities as measured at the property boundaries shall be equal to or below the existing noise level of the surrounding area except under temporary testing or emergency situations. Measures to reduce adverse impacts (e.g., due to noise, vibration) to the maximum extent feasible shall be used for facilities located adjacent to noise sensitive locations as identified in the Comprehensive Plan.

There are no permanent noise impacts associated with the proposed project. As discussed in Section 4.12 of the MND, and hereby incorporated by reference, temporary noise impacts from project construction would be mitigated to a less than significant level by limiting the hours of construction work (Condition 20 of Attachment B). The proposed consistency rezone is an administrative action that would not result in any physical development or associated noise impacts.

6.4 Subdivision/Development Review Committee (SDRC)

The E&B Natural Gas Pipeline Project was reviewed by the Subdivision/Development Review Committee (SDRC) on November 6, 2014. The conditions imposed by SDRC members are included in their departmental condition letters as Condition 27 (Rules-29) of Attachment B. The Fire Department provided a Completeness letter dated November 13, 2014. The letter was rescinded after the proposed pipeline was relocated within the Cuyama Pumping Station facility, which obviated the need for the items requested in the letter.

The proposed consistency rezone does not include a land division or development permit application. Therefore, it was not reviewed by the SDRC.

6.5 Public Input

Staff received one public comment letter on the Mitigated Negative Declaration (Attachment C) from the Santa Barbara County Air Pollution Control District (APCD). Supplemental information was incorporated into Section 4.3 of the MND to address the APCD's comments and the APCD letter dated April 29, 2015 has been included as an attachment to Condition 29 of Attachment B.

7.0 APPEALS PROCEDURE

A Zoning Map Amendment recommended for approval is automatically forwarded to the Board of Supervisors for final action, therefore no appeal is required. A Zoning Map Amendment denied by the Commission may be appealed to the Board of Supervisors within the ten (10) days following the action of the Commission, and by the applicant within five (5) days following the transmittal of the action of the Commission to the Board.

ATTACHMENTS

A. Findings
B. Development Plan 14DVP-00000-00018 Conditions of Approval with attached Departmental letters
C. Proposed Final Mitigated Negative Declaration (15NGD-00000-00007)
D. Site Plan
E. Resolution and Ordinance for Rezone 15RZN-00000-00007

ATTACHMENT A: FINDINGS

1.0 CEQA FINDINGS

1.1 Consideration of the Negative Declaration and Full Disclosure

The Final Mitigated Negative Declaration (MND) (15NGD-00000-00007) prepared by the County Planning & Development Department for the E&B Natural Resources Natural Gas Pipeline Project and dated September 9, 2015, was presented to the Planning Commission. The Planning Commission has reviewed and considered the MND, together with the comments received and considered during the public review process. The MND reflects the independent judgment and analysis of the Planning Commission and has been completed in compliance with the California Environmental Quality Act, and is adequate for this proposal.

1.2 Finding of No Significant Effect

On the basis of the whole record, including the Mitigated Negative Declaration (MND) 15NGD-00000-00007 dated September 9, 2015 and any comments received, the Planning Commission finds that through feasible conditions placed upon the project, the potentially significant impacts on the environment have been eliminated or substantially mitigated and on the basis of the whole record (including the initial study and any comments received), there is no substantial evidence that the project will have a significant effect on the environment.

1.3 Location of Documents

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Planning and Development Department located at 123 East Anapamu Street, Santa Barbara, CA 93101.

1.4 Environmental Reporting and Monitoring Program

Public Resources Code Section 21081.6 and CEQA Guidelines Section 15074(d) require the County to adopt a reporting or monitoring program for the changes to the project that it has adopted or made a condition of approval in order to avoid or substantially lessen significant effects on the environment. The approved project description for the E&B Natural Resources Natural Gas Pipeline Project and conditions of approval, with their corresponding permit monitoring requirements, are hereby adopted as the reporting and monitoring program for this project. The monitoring program is designed to ensure compliance during project implementation.

2.0 DEVELOPMENT PLAN FINDINGS

2.1 Findings required for all Preliminary or Final Development Plans. In compliance with Section 35.82.080.E.1 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for a Preliminary or Final Development Plan the review authority first makes all of the following findings, as applicable:

2.1.1 The site of the proposed project is adequate in terms of location, physical characteristics, shape, and size to accommodate the density and intensity of development proposed.

The proposed project would include construction and operation of a 1,125-footabove-ground, natural gas pipeline and associated above-ground equipment (tie-in points, pig launcher/receiver valves, condensate drop out, basket strainer, gas meter) and a consistency rezone. As discussed in Section 4.13 of the MND (Attachment C), and hereby incorporated by reference, the proposed project would not result in any change in existing utilities or service systems. The project would be constructed within an existing oil and gas facility, which is relatively flat and clear of vegetation. Pipeline construction would not expand existing areas of disturbance. The location of the proposed pipeline route would allow E&B to connect to two existing pipelines extending from the Russell Ranch and South Cuyama Oilfields. The site of the proposed project is adequate in terms of location, physical characteristics, shape, and size to accommodate the proposed pipeline. Therefore, this finding can be made.

2.1.2 Adverse impacts will be mitigated to the maximum extent feasible.

The project description of the proposed E&B Natural Resources Natural Gas Pipeline Project and all conditions of approval in Attachment B of this Staff Report dated August 20, 2015 and the MND (Attachment C), and hereby incorporated by reference, would ensure that adverse impacts would be mitigated to the maximum extent feasible. Therefore, this finding can be made.

2.1.3 Streets and highways will be adequate and properly designed to carry the type and quantity of traffic generated by the proposed use.

Any change in the type and quantity of traffic generated by the proposed pipeline would be primarily limited to use of construction-related vehicles and equipment for approximately three days. Once the construction process has been completed, operation of the proposed pipeline would not require any regular traffic, and only occasional trips to conduct inspections or maintenance activities. The processing of natural gas production from the Russell Ranch Field facility at the South Cuyama Gas Plant would represent a de minimis increase in natural gas processing and would not result in additional truck trips to and/or from the Gas Plant. Regional access to the project site would be provided by State Highway 166. Local access to the project site would be provided by existing interior roads. All streets and highways would be adequate and properly designed to carry the type and quantity of traffic generated by the proposed pipeline. Therefore, this finding can be made.

2.1.4 There will be adequate public services, including fire and police protection, sewage disposal, and water supply to serve the proposed project.

As discussed in Section 5.1 of the Staff Report dated August 20, 2015, and hereby incorporated by reference, there are adequate public services to serve the proposed project. Therefore, this finding can be made.

2.1.5 The proposed project will not be detrimental to the comfort, convenience, general welfare, health, and safety of the neighborhood and will not be incompatible with the surrounding area.

The proposed project would not be detrimental to the comfort, convenience, general welfare, health, and safety of the neighborhood or incompatible with the surrounding area. The project would be located within an existing oil and gas facility and included as part of the existing operations. The project would be limited to construction and operation of a 1,125-foot above-ground natural gas pipeline and associated above-ground equipment (tie-in points, pig launcher/receiver valves, condensate drop out, basket strainer, gas meter) and a consistency rezone. The pipeline would be located approximately 450-feet in distance from three residential dwellings located on the northern side of State Highway 166. However, this distance is sufficient to reduce risk, as discussed in Section 4.9 of the MND (Attachment C), and hereby incorporated by reference. Construction activities would last approximately 3 days and would be confined to the project site. The pipeline would operate at a low pressure and operations would not require regular onsite monitoring; however, locating the project within the gated facility would provide 24-hour security to all above-ground structures. As discussed above in Section 6.2 of this Staff Report dated August 20, 2015, and hereby incorporated by reference, the pipeline would be inspected by County Petroleum Unit staff prior to being placed into service and then subject to maintenance testing and held to current industry standards to ensure safe operations. The Petroleum Unit has monitoring authority under Chapter 25 (Petroleum Code), Section 25-28 of the Santa Barbara County Code. Operational changes to the South Cuyama Gas Plant would also be monitored by the System Safety and Reliability Review Committee (SSRRC) under the Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP) for E&B's South Cuyama Gas Plant to the extent that it modifies its operations. In addition, the required periodic safety inspections and maintenance activities for the entire inter-field line between E&B's Russell Ranch and South Cuyama facilities would be monitored by the U.S. Department of Transportation Pipeline Hazardous Materials Safety Administration (PHMSA) pursuant to the Natural Gas Pipeline Safety Act of 1968. Therefore, this finding can be made.

2.1.6 The proposed project will comply with all applicable requirements of this Development Code and the Comprehensive Plan.

As discussed in Sections 6.2 and 6.3 of this Staff Report dated August 20, 2015, and hereby incorporated by reference, the proposed project is consistent with the applicable provisions of the Comprehensive Plan and the Land Use and Development Code. The proposed consistency rezone is an administrative action that would replace an outdated U (Unlimited Agriculture) zone district under Zoning Ordinance 661 with the current AG-II-40 zoning under the County Land Use and Development Code (LUDC). The proposed rezone would increase the minimum lot size from 10 acres to 40 acres, which would be consistent with the

land use designation of the parcel, A-II, 40-acre minimum parcel size, under the County's Comprehensive Plan. Therefore, this finding can be made.

*2.1.7 **Within Rural areas as designated on the Comprehensive Plan maps, the use will be compatible with and subordinate to the agricultural, rural, and scenic character of the rural areas.***

As discussed in Section 6.2 of this Staff Report dated August 20, 2015, and hereby incorporated by reference, the proposed project would be compatible with and subordinate to the agricultural, rural, and scenic character of the rural area. The proposed project would include construction of an above-ground pipeline (1,125-ft) and associated equipment (i.e. tie-in points, pig launcher/receiver valves, condensate drop out, a gas meter, and a basket strainer) and a consistency rezone. These structures would be limited to 4-feet in height and would not intrude into the skyline from public viewing places. The proposed structures would be located within an existing oil and gas facility, which contains above-ground equipment much larger in size. Painting the proposed structures natural colors to match surrounding areas (Condition 3 of Attachment B) would ensure that above-ground project equipment is compatible with the surrounding natural environment. Following construction, the project site and all work areas would be restored to pre-construction condition with respect to natural contour and grade. Long-term operation of the new pipeline would not change the agricultural or rural nature of the ranch road. Therefore, this finding can be made.

*2.1.8 **The project will not conflict with any easements required for public access through, or public use of a portion of the subject property.***

There are no easements required for public access through, or public use of a portion of the subject property. Therefore, this finding can be made.

2.2 Additional finding required for Final Development Plans. § 35.82.080.E2.

*2.2.1 **Substantial conformity. The plan is in substantial conformity with any previously approved Preliminary Development Plan, except when the review authority considers a Final Development Plan for which there is no previously approved Preliminary Development Plan. In this case, the review authority may consider the Final Development Plan as both a Preliminary and Final Development Plan.***

There is no previously approved Preliminary Development Plan for the proposed pipeline. The review authority may consider the Final Development Plan as both a Preliminary and Final Development Plan. Therefore, this finding can be made.

*2.2.2 **If the Final Development Plan is under the jurisdiction of the Director, and the Director cannot find that the Final Development plan is in substantial conformity with the previously approved Preliminary Development Plan, the Director shall refer the Final Development Plan to the review authority that approved the Preliminary Development Plan for a decision on the Final***

Development Plan.
The Final Development Plan is not under the jurisdiction of the Director. Therefore, this finding does not apply.

3.0 REZONE FINDINGS

3.1 In compliance with Section 35.104.060 of the County Land Use and Development Code, prior to the approval or conditional approval of an application for an Amendment to the Development Code, Local Coastal Program, or Zoning Map the review authority shall first make all of the following findings:

3.1.1 ***The request is in the interests of the general community welfare.***
The subject parcel is zoned for agricultural use and would remain zoned for agricultural use. All types of agriculture activities allowed under the current U (Unlimited Agriculture) zone district would be allowed under the AG-II-40 zone district. Rezoning the subject parcel from U under the outdated Ordinance 661 to the AG-II-40 zone designation is in the interest of the general community welfare because it would bring the subject parcel into conformance with the current ordinance, the County's Land use and Development Code (LUDC), and would assist in the implementation of a uniform and up-to-date zoning ordinance throughout the inland area. Doing so would also ensure the subject parcel is governed by the same zoning regulations as those zoned AG-II around it. Therefore, this finding can be made.

3.1.2 ***The request is consistent with the Comprehensive Plan, the requirements of State planning and zoning laws, and this Development Code.***
The subject parcel land use designation is A-II, 40 acre minimum lot area under the County Comprehensive Plan. The request would rezone the subject parcel from the outdated U zone district under Ordinance 661 to the current AG-II-40 zone district under the LUDC, which would provide for consistency between the parcel's land use designation and its zoning. The AG-II-40 zone district is consistent with the objectives, policies, and general land uses in the A-II plan designation. In accordance with Sections 6.1 and 6.3 of this Staff Report dated August 20, 2015, and hereby incorporated by reference, the project is consistent with the Comprehensive Plan and the LUDC. Therefore, this finding can be made.

3.1.3 ***The request is consistent with good zoning and planning practices.***
The subject parcel is one of the few parcels in the surrounding rural areas currently subject to the outdated Ordinance 661. Ordinance 661 was first adopted by the County in 1950. It was later replaced in 1983 with Article III, and then replaced again in 2006 with the Inland Santa Barbara County Land Use and Development Code (LUDC). Rezoning the subject parcel from Unlimited Agriculture under the outdated Ordinance 661 to the current AG-II-40 zone

designation is consistent with good zoning and planning practices because it will bring the subject parcel into conformance with the current ordinance, the County's Land Use and Development Code (LUDC), and would assist in the implementation of a uniform and up-to-date zoning ordinance throughout the inland area. The proposed consistency rezone is consistent with the County's Comprehensive Plan. Therefore, this finding can be made.

ATTACHMENT B: CONDITIONS OF APPROVAL

PROJECT DESCRIPTION

1. **Proj Des-01 Project Description**. This Development Plan is based upon and limited to compliance with the project description, the hearing exhibits marked A-E, dated September 9, 2015, and all conditions of approval set forth below, including mitigation measures and specified plans and agreements included by reference, as well as all applicable County rules and regulations. The project description is as follows:

E&B Natural Resources (E&B) has requested a to consider Case No. 14DVP-00000-00018 [application filed on October 7, 2014], for a Development Plan in compliance with Section 35.82.080 of the County Land Use & Development Code (LUDC), on property zoned U (Unlimited Agriculture) to allow for construction and operation of an above-ground natural gas pipeline (1,125-feet) located approximately 0.7-miles east of the intersection of Aliso Canyon Road and State Highway 166 in the Cuyama Valley; and to consider Case No. 15RZN-00000-00007, proposing to rezone one lot (10.47 gross acres) from Unlimited Agriculture, 10 acre minimum lot area (U) under Zoning Ordinance No. 661 to Agriculture II, 40-acre minimum lot area (AG-II-40) in compliance with Chapter 35.104 of the LUDC.

The proposed pipeline would be approximately 1,125-feet in length and placed above-ground on sleepers within the existing Cuyama Pumping Station (PS) facility, located between the State-Designated Russell Ranch Oilfield and South Cuyama Oilfield. The pipeline would connect two existing pipelines (3- and 8-inches) and transport natural gas from E&B's existing Russell Ranch Field facility to its existing South Cuyama Gas Plant for processing and sale. The proposed project would replace E&B's current practice of disposing of excess natural gas by reinjection at its Russell Ranch Field facility. The entire length of the inter-field pipeline between the Russell Ranch Oilfield and the South Cuyama Oilfield would be comprised of existing, previously abandoned pipelines except for the 1,125-foot segment of new pipeline.

The pipeline would be located within the Cuyama PS facility and parallel to an existing fence surrounding the northwest and southwest sides of the facility. The pipeline would tie-in to E&B's existing 3-inch pipeline on the south and existing 8-inch pipeline on the north. Once connected, an existing 8-inch pipeline would transport natural gas from E&B's Russell Ranch Field facility to the new pipeline at the Cuyama PS, and an existing 3-inch pipeline would then transport the gas directly to the South Cuyama Gas Plant. The new line would be 3-inches in diameter, except for a 100-foot segment where it would be 8-inches to tie-in to the existing 8-inch line.

The inter-field pipeline would require upgrades to existing equipment at the Russell Ranch Field facility (located in San Luis Obispo County) and installation of new

equipment at the Cuyama PS and South Cuyama Gas Plant facilities. Within the PS facility, a set of pig launcher and receiver valves, two tie-in points to connect the new pipeline to the existing 3-inch and 8-inch lines, a basket strainer, and associated piping would be installed. The valves would be surrounded by steel posts (4.0-feet in height) and would cover a permanent footprint of approximately 196-square feet (8.5-ft width by 23-ft length). A new dual-purpose isolation valve and gas meter would be installed at the Gas Plant, which would enable E&B to perform maintenance and monitoring activities over the pipeline. A new condensate drop-out (a pressure vessel used to prevent pipeline debris from collecting) and associated piping would be installed adjacent to the Gas Plant, where the existing 3-inch pipeline to existing infrastructure.

Upon completion of construction activities, the following permanent equipment would be installed: 3-inch coated steel schedule 40 pipeline, 8-inch coated steel schedule 40 pipeline, pig launcher and receiver valves, tie-in points, 4-foot high steel posts surrounding the valves, condensate drop-out, basket strainer, gas meter, and associated piping. The valves would be installed at the start, end, and connection points of the inter-field line and would allow for pipeline shutdown in case of an emergency, isolation of leaks, and use of smart pigs to clean and maintain the entire length of the inter-field line. All pipelines, valves, and fittings would be tested and proven safe to operate before they are put into service. E&B would implement the following measures to ensure the safe condition and operations of the inter-field pipeline: Cathodic protection to prevent corrosion; hydro-testing of the line to detect for leaks; a Supervisory Control and Data Acquisition (SCADA) system to actively monitor pipeline conditions; pigging operations to clear pipeline debris and detect for anomalies; flow meters to control balance; and other measures to prevent and monitor existing corrosion.

No grading is proposed. However, the project would involve minor amounts of excavation for the proposed tie-in points. Project activities, including staging and storage of construction-related vehicles and equipment, would occur within previously disturbed areas (an existing oil and gas facility) which are clear of vegetation and subject to regular vehicle use and maintenance. No habitat disturbance or removal is proposed.

Regional access to the project site would be provided by Highway 166. The project site is surrounded by an existing chain-link fence and would continue to be gated (to prevent public access) during construction activities.

The property is comprised of 10.47-acres (APN 147-030-025). The parcel is zoned U (Unlimited Agriculture) and is located approximately 0.7-miles east of Aliso Canyon Road and south of Highway 166 in the Cuyama Valley area, First Supervisorial District. The project would rezone the subject parcel from the zone district U under Zoning Ordinance 661 to the current AG-II-40 zoning district under the County Land Use and Development Code (LUDC). The proposed consistency rezone would

increase the minimum lot size from 10 acres to 40 acres, which would be consistent with the existing land use designation of the parcel, A-II, 40 acre minimum parcel size, under the County's Comprehensive Plan. The subject parcel is zoned for agricultural uses and would remain zoned for agricultural uses.

Any deviations from the project description, exhibits or conditions must be reviewed and approved by the County for conformity with this approval. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above described approval will constitute a violation of permit approval.

2. **Proj Des-02 Project Conformity**. The grading, development, use, and maintenance of the property, the size, shape, arrangement, and location of the structures, parking areas and landscape areas, and the protection and preservation of resources shall conform to the project description above and the hearing exhibits and conditions of approval below. The property and any portions thereof shall be sold, leased or financed in compliance with this project description and the approved hearing exhibits and conditions of approval thereto. All plans (such as Landscape and Tree Protection Plans) must be submitted for review and approval and shall be implemented as approved by the County.

MITIGATION MEASURES FROM 15NGD-00000-00007

3. **Aest-06 Building Materials.** Natural building materials and colors compatible with surrounding terrain (earth-tones and non-reflective paints) shall be used on surfaces of all above-ground structures. **PLAN REQUIREMENT**: Materials shall be denoted on all plans associated with Zoning Clearance. **TIMING:** Structures shall be painted prior to project operations. **MONITORING**: P&D compliance monitoring staff shall inspect prior to project completion.

4. **Aest-09 Construction Clean-up**. The developer shall clear the project site of all excess construction debris. **PLAN REQUIREMENT**: This requirement shall be noted on all plans associated with Zoning Clearance. **TIMING**: Debris clearance shall occur prior to project operations. **MONITORING**: P&D compliance monitoring staff shall site inspect project operations.

5. **Air-01 Dust Control**. The Owner/Applicant shall comply with the following dust control components at all times including weekends and holidays:
   a. Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site.
   b. During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, use water trucks or sprinkler systems to prevent dust from leaving the site and to create a crust after each day's activities cease.
   c. During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
   d. Wet down the construction area after work is completed for the day and whenever wind exceeds 15 mph.

e. When wind exceeds 15 mph, have site watered at least once each day including weekends and/or holidays.
f. Order increased watering as necessary to prevent transport of dust off-site.
g. Cover soil stockpiled for more than two days or treat with soil binders to prevent dust generation. Reapply as needed.
h. If the site is graded and left undeveloped for over four weeks, the Owner/Applicant shall immediately:
   i. Seed and water to re-vegetate graded areas; and/or
   ii. Spread soil binders; and/or
   iii. Employ any other method(s) deemed appropriate by P&D or APCD.

PLAN REQUIREMENTS: These dust control requirements shall be noted on all plans associated with Zoning Clearance. **PRE-CONSTRUCTION REQUIREMENTS**: The contractor or builder shall provide P&D monitoring staff and APCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to:

a. Assure all dust control requirements are complied with including those covering weekends and holidays.
b. Order increased watering as necessary to prevent transport of dust offsite.
c. Attend the pre-construction meeting.

TIMING: The dust monitor shall be designated prior to issuance of Zoning Clearance. The dust control components apply from the beginning of any grading or construction throughout all development activities until project completion.

MONITORING: P&D processing planner shall ensure measures are on all plans associated with Zoning Clearance. P&D permit compliance staff shall ensure measures are on plans. P&D permit compliance staff shall spot check and perform site inspections as necessary to ensure compliance onsite. APCD inspectors shall respond to nuisance complaints.

6. **Spec MM Bio-1 Environmental Awareness Training.** An Environmental Awareness Program shall be conducted to orient all employees involved in construction. The training shall be conducted by a County-approved biologist. The program shall consist of a brief pre-construction presentation in which a qualified biologist approved by P&D and knowledgeable of endangered species biology and legislative protection explains endangered species concerns. The program shall include a discussion of sensitive wildlife species identification, life history, habitat requirements, status under the State and/or Federal Endangered Species Acts (as applicable), and required project-specific measures to protect these species and their habitats. The training shall be conducted as necessary for new workers entering the project site. This training shall be incorporated into the pre-construction meeting(s) with construction personnel to perform the work. Training materials shall be submitted to P&D staff for approval 3 weeks prior to the commencement of Project activities. **TIMING:** The Owner/Applicant shall submit training materials 3 weeks prior to commencement of Project activities and provide training prior to the start of work activities and as needed for new personnel accessing the Project site. **MONITORING:** The County-approved biologist shall notify P&D (1) at least 3 days prior to the training; and (2) after the required training has been conducted. The required

notifications shall be provided prior to the start of any project activities. The Owner/Applicant shall submit documentation of training (i.e. signatures of trained employees) to P&D staff prior to construction and after project completion if there are any additional training logs.

7. **Spec MM Bio-2 Final Pre-Construction Biological Survey.** As close to the beginning of project activities as possible, but not more than 14 days prior, a qualified biologist approved by P&D shall conduct a final pre-construction biological survey of the proposed project site and adjacent 500-foot buffer area to verify that no special-status species have become established in the project site. **TIMING:** Final pre-construction survey shall be conducted no more than 14 days prior to the start of construction activities. The survey report shall be distributed to P&D, CDFW, and USFWS at least one week prior to the start of construction. **MONITORING:** A qualified biologist approved by P&D shall monitor all grading activities to ensure permit compliance. The Applicant shall obtain P&D approval and retain the monitor at least 14 days prior to the start of project construction. The monitor shall attend any pre-construction meetings. The monitor shall take daily notes, which shall be made available to the County upon request. P&D permit compliance personnel shall perform site inspections as appropriate.

8. **Spec MM Bio-4 Avoidance of Burrows.** All small mammal burrows that may serve as potential refugia for special-status species shall be avoided during all phases of the project. The project biologist shall conduct a site inspection of the project site and within a 50-foot avoidance buffer. Any burrows discovered within the project site or buffer shall be clearly marked with flags, fencing, ropes, or cords and avoided. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. Initial survey shall be completed prior to construction. **MONITORING:** The project biologist shall inspect the site to ensure burrow avoidance measures, if necessary, are consistent with approved plans.

9. **Spec MM Bio-5 Blunt-Nosed Leopard Lizards Season Avoidance, Surveys, and Monitoring.** To avoid disturbance to blunt-nosed leopard lizards, proposed project activities shall take place at temperatures when lizards are inactive (generally when temperatures are below 77° F and/or above 95° F). Proposed project activities shall take place outside of the seasonal period of above-ground activity for blunt-nosed leopard lizard (mid-April through mid-October). If proposed project activities cannot avoid the period of peak activity, a qualified biologist approved by P&D shall conduct a final clearance survey of the project site to ensure that no blunt-nosed leopard lizard are present and no burrows have become established in the project site or within a 50-foot avoidance buffer. If a pre-construction survey discovers evidence of blunt-nosed leopard lizard, a buffer zone of 50-feet shall be established. Buffer zones shall be clearly marked with lath and survey flagging and all project-related vehicles and foot traffic shall be directed away from these zones. Pre-construction survey work, subsequent written reports, if any, and proposed buffer zones shall be coordinated with and approved by the P&D staff biologist. This measure shall apply to all areas subject to disturbance due to clearing, trenching, and/or grading activities.

If small mammal burrows that may serve as potential refugia for blunt-nosed leopard lizards cannot be avoided within the project site or a minimum 50-foot avoidance buffer cannot be maintained, then additional surveys to detect the species shall be completed in accordance with CDFW's Approved Survey Methodology For The Blunt-Nosed Leopard Lizard (CDFG 2004). A biological monitor shall be on site during ground disturbing activities. The biological monitor shall check the project site(s) and access route(s) daily during the blunt-nosed leopard lizard active season (mid-April through mid-October) to determine presence or absence of lizards in or near the work areas. If blunt-nosed leopard lizards are observed during monitoring, the biologist shall take action to avoid impacts to lizards. If a blunt-nosed leopard lizard is observed during project pre-construction or clearance surveys, or at any time during construction, P&D, CDFW, and USFWS shall be immediately notified for further guidance. Measures to protect blunt-nosed leopard lizards during their period of peak activity may be discontinued once site preparation activities are complete, or upon determination by the biological monitor that temperature patterns at the project site are no longer conducive to blunt-nosed leopard lizard activity for the season. **PLAN REQUIREMENTS & TIMING:** This condition shall be printed on all plans associated with Zoning Clearance. P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. **MONITORING:** A qualified biologist approved by P&D shall monitor all grading activities to ensure permit compliance. The monitor shall be retained by the Applicant at least 14 days prior to the start of project construction and shall attend any preconstruction meetings. The monitor shall take daily and weekly notes, which shall be made available to the County upon request. P&D permit compliance personnel shall perform site inspections as appropriate.

10. **Spec MM Bio-6 Avoidance of San Joaquin Kit Fox.** If San Joaquin kit foxes become established within the proposed project sites prior to project implementation, measures (7-12) contained in the USFWS's *Standardized Recommendations For Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) shall be implemented and the USFWS and CDFW shall be consulted. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

11. **Spec MM Bio-7 Kit Fox Pre-Construction Surveys and Den Management.** As close to the beginning of project construction as possible, a qualified biologist approved by P&D shall survey for and examine any dens occurring near the construction area. All discoveries and/or encounters with kit foxes, dens, and den management activities shall be coordinated with the P&D staff biologist and the USFWS and CDFW. If a natal/pupping den is discovered within the project site or within 200 feet of the project boundaries, P&D, CDFW, and USFWS shall be immediately notified and under no circumstances shall the den be disturbed or destroyed without prior authorization. If the pre-construction biological surveys reveal an active natal den or new information, the Applicant shall contact the USFWS and CDFW immediately to obtain the necessary take authorization/permit. If any den is considered to be a potential den, but is later determined during monitoring or

construction to be currently, or previously used by kit fox (e.g., if kit fox sign is found inside), then all construction activities shall cease and the USFWS and CDFW shall be notified immediately. **PLAN REQUIREMENTS AND TIMING:** Survey reports shall be distributed to P&D, CDFW, and USFWS at least one week prior to the start of construction. **MONITORING:** A qualified biologist approved by P&D shall monitor all grading activities to ensure permit compliance. The monitor shall be retained by the Applicant at least 14 days prior to the start of project construction and shall attend any preconstruction meetings. The monitor shall take daily notes, which shall be made available to the County upon request. P&D permit compliance personnel shall perform site inspections as appropriate.

12. **Spec MM Bio-8 Nesting Season Avoidance and Surveys.** To avoid disturbance to nesting migratory avian or raptor species, proposed project activities shall take place outside of the bird breeding season (February through mid-September). If proposed project activities cannot avoid the bird breeding season (February through mid-September), pre-project nest surveys shall be conducted by a qualified biologist approved by P&D for nesting migratory avian and raptor species in the project site and buffer area no more than 10 days prior to the start of project activities. Pre-construction biological surveys shall occur prior to the proposed project implementation, and shall follow required CDFW and USFWS protocols, where applicable. A qualified biologist approved by P&D shall survey suitable habitat for the presence of these species. If a pre-construction survey discovers evidence of nesting, a buffer zone shall be established to avoid impacts to the active nest. Buffer zones shall be clearly marked with lath and survey flagging and all project-related vehicles and foot traffic shall be directed away from these zones. Pre-construction survey work, subsequent written reports, and proposed buffer zones shall be coordinated with and approved by the P&D staff biologist. If a project buffer area is established around an active nest, the buffer area shall be observed until the young birds have fledged the nest. If nesting birds of another sensitive species is discovered, the mitigation protocol shall be conducted with the P&D staff biologist. This measure shall apply to all areas subject to disturbance due to clearing, trenching, and/or grading activities. These areas include access roadways and pipeline corridors, if any. Identified nests shall be continuously surveyed for the first 24 hours prior to any construction-related activities to establish a behavioral baseline. If no nesting avian species are found, project activities may proceed and no further minimization measures shall be required. If active nesting sites are found, the following exclusion buffers shall be established, and no project activities shall occur within these buffer zones until young birds have fledged and are no longer reliant upon the nest and parental care for survival:

a. Minimum no disturbance of 250 feet around active nest of non-listed bird species;

b. Minimum no disturbance of 500 feet around active nest of all raptor species; and 0.5-mile no disturbance buffer from listed species and fully protected bird species until breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival;

c. Once work commences, all nests shall be continuously monitored to detect any behavioral changes as a result of project activities. If behavioral changes are observed, the work causing that change shall cease and the appropriate regulatory agencies (i.e. P&D, CDFW, USFWS, etc.) shall be consulted for additional avoidance and minimization measures; and

d. A variance from these no disturbance buffers may be implemented when there is compelling biological or ecological reason to do so, such as when the project area would be concealed from a nest site by topography. Any variance from these buffers is advised to be supported by a qualified wildlife biologist and P&D, CDFW, and USFWS shall be notified in advance of implementation of a no disturbance buffer variance. Agency concurrence with the variance must be obtained.

PLAN REQUIREMENTS AND TIMING: Pre-construction surveys shall be conducted no more than 10 days prior to the start of project construction. Survey reports shall be distributed to P&D, CDFW, and USFWS at least one week prior to the start of construction. **MONITORING:** A qualified biologist approved by P&D shall monitor all grading activities to ensure permit compliance. The monitor shall be retained by the Applicant at least 14 days prior to the start of project construction and shall attend any preconstruction meetings. The monitor shall take daily notes, which shall be made available to the County upon request. P&D permit compliance personnel shall perform site inspections as appropriate.

13. **Spec MM Bio-9 Traffic Management.** Project-related traffic shall observe a 10 mph speed limit in all project areas except on County roads and State and federal highways to avoid impacts to special-status and common wildlife species. Off-road traffic outside of designated project sites shall be prohibited. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

14. **Spec MM Bio-10 Spill Management.** Hazardous materials, fuels, lubricants, and solvents that spill accidentally during project-related activities shall be cleaned up and removed from the project as soon as possible according to applicable federal, state and local regulations. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

15. **Spec MM Bio-11 Coverage/Inspection of Open Holes.** To avoid the potential for entrapment of wildlife, any open holes shall be securely covered at night and inspected for entrapped wildlife each morning prior to onset of project activities and immediately prior to the end of each working day. Before such holes or trenches are backfilled, they shall be

inspected thoroughly for entrapped animals. Any animals discovered shall be allowed to escape voluntarily without harassment before project activities related to the trench resume, or removed from the trench or hole by a qualified biologist and allowed to escape unimpeded. If state and/or federally listed wildlife species become entrapped, USFS and CDFW must be consulted prior to any capture or handling, which would constitute "harassment" under the State/Federal Endangered Species Acts. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

16. **Spec MM Bio-12 Equipment Inspection.** All pipes, culverts, or similar structures stored at the proposed project sites overnight having a diameter of three (3) inches or greater shall be inspected thoroughly for wildlife species before being buried, capped, or otherwise used or moved in any way. Pipes left on the project site overnight shall be capped. If, during project implementation, a wildlife species is discovered inside a pipe, that section of pipe shall not be moved or, if necessary, moved only once to remove it from the path of project activity, until the animal has escaped. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. **MONITORING:** The project biologist shall inspect the site to ensure consistency with approved plans.

17. **Spec MM Bio-13 Waste Management.** All food-related trash items such as wrappers, cans, bottles or food scraps generated during project activities will be disposed of only in closed containers and regularly removed from the proposed project sites. Food items may attract wildlife species onto the proposed project sites, consequently exposing such animals to increased risk of injury or mortality. No deliberate feeding of wildlife will be allowed. To prevent harassment or mortality of wildlife species via predation, or destruction of their dens or nests, no domestic pets shall be permitted on the project sites. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

18. **Spec MM Bio-14 Pet Restriction.** To prevent harassment or mortality of wildlife species via predation, or destruction of their dens or nests, no domestic pets shall be permitted on the project site. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of Zoning Clearance. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

19. **CulRes-09 Stop Work at Encounter.** The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall retain a P&D approved

archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of Phase 2 investigations of the County Archaeological Guidelines and funded by the Owner/Applicant. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of a Zoning Clearance for this Development Plan. **MONITORING:** P&D permit processing planner shall check plans prior to issuance of Zoning Clearance. P&D compliance monitoring staff shall spot check in the field throughout grading and construction.

20. **Noise-02 Construction Hours.** The Owner/Applicant, including all contractors and subcontractors shall limit construction activity, including equipment maintenance and site preparation, to the hours between 7:00 a.m. and 4:00 p.m. Monday through Friday. No construction shall occur on weekends or State holidays. Non-noise generating interior construction activities such as plumbing, electrical, drywall and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) are not subject to these restrictions. Any subsequent amendment to the Comprehensive General Plan, applicable Community or Specific Plan, or Zoning Code noise standard upon which these construction hours are based shall supersede the hours stated herein. **PLAN REQUIREMENTS:** The Owner/Applicant shall provide and post a sign stating these restrictions at all construction site entries. **TIMING:** Signs shall be posted prior to commencement of construction and maintained throughout construction. **MONITORING:** The Owner/Applicant shall demonstrate that required signs are posted prior to Zoning Clearance issuance and pre-construction meeting. P&D permit compliance staff shall spot check and respond to complaints.

PROJECT-SPECIFIC CONDITIONS

21. **Spec Condition Revised Safety Inspection Maintenance and Quality Assurance Program (modified).** The applicant shall revise the Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP) for the South Cuyama Gas Plant to include any operational changes at the Gas Plant which are associated with and result from the current project. Operational changes at the South Cuyama Gas Plant which are associated with the current project shall be subject to Condition of Approval Nos. 11 and 12 of Conditional Use Permit 87-CP-94 for the South Cuyama Gas Plant 10. **PLAN REQUIREMENTS:** The applicant shall submit a revised SIMQAP to the SSRRC which includes operational changes at the South Cuyama Gas Plant associated with the current project, as determined by the SSRRC. **TIMING:** The revised SIMQAP shall be reviewed and approved by the SSRRC and/or its consultants prior to project operation. **MONITORING:** The SSRRC shall monitor compliance with the SIMQAP through site inspections and regular status updates from the applicant.

COUNTY RULES & REGULATIONS / LEGAL REQUIREMENTS

22. **Rules-03 Additional Permits Required.** The use and/or construction of any structures or improvements authorized by this approval shall not commence until the all necessary

planning and building permits are obtained. Before any Permit will be issued by Planning and Development, the Owner/Applicant must obtain written clearance from all departments having conditions; such clearance shall indicate that the Owner/Applicant has satisfied all pre-construction conditions. A form for such clearance is available from Planning and Development.

23. **Rules-05 Acceptance of Conditions.** The Owner/Applicant's acceptance of this permit and/or commencement of use, construction and/or operations under this permit shall be deemed acceptance of all conditions of this permit by the Owner/Applicant.

24. **Rules-07 DP Conformance.** No permits for development, including grading, shall be issued except in conformance with an approved Final Development Plan. The size, shape, arrangement, use, and location of structures, walkways, parking areas, and landscaped areas shall be developed in conformity with the approved development plan marked Exhibit B, dated September 9, 2015.

25. **Rules-14 Final DVP Expiration.** Final Development Plans shall expire five years after the effective date unless substantial physical construction has been completed on the development or unless a time extension is approved in compliance with County rules and regulations.

26. **Rules-23 Processing Fees Required.** Prior to issuance of Zoning Clearance, the Owner/Applicant shall pay all applicable P&D permit processing fees in full as required by County ordinances and resolutions.

27. **Rules-29 Other Dept Conditions.** Compliance with Departmental/Division letters required as follows:

    a. Air Pollution Control District dated April 29, 2015;

28. **Rules-30 Plans Requirements.** The Owner/Applicant shall ensure all applicable final conditions of approval are printed in their entirety on applicable pages of plans associated with Zoning Clearance plans submitted to P&D. These shall be graphically illustrated where feasible.

29. **Rules-31 Mitigation Monitoring Required.** The Owner/Applicant shall ensure that the project complies with all approved plans and all project conditions including those which must be monitored after the project is built and occupied. To accomplish this, the Owner/Applicant shall:

    a. Contact P&D compliance staff as soon as possible after project approval to provide the name and phone number of the future contact person for the project and give estimated dates for future project activities;
    b. Pay a $1,500.00 deposit fee prior to approval of Zoning Clearance to cover full costs of monitoring as described above, including costs for P&D to hire and manage outside consultants when deemed necessary by P&D staff (e.g. non-compliance

situations, special monitoring needed for sensitive areas including but not limited to biologists, archaeologists) to assess damage and/or ensure compliance. In such cases, the Owner/Applicant shall comply with P&D recommendations to bring the project into compliance. The decision of the Director of P&D shall be final in the event of a dispute;

c. Note the following on each page of all plans associated with Zoning Clearance "This project is subject to Mitigation Compliance Monitoring and Reporting. All aspects of project construction shall adhere to the approved plans, notes, and conditions of approval, and mitigation measures from Mitigated Negative Declaration #15NGD-00000-00007.
d. Contact P&D compliance staff at least two weeks prior to commencement of construction activities to schedule an on-site pre-construction meeting to be led by P&D Compliance Monitoring staff and attended by all parties deemed necessary by P&D, including the permit issuing planner, grading and/or building inspectors, other agency staff, and key construction personnel: contractors, sub-contractors and contracted monitors among others.

30. **Rules-32 Contractor and Subcontractor Notification.** The Owner/Applicant shall ensure that potential contractors are aware of County requirements. Owner / Applicant shall notify all contractors and subcontractors in writing of the site rules, restrictions, and Conditions of Approval and submit a copy of the notice to P&D compliance monitoring staff.

31. **Rules-33 Indemnity and Separation.** The Owner/Applicant shall defend, indemnify and hold harmless the County or its agents or 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 this project. In the event that the County fails promptly to notify the Owner / Applicant of any such claim, action or proceeding, or that the County fails to cooperate fully in the defense of said claim, this condition shall thereafter be of no further force or effect.

32. **Rules-37 Time Extensions-All Projects.** The Owner / Applicant may request a time extension prior to the expiration of the permit or entitlement for development. The review authority with jurisdiction over the project may, upon good cause shown, grant a time extension in compliance with County rules and regulations, which include reflecting changed circumstances and ensuring compliance with CEQA. If the Owner / Applicant requests a time extension for this permit, the permit may be revised to include updated language to standard conditions and/or mitigation measures and additional conditions and/or mitigation measures which reflect changed circumstances or additional identified project impacts.

Santa Barbara County
Air Pollution Control District

April 29, 2015

Christine Louie
Santa Barbara County
Planning and Development
Energy and Minerals Division
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: Mitigated Negative Declaration for the E&B Natural Resources – Natural Gas Pipeline Project, 15NGD-00000-00007

Dear Ms. Louie:

The Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Draft Mitigated Negative Declaration for the E&B Natural Resources Natural Gas Pipeline Project. The proposed project consists of constructing a pipeline to transport natural gas from the Russell Ranch Field to a point of sale in the South Cuyama Field. One 3-inch coated steel natural gas pipeline of approximately 1,125 feet in length would be installed. As part of the project, pig launcher and pig receiver valves would be installed to enable the applicant to perform pigging maintenance activities. Grading for the project consists of approximately 406 cubic yards of cut and fill. The subject property, a 7,326-acre parcel zoned AG-II-100, and identified in the Assessor Parcel Map Book as APN 147-030-060, is located adjacent to Highway 166 approximately 0.7 miles east of Aliso Canyon Road in the Cuyama Valley area.

The proposed project will involve modifications to the applicant's stationary source of emissions that is currently subject to APCD permit requirements, operational conditions, and prohibitory rules. Therefore, APCD will be a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the County's CEQA analysis when evaluating APCD permits or permit modifications for the proposed project. APCD staff will work closely with your agency's staff to ensure that the CEQA document that is generated adequately addresses air quality and climate change impacts. The following information will be necessary to evaluate the air quality and climate change impacts of the proposed project in the context of CEQA:

Air Pollution Control District staff provides the following comments on the MND:

1. **Section 4.3, Air Quality, Impact Discussion, Page 7:** The text states the project, *"...would not involve new stationary sources (i.e., equipment, machinery, hazardous materials storage, industrial or chemical processing, etc.) that would increase the amount of pollutants released into the atmosphere."* It should be noted that the project, as proposed, will add additional fugitive components and associated emissions; a valid APCD Authority to Construct is required before construction may commence.

2. **Section 4.3, Air Quality, Impact Discussion, (a-c) Potential Air Quality Impacts, Page 7:** It is recommended that temporary/short-term and long-term emissions be quantified and presented in the environmental document. The long term emissions should be

compared to Santa Barbara County's CEQA significance thresholds. For additional information, please refer to Section 5.2 of the APCD's *"Scope and Content of Air Quality Sections in Environmental Documents"* document, available at www.ourair.org/land-use.

3. **Section 4.3, Air Quality, Impact Discussion, (a-c) Potential Air Quality Impacts, Long-Term Operation Emissions, Page 7:**
   a. The text mentions that *"Long-term emissions are typically estimated using the URBEMIS computer model."* It should be noted that URBEMIS is an outdated model, and the APCD no longer recommends its use.
   b. The text cites the APCD's "screening table." This table, located within the APCD's *"Scope and Content of Air Quality Sections in Environmental Documents"* document, does not address the emissions of natural gas pipelines. Accordingly, this reference should be removed.

Additionally, Air Pollution Control District staff offers the following suggested conditions:

1. Standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities. The name and telephone number of an on-site contact person must be provided to the APCD prior to issuance of land use clearance.

2. APCD Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities* establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site. The text of the rule can be viewed on the APCD website at www.ourair.org/wp-content/uploads/rule345.pdf.

3. Fine particulate emissions from diesel equipment exhaust are classified as carcinogenic by the State of California. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of ozone precursors and fine particulate emissions from diesel exhaust.

4. If the proposed project requires an APCD permit/permit modification, permits must be received prior to commencing construction activities.

5. All portable diesel-fired construction engines rated at 50 bhp or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.

6. At all times, idling of heavy-duty diesel trucks should be minimized; auxiliary power units should be used whenever possible. State law requires that:
   - Drivers of diesel-fueled commercial vehicles shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location.
   - Drivers of diesel-fueled commercial vehicles shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle. Trucks with 2007 or newer model year engines must meet additional requirements (verified clean APS label required).
   - See www.arb.ca.gov/noidle for more information.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8831, or via email at bdk@sbcapcd.org.

Sincerely,

Brent Kraushaar

Brent Kraushaar
Air Quality Specialist
Technology and Environmental Assessment Division

Attachments: Fugitive Dust Control Measures
Diesel Particulate and NO_x Emission Measures

cc: Robert Booher
TEA Chron File

Santa Barbara County
Air Pollution Control District

ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions.

- During construction, use water trucks or sprinkler systems 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 completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.

- 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 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 or builder 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 Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

  Plan Requirements: All requirements shall be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. **Timing:** Requirements shall be shown on plans or maps prior to land use clearance or map recordation. Condition shall be adhered to throughout all grading and construction periods.

  MONITORING: Lead Agency shall ensure measures are on project plans and maps to be recorded. Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

Santa Barbara County
Air Pollution Control District

ATTACHMENT B
DIESEL PARTICULATE AND NO_x EMISSION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is an updated list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

The following measures are recommended:

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- 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.

Plan Requirements: Measures shall be shown on grading and building plans. **Timing:** Measures shall be adhered to throughout grading, hauling and construction activities.

MONITORING: Lead Agency staff shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors shall respond to nuisance complaints.

ATTACHMENT C: MITIGATED NEGATIVE DECLARATION

COUNTY OF SANTA BARBARA

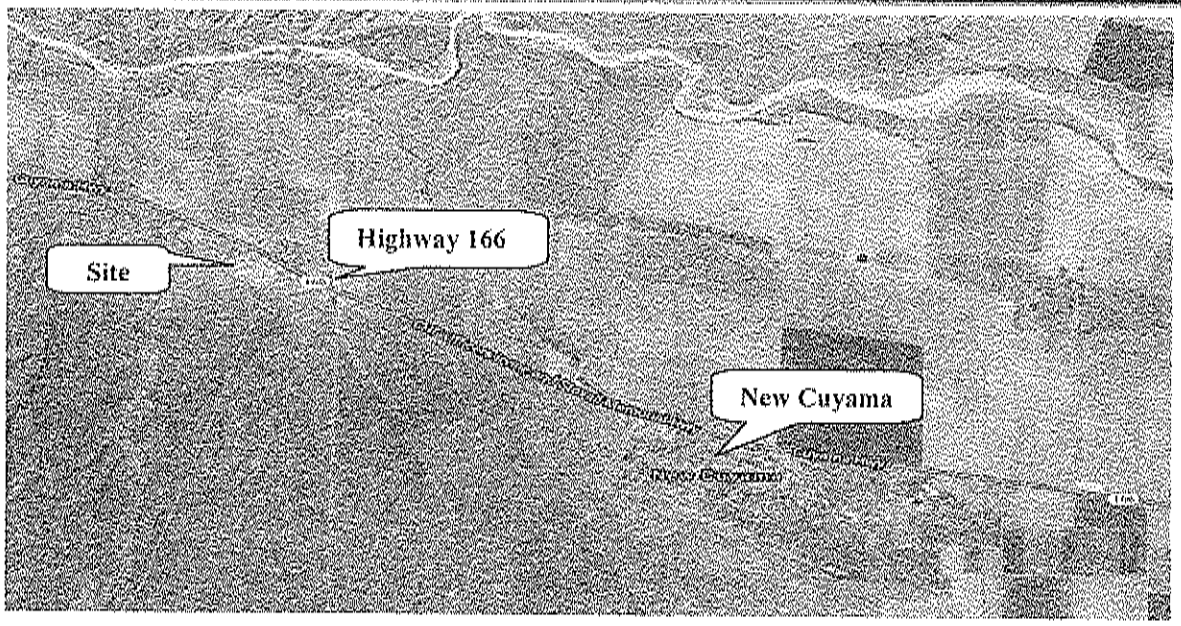
Planning and Development

www.sbcountyplanning.org

Proposed Final Mitigated Negative Declaration

E&B Natural Resources Natural Gas Pipeline Project

15NGD-00000-00007; 14DVP-00000-00018 15RZN-00000-00007



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1.0 REQUEST/PROJECT DESCRIPTION

Hearing on the request of Robert Booher, agent for E&B Natural Resources (E&B), to consider Case No. 14DVP-00000-00018 [application filed on October 7, 2014], for a Development Plan in compliance with Section 35.82.080 of the County Land Use & Development Code (LUDC), on property zoned U (Unlimited Agriculture) ~~AG-II-100~~ to allow for construction and operation of ~~a 3-inch buried~~ an above-ground natural gas pipeline (1,125-feet) located approximately 0.7-miles east of the intersection of Aliso Canyon Road and State Highway 166 in the Cuyama Valley; and to consider Case No. 15RZN-00000-00007, proposing to rezone one lot (10.47 gross acres) from Unlimited Agriculture, 10 acre minimum lot area (U) under Zoning Ordinance No. 661 to Agriculture II, 40-acre minimum lot area (AG-II-40) in compliance with Chapter 35.104 of the LUDC.

The proposed pipeline would be approximately 1,125-feet in length and placed above-ground on sleepers ~~buried~~ within ~~an~~ the existing ~~roadway surrounding the Plains All American Pipeline Pump Station (PAAPL PS)~~ Cuyama Pumping Station (PS) facility, located ~~in~~between the State-Designated Russell Ranch ~~Oil~~Field and South Cuyama Oilfield. The pipeline would connect two existing pipelines (3- and 8-inches) and transport natural gas from E&B's existing Russell Ranch Field facility to its existing South Cuyama Gas Plant for processing and sale. The proposed project would replace E&B's current practice of disposing of excess natural gas by reinjection at its Russell Ranch Field facility. The entire length of the inter-field pipeline between the Russell Ranch Oilfield and the South Cuyama Oilfield would be comprised of existing, previously abandoned pipelines except for the 1,125-foot segment of new pipeline.

~~The project would cover a temporary construction footprint of 0.06 acres.~~ The pipeline would be located within ~~an existing dirt roadway located adjacent~~ the Cuyama PS facility and parallel to an existing fence surrounding the northwest and southwest ~~and south~~ sides of the ~~PAAPL PS~~ facility. The pipeline would tie-in to E&B's existing 3-inch pipeline on the south ~~on the east~~ and existing 8-inch pipeline on the north. Once connected, an existing 8-inch pipeline would transport natural gas from E&B's Russell Ranch Field facility to the new pipeline at the Cuyama PS, and an existing 3-inch pipeline would then transport the gas directly to the South Cuyama Gas Plant. The new line would be 3-inches in diameter, except for a 100-foot segment where it would be 8-inches to tie-in to the existing 8-inch line.

The inter-field pipeline would require upgrades to existing equipment at the Russell Ranch Field facility (located in San Luis Obispo County) and installation of new equipment at the Cuyama PS and South Cuyama Gas Plant facilities. Within the PS facility, a set of pig launcher and receiver valves, two tie-in points to connect the new pipeline to the existing 3-inch and 8-inch lines, a basket strainer, and associated piping would be installed. ~~A facility with an above-ground pig launcher and receiver valves would be installed.~~ The valves would be surrounded by steel posts (4.0-feet in height) and would cover a permanent footprint of approximately 196-square feet (8.5-ft width by 23-ft length). A new dual-purpose isolation valve and gas meter would be installed at the Gas Plant, which would enable E&B to perform maintenance and monitoring activities over the pipeline. A new condensate drop-out (a pressure vessel used to prevent pipeline debris from collecting) and associated piping would be installed adjacent to the Gas Plant, where the existing 3-inch pipeline to existing infrastructure.

Upon completion of construction activities, the following permanent equipment would be installed: 3-inch coated steel schedule 40 pipeline, 8-inch coated steel schedule 40 pipeline, pig launcher and receiver valves, tie-in points, 4-foot high steel posts surrounding the valves, condensate drop-out, basket strainer, gas meter, and associated piping. The valves would be installed at the start, end, and connection points of the inter-field line and would allow for pipeline shutdown in case of an emergency, isolation of leaks, and use of smart pigs to clean and maintain the entire length of the inter-field line. All pipelines, valves, and fittings would be tested and proven safe to operate before they are put into service. E&B would implement the following measures to ensure the safe condition and operations of the inter-field pipeline: Cathodic protection to

prevent corrosion; hydro-testing of the line to detect for leaks; a Supervisory Control and Data Acquisition (SCADA) system to actively monitor pipeline conditions; pigging operations to clear pipeline debris and detect for anomalies; flow meters to control balance; and other measures to prevent and monitor existing corrosion.

~~Grading quantities for the project would include approximately 406 cubic yards of both cut and fill.~~ No grading is proposed. However, the project would involve minor amounts of excavation for the proposed tie-in points. Project activities, including staging and storage of construction-related vehicles and equipment, would occur within previously disturbed areas (an existing ~~oil and gas facility ranch road~~) which are ~~relatively~~ clear of vegetation and subject to regular vehicle use and maintenance. No habitat disturbance or removal is proposed.

Regional access to the project site would be provided by ~~Aliso Canyon Road and~~ Highway 166. ~~Local access to the project site would be provided by existing interior roads.~~ The project site is surrounded by an existing chain-link fence and would continue to be gated (to prevent public access) during construction activities.

~~Upon completion of construction activities, the following permanent equipment would be installed: 3-inch coated steel schedule 40 pipeline, tie-in points, pig launcher valve, pig receiver valve, and 4-foot high steel posts surrounding the valves. All pipelines, valves, and fittings would be tested and proven safe to operate before they are put into service.~~

The property is comprised of ~~7,326.01~~ 10.47-acres (APN 147-030-~~060~~025). The parcel is zoned ~~AG-II-100~~ U (Unlimited Agriculture) and is located approximately 0.7-miles east of Aliso Canyon Road and south of Highway 166 in the Cuyama Valley area, First ~~1st~~ Supervisorial District. The project would rezone the subject parcel from the zone district U under Zoning Ordinance 661 to the current AG-II-40 zoning district under the County Land Use and Development Code (LUDC). The proposed consistency rezone would increase the minimum lot size from 10 acres to 40 acres, which would be consistent with the existing land use designation of the parcel, A-II, 40 acre minimum parcel size, under the County's Comprehensive Plan. The subject parcel is zoned for agricultural uses and would remain zoned for agricultural uses.

2.0 PROJECT LOCATION

The project site is located approximately 2.0-miles northwest of New Cuyama and 0.7-miles east of Aliso Canyon Road and south of State Highway 166, Assessor's Parcel Number 147-030-025 ~~060~~, First ~~1st~~ Supervisorial District.

2.1 Site Information	
Comprehensive Plan Designation	Inland, Rural, A-II-~~100~~, 40 ~~100~~-acre minimum parcel size
Zoning District, Ordinance	Zoning Ordinance No. ~~661 Land Use and Development Code (LUDC)~~, U (Unlimited Agriculture) ~~AG-II-100~~, ~~10~~100-acre minimum parcel size
Site Size	10.47 ~~7,326.01~~-acres
Present Use & Development	Pipelines, crude oil storage and shipping ~~Interior access road, cattle grazing (Williamson Act Contract 77-AP-049)~~
Surrounding Uses/Zoning	North: AG-II-100, Unlimited Agriculture (U), agriculture, cattle grazing, State Highway 166, ~~Plains All American Pipeline Pump Station (oil industry)~~ South: AG-II-100, cattle grazing East: AG-II-100, cattle grazing, State Highway 166, Recreation/Open Space, Unlimited Agriculture, Residential (RES), New Cuyama Urban Area

	West: AG-II-100, agriculture, cattle grazing, State Highway 166
Access	State Highway 166~~, Aliso Canyon Road, interior agricultural roads~~
Other Site Information	Oil Industry Overlay, Scenic Corridor Overlay
Public Services	Water Supply: None Sewage: None Fire: Santa Barbara County Fire Protection District, Station #41 Other: Cuyama Joint School District (40, 42, 56)

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SETTING

The project site is located in the Cuyama Valley approximately 2.0-miles northwest of the town of New Cuyama in a rural area characterized by undeveloped agricultural lands with varying topography. The ~~0.06-acre~~ project site consists of an existing ~~interior dirt road~~ oil and gas storage facility located adjacent to ~~the existing Plains All American Pipeline (Plains) Pump Station (PS) facility and~~ State Highway 166. Topography within the project site is relatively flat and consists of soils which are heavily compacted due to regular vehicle use and maintenance within the facility~~ of the roadway~~. A small residential community of three homes is located further north of the project site, on the northern side of the highway. Surrounding areas on the west, south, and east consist of rural, undeveloped agricultural lands which have historically been used for production and livestock (cattle) grazing. The project site is located within areas classified as prime soil (Class 2-I).

The primary viewshed of the project site is the ~~Plains PS~~ Cuyama Pumping Station (PS), a square-shaped facility ~~which is~~ surrounded on all four sides by a 6-foot high chain-link fence. An existing interior access road runs parallel to the fence line outside of the facility. State Highway 166 is located directly adjacent to the northern side of the facility and provides direct access to a gated entrance. The facility was previously operated by the Plains All American Pipeline (PAAPL) Company as a Pumping Station (PS). It is currently being operated by E&B Natural Resources (E&B) as a storage and shipping facility for crude oil production. Development within the project site is limited to equipment associated with oil and gas operations, including a crude oil tank, three water storage tanks, a Lease Automatic Custody Transfer (LACT) unit, and a truck loading rack. A 10 to 12-foot segment of the existing 8-inch pipeline is exposed just outside of the northwestern corner of the facility and adjacent to State Highway 166. The existing 3-inch pipeline extending from the South Cuyama field is buried at the midway point along the southwestern side of the facility. The proposed 1,125-foot, above-ground pipeline would be located adjacent to the fence surrounding the north- and southwest sides of the facility. ~~The proposed pipeline would be buried within the road located adjacent to the west and south sides of the facility. The facility contains equipment used for oil and natural gas development, including a truck loading rack, pipe station, and four storage tanks. Development within the project site is limited to equipment associated with historic oil and gas development. A 10 to 12-foot segment of the existing 8-inch pipeline is located above-ground in the northern corner of the site and adjacent to State Highway 166. The existing 3-inch pipeline extending from the South Cuyama field is buried within the roadway on the southern side of the Plains facility.~~ A prehistoric archaeological site is located within the project vicinity and outside of the facility fence line.

The project ~~0.06-acre~~ site contains little to no vegetation due to frequent vehicle use and maintenance of the facility~~roadway~~. No native trees are present within the proposed project site. Some non-native annual and perennial grassland habitat is present within a 500-foot buffer outside of the facility, though there is evidence of past disturbance (plowing). Vegetated areas surrounding the project site are comprised mainly of red-stemmed filaree (*Erodium cicutarium*). No suitable habitat for special-status species is located within the project site. Special-status wildlife species that could potentially occur in the project site or its vicinity

include: Blunt-nosed lizard, San Joaquin kit fox, giant kangaroo rat, prairie falcon, Kern primrose sphinx moth.

No surface water bodies, including wetlands, riparian areas, vernal pools, ponds, springs, streams, or other sensitive habitats are located in the project site or buffer area. A designated USGS blue line creek (Bitter Creek; Stream/River-intermittent), is located approximately 630-feet west of the project site. North of Bitter Creek, the Cuyama River winds along the foot of the mountains.

3.2 ENVIRONMENTAL BASELINE

The environmental baseline from which the project's impacts are measured consists of the physical environmental conditions in the vicinity of the project, as described above.

4.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

The following checklist indicates the potential level of impact and is defined as follows:

Potentially Significant Impact: A fair argument can be made, based on the substantial evidence in the file, that an effect may be significant.

Less Than Significant Impact with Mitigation: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to a Less Than Significant Impact.

Less Than Significant Impact: An impact is considered adverse but does not trigger a significance threshold.

No Impact: There is adequate support that the referenced information sources show that the impact simply does not apply to the subject project.

Reviewed Under Previous Document: The analysis contained in a previously adopted/certified environmental document addresses this issue adequately for use in the current case and is summarized in the discussion below. The discussion should include reference to the previous documents, a citation of the page(s) where the information is found, and identification of mitigation measures incorporated from the previous documents.

4.1 AESTHETICS/VISUAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. The obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view?		X			
b. Change to the visual character of an area?			X		
c. Glare or night lighting which may affect adjoining areas?				X	
d. Visually incompatible structures?			X		

Existing Setting: The project site is located approximately 0.7-miles east of the intersection of Aliso Canyon Road and State Highway 166 in a rural area bounded by undeveloped agricultural land and characterized by cattle grazing. Public views in this area as seen from Highway 166 are dominated by flat, sparsely vegetated land and distant views of the Cuyama Valley mountains. The Cuyama River and

Bitters Creek are located north of the project site along the foot of the mountains, but are not visible from the site. The primary viewshed for this project from adjacent public roads and State Highway 166 is the Cuyama Pumping Station (PS) ~~Plains PS~~ facility surrounded by open lands used for cattle grazing. The facility covers a square footprint of approximately 10-acres and is surrounded on all four sides by a 6-foot high chain-link fence. The facility contains above-ground equipment associated with oil and gas development, including a truck loading rack, a pipe station, and four storage tanks. Public views of the site are limited to those from the highway and Aliso Canyon Road. Views of the project site include a 10 to 12-foot segment of the existing 8-inch pipeline which is exposed ~~runs above ground~~ adjacent to the highway, as well as the ~~Plains~~ facility, surrounding fence, and above-ground equipment within the facility.

County Environmental Thresholds. The County's Visual Aesthetics Impact Guidelines classify coastal and mountainous areas, the urban fringe, and travel corridors as "especially important" visual resources. A project may have the potential to create a significantly adverse aesthetic impact if (among other potential effects) it would impact important visual resources, obstruct public views, remove significant amounts of vegetation, substantially alter the natural character of the landscape, or involve extensive grading visible from public areas. The guidelines address public, not private views.

Impact Discussion:

(a) The project proposes to construct above-ground equipment, including a 1,123-foot pipeline, pig launcher valve, pig receiver valve, two tie-in points where the proposed pipeline would connect to the existing 3- and 8-inch pipelines, a condensate drop-out, a gas meter, and a basket strainer. The pig launcher and receiver valves would be surrounded by 4-foot high steel posts (4-inches in diameter) and encompass an area of approximately 196 square feet 8.5-ft width by 23-ft length). The valve site and tie-in point to the existing 8-inch pipeline would be located directly adjacent to State Highway 166 and viewable to those traveling on the highway. This could result in the creation of an aesthetically offensive site open to public view. However, the proposed equipment would be limited to 4-feet in height and would not obstruct any public views of the mountains, water courses, or State Highway 166. In addition, all project components would be partially screened by the 6-foot high chain-link fence surrounding the facility.

Construction activities would last a total of approximately 3 days from start to finish. However, construction-related waste could result in potentially significant but mitigable aesthetic impacts if left on the site after project completion. Requiring site cleanup and restoration would reduce this impact to a less than significant level (Aesthetic/Visual Resources Mitigation Measure 2).

(b, d) The project proposes to construct above-ground equipment, including a 1,125-foot pipeline, pig launcher valve, pig receiver valve, two tie-in points where the new pipeline would connect to the existing 3- and 8-inch pipelines, a condensate drop-out, a gas meter, and a basket strainer. However, the equipment would be limited to 4-feet in height and constructed within the existing Cuyama Pumping Station (PS) ~~directly adjacent to the Plains~~ facility, which contains above-ground equipment associated with oil and gas development within public view from State Highway 166 (e.g. truck loading rack, a pipe station, storage tanks). The proposed equipment would be similar in nature to existing equipment associated with the ~~Plains~~ facility, and would appear to be a minor extension of ~~Plains'~~ E&B's existing oil and gas operations. Therefore, the project would not change the visual character of the area, nor would it introduce any visually incompatible structures. In addition, all project components would be partially screened by the 6-foot chain link fence surrounding the facility. Mitigation which requires above-ground equipment to be painted natural colors to match surrounding areas would ensure visual compatibility with the existing development at the Cuyama PS facility ~~Plains PS~~ (Aesthetic/Visual Resources Mitigation Measure 1).

(c) No permanent or temporary lighting is proposed as part of the project. Therefore, there would be no impact from glare or night lighting associated with the project.

Cumulative Impacts: The implementation of the project is not anticipated to result in any substantial change in the aesthetic character of the area since views of the project site are limited and the new equipment would be visually compatible with existing equipment located in the ~~Plains~~-Cuyama PS facility. Mitigation measures, including enforcing site cleanup, would reduce construction-related impacts. Thus, the project would not cause a cumulatively considerable effect on aesthetics. The proposed rezone is an administrative action that would not result in any physical changes to the project site or visual impacts. Therefore, rezoning the parcel from U to AG-II-40 would not result in cumulative impacts to aesthetic or visual resources.

Mitigation and Residual Impact:

The following mitigation measures would reduce the project's aesthetic impacts to a less than significant level:

1. **Aest-06 Building Materials**. Natural building materials and colors compatible with surrounding terrain (earth-tones and non-reflective paints) shall be used on surfaces of all above-ground structures. **PLAN REQUIREMENT**: Materials shall be denoted on all plans associated with Zoning Clearance. **TIMING:** Structures shall be painted prior to project operations ~~completion~~. **MONITORING**: P&D compliance monitoring staff shall inspect prior to project completion.

2. **Aest-09 Construction Clean-up**. The developer shall clear the project site of all excess construction debris. **PLAN REQUIREMENT**: This requirement shall be noted on all plans associated with Zoning Clearance. **TIMING**: Debris clearance shall occur prior to project completion. **MONITORING**: P&D compliance monitoring staff shall site inspect project operations ~~completion~~.

With the incorporation of these measures, residual impacts would be less than significant.

4.2 AGRICULTURAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Convert prime agricultural land to non-agricultural use, impair agricultural land productivity (whether prime or non-prime) or conflict with agricultural preserve programs?			X		
b. An effect upon any unique or other farmland of State or Local Importance?			X		

Setting:

Background

Agricultural lands play a critical economic and environmental role in Santa Barbara County. Agriculture continues to be Santa Barbara County's major producing industry with a gross production value of over $1 billion (Santa Barbara County 2007 Crop Production Report). In addition to the creation of food, jobs, and economic value, farmland provides valuable open space and maintains the County's rural character.

Physical:

The existing 10,477,326.01-acre parcel is not under agricultural preserve contract (77-AP-040) subject to the Williamson Act. The parcel currently supports oil and gas operations livestock (cattle) grazing. The project site has historically been used for this purpose until it was developed as an interior access road. The property adjoins agricultural parcels ranging from approximately 200 to 550-acres; these neighboring south, east, and west are used for cattle grazing. The site is entirely covered by soils described as prime (Class 2).

The proposed project includes a consistency rezone application to rezone the subject parcel from an outdated U (Unlimited Agriculture) zone district under Zoning Ordinance 661 with the current AG-II-40 zoning under the County Land Use and Development Code (LUDC). Future development and uses on this parcel would be subject to the permitting requirements contained within the LUDC for AG-II zoned property. The proposed rezone would increase the minimum lot size from 10 acres to 40 acres, which would be consistent with the land use designation of the parcel, A-II, 40 acre minimum parcel size, under the County's Comprehensive Plan. The subject parcel is zoned for agricultural uses and would remain zoned for agricultural uses. Therefore, rezoning the parcel from U to AG-II-40 would not result in impacts to agricultural resources.

Regulatory:

County Thresholds Manual:

The County's Agricultural Resources Guidelines (approved by the Board of Supervisors, August 1993) provide a methodology for evaluating agricultural resources. These guidelines utilize a weighted point system to serve as a preliminary screening tool for determining significance. The tool assists planners in identifying whether a previously viable agricultural parcel could potentially be subdivided into parcels that are not considered viable after division. A project which would result in the loss or impairment of agricultural resources would create a potentially significant impact. The Point System is intended to measure the productive ability of an existing parcel as compared to proposed parcels. The tool compares availability of resources and prevalent uses that benefit agricultural potential but does not quantifiably measure a parcel's actual agricultural production.

Initial Studies are to use this Point System in conjunction with any additional information regarding agricultural resources. The Initial Study assigns values to nine particular characteristics of agricultural productivity of a site. These factors include parcel size, soil classification, water availability, agricultural suitability, existing and historic land use, comprehensive plan designation, adjacent land uses, agricultural preserve potential, and combined farming operations. If the tabulated points total 60 or more, that parcel is considered viable for the purposes of analysis. The project would be considered to have a potentially significant impact if the division of land of a viable parcel would result in parcels that did not either score over 60 in themselves or resulted in a score with a significantly lower score than the existing parcel. Any loss or impairment of agricultural resources identified using the Point System could constitute a potentially significant impact and warrants additional site specific analysis.

Impact Discussion:

The project would not divide the existing 7,326.01-acre parcel into smaller parcels. The project would be located cover a total footprint of 0.06-acres in an area characterized as prime agriculture land by virtue of its soil classification (Class 2). However, the proposed pipeline and all associated equipment (i.e. pig launcher/receiver valves, tie-in points, condensate drop-out, gas meter, basket strainer) would be constructed within an existing dirt roadway directly adjacent to an existing fence surrounding the Plains PS oil and gas facility surrounded by a chain-link fence, an area that does not tend to support cattle grazing. Soils within the project site are heavily compacted and there is little to no vegetation due to regular vehicle use and maintenance of the facility road. Following project completion, the site would be returned to its original condition and available for roadway use. The proposed rezone would not change the designated zoning of the parcel for agricultural use. Therefore, the proposed project would not convert prime agricultural land to non-agricultural use or conflict with agricultural preserve programs, nor would it result in an effect upon any unique or other farmland of State or Local Importance.

Mitigation and Residual Impact: No impacts are identified. No mitigations are necessary.

4.3 AIR QUALITY

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. The violation of any ambient air quality standard, a substantial contribution to an existing or projected air quality violation, or exposure of sensitive receptors to substantial pollutant concentrations (emissions from direct, indirect, mobile and stationary sources)?				X	
b. The creation of objectionable smoke, ash or odors?				X	
c. Extensive dust generation?		X			
Greenhouse Gas Emissions	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
d. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	~~X~~	
e. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X	

County Environmental Threshold:

Chapter 5 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (as amended in 2006) addresses the subject of air quality. The thresholds provide that a proposed project will not have a significant impact on air quality if operation of the project will:

- emit (from all project sources, mobile and stationary), less than the daily trigger for offsets for any pollutant (currently 55 pounds per day for NOx and ROC, and 80 pounds per day for PM_{10});
- emit less than 25 pounds per day of oxides of nitrogen (NOx) or reactive organic compounds (ROC) from motor vehicle trips only;
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone);
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board; ~~and~~
- be consistent with the adopted federal and state Air Quality Plans; and
- generate more than 1,000 metric tons of Greenhouse Gases (GHG) per day.

No thresholds have been established for short-term impacts associated with construction activities. However, the County's Grading Ordinance requires standard dust control conditions for all projects involving grading activities. Long-term/operational emissions thresholds have been established to address mobile emissions (i.e., motor vehicle emissions) and stationary source emissions (i.e., stationary boilers, engines, paints, solvents, and chemical or industrial processing operations that release pollutants).

Impact Discussion:

Construction of the proposed above-ground pipeline and associated above-ground equipment (i.e. pig launcher/receiver valves, tie-in points, condensate drop-out, gas meter, basket strainer) would not involve any grading. However, minor amounts of excavation would be required for the tie-in points. Implementation of P&D standard dust control measures (Air Quality Mitigation Measure 1) would help keep dust generation at a minimum during construction activities. The project would not result in significant new vehicle emissions (i.e., new vehicular trips to or from the site would be fewer than 100). It would not involve new stationary sources (i.e., equipment, machinery, hazardous materials storage, industrial or chemical processing, etc.) that would increase the amount of pollutants released into the atmosphere. ~~The project would also not~~ The project would also not generate additional smoke, ash, odors, or long term dust after construction. However, the project would add new fugitive components that would generate limited fugitive emissions (i.e., valves, condensate drop-out). Air emissions from the gas plant would also increase slightly as a result of processing the increased amount of natural gas coming from the Russell Ranch Field. A technical report prepared by M.F. Strange & Associates, Inc. and dated July 2015 found that air emissions associated with the project would be below County thresholds of significance. The report was reviewed for adequacy and accuracy by the Santa Barbara County Air Pollution Control District (APCD) and is included as Attachment 5. ~~The project would also not generate additional smoke, ash, odors, or long term dust after construction.~~ Fugitive emissions associated with the project (i.e. valves, condensate drop-out) were estimated using the APCD's Component Leak Path (CLP) methodology. Air quality impacts from greenhouse gas emissions were found to be below thresholds of significance. Implementation of P&D standard dust control measures (Air Quality Mitigation Measure 1) would help keep dust generation at a minimum during construction ~~grading~~ activities. The proposed consistency rezone is an administrative action that would not result in any physical changes to the project site or air emissions. The project's contribution to global warming from the generation of greenhouse gases would be ~~negligible~~ less than significant.

a-c. Potential Air Quality Impacts

Short-Term Construction Impacts. Project-related construction activities for the above-ground pipeline and associated equipment (i.e. pig launcher/receiver valves, tie-in points, condensate drop-out, gas meter, basket strainer) would not require grading ~~that has been minimized to the extent possible under the circumstances~~. However, the project would involve minor amounts of excavation for the proposed tie-in points. Earth moving operations at the project site would not have the potential to result in significant project-specific short-term emissions of PM_{10}. With the implementation of standard dust control measures that are required for all new development in the County, dust-related impacts would be mitigated to less than significant levels.

Emissions of ozone precursors (NO_x and ROC) during project construction would result primarily from the on-site use of heavy earthmoving equipment. Due to the limited period of time that grading activities would occur on the project site, construction-related emissions of NO_x and ROC would not be significant on a project-specific or cumulative basis. However, due to the non-attainment status of the air basin for ozone, the project should implement measures recommended by the APCD to reduce construction-related emissions of ozone precursors to the extent feasible. Compliance with these measures is routinely required for all new development in the County.

Long-Term Operation Emissions. Long-term emissions are typically estimated using the URBEMIS computer model program. A technical report prepared by Strange & Associates and dated July 2015 was prepared to analyze air quality impacts associated with the proposed project. The report was reviewed for adequacy and accuracy by the Santa Barbara County Air Pollution Control District (APCD) and is included as Attachment 5. Given the limited nature of the project, air emissions would be limited to those from fugitive leak components of proposed equipment (i.e. valves, basket strainer) and indirect emissions associated with processing an increased amount of natural gas at the Gas Plant. Fugitive emissions were calculated using the Santa Barbara County Air Pollution Control District's (APCD) Component Leak Path methodology. Criteria pollutants include Ozone (O), Carbon Monoxide (CO), Nitrogen Dioxide (NO2), Sulfur Dioxide (SO2), and suspended particulate matter 10 microns or less in diameter (PM10),

Long-term operation and maintenance of the inter-field pipeline between the Russell Ranch Field and South Cuyama Gas Plant would generate 1.41 lbs/day of CO, which is less than the County significance threshold of 25 lb/day; 1.25 lb/day of ROC, which is less than the County significance threshold of 55 lb/day; 1.39 lb/day of NOx, which is less than the County significance threshold of 55 lb/day; and 1.70 lb/day of PM10, which is less than the County significance threshold of 80 lb/day. Therefore, long-term emissions associated with the inter-field pipeline would be below County significance thresholds

The South Cuyama Gas Plant is designed to process up to 6.5 million standard cubic feet (MMSCF) of produced gas daily. The current rate through the Gas Plant is approximately 0.6 MMSCF per day, which is less than one-tenth of the designed processing rate. The proposed project would add 0.8 MMSCF of natural gas to the Gas Plant's current processing rate, which would bring the total daily amount of production to 1.4 MMSCF, just slightly over 20% of the Plant's design capacity. ~~However, t~~The proposed project ~~(buried above-ground~~ natural gas pipeline, ~~construction of~~ pig launcher/receiver valves and two tie-in points, condensate drop-out, gas meter, basket strainer, and consistency rezone) is below threshold levels for significant air quality impacts because of its limited nature, lack of stationary sources, and minimal fugitive and indirect emissions, ~~pursuant to the screening table maintained by the Santa Barbara County APCD~~. Therefore, the proposed project would not have a potentially significant long-term impact on air quality.

d-e. Greenhouse Gas Emissions

The proposed project is limited in nature to construction and operation of a ~~3-inch, buried~~ natural gas pipeline (1,125-ft) and associated equipment (two tie-in points, ~~and~~ pig launcher/receiver valves, condensate drop-out, gas meter, basket strainer). The proposed pipeline would connect two existing buried pipelines (3- and 8-inches) and transport natural gas from E&B's Russell Ranch facility to its South Cuyama Gas Plant for processing and sale. ~~The project does not propose to add any new equipment to either facility. Given its limited scope, the project does not have the potential to generate greenhouse gas emissions that may have a significant impact on the environment.~~ A technical report prepared by Strange & Associates and dated July 2015 determined that Greenhouse Gas emissions associated with the proposed project would be 646.58 metric tons per year, which is below the County's significance threshold of 1,000 metric tons per year. The report was reviewed for adequacy and accuracy by the Santa Barbara County Air Pollution Control District (APCD) and is included as Attachment 5. The project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Cumulative Impacts:

The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level.

In this instance, the project has been found not to exceed the significance criteria for air quality. Therefore, the project's contribution to regionally significant air pollutant emissions, including GHGs, is not cumulatively considerable, and its cumulative effect is less than significant (Class III).

Mitigation and Residual Impact:

The following mitigation measures would reduce the project's air quality impacts to a less than significant level:

1. **Air-01 Dust Control**. The Owner/Applicant shall comply with the following dust control components at all times including weekends and holidays:

a. Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site.

b. During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, use water trucks or sprinkler systems to prevent dust from leaving the site and to create a crust after each day's activities cease.
c. During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
d. Wet down the construction area after work is completed for the day and whenever wind exceeds 15 mph.
e. When wind exceeds 15 mph, have site watered at least once each day including weekends and/or holidays.
f. Order increased watering as necessary to prevent transport of dust off-site.
g. Cover soil stockpiled for more than two days or treat with soil binders to prevent dust generation. Reapply as needed.
h. If the site is graded and left undeveloped for over four weeks, the Owner/Applicant shall immediately:
    i. Seed and water to re-vegetate graded areas; and/or
    ii. Spread soil binders; and/or
    iii. Employ any other method(s) deemed appropriate by P&D or APCD.

PLAN REQUIREMENTS: These dust control requirements shall be noted on all plans associated with Zoning Clearance.
PRE-CONSTRUCTION REQUIREMENTS: The contractor or builder shall provide P&D monitoring staff and APCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to:
a. Assure all dust control requirements are complied with including those covering weekends and holidays.
b. Order increased watering as necessary to prevent transport of dust offsite.
c. Attend the pre-construction meeting.

TIMING: The dust monitor shall be designated prior to issuance of a Zoning Clearance for this Development Plan. The dust control components apply from the beginning of any grading or construction throughout all development activities until project completion.
MONITORING: P&D processing planner shall ensure measures are on all plans associated with Zoning Clearance. P&D permit compliance staff shall ensure measures are on plans. P&D permit compliance staff shall spot check and perform site inspections as necessary to ensure compliance onsite. APCD inspectors shall respond to nuisance complaints.

Implementation of standard conditions placed on the plans associated with Zoning Clearance, along with standard APCD conditions would reduce potential short-term dust impacts to a less than significant level. The project would not result in significant project-specific long-term air quality impacts. No further mitigation measures are required.

Mitigation and Residual Impact:

No impacts are identified. No mitigations are necessary, other than the standard dust control measure which is required for all new development in the County.

4.4 BIOLOGICAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
Flora					
a. A loss or disturbance to a unique, rare or threatened plant community?				X	
b. A reduction in the numbers or restriction in the range				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
of any unique, rare or threatened species of plants?					
c. A reduction in the extent, diversity, or quality of native vegetation (including brush removal for fire prevention and flood control improvements)?				X	
d. An impact on non-native vegetation whether naturalized or horticultural if of habitat value?				X	
e. The loss of healthy native specimen trees?				X	
f. Introduction of herbicides, pesticides, animal life, human habitation, non-native plants or other factors that would change or hamper the existing habitat?				X	
Fauna					
g. A reduction in the numbers, a restriction in the range, or an impact to the critical habitat of any unique, rare, threatened or endangered species of animals?		X			
h. A reduction in the diversity or numbers of animals onsite (including mammals, birds, reptiles, amphibians, fish or invertebrates)?		X			
i. A deterioration of existing fish or wildlife habitat (for foraging, breeding, roosting, nesting, etc.)?		X			
j. Introduction of barriers to movement of any resident or migratory fish or wildlife species?		X			
k. Introduction of any factors (light, fencing, noise, human presence and/or domestic animals) which could hinder the normal activities of wildlife?		X			

Existing Plant and Animal Communities/Conditions:

Background and Methods:

Santa Barbara County has a wide diversity of habitat types, including chaparral, oak woodlands, wetlands and beach dunes. These are complex ecosystems and many factors are involved in assessing the value of the resources and the significance of project impacts. For this project, site visits were conducted on October 29, 2014 and January 27, 2015 and a biological assessment was prepared by Robert A. Booher Consulting dated July 2014. The survey and biological assessment considered the originally proposed pipeline alignment outside of the facility-, and an adjacent 500-foot "buffer" ~~(Project Site)~~ area which includes the current location of the pipeline within the facility. The biological assessment was reviewed by County-contract Biologist John Storrer and his comments were provided in a memorandum dated November 6, 2014. The following analysis is based on this information.

Flora:

The proposed pipeline would be constructed within an existing ~~unsurfaced service road that is adjacent to and parallel with an existing valve and meter~~ oil and gas facility. Soil within the facility roadway is highly compacted due to regular vehicle use and maintenance of the facility. ~~The construction right-way (ROW)~~ All project activities, including staging and storage of vehicles and equipment, ~~would be confined largely to the limits of the existing roadway facility, with adjacent areas designated for staging of equipment and materials. The ROW (area to be affected by pipeline construction) measures 0.06 acres.~~ No project activities are proposed to occur outside of the facility fence line.

There is little to no vegetation present within the ~~roadway~~ facility. No oak trees are present in the vicinity. The biological assessment identified the presence of 8 sparse ruderal (weedy, non-native) non-native vegetation ~~is predominant within the Project Site. Some~~ and some California non-native annual and perennial grassland habitat outside the Cuyama Pumping Station (PS) facility boundary, ~~is present within the 500-foot buffer area~~ However, these findings do not apply to gated facility where the pipeline and all associated equipment would be located, ~~though past disturbance (cultivation) was evident in historic aerial imagery~~. No suitable habitat for special-status plant species is present in the ~~Project~~ project ~~Site~~site. No special-status plants are present or likely to become established in the ~~Project~~ project ~~Site~~site. Based on the presence of annual grassland habitat in the ~~project~~ vicinity (i.e. site context) of the original pipeline alignment, the biological assessment indicates that the following special-status plant species have the potential to occur in the project area outside the PS facility boundary, ~~but not within the construction ROW or staging areas~~: Lost Hills crownscale (*Atriplex coronate var. vallicola*), California jewelflower (*Caulanthus californicus*), Lemmon's jewelflower (*Caulanthus lemmondii*), Kern mallow (*Eremalche kernensis*), Showy golden madia (*Madia radiante*), and San Joaquin woolly-threads (*Monolopia congdonii*). Since the current pipeline alignment would be located in proximity to the original alignment, the conclusions of the biological assessment still apply to the current project. However, the project would reduce potential impacts associated with the original project by relocating the pipeline and associated equipment within the facility, eliminating the need for grading, and confining all project activities to the gated facility. The Project Site does not contain natural plant communities considered rare by the California Dept. of Fish and Game (2003).

Fauna:

The biological assessment indicates that the following special-status wildlife species have the potential to occur in the project vicinity ~~Project Site area (roadway and adjacent 500-foot buffer)~~ because they have been historically documented or recorded in its proximity: Blunt-nosed leopard lizard (*Gambelia sila*), San Joaquin kit fox (*Vulpes macrotis mutica*), giant kangaroo rat (*Dipodomys ingens*), prairie falcon (*Falco mexicanus*), and Kern primrose sphinx moth (*Euproserpinus euterpe*). No special-status wildlife species have been recorded within this area ~~the Project Site~~ and none were observed during the biological survey completed on May 8, 2014. No suitable foraging or breeding habitat for special-status wildlife species is present in the ~~proposed~~-project site within the facility boundary and thus no special-status wildlife species are expected to permanently reside there. However, there is potential for some wildlife species, including those afforded regulatory protection under the State and/or Federal Endangered Species Acts, to occur on a transient basis while foraging or during dispersal. These include Blunt-nosed leopard lizard, San Joaquin kit fox, giant kangaroo rat, prairie falcon, and Kern primrose sphinx moth.

Thresholds:
Santa Barbara County's Environmental Thresholds and Guidelines Manual (2008) includes guidelines for the assessment of biological resource impacts. The following thresholds are applicable to this project:

Riparian Habitats

Project created impacts may be considered significant due to: direct removal of riparian vegetation; disruption of riparian wildlife habitat, particularly animal dispersal corridors and or understory vegetation; or intrusion within the upland edge of the riparian canopy leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion; or construction activity which disrupts critical time periods for fish and other wildlife species.

Native Grasslands:

In general, project created impacts to native grasslands may be considered significant if they involve removal of or severe disturbance to a patch or a combined patch area of native grasses that is greater than one-quarter (1/4) acre in size. The grassland must contain at least 10 percent relative cover of native grassland species (based on a sample unit). Impacts to patch areas less than one-quarter acre in size that

are clearly isolated and not part of a significant native grassland or an integral component of a larger ecosystem are usually considered insignificant.

Other Rare Habitat Types:

The Manual recognizes that not all habitat-types found in Santa Barbara County are addressed by the habitat-specific guidelines. Impacts to other habitat types or species may be considered significant, based on substantial evidence in the record, if they substantially: (1) reduce or eliminate species diversity or abundance; (2) reduce or eliminate the quality of nesting areas; (3) limit reproductive capacity through losses of individuals or habitat; (4) fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources; (5) limit or fragment range and movement; or (6) interfere with natural processes, such as fire or flooding, upon which the habitat depends.

Impact Discussion:

(a-d) The proposed project would be located within an existing ~~oil~~ and gas facility which is surrounded on all four sides by a chain-link fence ~~interior access roadway~~. Special-status plant species were not observed during the site survey conducted by Robert A. Booher Consulting on May 8, 2014 and are not expected to occur in the ~~Project~~ project ~~Site~~ site based on past use, level of disturbance, and current land use (existing ~~access road,~~ oil and gas development and production~~, and livestock grazing~~). Proposed mitigation measures include ~~confining project activities to existing disturbed areas (Biological Resource Mitigation Measure 3) and~~ prohibiting off-road traffic outside of designated project sites (Biological Resource Mitigation Measure 9). ~~These~~ This mitigation measures would ensure that potential impacts are less than significant. Biological Resource Mitigation Measure 3, which required delineation of project boundaries, was removed after the pipeline and associated equipment were relocated within the fenced boundaries of the Cuyama Pumping Station facility because the existing fence line would provide a natural barrier around project activities.

(g-k) The project would potentially result in construction-related impacts to special-status wildlife species, including Blunt-nosed leopard lizard, San Joaquin County kit fox, giant kangaroo rat, prairie falcon, and primrose sphinx moth. No suitable foraging or breeding habitat for special-status wildlife species is present within the proposed ~~Project~~ project ~~Site~~site, due to regular vehicle use and maintenance of the ~~facility access road~~. Little to no native vegetation is present within the project area. No special-status wildlife species have been recorded within the project site and none were observed during the biological assessment. However, signs of wildlife presence were observed within the ~~project site and its~~ vicinity of the project site during a site inspection conducted by County staff and County-contract biologist John Storrer on October 29, 2014. These signs could have been attributed to special-status species and included burrows within and adjacent to the roadway outside of the facility fence line, tracks of rodents (e.g. kangaroo rat) and reptiles (e.g. lizard) in the roadway and adjacent buffer area, and tracks and scat that were characteristic of San Joaquin kit fox. No active dens, burrows, or other evidence of residence by special-status species were observed. Although no special-status wildlife species are expected to reside within the ~~Project~~ project ~~Site~~ site due to lack of suitable habitat, regular use of the facility, and the fence line barrier surrounding the facility, the project could adversely affect such species if they transit through the chain-link fence ~~area~~ and into the area during construction or become established in the site prior to or during project implementation. Direct mortality or injury to special-status wildlife species could occur from vehicles and equipment ~~earth-moving activities~~ associated with pipeline installation. Wildlife could potentially be crushed by vehicular traffic or become entrapped in equipment stored over night~~the trench if left open~~. The project could also result in indirect impacts to wildlife species. Project-related noise may temporarily disturb wildlife in the project area, and increased vehicular traffic may impede species' foraging activities or dispersal. As discussed above, Biological Resource Mitigation Measure 3 was removed after the pipeline and associated equipment were relocated within the fenced facility because the existing fence line would provide a natural barrier around project activities.

Measures to avoid or reduce potential impacts to special-status wildlife species would be implemented before, during, and after project construction. General measures would include completing pre-construction surveys and inspections to verify that no special-status wildlife species have become established in the project site (Biological Resource Mitigation Measures 2, 4, 5, 7, 8, 11, 12), ~~delineating project boundaries (Biological Resource Mitigation Measure 3),~~ limiting vehicle speed limits (Biological Resource Mitigation Measure 9), and maintaining general site housekeeping (Biological Resource Mitigation Measures 10, 13, 14). Additional measures to avoid or reduce the potential for impacts to specific species would be implemented. Specific minimization and avoidance measures would address blunt-nosed leopard lizard (Biological Resource Mitigation Measure 5), San Joaquin kit fox (Biological Resource Mitigation Measures 6, 7), and avian species (Biological Resource Mitigation Measure 8). These measures would reduce potential impacts to special-status wildlife species to less than significant levels.

Cumulative Impacts:

The proposed rezone is an administrative action that would not result in any physical changes to the project site. Rezoning the parcel from U to AG-II-40 would not result in impacts to biological resources. Since the project, as mitigated, would not significantly impact biological resources onsite, it would not have a cumulatively considerable effect on the County's biological resources.

Mitigation and Residual Impact:

The following mitigation measures would reduce the project's biological resource impacts to a less than significant level:

1. **Spec MM Bio-1 Environmental Awareness Training.** An Environmental Awareness Program shall be conducted to orient all employees involved in construction. The program shall consist of a brief pre-construction presentation in which a qualified biologist approved by P&D and knowledgeable of endangered species biology and legislative protection explains endangered species concerns. The program shall include a discussion of sensitive wildlife species identification, life history, habitat requirements, status under the State and/or Federal Endangered Species Acts (as applicable), and required project-specific measures to protect these species and their habitats. The training shall be conducted as necessary for new workers entering the project site. This training shall be incorporated into the pre-construction meeting(s) with construction personnel to perform the work. Training materials shall be submitted to P&D staff for approval 3 weeks prior to the commencement of Project activities. **PLAN REQUIREMENTS:** The Owner/Applicant shall provide environmental awareness training to its workers. The training shall be conducted by a County-approved biologist. **TIMING:** The Owner/Applicant shall submit training materials 3 weeks prior to commencement of Project activities and provide training prior to the start of work activities and as needed for new personnel accessing the Project site. **MONITORING:** The County-approved biologist shall notify P&D (1) at least 3 days prior to the training; and (2) after the required training has been conducted. The required notification shall be provided prior to the start of any project activities. The Owner/Applicant shall submit documentation of training (i.e. signatures of trained employees) to P&D staff prior to construction and after project completion if there are any additional training logs.

2. **Spec MM Bio-2 Final Pre-Construction Biological Survey.** As close to the beginning of project activities as possible, but not more than 14 days prior, a qualified biologist approved by P&D shall conduct a final pre-construction biological survey of the proposed project site and adjacent 500-foot buffer area to verify that no special-status species have become established in the project site. **PLAN REQUIREMENTS AND TIMING:** Final pre-construction survey shall be conducted no more than 14 days prior to the start of construction activities. The survey report shall be distributed to P&D, CDFW, and USFWS at least one week prior to the start of construction. **MONITORING:** A qualified biologist approved by P&D shall monitor all earth-moving ~~grading~~ activities to ensure

permit compliance. The Applicant shall obtain P&D approval and retain the monitor at least 14 days prior to the start of project construction. The monitor shall attend any pre-construction meetings. The monitor shall take daily and weekly notes, which shall be made available to the County upon request. P&D permit compliance personnel shall perform site inspections as appropriate.

3. ~~Spec MM Bio-3 Construction Area Delineation. Project site boundaries (i.e. limits of ROW and staging areas) shall be clearly delineated by stakes, flagging, rope, and/or cord to minimize the possibility of inadvertent degradation or loss of adjacent habitat during construction and grading activities. Project activities shall be restricted to the project site. PLAN REQUIREMENTS: This condition shall be printed on all plans associated with Zoning Clearance. TIMING: P&D shall review the plans with this requirement prior to issuance of a Zoning Clearance for this Development Plan. Project boundaries shall be delineated prior to any work activity and shall be maintained until construction has been completed. MONITORING: The project biologist shall inspect the site to ensure the required fencing is installed consistent with approved plans.~~

4. **Spec MM Bio-4 Avoidance of Burrows.** All small mammal burrows that may serve as potential refugia for special-status species shall be avoided during all phases of the project. The project biologist shall conduct a site inspection of the project site and within a 50-foot avoidance buffer. Any burrows discovered within the project site or buffer shall be clearly marked with flags, fencing, ropes, or cords and avoided. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of a Zoning Clearance ~~for this Development Plan~~. Initial survey shall be completed prior to construction. **MONITORING:** The project biologist shall inspect the site to ensure burrow avoidance measures, if necessary, are consistent with approved plans.

5. **Spec MM Bio-5 Blunt-Nosed Leopard Lizards Season Avoidance, Surveys, and Monitoring.** To avoid disturbance to blunt-nosed leopard lizards, proposed project activities shall ~~should~~ take place at temperatures when lizards are inactive (generally when temperatures are below 77° F and/or above 95° F) ~~to the extent possible~~. Proposed project activities ~~should~~ shall take place outside of the seasonal period of above-ground activity for blunt-nosed leopard lizard (mid-April through mid-October). If proposed project activities cannot avoid the period of peak activity, a qualified biologist approved by P&D shall conduct a final clearance survey of the project site to ensure that no blunt-nosed leopard lizard are present and no burrows have become established in the project site or within a 50-foot avoidance buffer. If a pre-construction survey discovers evidence of blunt-nosed leopard lizard, a buffer zone of 50-feet shall be established. Buffer zones shall be clearly marked with lath and survey flagging and all project-related vehicles and foot traffic shall be directed away from these zones. Pre-construction survey work, subsequent written reports, if any, and proposed buffer zones shall be coordinated with and approved by the P&D staff biologist. This measure shall apply to all areas subject to disturbance due to clearing, trenching, and/or grading activities. If small mammal burrows that may serve as potential refugia for blunt-nosed leopard lizards cannot be avoided within the project site or a minimum 50-foot avoidance buffer cannot be maintained, then additional surveys to detect the species shall be completed in accordance with CDFW's Approved Survey Methodology For The Blunt-Nosed Leopard Lizard (CDFG 2004). A biological monitor shall be on site during ground disturbing activities. The biological monitor shall check the project site(s) and access route(s) daily during the blunt-nosed leopard lizard active season (mid-April through mid-October) to determine presence or absence of lizards in or near the work areas. If blunt-nosed leopard lizards are observed during monitoring, the biologist shall take action to avoid impacts to lizards. If a blunt-nosed leopard lizard is observed during project pre-construction or clearance surveys, or at any time during construction, P&D, CDFW, and USFWS shall be immediately notified for further guidance. Measures to protect blunt-nosed leopard lizards during their period of peak activity may be discontinued once site preparation activities are complete, or upon determination by the biological monitor that temperature patterns at the project site are no longer conducive to blunt-nosed leopard lizard activity for the season. **PLAN REQUIREMENTS & TIMING:** This condition shall be

printed on all plans associated with Zoning Clearance. P&D shall review the plans with this requirement prior to issuance of a Zoning Clearance for this Development Plan. **MONITORING:** A qualified biologist approved by P&D shall monitor all earth-moving grading activities to ensure permit compliance. The monitor shall be retained by the Applicant at least 14 days prior to the start of project construction and shall attend any preconstruction meetings. The monitor shall take daily and weekly notes, which shall be made available to the County upon request. P&D permit compliance personnel shall perform site inspections as appropriate.

6. **Spec MM Bio-6 Avoidance of San Joaquin Kit Fox.** If San Joaquin kit foxes become established within the proposed project sites prior to project implementation, measures (7-12) contained in the USFWS's *Standardized Recommendations For Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) shall be implemented and the USFWS and CDFW shall be consulted. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of a Zoning Clearance for this Development Plan. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

7. **Spec MM Bio-7 Kit Fox Pre-Construction Surveys and Den Management.** As close to the beginning of project construction as possible, a qualified biologist approved by P&D shall survey for and examine any dens occurring near the construction area. All discoveries and/or encounters with kit foxes, dens, and den management activities shall be coordinated with the P&D staff biologist and the USFWS and CDFW. If a natal/pupping den is discovered within the project site or within 200 feet of the project boundaries, P&D, CDFW, and USFWS shall be immediately notified and under no circumstances should the den be disturbed or destroyed without prior authorization. If the pre-construction biological surveys reveal an active natal den or new information, the Applicant shall contact the USFWS and CDFW immediately to obtain the necessary take authorization/permit. If any den is considered to be a potential den, but is later determined during monitoring or construction to be currently, or previously used by kit fox (e.g., if kit fox sign is found inside), then all construction activities shall cease and the USFWS and CDFW shall be notified immediately. **PLAN REQUIREMENTS AND TIMING:** Survey reports shall be distributed to P&D, CDFW, and USFWS at least one week prior to the start of construction. **MONITORING:** A qualified biologist approved by P&D shall monitor all grading activities to ensure permit compliance. The monitor shall be retained by the Applicant at least 14 days prior to the start of project construction and shall attend any preconstruction meetings. The monitor shall take daily and weekly notes, which shall be made available to the County upon request. P&D permit compliance personnel shall perform site inspections as appropriate.

8. **Spec MM Bio-8 Nesting Season Avoidance and Surveys.** To avoid disturbance to nesting migratory avian or raptor species, proposed project activities shall take place outside of the bird breeding season (February through mid-September). If proposed project activities cannot avoid the bird breeding season (February through mid-September), pre-project nest surveys shall be conducted by a qualified biologist approved by P&D for nesting migratory avian and raptor species in the project site and buffer area no more than 10 days prior to the start of project activities. Pre-construction biological surveys shall occur prior to the proposed project implementation, and shall follow required CDFW and USFWS protocols, where applicable. A qualified biologist approved by P&D shall survey suitable habitat for the presence of these species. If a pre-construction survey discovers evidence of nesting, a buffer zone shall be established to avoid impacts to the active nest. Buffer zones shall be clearly marked with lath and survey flagging and all project-related vehicles and foot traffic shall be directed away from these zones. Pre-construction survey work, subsequent written reports, and proposed buffer zones shall be coordinated with and approved by the P&D staff biologist. If a project buffer area is established around an active nest, the buffer area shall be observed until the young birds have fledged the nest. If nesting birds of another sensitive species is discovered, the mitigation

protocol shall be conducted with the P&D staff biologist. This measure shall apply to all areas subject to disturbance due to clearing, excavation, trenching, and/or grading activities. These areas include access roadways and pipeline corridors, if any. Identified nests shall be continuously surveyed for the first 24 hours prior to any construction-related activities to establish a behavioral baseline. If no nesting avian species are found, project activities may proceed and no further minimization measures shall be required. If active nesting sites are found, the following exclusion buffers shall be established, and no project activities shall occur within these buffer zones until young birds have fledged and are no longer reliant upon the nest and parental care for survival:

a. Minimum no disturbance of 250 feet around active nest of non-listed bird species;

b. Minimum no disturbance of 500 feet around active nest of all raptor species; and 0.5-mile no disturbance buffer from listed species and fully protected bird species until breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival;

c. Once work commences, all nests shall be continuously monitored to detect any behavioral changes as a result of project activities. If behavioral changes are observed, the work causing that change shall cease and the appropriate regulatory agencies (i.e. P&D, CDFW, USFWS, etc.) shall be consulted for additional avoidance and minimization measures; and

d. A variance from these no disturbance buffers may be implemented when there is compelling biological or ecological reason to do so, such as when the project area would be concealed from a nest site by topography. Any variance from these buffers is advised to be supported by a qualified wildlife biologist and P&D, CDFW, and USFWS shall be notified in advance of implementation of a no disturbance buffer variance. Agency concurrence with the variance must be obtained.

PLAN REQUIREMENTS AND TIMING: Pre-construction surveys shall be conducted no more than 10 days prior to the start of project construction. Survey reports shall be distributed to P&D, CDFW, and USFWS at least one week prior to the start of construction. **MONITORING:** A qualified biologist approved by P&D shall monitor all grading activities to ensure permit compliance. The monitor shall be retained by the Applicant at least 14 days prior to the start of project construction and shall attend any preconstruction meetings. The monitor shall take daily and weekly notes, which shall be made available to the County upon request. P&D permit compliance personnel shall perform site inspections as appropriate.

9. **Spec MM Bio-9 Traffic Management.** Project-related traffic shall observe a 10 mph speed limit in all project areas except on County roads and State and federal highways to avoid impacts to special-status and common wildlife species. Off-road traffic outside of designated project sites shall be prohibited. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of a Zoning Clearance ~~for this Development Plan~~. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

10. **Spec MM Bio-10 Spill Management.** Hazardous materials, fuels, lubricants, and solvents that spill accidentally during project-related activities shall be cleaned up and removed from the project as soon as possible according to applicable federal, state and local regulations. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of a Zoning Clearance ~~for this Development Plan~~. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

11. **Spec MM Bio-11 ~~French~~ Coverage/Inspection** of Open Holes. To avoid the potential for entrapment of wildlife, ~~an incremental construction method (excavation, installation of pipe, and backfill for each segment) shall be used for pipeline installation and all excavations shall be completely backfilled or securely covered at the end of each work day.~~ A any open holes shall be securely covered at night and inspected for entrapped wildlife each morning prior to onset of project activities and immediately prior to the end of each working day. Before such holes or trenches are backfilled, they shall be inspected thoroughly for entrapped animals. Any animals discovered shall be allowed to escape voluntarily without harassment before project activities related to the trench resume, or removed from the trench or hole by a qualified biologist and allowed to escape unimpeded. If state and/or federally listed wildlife species become entrapped, USFS and CDFW must be consulted prior to any capture or handling, which would constitute "harassment" under the State/Federal Endangered Species Acts. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of ~~a~~ Zoning Clearance ~~for this Development Plan~~. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

12. **Spec MM Bio-12 Equipment Inspection.** All pipes, culverts, or similar structures stored at the proposed project sites overnight having a diameter of three (3) inches or greater shall be inspected thoroughly for wildlife species before being buried, capped, or otherwise used or moved in any way. Pipes left on the project site overnight shall be capped. If during project implementation a wildlife species is discovered inside a pipe, that section of pipe shall not be moved or, if necessary, moved only once to remove it from the path of project activity, until the animal has escaped. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of ~~a~~ Zoning Clearance ~~for this Development Plan~~. **MONITORING:** The project biologist shall inspect the site to ensure consistency with approved plans.

13. **Spec MM Bio-13 Waste Management.** All food-related trash items such as wrappers, cans, bottles or food scraps generated during project activities will be disposed of only in closed containers and regularly removed from the proposed project sites. Food items may attract wildlife species onto the proposed project sites, consequently exposing such animals to increased risk of injury or mortality. No deliberate feeding of wildlife will be allowed. To prevent harassment or mortality of wildlife species via predation, or destruction of their dens or nests, no domestic pets shall be permitted on the project sites. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of ~~a~~ Zoning Clearance ~~for this Development Plan~~. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

14. **Spec MM Bio-14 Pet Restriction.** To prevent harassment or mortality of wildlife species via predation, or destruction of their dens or nests, no domestic pets shall be permitted on the project site. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of ~~a~~ Zoning Clearance ~~for this Development Plan~~. **MONITORING:** P&D permit compliance personnel shall perform site inspections as appropriate.

Potential impacts associated with noise would be avoided by limiting construction activities to daylight hours (See Noise Mitigation Measure ~~12~~). With the incorporation of these measures, residual impacts would be less than significant.

4.5 CULTURAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
Archaeological Resources					
a. Disruption, alteration, destruction, or adverse effect on a recorded prehistoric or historic archaeological site (note site number below)?		X			
b. Disruption or removal of human remains?				X	
c. Increased potential for trespassing, vandalizing, or sabotaging archaeological resources?				X	
d. Ground disturbances in an area with potential cultural resource sensitivity based on the location of known historic or prehistoric sites?		X			
Ethnic Resources					
e. Disruption of or adverse effects upon a prehistoric or historic archaeological site or property of historic or cultural significance to a community or ethnic group?				X	
f. Increased potential for trespassing, vandalizing, or sabotaging ethnic, sacred, or ceremonial places?				X	
g. The potential to conflict with or restrict existing religious, sacred, or educational use of the area?				X	

Existing Setting:

For at least the past 10,000 years, the area that is now Santa Barbara County has been inhabited by Chumash Indians and their ancestors. Based on a records search at the CCIC (Central Coast Information Center of the University of California, Santa Barbara) (May 21, 2014) and the HPD (California State Historic Property Data File); a Phase I survey (conducted by David Brunzell; Principal Archaeologist, BCR Consulting, on May 15, 2014), cultural resources are located within a 1.0-mile radius of the project site.

Previous ground disturbance on the subject parcel includes ~~–~~oil and gas development and ongoing operations ~~cattle grazing~~. Areas within the project site and its immediate vicinity have been disturbed by regular vehicle use and maintenance of the facility ~~of the interior access road~~ and development associated with the ~~Cuyama Pumping Station (PS)~~ ~~Plains PS~~. Previous ground disturbance includes construction of the ~~Plains~~ facility and surrounding chain-link fence, excavation and installation of the existing 3- and 8-inch buried pipelines, and construction of the interior dirt roadway located adjacent to the fence line. The roadway has been subject to mechanical clearing, terracing, and maintenance activities. It is likely that previous ground disturbance to the project site occurred in shallower sediments, and that native, undisturbed soil is present 50-centimeters below ground.

County Environmental Thresholds: The County Environmental Thresholds and Guidelines Manual contains guidelines for identification, significance determination, and mitigation of impacts to important cultural resources. Chapter 8 of the Manual, the *Archaeological Resources Guidelines: Archaeological, Historic and Ethnic Element,* specifies that if a resource cannot be avoided, it must be evaluated for importance under CEQA. CEQA Section 15064.5 contains the criteria for evaluating the importance of archaeological and historical resources. For archaeological resources, the criterion usually applied is: (D), "Has yielded, or may be likely to yield, information important in prehistory or history". A project that may cause a substantial adverse effect on an archaeological resource may have a significant effect on the environment.

Impact Discussion: A known prehistoric archaeological site (CA-SBA-3679) is located within close proximity to the project site and outside of the facility fence line. The archaeological site consists of a lithic scatter (three milling stones). Although no cultural resources were identified within the project site during the Phase I study, the project is considered potentially sensitive for buried cultural resources, particularly at depths within undisturbed soil (greater than 50 centimeters). The Phase I survey covered the original location of the pipeline outside of the facility and the current location within the facility fence line. The proposed project would include minor excavation of the tie-in points to the existing 3- and 8-inch lines ~~excavation of a trench (4-ft deep),~~ installation of 1,125-feet of above-ground pipeline, backfill of excavated areas, and construction of associated above-ground equipment (e.g. two tie-in points and pig launcher/receiver valves, condensate drop-out, gas meter, basket strainer). Construction ~~Excavation~~ activities could result in adverse effects to ~~the~~ unknown archaeological resources ~~site because~~ of the potential to encounter undisturbed soil during excavation of the tie-in points ~~and the proximal distance between the site and the project area~~. To prevent potential impacts to cultural resources, all work would be required to stop if a potential resource is found (Cultural Resources Mitigation Measure 1). ~~an archaeological monitor would be required to be present during earth-moving activities proposed within the project site that have potential to disturb soils deeper than 50 centimeters. The monitor would have the authority to halt work in the event a potential resource is found (Cultural Resources Mitigation Measure 1).~~ Implementation of this mitigation measure, ~~as well as standard P&D mitigation measures (Cultural Resources Mitigation Measures 2, 3),~~ would reduce this potential impact to less than significant. Cultural Resources Mitigation Measures 1 and 3 were removed after the pipeline was proposed to be placed above-ground and relocated within the Cuyama Pumping Station facility because earthwork required for pipeline installation would be minimal and project activities would occur only within the facility fence line and the known archaeological site (CA-SBA-3679) is outside of the fence line.

The proposed rezone is an administrative action that would not result in any physical changes to the project site. Therefore, rezoning the parcel from U to AG-II-40 would not result in impacts to cultural resources.

Cumulative Impacts:
Since no cultural resources were discovered within the project site and mitigation measures would be imposed to prevent potential impacts to cultural resources, the project would not have a cumulatively considerable effect on the County's cultural resources.

Mitigation and Residual Impact:

The following mitigation measures would reduce the project's cultural resource impacts to a less than significant level:

~~1. Spec CulRes-07 Cultural Resource Monitor. The Owner/Applicant shall have all earth disturbances including scarification and placement of fill within the project site that have the potential to disturb soils deeper than 50 centimeters area monitored by a P&D approved archaeologist and a Native American consultant in compliance with the provisions of the County Archaeological Guidelines. PLAN REQUIREMENTS: Prior to issuance of a Zoning Clearance for this Development Plan, the Owner/Applicant shall submit for P&D review and approval, a contract or Letter of Commitment between the Owner/Applicant and the archaeologist consisting of a project description and scope of work, and once approved, shall execute the contract. TIMING: P&D shall review the contract or Letter of Commitment with this requirement prior to issuance of a Zoning Clearance for this Development Plan. MONITORING: The Owner/Applicant shall provide P&D compliance monitoring staff with the name and contact information for the assigned onsite monitor(s) prior to Zoning Clearance issuance and pre-construction meeting. P&D compliance monitoring staff shall confirm monitoring by archaeologist and Native American consultant and P&D compliance monitoring staff shall spot check field work.~~

~~3.~~ **CulRes-09 Stop Work at Encounter.** The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of Phase 2 investigations of the County Archaeological Guidelines and funded by the Owner/Applicant. **PLAN REQUIREMENTS:** This condition shall be printed on all plans associated with Zoning Clearance. **TIMING:** P&D shall review the plans with this requirement prior to issuance of ~~a~~ Zoning Clearance ~~for this Development Plan~~. **MONITORING:** P&D permit processing planner shall check plans prior to issuance of ~~a~~ Zoning Clearance ~~for this Development Plan~~. P&D compliance monitoring staff shall spot check in the field throughout grading and construction.

~~3.~~

~~4. CulRes-08 Cultural Resource Buffer. The Owner/Applicant shall temporarily fence the archaeological site and 50 foot buffer area with chain link flagged with color or other material authorized by P&D where ground disturbance is proposed within 100 feet of the site and a buffer. PLAN REQUIREMENTS: The fencing requirement shall be printed on all plans associated with Zoning Clearance. TIMING: Fencing shall be in place prior to issuance of Zoning Clearance for this Development Plan. MONITORING: P&D compliance monitoring staff shall verify installation of fencing by reviewing photo documentation or by site inspection prior to issuance of Zoning Clearance, and ensure fencing remains in place throughout grading and construction through site inspections.~~

With the incorporation of these measures, residual impacts would be less than significant.

4.6 ENERGY

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Substantial increase in demand, especially during peak periods, upon existing sources of energy?				X	
b. Requirement for the development or extension of new sources of energy?				X	

Impact Discussion: The County has not identified significance thresholds for electrical and/or natural gas service impacts (Thresholds and Guidelines Manual). Private electrical and natural gas utility companies provide service to customers in Central and Southern California, including the unincorporated areas of Santa Barbara County. The proposed project consists of construction and operation of an above-ground ~~3-inch buried~~-natural gas pipeline. The proposed rezone is an administrative action that would not result in any physical development or require use of energy. Therefore, rezoning the parcel from U to AG-II-40 would not result in impacts to energy resources.

The project would have a negligible effect on regional energy needs. No adverse impacts would result.

Cumulative Impacts:

The project's contribution to the regionally significant demand for energy is not considerable, and is therefore less than significant.

Mitigation and Residual Impact:

No mitigation is required. Residual impacts would be less than significant.

4.7 FIRE PROTECTION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Introduction of development into an existing high fire hazard area?			X		
b. Project-caused high fire hazard?			X		
c. Introduction of development into an area without adequate water pressure, fire hydrants or adequate access for fire fighting?				X	
d. Introduction of development that will hamper fire prevention techniques such as controlled burns or backfiring in high fire hazard areas?				X	
e. Development of structures beyond safe Fire Dept. response time?				X	

County Standards

The following County Fire Department standards are applied in evaluating impacts associated with the proposed development:

- The emergency response thresholds include Fire Department staff standards of one on-duty firefighter per 4,000 persons (generally 1 engine company per 12,000 people, assuming three firefighters/station). The emergency response time standard is approximately 5-6 minutes.
- Water supply thresholds include a requirement for 750 gpm at 20 psi for all single family dwellings.
- The ability of the County's engine companies to extinguish fires (based on maximum flow rates through hand held line) meets state and national standards assuming a 5,000 square foot structure. Therefore, in any portion of the Fire Department's response area, all structures over 5,000 square feet are an unprotected risk (a significant impact) and therefore should have internal fire sprinklers.
- Access road standards include a minimum width (depending on number of units served and whether parking would be allowed on either side of the road), with some narrowing allowed for driveways. Cul-de-sac diameters, turning radii and road grade must meet minimum Fire Department standards based on project type.
- Two means of egress may be needed and access must not be impeded by fire, flood, or earthquake. A potentially significant impact could occur in the event any of these standards is not adequately met.

Impact Discussion:

(a, b) The project would introduce development into an existing high fire hazard area, which includes an above-ground pipeline and associated above-ground equipment (pig receiver/launcher valves and tie-in points, condensate drop-out, gas meter, basket strainer). This could result in new fire hazards during construction activities and operation of the pipeline. However, the project would be located within an existing oil and gas facility which is surrounded by a 6-foot high chain-link fence. ~~However, construction activities would be limited to approximately three days.~~ All construction activities, including staging and storage of vehicles and equipment, would be confined to the gated facility. Project construction would be limited to approximately three days. ~~.~~ A 500-gallon water tank would be located on-site during construction activities and provide adequate fire protection. Following construction, the project would not result in a high fire hazard because the pipeline and associated above-ground equipment would be ~~buried and subject to 24-hour monitoring as part of current facility operations would not require regular maintenance or increase human presence in the area~~. Existing infrastructure within the facility includes a fire water storage tank with a capacity of 500 bbl, a fire water pump (7.5 HP), a fire hydrant, and portable fire hydrants, and would provide adequate fire protection for ongoing pipeline operations. The processing

of natural gas from the Russell Ranch Field facility at the South Cuyama Gas Plant would represent a de minimis increase in natural gas processing and would be well within the permitted capacity of the Gas Plant. Therefore, no increase in the level of potential fire risks at the Gas Plant would result. Impacts are considered less than significant. No additional mitigation measures are necessary.

(c, e) The project would not result in the introduction of development into an area without adequate water pressure, fire hydrants or adequate access for fire fighting. Existing infrastructure within the Cuyama Pumping Station (PS) ~~Plains PS~~ facility includes a fire water storage tank with a capacity of 500 bbl, a fire water pump (7.5 HP), a fire hydrant, and portable fire hydrants. Additionally, a 500-gallon water tank would be temporarily located on site during construction activities. The project site is within adequate response time from fire protective services. The pipeline would be ~~buried~~ placed above-ground on sleepers and located within an existing oil and gas facility ~~interior dirt roadway~~ that can be accessed directly from ~~Alise Canyon Road and an existing gravel road parallel to~~ State Highway 166. ~~The Plains PS facility can be accessed directly via Highway 166, and t~~There is adequate space within the facility for fire protective services to access existing infrastructure. ~~The applicant would also be required to implement a Fire Protection Plan to prevent potential impacts from fire hazards during operation of the pipeline (Fire Department Memorandum dated November 13, 2014~~).

(d) The project would not result in the introduction of development that would hamper fire prevention techniques. The pipeline would be ~~buried~~ placed above-ground and ~~all the~~ above-ground associated equipment (pig receiver/launcher valves and tie-in points, condensate drop-out, gas meter, basket strainer) would be located within ~~adjacent to~~ the gated PS ~~Plains~~ facility and would result in minimal ground coverage. The pipeline would not require regular maintenance work or increase human presence, which could potentially hamper fire prevention techniques.

Cumulative Impacts:
The proposed rezone is an administrative action that would not result in any physical changes to the project site or impacts to fire protection. Since the project would not create significant fire hazards, it would not have a cumulatively considerable effect on fire safety within the County.

4.8 GEOLOGIC PROCESSES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mudslides, ground failure (including expansive, compressible, collapsible soils), or similar hazards?				X	
b. Disruption, displacement, compaction or overcovering of the soil by cuts, fills or extensive grading?			X		
c. Exposure to or production of permanent changes in topography, such as bluff retreat or sea level rise?				X	
d. The destruction, covering or modification of any unique geologic, paleontologic or physical features?				X	
e. Any increase in wind or water erosion of soils, either on or off the site?				X	
f. Changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
g. The placement of septic disposal systems in impermeable soils with severe constraints to disposal of liquid effluent?				X	
h. Extraction of mineral or ore?				X	
i. Excessive grading on slopes of over 20%?				X	
j. Sand or gravel removal or loss of topsoil?				X	
k. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?			X		
l. Excessive spoils, tailings or over-burden?				X	

Impact Discussion:

The proposed project site does not have substantial geological constraints or slopes exceeding 20%. The proposed pipeline ~~project~~ would not result in any ~~excessive~~ grading. The proposed rezone is an administrative action that would not result in any physical changes to the project site. As such, the proposed project would not result in impacts related to geological resources.

Mitigation and Residual Impact: No impacts are identified. No mitigations are necessary.

Threshold

Pursuant to the County's Adopted Thresholds and Guidelines Manual, impacts related to geological resources may have the potential to be significant if the proposed project involves any of the following characteristics:

1. The project site or any part of the project is located on land having substantial geologic constraints, as determined by P&D or PWD. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. "Special Problems" areas designated by the Board of Supervisors have been established based on geologic constraints, flood hazards and other physical limitations to development.

2. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical.

3. The project proposes construction of a cut slope over 15 feet in height as measured from the lowest finished grade.

4. The project is located on slopes exceeding 20% grade.

Impact Discussion:

a. Potential to Result in Geologic Hazards. The project site is not underlain by any known fault. Compliance with pipeline construction regulations would reduce potential ground shaking impacts caused by movement along a distant fault to a less than significant level. There are no unstable soil areas on the site.

Liquefaction potential in the area has been determined to be low. Any potential for expansive soils would be mitigated by the use of non-expansive engineered fill. There are no soils-related hazards at the site. The proposed consistency rezone is an administrative action that would not result in any physical development.

b, i. Potential for Grading-Related Impacts. The project would not involve ~~any~~ grading. However, small amounts of excavation would be required for the proposed tie-in points ~~approximately 496 cubic yards of cut and 496 cubic yards of fill, which would have negligible impacts on the environment~~. The project site consists of an existing oil and gas facility ~~dirt road~~ which is relatively flat and consists of compacted soil due to regular vehicle use and maintenance of the facility. Following project completion, the site would be restored to its pre-construction condition.

c. Exposure to Rising Sea Level. The ~~project~~ proposed pipeline would be located in the Cuyama Valley, an inland area. The proposed consistency rezone is an administrative action that would not result in any physical development. Therefore, the project would not be exposed to rising sea levels.

e, f. Potential Erosion and Sedimentation Impacts. The project would not involve any grading. Excavation ~~Grading operations~~ required for the proposed tie-in points would be minimal, and would not increase the potential for erosion and sedimentation impacts~~that would occur on the project site would remove vegetative cover and disturb the ground surface, thereby increasing the potential for erosion and sedimentation impacts. However, the potential for the project to cause substantial erosion and sediment transport would be adequately mitigated by the County's standard erosion control and drainage requirements.~~

d, g, h, j, k, l. Other Potential Geological Hazards. There are no unique geological features located on the project site, and the project would not result in the use of septic systems. The project would not involve mining, the loss of topsoil, or construction-related vibrations.

Cumulative Impacts:
Since the project would not result in significant geologic impacts, it would not have a cumulatively considerable effect on geologic hazards within the County.

4.9 HAZARDOUS MATERIALS/RISK OF UPSET

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. In the known history of this property, have there been any past uses, storage or discharge of hazardous materials (e.g., fuel or oil stored in underground tanks, pesticides, solvents or other chemicals)?			X		
b. The use, storage or distribution of hazardous or toxic materials?			X		
c. A risk of an explosion or the release of hazardous substances (e.g., oil, gas, biocides, bacteria, pesticides, chemicals or radiation) in the event of an accident or upset conditions?			X		
d. Possible interference with an emergency response plan or an emergency evacuation plan?				X	
e. The creation of a potential public health hazard?			X		
f. Public safety hazards (e.g., due to development near chemical or industrial activity, producing oil wells, toxic disposal sites, etc.)?			X		
g. Exposure to hazards from oil or gas pipelines or oil well facilities?			X		

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
h. The contamination of a public water supply?				X	

Threshold:
The County's safety threshold addresses involuntary public exposure from projects involving significant quantities of hazardous materials. The threshold addresses the likelihood and severity of potential accidents to determine whether the safety risks of a project exceed significant levels.

Impact Discussion:

a-h. Potential Hazardous Materials/Risk of Upset Impacts. The proposed project would result in the construction and operation of an above-ground ~~3-inch, buried~~ natural gas pipeline (1,125-ft). The proposed pipeline would connect two existing pipelines (3- and 8-inches) and transport natural gas from E&B Natural Resources' existing facility in the State-Designated Russell Ranch Oilfield to its existing South Cuyama Gas Plant in the State-Designated South Cuyama Oilfield. Prior to entering the inter-field pipeline, the raw natural gas would be treated at E&B's Russell Ranch Field facility to remove toxic impurities such as Hydrogen Sulfide (H2S) from the gas to non-hazardous levels. The temporary storage of acetylene and oxygen on-site during the three-day construction period would not result in significant hazardous materials or waste impacts. Traffic that would be generated by the project would not substantially interfere with emergency response capabilities to the project site or to other properties in the project area.

The existing Cuyama Pumping Station ~~Plains~~ (PS) facility includes the storage and transport of crude oil production and gas. The property contains two, previously idled buried pipelines (3- and 8-inches). According to the applicant, these pipelines were historically used to transport natural gas and/or crude oil production.

~~Prior to project construction, the applicant would be required to perform a Hazardous Risk Assessment to identify potential impacts associated with the transport of natural gas (Fire Department Memorandum dated November 13, 2014).~~ The proposed natural gas pipeline would transport natural gas at a low pressure (400 psig). The existing 3-inch and 8-inch pipelines recently passed hydrostatic testing and were proven to be in operational condition. Once all sections of the pipe are connected, a final hydrostatic test would be completed to ensure line integrity and ~~County~~ approval by the County Petroleum Unit would be required. The Petroleum Unit has monitoring authority over the inter-field line under Chapter 25 (Petroleum Code), Section 25-28 of the Santa Barbara County Code. All of the pipelines, valves, and fittings under the proposed project would be tested and proven safe to operate before being put into service and held to current industry standards.

Several regulatory bodies share regulatory authority over the pipeline to ensure its safe condition and operation, including the Santa Barbara County Planning and Development Department, the County Petroleum Unit, and the U.S. Department of Transportation Pipeline Hazardous Materials Safety Administration (PHMSA). PHMSA has regulatory authority over the pipeline pursuant to federal laws, including the Natural Gas Pipeline Safety Act of 1968. The County Petroleum Unit has authority to monitor the condition of the pipeline and order necessary repairs pursuant to Chapter 25, Section 25-28 of the Santa Barbara County Code. The County Planning and Development Department also has monitoring authority over the pipeline to ensure compliance with the project description condition included in the project conditions of approval in Attachment B, which the County evaluated under the California Environmental Quality Act (CEQA) and serves to address public safety and environmental impacts. Finally, the project would be subject to safety monitoring and oversight by the County System Safety Reliability Review Committee (SSRRC) to the extent that it affects operations at the South Cuyama Gas Plant.

The proposed pig launcher and receiver valves would allow E&B Natural Resources to perform maintenance activities necessary for safe operation and quality control of the entire length of the pipeline, once installed. Specifically, the valves would allow for pipeline shutdown, isolating leaks, and the use of smart pigs which are specialized devices that detect for potential leaks, corrosion, and scale, and identify areas on the pipeline that may need maintenance work. E&B would also implement the following safety measures to ensure the safe condition and operations of the entire length of the inter-field pipeline: Cathodic protection to prevent corrosion; hydro-testing of the line to detect for leaks; installation and use of a Supervisory Control and Data Acquisition (SCADA) system to actively monitor pipeline conditions; pigging operations to clear pipeline debris and detect for anomalies; flow meters to control balance; and other measures to prevent and monitor corrosion in the existing portions of the line.

Given the low pressure of the proposed pipeline, the safe content of natural gas before it enters the pipeline, the safe condition of the existing and proposed infrastructure, and required maintenance of the pipeline to ensure safe operation, there are no aspects of the proposed use that would include or involve hazardous materials at levels that would constitute a hazard to human health or the environment. In addition, the applicant would be required to clean up any release of hazardous materials immediately.

The proposed consistency rezone is an administrative action that would not result in any physical development. Therefore, the proposed rezone would not result in impacts associated with hazardous materials or risk of upset.

Cumulative Impacts:
Since the project would not create significant impacts with respect to hazardous materials and/or risk of upset, it would not have a cumulatively considerable effect on safety within the County.

Mitigation and Residual Impact: No impacts are identified. No mitigations are necessary.

4.10 HISTORIC RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Adverse physical or aesthetic impacts on a structure or property at least 50 years old and/or of historic or cultural significance to the community, state or nation?				X	
b. Beneficial impacts to an historic resource by providing rehabilitation, protection in a conservation/open easement, etc.?				X	

Impact Discussion: No structures or formal landscape features currently exist on the project site. The proposed development does not include the demolition or alteration of structures in excess of 50 years in age. Nor would the project alter the contextual nature of the site in a manner which would significantly degrade the historical significance of the existing structure(s). The proposed rezone is an administrative action that would not result in any physical changes to the project site. As a result, no impacts to historic resources are anticipated.

Mitigation and Residual Impact: No impacts are identified. No mitigations are necessary.

4.11 LAND USE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Structures and/or land use incompatible with existing land use?				X	
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X	
c. The induction of substantial growth or concentration of population?				X	
d. The extension of sewer trunk lines or access roads with capacity to serve new development beyond this proposed project?				X	
e. Loss of existing affordable dwellings through demolition, conversion or removal?				X	
f. Displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X	
g. Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X	
h. The loss of a substantial amount of open space?				X	
i. An economic or social effect that would result in a physical change? (i.e. Closure of a freeway ramp results in isolation of an area, businesses located in the vicinity close, neighborhood degenerates, and buildings deteriorate. Or, if construction of new freeway divides an existing community, the construction would be the physical change, but the economic/social effect on the community would be the basis for determining that the physical change would be significant.)				X	
j. Conflicts with adopted airport safety zones?				X	

Impact Discussion:

As part of the project, the subject parcel would be rezoned from U (Unlimited Agriculture) under outdated Ordinance 661 to AG-II-40 under the current Santa Barbara County Land Use and Development Code (LUDC). The subject parcel is zoned for agricultural use and would remain zoned for agricultural use. All types of agriculture allowed under the current U (Unlimited Agriculture) zone district would be allowed under the AG-II-40 zone district. The proposed project would not cause a physical change that conflicts with adopted environmental policies or regulations. The project is not growth inducing, and does not result in the loss of affordable housing, loss of open space, or a significant displacement of people. The project does not involve the extension of a sewer trunk line, and does not conflict with any airport safety zones. The project is compatible with existing land uses.

4.12 NOISE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Long-term exposure of people to noise levels exceeding County thresholds (e.g. locating noise sensitive uses next to an airport)?				X	
b. Short-term exposure of people to noise levels exceeding County thresholds?		X			
c. Project-generated substantial increase in the ambient noise levels for adjoining areas (either day or night)?				X	

Setting/Threshold: Noise is generally defined as unwanted or objectionable sound which is measured on a logarithmic scale and expressed in decibels (dB(A)). The duration of noise and the time period at which it occurs are important values in determining impacts on noise-sensitive land uses. The Community Noise Equivalent Level (CNEL) and Day-Night Average Level (L_{dn}) are noise indices which account for differences in intrusiveness between day- and night-time uses. County noise thresholds are: 1) 65 dB(A) CNEL maximum for exterior exposure, and 2) 45 dB(A) CNEL maximum for interior exposure of noise-sensitive uses. Noise-sensitive land uses include: residential dwellings; transient lodging; hospitals and other long-term care facilities; public or private educational facilities; libraries, churches; and places of public assembly.

The proposed project site is located outside of 65 dB(A) noise contours for roadways, public facilities, airport approach and take-off zones. Surrounding noise-sensitive uses consist of a residential community located across from the project site on the north side of State Highway 166.

Impact Discussion:

(a, c) The proposed project consists of construction and operation of an above-ground ~~3-inch, buried~~ natural gas pipeline and a consistency rezone. The proposed project would not result in: 1) the long-term generation of any noise exceeding County thresholds; or 2) substantially increase ambient noise levels in adjoining areas; or 3) exposure of noise sensitive uses on the proposed project site to off-site noise levels exceeding County thresholds. No noise-related impacts would result from long-term operation of the pipeline. The proposed rezone is an administrative action that would not result in any physical development or noise impacts.

(b) The proposed pipeline ~~project~~ would be located within 1,600-feet (approximately 460-feet) from residential uses north of State Highway 166. Construction activities would occur for approximately three days. Noise from ~~grading and~~ construction activities~~activity~~ could result in short-term noise impacts exceeding County thresholds. Limiting construction activities to weekdays before the hours of 7 AM to 4 PM only would mitigate this impact to less than significant (Noise Mitigation Measure 1). The proposed rezone is an administrative action that would not result in any physical development or noise impacts.

Cumulative Impacts:
The implementation of the project is not anticipated to result in any substantial noise effects. Therefore, the project would not contribute in a cumulatively considerable manner to noise impacts.

Mitigation and Residual Impact: The following mitigation measures would reduce the project's noise effects to a less than significant level:

1. **Noise-02 Construction Hours.** The Owner /Applicant, including all contractors and subcontractors shall limit construction activity, including equipment maintenance and site preparation, to the hours between 7:00 a.m. and 4:00 p.m. Monday through Friday. No

construction shall occur on weekends or State holidays. Non-noise generating interior construction activities such as plumbing, electrical, drywall and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) are not subject to these restrictions. Any subsequent amendment to the Comprehensive General Plan, applicable Community or Specific Plan, or Zoning Code noise standard upon which these construction hours are based shall supersede the hours stated herein. **PLAN REQUIREMENTS:** The Owner/Applicant shall provide and post a sign stating these restrictions at all construction site entries. **TIMING:** Signs shall be posted prior to commencement of construction and maintained throughout construction. **MONITORING:** The Owner/Applicant shall demonstrate that required signs are posted prior to Zoning Clearance issuance and pre-construction meeting. P&D permit compliance staff shall spot check and respond to complaints.

With the incorporation of these measures, residual impacts would be less than significant.

4.13 PUBLIC FACILITIES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. A need for new or altered police protection and/or health care services?				X	
b. Student generation exceeding school capacity?				X	
c. Significant amounts of solid waste or breach any national, state, or local standards or thresholds relating to solid waste disposal and generation (including recycling facilities and existing landfill capacity)?				X	
d. A need for new or altered sewer system facilities (sewer lines, lift-stations, etc.)?				X	
e. The construction of new storm water drainage or water quality control facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X	

Impact Discussion:

The proposed project would result in the construction and operation of an above-ground ~~3-inch, buried~~ natural gas pipeline (1,125-ft) and associated equipment (two tie-in points and pig launcher/receiver valves, condensate drop-out, gas meter, basket strainer) and a consistency rezone. This level of new development would not have a significant impact on existing police protection or health care services. Existing service levels would be sufficient to serve the proposed project. The proposed project would not generate solid waste in excess of County thresholds. The project would not cause the need for new or altered sewer system facilities as it is already in the service district, and the District has adequate capacity to serve the project. No additional drainages or water quality control facilities would be necessary to serve the project. The proposed rezone is an administrative action that would not result in any physical changes to the project site or require the use of public facilities. Therefore, the project would have no impact to public facilities.

Mitigation and Residual Impact: No impacts are identified. No mitigation is necessary.

4.14 RECREATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Conflict with established recreational uses of the area?				X	
b. Conflict with biking, equestrian and hiking trails?				X	
c. Substantial impact on the quality or quantity of existing recreational opportunities (e.g., overuse of an area with constraints on numbers of people, vehicles, animals, etc. which might safely use the area)?				X	

Impact Discussion:

(a,b) The proposed project site is not located on or near any established recreational uses, including biking, equestrian or hiking trails. No adverse impacts would result.

(c) The proposed project would not result in any population increase and would have no adverse impacts on the quality or quantity of existing recreational opportunities, either in the project vicinity or County-wide.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would be less than significant.

4.15 TRANSPORTATION/CIRCULATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Generation of substantial additional vehicular movement (daily, peak-hour, etc.) in relation to existing traffic load and capacity of the street system?				X	
b. A need for private or public road maintenance, or need for new road(s)?				X	
c. Effects on existing parking facilities, or demand for new parking?				X	
d. Substantial impact upon existing transit systems (e.g. bus service) or alteration of present patterns of circulation or movement of people and/or goods?				X	
e. Alteration to waterborne, rail or air traffic?				X	
f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians (including short-term construction and long-term operational)?			X		
g. Inadequate sight distance?				X	
ingress/egress?				X	
general road capacity?				X	
emergency access?				X	
h. Impacts to Congestion Management Plan system?				X	

Impact Discussion:

The proposed project is limited to the construction and operation of an above-ground ~~3-inch, buried~~ natural gas pipeline (1,125-ft) and associated equipment (two tie-in points and pig launcher/receiver valves, condensate drop-out, gas meter, basket strainer) and a consistency rezone, and, as such, would not increase long-term, operational vehicular traffic to or from the site nor would it affect roadways; parking facilities; pedestrian, bicycle, or transit access; or any other type of transportation facility on a long-term, operational basis. The processing of natural gas from the Russell Ranch Field facility at the South Cuyama Gas Plant would represent a de minimis increase in natural gas processing and would not result in additional truck trips to or from the Plant. Construction activities for the pipeline would occur for approximately three days. The site would be accessed ~~via Alise Canyon Road and an existing gravel road~~ directly from Highway 166. The Cuyama Pumping Station (PS) facility ~~roadway~~ would be closed to the property owner during the three-day construction period. Project-related vehicles and equipment would be located onsite within the gated facility during construction and would not increase traffic hazards. The proposed rezone is an administrative action that would not result in any physical changes to the project site or traffic-related impacts. The project's effect on transportation modes would therefore be less than significant.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would be less than significant.

4.16 WATER RESOURCES/FLOODING

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?				X	
b. Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff?				X	
c. Change in the amount of surface water in any water body?				X	
d. Discharge, directly or through a storm drain system, into surface waters (including but not limited to wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc) or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution?				X	
e. Alterations to the course or flow of flood water or need for private or public flood control projects?				X	
f. Exposure of people or property to water related hazards such as flooding (placement of project in 100 year flood plain), accelerated runoff or tsunamis, sea level rise, or seawater intrusion?				X	
g. Alteration of the direction or rate of flow of groundwater?				X	
h. Change in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or recharge interference?				X	
i. Overdraft or over-commitment of any groundwater basin? Or, a significant increase in the existing overdraft or over-commitment of any groundwater basin?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
j. The substantial degradation of groundwater quality including saltwater intrusion?				X	
k. Substantial reduction in the amount of water otherwise available for public water supplies?				X	
l. Introduction of storm water pollutants (e.g., oil, grease, pesticides, nutrients, sediments, pathogens, etc.) into groundwater or surface water?				X	

Impact Discussion:

The project would not result in impacts on surface water quality, including storm water runoff, direction or course of surface or ground water or the direction, volume, or frequency of runoff. There is an adequate supply of water for the project and the project would not contribute to overdraft of groundwater resources. The proposed rezone is an administrative action that would not result in any physical changes to the project site.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would be less than significant.

5.0 INFORMATION SOURCES

5.1 County Departments Consulted

Police, Fire, Public Works, Flood Control, Parks, Environmental Health, APCD, Regional Programs, Other: _____

5.2 Comprehensive Plan

X	Seismic Safety/Safety Element	____	Conservation Element
____	Open Space Element	____	Noise Element
____	Coastal Plan and Maps	____	Circulation Element
____	ERME	X	Land Use Element

5.3 Other Sources

X	Field work	____	Ag Preserve maps
X	Calculations	____	Flood Control maps
X	Project plans	X	Other technical references (reports, survey, etc.)
____	Traffic studies	X	Planning files, maps, reports
X	Records	X	Zoning maps
X	Grading plans	X	Soils maps/reports
____	Elevation, architectural renderings	X	Plant maps
X	Published geological map/reports	X	Archaeological maps and reports
X	Topographical maps	X	Other P&D Biologist (John Storrer); P&D Archaeologist (Joyce Gerber)

6.0 PROJECT SPECIFIC *(short- and long-term)* AND CUMULATIVE IMPACT SUMMARY

Class I Impacts: None

Class II Impacts: Aesthetic/Visual Resources, Air Quality, Biological Resources, Cultural Resources, Noise

7.0 MANDATORY FINDINGS OF SIGNIFICANCE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
1. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, contribute significantly to greenhouse gas emissions or significantly increase energy consumption, or eliminate important examples of the major periods of California history or prehistory?		X			
2. Does the project have the potential to achieve short-term to the disadvantage of long-term environmental goals?				X	
3. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects and the effects of probable future projects.)				X	
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X	
5. Is there disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR ?				X	

1. As discussed in Sections 4.4, 4.5, and 4.12 of this document, the proposed pipeline ~~project~~ has the potential to substantially degrade the quality of the environment. Implementation of mitigation measures proposed in these sections would reduce potential impacts to less than significant levels. The proposed rezone is an administrative action that would not result in any physical changes to the project site or changes regarding the allowable uses of land that could affect sensitive species and habitats. The subject parcel is currently zoned for agricultural uses and would remain zoned for agricultural uses. Therefore, the project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a

plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, contribute significantly to greenhouse gas emissions or significantly increase energy consumption, or eliminate important examples of the major periods of California history or prehistory.

2. The proposed project would include construction and operation of an above-ground ~~3-inch, buried~~ natural gas pipeline 1,125-feet in length and associated above-ground equipment ~~including~~ (i.e. pig launcher and receiver valves and two tie-in-points, a condensate drop-out, a gas meter, and a basket strainer), and a consistency rezone. The proposed rezone is an administrative action that would not result in any physical changes to the project site or changes regarding the allowable uses of land that could affect long-term environmental goals. The subject parcel is currently zoned for agricultural uses and would remain zoned for agricultural uses. The project does not have the potential to achieve short-term, to the disadvantage of long-term environmental goals.

3. The proposed project would include construction and operation of an above-ground ~~3-inch, buried~~ natural gas pipeline 1,125-feet in length and associated above-ground equipment ~~including~~ (i.e. pig launcher and receiver valves and two tie-in-points, a condensate drop-out, gas meter, and a basket strainer), and a consistency rezone. The proposed pipeline ~~project~~ would be located within an ~~existing dirt roadway adjacent to an~~ existing oil and gas development facility and all project construction activities would occur within previously disturbed areas of the gated facility. ~~The project would cover a total footprint of 0.06 acres.~~ Following project completion, the proposed pipeline would be subject to applicable regulations and safety standards. The proposed rezone is an administrative action that would not result in any physical changes to the project site. Rezoning the subject parcel from an outdated U (Unlimited Agriculture) zone district under Zoning Ordinance 661 with the current AG-II-40 zoning under the County Land Use and Development Code (LUDC) would be consistent with the land use designation of the parcel under the County's Comprehensive Plan. Due to the limited nature of the proposed project and the fact that it would be conditioned for consistency with the County's Comprehensive Plans, the project would not result in impacts that are individually limited, but cumulatively considerable.

4. The proposed project would include construction and operation of an above-ground ~~3-inch, buried~~ natural gas pipeline and associated above-ground equipment ~~including~~ (i.e. pig launcher and receiver valves and two tie-in points, a condensate drop-out, gas meter, gas meter, and a basket strainer), and a consistency rezone. All of the pipelines, valves, and fittings under the proposed project would be tested and proven safe to operate before being put into service and held to current industry standards. The proposed pipeline would not result in the use, storage or distribution of hazardous or toxic materials, since toxic impurities would be removed from the raw natural gas before it enters the inter-field pipeline. The proposed natural gas pipeline would transport natural gas at a low pressure. The applicant would implement several safety measures to ensure the safe condition and operations of the inter-field pipeline, including cathodic protection to prevent corrosion; hydro-testing of the line to detect for leaks; a Supervisory Control and Data Acquisition (SCADA) system to actively monitor pipeline conditions; pigging operations to clear pipeline debris and detect for anomalies; flow meters to control balance; and other measures to prevent and monitor existing corrosion. The entire length of the inter-field pipeline would be subject to oversight and safety monitoring by the County Petroleum Unit, pursuant to Chapter 25 (Petroleum Code), Section 25-28 of the Santa Barbara County Code, and the federal Department of Transportation Pipeline Hazardous Materials Safety Administration (PHMSA), pursuant to the Natural Gas Pipeline Safety Act of 1968. The County Planning and Development Department would monitor the pipeline for compliance with conditions of project approval included as Attachment B, which the County imposed through the California Environmental Quality Act (CEQA) environmental review process to mitigate public safety and environmental impacts to less than County significance levels. In addition, the County System Reliability Review Committee (SSRRC) would monitor the project to the extent that it affects operations at the South Cuyama Gas Plant. The project can be accessed by fire protection and emergency response personnel. The proposed rezone is an administrative action that would not result in any physical changes to the

project site or changes regarding the allowable uses of land. The subject parcel is currently zone for agricultural use and would remain zoned for agricultural use. Given the low pressure of the proposed pipeline, the safe content of the natural gas, and the safe condition of the existing and proposed infrastructure due to regulatory oversight of the pipeline, the proposed project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

5. There are no disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR associated with the proposed project. The biological assessment prepared by Robert A. Booher Consulting Environmental Planning and Management, dated July 2014 was peer-reviewed by a P&D Biologist and found to meet the County's guidelines for preparation of a biological report and to be adequate for the project. A Phase I Cultural Resource Assessment dated May 21, 2014 and a supplemental report dated November 25, 2014 were prepared by archaeologist David Brunzell and peer-reviewed by the P&D Archaeologist. The studies were found to meet the County's guidelines for preparation of a cultural resources report and to be adequate for the project. The proposed rezone is an administrative action that would not result in any physical changes to the project site or changes regarding the allowable uses of land which would result in environmental impacts.

9.0 INITIAL REVIEW OF PROJECT CONSISTENCY WITH APPLICABLE SUBDIVISION, ZONING AND COMPREHENSIVE PLAN REQUIREMENTS

Land Use Element Historical/Archaeological Sites Policy 2: *When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.*

Land Use Element Visual Resource Policy 2: *In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.*

Safety Element Gas Pipeline Safety Policy 3-A: *New pipelines, or existing pipeline relocations, shall be routed to avoid significant risk to populated areas where feasible. New pipelines, or existing pipeline relocations, shall also be routed to prevent significant risk to highly sensitive land uses as defined in this chapter, unless the risk can be rendered insignificant via other measures.*

Safety Element Gas Pipeline Safety Policy 4-A: *In a manner consistent with applicable law, the County shall condition discretionary land-use approvals of new gas pipelines to require safe design, including technology to prevent failure and reduce the consequences of failure. Examples include proven controls for preventing internal and external corrosion and fractures; proven leak detection; safe venting systems; appropriate capabilities for shutting the pipeline down and isolating the pipeline leak; and effective, public warning systems.*

Safety Element Gas Pipeline Safety Policy 4-B: *The County shall condition discretionary land-use approvals of new or substantially upgraded gas pipelines to require a Safety Inspection, Maintenance, Quality Assurance Program or similar mechanism to ensure adequate inspection (including smart pigs), maintenance, and other operating procedures. Any such mechanism shall meet the approval of County permitting agencies prior to commencement of pipeline operations and provide for systematic updates also subject to County approval.*

Safety Element Gas Pipeline Safety Policy 4-C: *For pipelines associated with new production of natural gas, the County shall require feasible operating methods for reducing the hazard along the pipeline corridor that are commensurate with the level of risk.*

~~*Safety Element Gas Pipeline Safety Policy 5-C: Unless infeasible, new subsurface pipelines, or relocation of existing subsurface pipeline, shall be buried at an appropriate depth, taking into consideration effects of erosion, scouring, and other forms of natural or human-caused earth movement. A minimum burial depth shall be maintained for the entire operating life of the pipelines.*~~

Safety Element Gas Pipeline Safety Policy 5-D: *New pipelines, or relocation of existing pipelines, shall include measures to clearly warn outside parties about the presence of a gas pipeline, including proper marking of the right-of-way with signage and use of brightly colored warning tape approximately one foot above buried pipelines where feasible.*

10.0 RECOMMENDATION BY P&D STAFF

On the basis of the Initial Study, the staff of Planning and Development:

_X_ Finds that the proposed project WILL NOT have a significant effect on the environment and, therefore, recommends that a Negative Declaration (ND) be prepared.

_____ Finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures incorporated into the REVISED PROJECT DESCRIPTION would successfully mitigate the potentially significant impacts. Staff recommends the preparation of an ND. The ND finding is based on the assumption that mitigation measures will be acceptable to the applicant; if not acceptable a revised Initial Study finding for the preparation of an EIR may result.

_____ Finds that the proposed project MAY have a significant effect on the environment, and recommends that an EIR be prepared.

_____ Finds that from existing documents (previous EIRs, etc.) that a subsequent document (containing updated and site-specific information, etc.) pursuant to CEQA Sections 15162/15163/15164 should be prepared.

Potentially significant unavoidable adverse impact areas:

_____ With Public Hearing ___X___ Without Public Hearing

PREVIOUS DOCUMENT:

PROJECT EVALUATOR: Christine Louie **DATE:** _____

11.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

_X_ I agree with staff conclusions. Preparation of the appropriate document may proceed.
_____ I DO NOT agree with staff conclusions. The following actions will be taken:
_____ I require consultation and further information prior to making my determination.

SIGNATURE: _____ **INITIAL STUDY DATE:** _____

SIGNATURE: _____ **NEGATIVE DECLARATION DATE:** _____

SIGNATURE: _____ REVISION DATE: 9/9/15

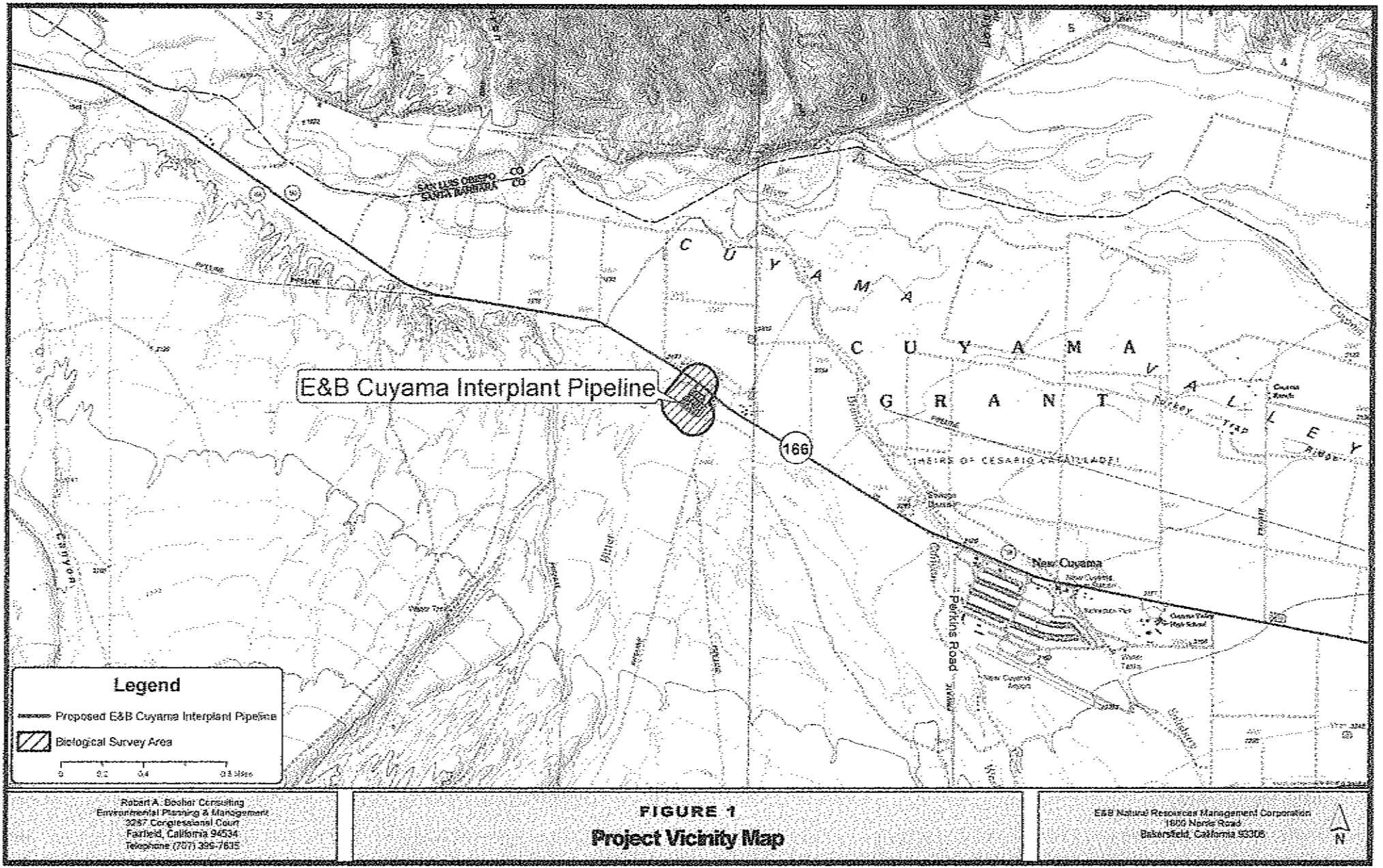
SIGNATURE: _____ FINAL NEGATIVE DECLARATION DATE: _____

12.0 ATTACHMENTS

1. Vicinity Map
2. Site Plan
3. Facility Site Plan
4. Location Map
5. ~~Grading Plan~~
6. ~~Photographs~~
5. Technical Air Quality Impact Report
6. Public Comment Letter dated April 29, 2015

G:\GROUP\PERMITTING\Case Files\DVP\14 Cases\14DVP-00000-00018 E&B Natural Resources\CEQA\Proposed Final MND\Final MND 9-09-15

ATTACHMENT 1: VICNITY MAP



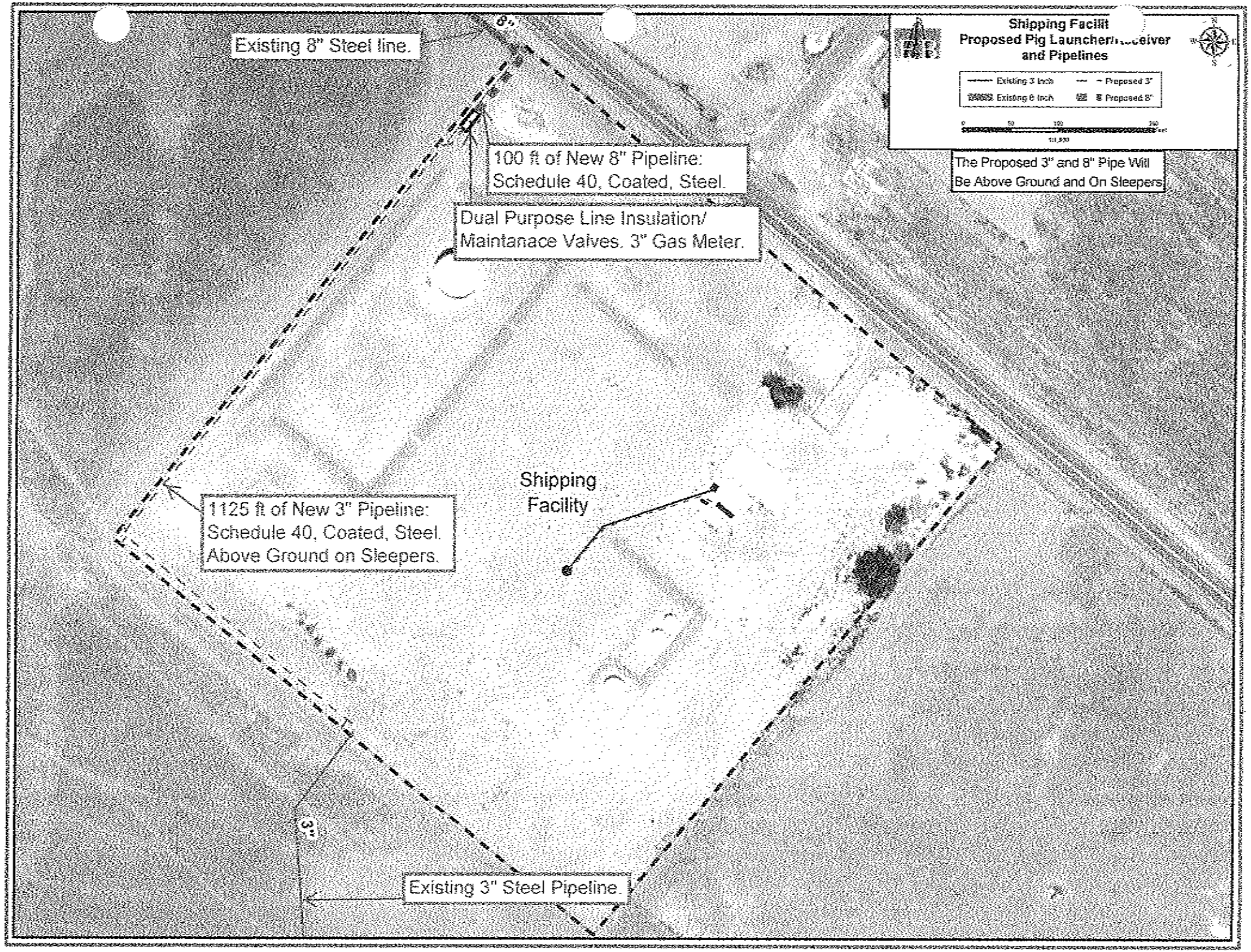
Robert A. Booher Consulting
Environmental Planning & Management
3287 Congressional Court
Fairfield, California 94534
Telephone (707) 399-7635

FIGURE 1

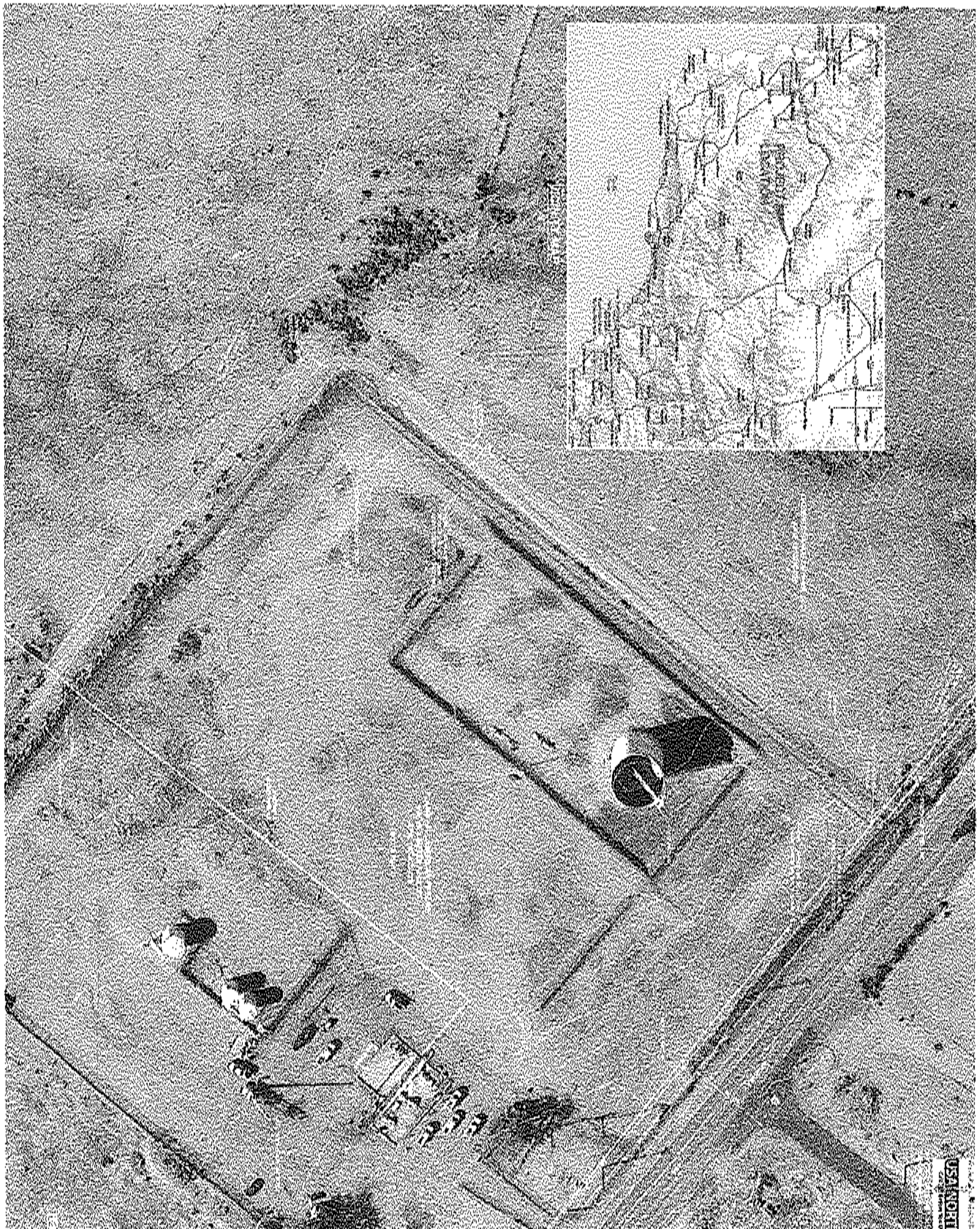
Project Vicinity Map

E&B Natural Resources Management Corporation
1600 Norris Road
Bakersfield, California 93308

ATTACHMENT 2: SITE PLAN


Existing 8" Steel line.
100 ft of New 8" Pipeline:
Schedule 40, Coated, Steel.
Dual Purpose Line Insulation/
Maintanace Valves. 3" Gas Meter.
1125 ft of New 3" Pipeline:
Schedule 40, Coated, Steel.
Above Ground on Sleepers.
Shipping
Facility
Existing 3" Steel Pipeline.
Shipping Facilit
Proposed Pig Launcher/Receiver
and Pipelines
Existing 3 Inch
Proposed 3"
Existing 8 Inch
Proposed 8"
The Proposed 3" and 8" Pipe Will
Be Above Ground and On Sleepers

ATTACHMENT 3: FACILITY SITE PLAN

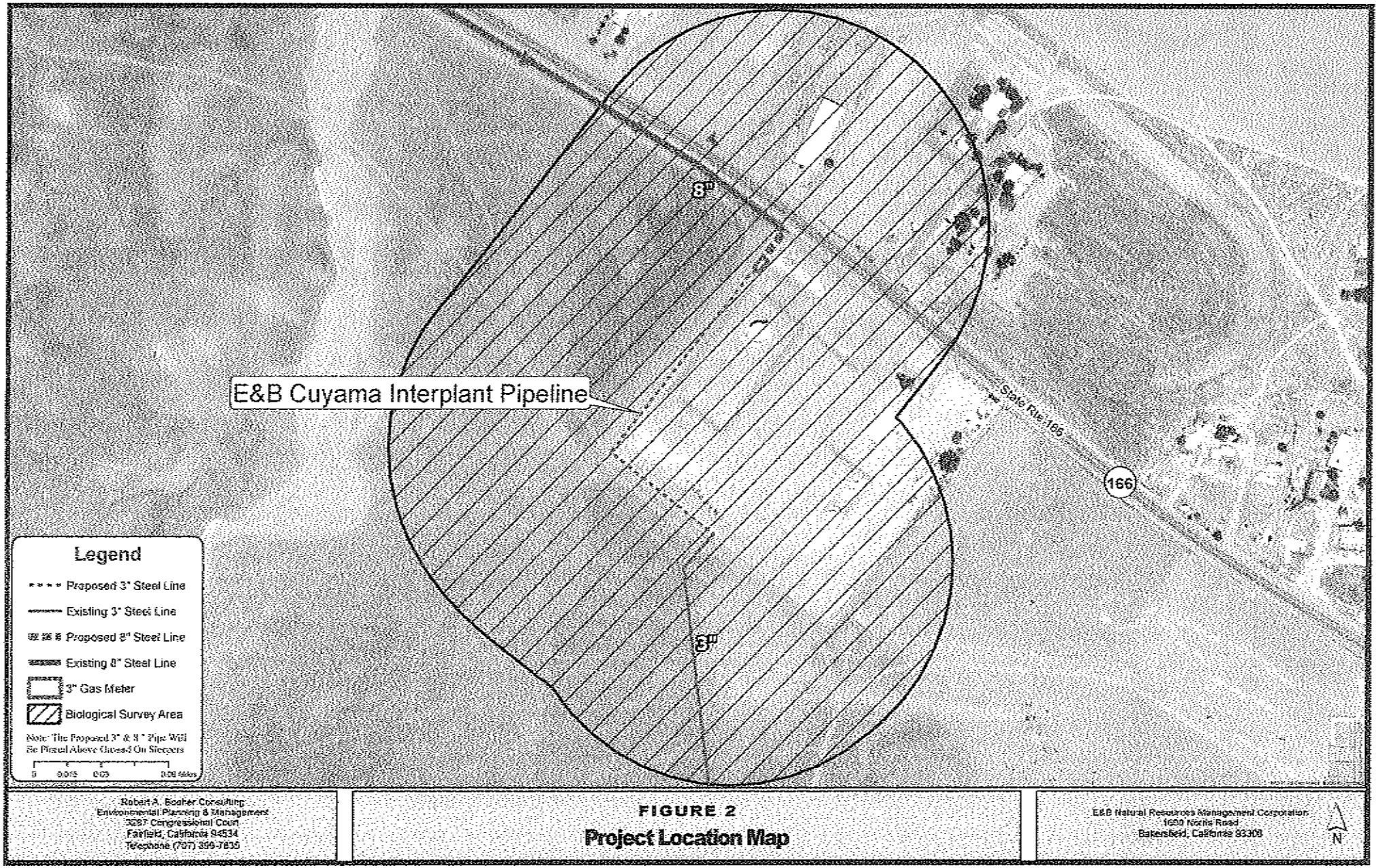


E & B NATURAL RESOURCES
PROPOSED PIPELINE
SITE PLAN
SANTA BARBARA COUNTY, CA.

1

LANDMARK
SURVEYING & ENGINEERING

ATTACHMENT 4: LOCATION MAP



Robert A. Booher Consulting
Environmental Planning & Management
3087 Congressional Court
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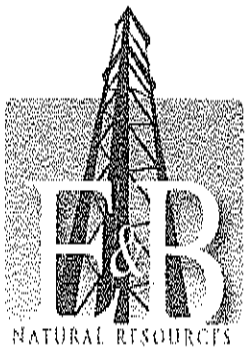
Telephone (707) 399-7835

FIGURE 2

Project Location Map

E&B Natural Resources Management Corporation
1600 Norris Road
Bakersfield, California 93308

ATTACHMENT 5: TECHNICAL AIR QUALITY IMPACT REPORT



E&B Natural Resources Corporation
SCU/RRU Interplant Produced Gas Gathering Pipeline Project

Prepared for:

E&B Natural Resources Corporation
3000 James Road
Bakersfield, CA 93308

Prepared by:

M. F. Strange & Associates, Inc.
105 E. De La Guerra Street Suite 10
Santa Barbara CA 93101

Submitted to:

Santa Barbara County
Planning and Development
Energy and Minerals Division
123 East Anapamu Street
Santa Barbara CA 93101

July 2015

E&B Natural Resources Corporation
SCU/RRU Interplant Produced Gas Gathering Pipeline Project
Project Description – July 2015 Supplemental

1.0 Overview

E&B Natural Resources (E&B) is re-establishing a natural gas gathering pipeline from the Russell Ranch Unit (RRU) in San Luis Obispo County to E&B's Gas Plant #10 (GP10) in Santa Barbara County. This pipeline will be used to transport produced gas from the RRU to the gas plant for processing. With the exception of approximately 1125 feet, this entire pipeline will be comprised of existing, unutilized, pipelines.

2.0 Russell Ranch Compressor Plant, San Luis Obispo County

Within E&B's Russell Ranch Compressor Plant, located within San Luis Obispo County, an existing four inch pipeline will be used to connect the RRU compressor plant in San Luis Obispo County to an existing six inch pipeline at the RRU Central Tank Farm in Santa Barbara County.

The existing gas compressor will be utilized to transport the gas through this pipeline. However, since the dynamics associated with processing the gas will change as a result of this pipeline project, the compressor's suction scrubber will be enlarged and a new discharge scrubber and a fin-fan type of cooler will be added.

In addition to the upgrades to the gas compression system, a gas meter and a dual purpose isolation valve will be located at the RRU compressor plant. The meter will be used to monitor the pipeline operations and be used as a means of performing a pipeline mass balance to monitor for losses along the pipeline route (a second meter will also be installed at the GP10 end of the pipeline for mass balance comparison).

The dual purpose isolation valve on this four inch line will allow for this segment of the pipeline to be isolated for maintenance purposes. The secondary function of this valve allows for specialized pigs to be inserted into the pipeline for maintenance.

3.0 Russell Ranch Central Tank Farm, Santa Barbara County

The existing four inch line from the RRU compressor plant enters the RRU Central Tank farm where it is fitted with another dual purpose isolation valve. Once again, these valves are necessary in order to perform maintenance on the various pipeline sections and isolate the specific sections of the pipeline for safety shutdown purposes.

At the RRU Central Tank Farm the four inch line will be connected with an existing six inch pipeline. This end of the six inch pipeline will also be fitted with a dual purpose isolation valve.

This six inch section of the pipeline exits the tank farm and traverses Highway 166 and then goes through the existing production operations of the RRU field until approximately Wasioja Road.

4.0 Highway 166 & Wasioja Road, Six Inch to Eight Inch Pipeline Transition

At this point the six inch pipeline is fitted with a dual purpose isolation valve and connected to an existing eight inch pipeline (through a second dual purpose isolation valve).

The eight inch pipeline runs parallel to highway 166 towards the Cuyama Pumping Station.

5.0 Cuyama Pumping Station, Eight Inch to Three Inch Pipeline Transition

In the past (the exact timing is unknown) the eight inch pipeline was connected to several pipelines within the Cuyama Pumping Station, including the three inch pipeline that E&B will use for the final leg of the interplant gas gathering pipeline leading to GP10. Since the original connection point between these lines is unknown, E&B will be constructing a new run of three inch pipeline to make this connection. This is the section of the pipeline project that is the subject of the current Development Plan and Mitigated Negative Declaration (Case Nos. 15NGD-00000-00007; 14DVP-00000-00018). This newly constructed three inch pipeline will traverse along the fence line of the Cuyama Pumping Station to connect with the existing three inch pipeline that goes directly to GP10.

Please refer to Attachment A for details on the construction emissions for this specific segment of the project. It should be noted that the project as described in the original LUP application had the pipeline running outside of the Cuyama Pumping Station fence line. The project has since been changed to run the new three inch pipeline along the inside of the fence line. This change eliminated the necessity to burry this section of the pipeline, hence the construction emissions shown in Attachment A are less than the emissions described in the original LUP application.

The transition between the eight inch pipeline and the new section of three inch pipeline will be made through another set of dual purpose isolation valves and bypass piping (eight and three inch dual purpose valves and strainer).

6.0 Pipeline Terminus on the South Cuyama Unit (SCU) at Gas Plant 10

The final existing three inch section of pipeline from the Cuyama Pumping station will carry the produced gas the remainder of the way to E&B's GP10 located within the South Cuyama Unit. At this location a final dual purpose isolation valve will be installed. This final isolation valve completes the segmentation of this entire pipeline into four individual, isolatable, segments (using eight individual dual purpose isolation valves). With the addition of the second gas meter at this location, monitoring of potential losses by mass balance is possible. Through pressure monitoring and segment isolation along the pipeline's path, the identification of possible leak locations is streamlined.

Downstream of the final isolation valve the pipeline will be connected to existing GP10 infrastructure. To prevent slugs of liquefied natural gasses (LNGs), condensed water and possible debris (corrosion by products) from traversing into the gas plant, a slug catcher will be added. The slug catcher is a pressure vessel that provides a 'wide-spot' in the pipeline for the liquids and debris to settle out. Since this component will be part of the SCU/GP 10 operations, and no grading will be required, E&B believes that the installation of this device is exempt from LUP per County Land Use & Development Code section 35.20.040.B.2.f *(Accessory equipment incidental to existing production facilities does not require a LUP where no grading or site expansion is required).*

7.0 Interplant Gas Gathering Pipeline Operating Emissions Summary

7.1 Fugitive emissions

E&B has estimated the fugitive emissions associated with this project using the Santa Barbara County APCD's Component Leak Path (CLP) methodology.

The component leak path counts that were used to estimate the fugitive emissions from this project are shown in Table 1. (Note: all of these leak paths are in gas/condensate service).

Please refer to Attachment B for details of these calculations, including the emission factors used and the control efficiency applied. (Note: an 80% control efficiency was applied for incorporating these components into the SCU and RRU I&M programs).

Table 1
Russell Ranch Interplant Gas Gathering Pipeline Project
Device Summary

Site Description	*Device ID(s)*	*Device Location*	*Device Description*	*Device Details for Fugitive Emission Calcs*
Compressor Site	PV1, V203B	SLO - RRU Compressor Plant	4" Pig Valve, By-pass piping, Upgraded compressor scrubber, Gas Metering	32 Valves, 101 Flanges & connections, & 2 PRV's
Maintenance Site	PV2, S1, PV3	SB - RRU Central Tk Farm	4" Pig Valve, 6" Strainer, 6" Pig Valve & by-pass piping	7 Valves, 28 Flanges & Connections
Maintenance Site	PV4, S2, PV5	SB - Wasioja Road	6" Pig Valve, 8" Strainer, 8" Pig Valve & by-pass piping	7 Valves, 28 Flanges & Connections
Maintenance Site	PV6, S3, PV7	SB - Cuyama Pumping Station	6" Pig Valve, 8" Strainer, 3" Pig Valve & by-pass piping	9 Valves, 40 Flanges & Connections
Pipeline Terminus	PV8, V204	SB - SCU/Adjacent to GP10	3" Pig Valve, Slug Catcher, By-pass piping, Gas metering	21 Valves, 59 Flanges & Connections, 1 PSV

7.2 Pigging Emissions

To estimate the quantity of ROC emissions from one pigging event, the internal volume of the pig valve was used (Note: the volume displaced by the pig itself is ignored to calculate the worst case scenario emissions). During a single pigging event, each valve will be opened three times, releasing gaseous contents into the atmosphere.

Due to the changing diameters of the pipeline, and as a result of working pressure losses, the pressures across this pipeline are predicted to vary. E&B's project engineering staff has provided the estimates of pipeline pressures as shown in Table 2. Whenever a pig valve or line strainer is vented, the volume vented is limited by the physical geometry of the device. These volumes have also been calculated by E&B's project engineering staff and are also referenced in Table 2.

Using Boyles's Gas Law, the STP volume of the gas that may be released to atmosphere when this pig valves or strainers are opened was determined as follows:

$$P_1V_1 = P_2V_2, \qquad \textit{(eq 1)}$$

Where,

P_1 & V_1 are the system pressure and volume, and
P_2 & V_2 are Standard Pressure and Volume

Therefore,

$$V_2 = (P_1V_1)/P_2 \qquad \textit{(eq 2)}$$

A June 2015 analysis of the gas from the RRU was then used to quantify the ROCs emitted from this volume of gas. This analysis (see Attachment C) indicates that the RRU produced gas has a density of 59.442 pounds per 1000 cubic feet and a non-methane and non-ethane hydrocarbon concentration of 28.777 wt.%.

Using the above described device specifications and calculation methodology, the volume of gas released for each device was calculated. This data is also presented in Table 2.

Table 2
Russell Ranch Interplant Gas Gathering Pipeline Project

Stationary Source	Emission Source	Emissions Source Description	Location	Line Pressure, psia[1]	Volume of Gas Released Per Component Opening Cu. Ft. @ Line Pressure[1]	Volume of Gas Released Per Component Opening Cu. Ft. @Std Pressure[2]	Component openings per Pigging Event	Pigging Events per day	Pigging Events per year	ROC, lb/event (day)	ROC, TPY
SB Russel Ranch Unit San Luis Obispo County	PV3	4" Launcher	SLO RRU Compressor Plant	366	0.108	2.639	3.000	1.000	4.000	0.14	0.005
	Fugitive emissions	clp's from valves and flanges	SLO RRU Compressor Plant							1.356	0.248
									Total @ SLO RRU Compressor Plant Pipeline Beginning	1.494	0.253
SB Russel Ranch Unit Santa Barbara County	PV2	4" Receiver	SB RRU Central Tk Farm	356	0.106	2.597	3	1	4	0.13	0.000
	S1	6" Strainer	SB RRU Central Tk Farm	356	1.47	35.000	3	1	4	1.83	0.004
	PV3	6" Launcher	SB RRU Central Tk Farm	356	0.652	15.790	3	1	4	0.81	0.002
	Fugitive emissions	Fugitive emissions: clp's from pig valves & strainer	SB RRU Central Tk Farm							0.25	0.046
									Total @ SB RRU Central Tk Farm 4" to 6" pipeline Transition	3.02	0.051
	PV1	6" Receiver	Wasioja Road	350	0.326	7.762	3	1	4	0.40	0.001
	S2	8" Strainer	Wasioja Road	350	2.28	54.286	3	1	4	2.76	0.006
	PV5	8" Launcher	Wasioja Road	350	1.412	33.619	3	1	4	1.73	0.003
	Fugitive emissions	Fugitive emissions: clp's from pig valves & strainer	Wasioja Road							0.25	0.046
									Total @ Wasioja Road 6" to 8" Pipeline Transition	5.16	0.055
									Total Russell Ranch Unit	8.18	0.11
Cuyama Pump Station Santa Barbara County	PV6	6" Receiver	Cuyama Pump Station	342	0.706	16.425	3	1	4	0.84	0.002
	S3	6" Strainer	Cuyama Pump Station	342	3.205	74.565	3	1	4	3.83	0.008
	PV7	3" Launcher	Cuyama Pump Station	342	0.108	2.466	3	1	4	0.13	0.000
	Fugitive emissions	Fugitive emissions: clp's from pig valves & strainer	Cuyama Pump Station							0.34	0.062
									Total Cuyama Pump Station	5.13	0.071
South Cuyama Unit Gas Plant #10 Santa Barbara County	PV8	3" Receiver	SCU-GP10	342	0.108	2.466	3	1	4	0.13	0.000
	Fugitive emissions	Fugitive emissions: clp's from valves and flanges	SCU-GP10							1.85	0.34
									Total SCU @ GP10	1.98	0.34
									Total RRU Interplant Gas Gathering Pipeline	16.78	0.77

Notes

1 Data provided by E&B Engineering based upon system design & device specifications.

2 Calculated data by Boyles's Gas Law; See Process Description.

7.3 RRU Gas Processing Impacts at the Gas Plant #10

GP10 is designed and permitted to process up to 6.500 million standard cubic feet (MMSCF) of produced gas daily. The current process rate through GP10 is approximately 0.600 MMSCF per day, or less than one-tenth of the designed processing rate.

The current gas production rate at the RRU is approximately 0.280 MMSCF per day. The existing operating scenario at the RRU is for the majority of this gas to be reinjected back into the producing formation. Approximately 0.200 to 0.230 MMSCF of gas is reinjected daily. The remainder of the produced gas (approximately 0.050 to 0.080 MMSCF per day) is used for field operations: e.g. powering IC engines. E&B has estimated that there is an additional 0.500 to 0.600 MMSCF per day of ready reserve gas to be produced through currently shut-in and idle wells. When the interplant pipeline is completed E&B anticipates it will be able to process 0.800 MMSCF of RRU produced gas daily through this pipeline. This would bring the total processing

rate of GP10 up to approximately 1.400 MMSCF per day; just slightly over 20% of the plant's design capacity.

7.3.1 GP10 Emission rates

With the exception of the devices identified in the next section, the emissions associated with GP10 are all fugitive emissions through component leak paths. The emission rates through component leak paths are independent of the process rate of the particular component. Therefore, the increase in GP10 throughput will not increase the fugitive emissions from component leak paths.

7.3.1.1 Emissions based upon Throughput

There are a few devices operated at GP10 that have associated emissions that are proportional to a specific throughput. The emission from these devices are discussed below:

a. Glycol Re-boilers – Emissions are Dependent Upon Fuel Gas Throughput

A glycol scrubbing process is employed at GP10 to dehydrate (remove entrained water) from the processed gas stream. The glycol system was designed to process gas rates up to the design capacity of the GP10; 6.500 MMSCF per day. After the produced gas is scrubbed in a glycol tower, the glycol is heated to drive off the captured water and then reused. This glycol process is a continuous closed loop process. The dependent process parameter for this system is temperature. The glycol is heated to a specific temperature during the regeneration process. This temperature requirement will not change with an increased GP10 produced gas throughput. The volume of glycol in the system is fixed, and the temperature required to dehydrate the glycol is also a fixed physical parameter. Therefore the gas used in the combustion process to heat the glycol re-boilers will not change and there will not be any emission increase from the glycol re-boilers.

b. Amine Re-Boilers – Emissions are Dependent Upon Fuel Gas Throughput

An amine scrubbing process is used to remove acid gasses (primarily CO2) from the produced gas stream. As with the glycol process, the amine scrubbing process was designed to process gas rates up to the design capacity of the GP10; 6.500 MMSCF per day. The amine process operates in a similar fashion as compared to the glycol process; the dependent process parameter is temperature and the temperature required to regenerate the amine is also a fixed physical parameter. Therefore the gas used in the combustion process to heat the amine re-boilers will not change and there will not be any emissions increases from the amine re-boilers.

c. Emergency Stand-by/Back-up Engines – Emissions are Dependent Upon Operating Hours

E&B maintains a back-up generator, a fire water pump, and an air compressor, each powered by an IC engine. These devices are in place to provide the necessary plant infrastructure in the event of a plant emergency. Currently these engines are only operated a few hours per year each to perform required maintenance. Increasing the GP10 throughput will not alter the maintenance requirements for these devices. Therefore there will not be any emission increases from any of the back-up/emergency stand-by engines.

7.4 Indirect Emissions

To process the additional 0.600 MMSCF of produced gas through the RRU compressor and then through the GP10 compressor(s), the loading on each of these compressors will increase.

The compressor at the RRU compressor plant is driven by a 250 hp electric motor and has a rated capacity to process up to 1.000 MMSCF per day. The current daily gas production rate at the RRU of 0.280 MMSCF per day implies that this compressor is operating at a 28% load. Once the interplant gas gathering pipeline is complete, it is anticipated that the RRU compressor will be processing up 0.880 MMSCF of produced gas per day. This represents an increase of 60% on the loading of the RRU compressor.

There are two compressors at GP10. These compressors have a combined horsepower of 1200 hp (600 hp each). The combined rated capacity of these compressors is 3.500 MMSCF per day. The current daily gas production rate at GP10 of 0.600 MMSCF per day implies that these compressors are operating at a 22.9% load. Once the interplant gas gathering pipeline is complete, it is anticipated that the GP10 compressor will be processing up to 1.400 MMSCF of produced gas per day. This represents an increase of 17.1% on the loading of the GP10 compressors.

Greenhouse Gas emissions (GHG) are the only indirect emissions associated with the increased loading on these compressors. The GHG emissions have been estimated by determining the increased electrical needs and then applying GHG emission factors based upon electricity generation published by the US EPA. These calculations are summarized in Table 3 Below.

Table 3
Russell Ranch Interplant Gas Gathering Pipeline Project
Indirect Emissions Summary

	Total Compressor(s) Rated HP	Compressor Rated Capacity, MMSCF/day	Pre-Pipeline Gas Processed, MMSCF/day	Post-Pipeline Gas Processed, MMSCF/day	Pre-Pipeline Load	Post-Pipeline Load	Load Increase	kW-hr Increase	Total GHG, lb/day	Total GHG, MT/yr
RRU Compressor Plant	250	1.000	0.280	0.880	28.0%	88.0%	60.0%	111.85	1646.38	272.65
GP10	1200	3.500	0.600	1.400	22.9%	40.0%	17.1%	153.40	2257.90	373.93
							Total Indirect Emissions		3904.28	646.56

Indirect Electricity Emission Factors Source: EPA Year 2010 eGRID 9th edition Version 1.0 February 2014. Region: CAMX (WECC California)

8.0 Total Emissions Summary

Per the emissions calculation methodologies outlined above, the worst case total daily operating emissions for this interplant gas gathering pipeline is 16.78 lb/day of direct ROC emissions and 3904.28 of indirect GHG emissions. Annually, this interplant gas gathering pipeline will emit 0.77 tons per year of direct ROC emissions and 645.58 metric tones of GHG emissions.

The emissions associated with the construction of the 1125 foot of three inch pipeline at the Cuyama Pump Station are not represented in this summary. Those emissions are detailed in the LUP application and included as Attachment A to this document.

9.0 Interplant Gas Gathering Pipeline Safety Measures.

E&B has incorporated several safety measures into the design of the RRU Interplant Gas gathering Pipeline. Follow is a summary discussion of these safety measures:

9.1 Cathodic protection will be implemented. The cathodic protection contractor has surveyed the lines and determined that the existing corrosion currents are relatively low; indicating that the pipelines have good coating integrity.

9.2 All lines were hydro-tested to over 150% of the system pressures. (The hydro-testing of the existing three inch line was witnessed by County P&D).

9.3 All lines have been cleaned.

9.4 Each section of the pipeline, including the starting and end points, will be fitted with a pressure gauge that will communicate with a Supervisory Control and Data Acquisition (SCADA) system. This SCADA system will be capable of communicating with the Plant Logic Controller (PLC) for the RRU compressor. This system will allow E&B the capability to monitor the pipeline for anomalous conditions and take the appropriate actions.

9.5 Flow meters will be installed at the beginning and end of the pipeline for mass balance control.

9.6 There will be remote close-in valves tied into the SCADA. These valves will be capable of shutting in the line at both ends.

9.7 Corrosion coupons will be employed in each line segment to determine and monitor actual corrosion rates.

9.8 Corrosion inhibitors and or biocide treatments will be used to aid in corrosion prevention.

9.9 Pigging of each line segment will be used to clear the pipelines of any debris that could lead to under deposit corrosion. Any pigging debris captured will be monitored for anomalous conditions. Pigging frequency will be as needed up to a quarterly schedule.

E&B Natural Resources Corporation
SCU/RRU Interplant Produced Gas Gathering Pipeline Project
Project Description – July 2015 Supplemental

Attachment A
Construction Emissions for 1125 Feet of Pipeline

E&B Natural Resources
RRU Pipeline Construction @ Hwy 166 & Cuyama Pumping Station

updated
7/17/2015

Table 1a: Maintenance and Operations Emission Summary

Construction Phase	Worst Case Daily Emission (lbs)						Total (Yearly) Emissions (tons)						Annual Emissions GHG
	CO	ROC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	CO	ROC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	MT
Construction													
Construction Equipment (Mobile Devices)	27.33	2.67	27.26	1.69	1.62	1.62	0.04	0.00	0.04	0.00	0.00	0.00	6.52
Offsite Emissions	1.96	0.26	11.40	0.01	0.19	0.18	0.01	0.00	0.05	0.00	0.00	0.00	6.73
On-Site Fugitive Dust					8.52	0.85					0.01	0.00	
Total Maintenance	29.89	3.13	38.68	1.70	10.53	2.65	0.05	0.01	0.10	0.00	0.02	0.00	13.25

Table 1b: Maintenance Emission Summary

Operations & Maintenance Phase	Worst Case Daily Emission (lbs)						Total (Yearly) Emissions (tons)						Annual Emissions GHG
	CO	ROC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	CO	ROC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	MT
Operations & Maintenance													
Maintenance Activities (Mobile Devices)	1.41	1.25	1.39	0.05	0.10	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.18
Offsite Emissions	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
On-Site Fug Dust					1.60	0.15					0.00	0.00	
Total Operations & Maintenance	1.41	1.25	1.39	0.05	1.70	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.18

E&B Natural Resources
RRU Pipeline Construction @ Hwy 166 & Cuyama Pumping Station

updated
7/17/2015

Table 2a: Emission Detail - Mobile Equipment

Max Daily and Annual Emissions

Equipment	Number	Activity	Daily Hours	Weekly Schedule (days/week)	Duration (Wks/Yr)	Hourly Emissions (lbs/hr)						Daily Emission (lbs/day)						Total Emissions (tons)						GHG
						CO	ROC	NO_x	SO_x	PM_{10}	GHG	CO	ROC	NO_x	SO_x	PM_{10}	$PM_{2.5}$	CO	ROC	NO_x	SO_x	PM_{10}	$PM_{2.5}$	MT
Construction	24 Hours per Day - 7 Days per week																							
Backhoe (Cat 420D)	1	Contractor - Pipeline Construction	2	3	1	0.54	0.03	0.41	0.03	0.03	75.58	1.08	0.05	0.82	0.05	0.06	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.21
John Deere 459 GIH Combo Side Boom	1	Contractor - Pipeline Construction	8	3	1	0.49	0.02	0.30	0.02	0.02	55.63	3.16	0.15	2.42	0.16	0.19	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.51
Pick-up Truck (1 ton)	1	Contractor - Pipeline Construction	2	3	1	0.19	0.00	0.31	0.00	0.02	30.18	0.39	1.29	0.01	0.03	0.04	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.09
Semi-Truck	1	Contractor - Pipeline Construction	8	3	1	0.06	0.00	0.53	0.00	0.05	171.79	0.38	0.49	7.44	0.46	0.40	0.35	0.01	0.00	0.01	0.00	0.00	0.00	1.87
Water Truck	1	Contractor - Pipeline Construction	6	3	1	0.97	0.07	1.05	0.07	0.05	193.25	7.74	0.55	8.37	0.54	0.45	0.40	0.01	0.00	0.01	0.00	0.00	0.00	2.10
Utility Truck & Trailer	1	Contractor - Pipeline Construction	2	3	1	0.51	0.03	0.39	0.03	0.03	71.55	1.02	0.05	0.78	0.05	0.06	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.19
Welder (2.5 Ton Truck)	1	Contractor - Pipeline Construction	10	3	1	0.78	0.04	0.68	0.04	0.05	107.88	7.85	0.36	6.83	0.38	0.62	0.56	0.01	0.00	0.01	0.00	0.00	0.00	1.46
Total Maintenance						4.23	0.24	4.07	0.25	0.27	705.56	27.93	2.67	27.26	1.69	1.82	1.62	0.04	0.00	0.04	0.02	0.00	0.00	6.52

Table 2b: Emission Detail - Maintenance Equipment

Max Daily and Annual Emissions

Equipment	Number	Activity	Daily Hours	Weekly Schedule (days/week)	Duration (Wks/Yr)	Hourly Emissions (lbs/hr)						Daily Emission (lbs/day)						Total Emissions (tons)						GHG
						CO	ROC	NO_x	SO_x	PM_{10}	GHG	CO	ROC	NO_x	SO_x	PM_{10}	$PM_{2.5}$	CO	ROC	NO_x	SO_x	PM_{10}	$PM_{2.5}$	MT
Maintenance	46																							
Pick-up Truck (1 ton)	1	Rigging Operations	2	1	2	0.19	0.00	0.31	0.00	0.02	30.15	0.39	1.29	0.01	0.03	0.04	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.05
Utility Truck & Trailer	1	Rigging	2	1	2	0.51	0.03	0.39	0.03	0.03	71.56	1.02	0.05	0.78	0.05	0.06	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.13
Total Maintenance						0.70	0.02	0.69	0.04	0.05	101.75	1.41	1.26	1.39	0.08	0.10	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.18

E&B Natural Resources
RRU Pipeline Construction @ Hwy 166 & Cuyama Pumping Station

Updated

Table 3a: Offsite Mobile Emissions Detail - Construction

Source	Parameters								Peak Day Emissions, lbs/day						GHG	Total Emissions, Tons						GHG
	SN PRC 9121 Vehicle Type	Number of Vehicles per Day	Daily Trips (one way)	Number of days/year	EMFAC2011 Vehicle Class	Fuel	Avg Vehicle Speed (mph)	Distance One Way (mi)	CO	ROC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	lb/day	CO	ROC	NO_x	SO_2	PM_{10}	$PM_{2.5}$	MT
Construction																						
Backhoe (Cat 420D)	Delivered via Heavy-Heavy Duty Diesel Tractor Construction Truck	1	1	2	T7 tractor construction	DSL	55	61	0.20	0.04	1.43	0.00	0.09	0.09	212.88	0.00	0.00	0.00	0.00	0.00	0.00	0.10
John Deere 450 Crawler Dozer	Delivered via Heavy-Heavy Duty Diesel Tractor Construction Truck	1	1	2	T7 tractor construction	DSL	55	61	0.20	0.04	1.43	0.00	0.09	0.09	212.88	0.00	0.00	0.00	0.00	0.00	0.00	0.10
Pickup Truck (1 ton)	1	3	2	14	LDT2	GAS	55	61	0.65	0.05	2.11	0.00	0.03	0.03	126.80	0.00	0.00	0.00	0.00	0.00	0.00	0.03
Semi-Truck	1	1	1	14	T7 tractor construction	DSL	55	61	0.44	0.03	2.86	0.00	0.07	0.06	427.76	0.00	0.00	0.02	0.00	0.00	0.00	0.02
Water Truck	Heavy-Heavy Duty Diesel Tractor Construction Truck	1	1	2	T7 tractor construction	DSL	55	61	0.22	0.04	1.43	0.00	0.07	0.07	212.88	0.00	0.00	0.00	0.00	0.00	0.00	0.10
5th Wy Truck & Trailer	1	1	2	14	T7 other	DSL	50	61	0.51	0.02	2.67	0.00	0.01	0.01	433.04	0.00	0.00	0.01	0.00	0.00	0.00	0.23
Vehicle (2.5 Ton Truck)	Light-Duty Trucks (3751-5750 lbs)	1	2	14	T7 other	DSL	50	61	0.51	0.02	2.67	0.00	0.01	0.01	433.04	0.00	0.00	0.01	0.00	0.00	0.00	0.23
Total Construction									1.95	0.20	11.40	0.01	0.19	0.18	1668.32	0.01	0.00	0.05	0.00	0.00	0.00	0.73

Table 3b: Offsite Mobile Emissions Detail - Maintenance

Source																						
Operations/Maintenance Maintenance																						
No additional employee trips will be needed to maintain this project		0	0	0																		
		0	0	0																		
Total Operations & Maintenance									0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Notes for the Table
1. Emissions calculations based on EMFAC2011 Update Jan 2013, Region: Santa Barbara County APCD, Scenario Year 2014, Season: Annual, Model Year: Aggregated
2. Peak day assumes that workers for all vehicles commute to the site
3. It is assumed that ongoing maintenance and operations will be accomplished with existing staffing profiles (no additional employee commutes).

E&B Natural Resources
RRU Pipeline Construction @ Hwy 155 & Cuyama Pumping Station

updated
7/17/2015

Table 4a: On Site Fugitive Dust Emissions Detail - Construction

Activity	Number of Vehicles	Distance Traveled on Project Site, ft	Source	Source Units	Number of Days	PM_{10} Emission Factor	$PM_{2.5}$ Emission Factor	Emission Factor, Units	Mitigation Reduction percentage	Peak Day PM_{10} Emissions, lbs/day	Total PM_{10} Emissions, tons	Peak Day $PM_{2.5}$ Emissions, lbs/day	Total $PM_{2.5}$ Emissions, tons
Construction													
Backhoe (Cat 420D)	1	500	0.189	vehicle-miles/day	3	8.46	0.85	lbs/vehicle-miles	50%	0.80	0.00	0.08	0.00
John Deere 450 G/H Combo Side Boom	1	500	0.189	vehicle-miles/day	3	8.46	0.85	lbs/vehicle-miles	50%	0.80	0.00	0.08	0.00
Pick-up Truck (1 ton)	1	500	0.189	vehicle-miles/day	3	11.17	1.12	lbs/vehicle-miles	50%	1.06	0.00	0.11	0.00
Semi-Truck	1	500	0.189	vehicle-miles/day	3	11.17	1.12	lbs/vehicle-miles	50%	1.06	0.00	0.11	0.00
Water Truck	1	2,000	0.758	vehicle-miles/day	3	8.46	0.85	lbs/vehicle-miles	50%	3.20	0.00	0.32	0.00
Utility Truck & Trailer	1	500	0.189	vehicle-miles/day	3	8.46	0.85	lbs/vehicle-miles	50%	0.80	0.00	0.08	0.00
Welder (2.5 Ton Truck)	1	500	0.189	vehicle-miles/day	3	8.46	0.85	lbs/vehicle-miles	50%	0.80	0.00	0.08	0.00
Pipeline Trench Cut & Fill	na	na	0.000	Cubic Yards	3	0.00375	0.00021	lbs/cu-yd	50%	0.00	0.00	0.00	0.00
									Total On-Site Fugitive Dust	8.52	0.013	0.85	0.00

Table 4b: On Site Fugitive Dust Emissions Detail - Maintenance

Activity	Number of	Distance	Source	Source Units	Number	PM_{10}	$PM_{2.5}$	Emission Factor,	Mitigation	Peak Day	Total PM_{10}	Peak Day	Total $PM_{2.5}$
Maintenance													
Pick-up Truck (1 ton)	40	500	7.576	vehicle-miles/day	2	11.17	1.12	lbs/vehicle-miles	0%	84.64	0.08	8.46	0.01
Utility Truck & Trailer	1	500	0.189	vehicle-miles/day	2	8.46	0.85	lbs/vehicle-miles	0%	1.59	0.00	0.16	0.00
									Total On-Site Fugitive Dust	86.24	0.086	8.62	0.01

Notes for the Table

1. Emission Factor for vehicle travel on un paved surfaces from AP-42 Section 13.2.2

2. Emission Factor for trench cut & fill; from AP-42 Table 11.9-1 Dragline Overburden Removal

3. It is assumed that on-going maintenance and operations of the loading reach will be accomplished with existing staffing profiles at the Cuyama Pumping Station (no additional employee commutes).

4. Water truck will be used to mitigate dust emissions during construction. 50% control efficiency applied.

Emission factor for travel on unpaved roads based on following inputs		Assumptions, Comments
surface silt loading in percent	24	
mean vehicle weight in tons	65	Light vehicles only
mean vehicle weight in tons	35	Heavy Vehicles
Surface Material moisture content, %	12	
Voume of Cut Material	0	cu-yd
Voume of Fill Material	0	cu-yd
Cut & Fill Drop Height	10	ft

Table 5: Emission Factors

Equipment	HP	Type	Load Factor, %	Emission Factors with Engine Loading Applied (lb/hr)							Emission Factors (lb/hp-hr)						Emission Factors (gm/hp-hr)					
				CO	ROG	NO_x	SO_2	PM_{10}	$PM_{2.5}$	GHG	CO	ROG	NO_x	SO_2	PM_{10}	GHG	CO	ROG	NO_x	SO_2	PM_{10}	GHG
Excavator (Cat 420D)	88	Diesel	75%	0.54	0.03	0.41	0.03	0.03	0.03	79.58	0.0082	0.0004	0.0062	0.0004	0.0005	1.1452	3.7000	0.1836	2.8127	0.1820	0.2200	519.453
John Deere 450 G/H Combo Side Boom	65	Diesel	75%	0.40	0.02	0.30	0.02	0.02	0.02	55.83	0.0082	0.0004	0.0062	0.0004	0.0005	1.1452	3.7000	0.1836	2.8127	0.1820	0.2200	519.453
Pickup Truck (1 ton)	185	Gasoline	15%	0.19	0.06	0.31	0.02	0.02	0.02	30.18	0.0070	0.0216	0.0110	0.0006	0.0007	1.0875						--
Semi-Truck	300	Diesel	50%	0.88	0.02	0.93	0.03	0.05	0.04	171.78	0.0057	0.0004	0.0062	0.0004	0.0003	1.1452	2.6000	0.1806	2.8127	0.1820	0.1500	519.453
Tanker Truck	300	Diesel	50%	0.35	0.06	0.93	0.05	0.05	0.04	171.75	0.0057	0.0004	0.0062	0.0004	0.0003	1.1452	2.6000	0.1803	2.8127	0.1820	0.1500	519.453
Utility Truck & Trailer	125	Diesel	50%	0.51	0.03	0.39	0.03	0.03	0.03	71.56	0.0082	0.0004	0.0062	0.0004	0.0005	1.1452	3.7000	0.1805	2.8127	0.1820	0.2200	519.453
Water Truck	225	Diesel	75%	0.97	0.07	1.05	0.07	0.08	0.05	193.25	0.0057	0.0004	0.0062	0.0004	0.0003	1.1452	2.6000	0.1835	2.6127	0.1820	0.1500	519.453
Welder (2.5 Ton Truck)	125	Diesel	75%	0.72	0.01	0.69	0.04	0.08	0.08	107.29	0.0082	0.0004	0.0073	0.0004	0.0007	1.1452	3.7000	0.1836	3.3127	0.1820	0.3000	519.453

References

1) Pound/hp-hr Emission Factors (Diesel) are calculated from Tier 3 Factors found in "Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling - Compression-Ignition", US EPA, July 2010 (US EPA Document number EPA-420-R-10-018). (Except Workover Rig)

2) Pound/hp-hr Emission Factors (Diesel) for the workover rigs are calculated from Tier 4i Factors found in "Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling - Compression-Ignition", US EPA, July 2010 (US EPA Document number EPA-420-R-10-018).

3) Pound/hp-hr Emission Factors (gasoline) are from AP42 Table 3.3-1 (10/96), except GHG.

4) GHG EF's are from 40 CFR Pt 98 Subpart C, Tables C-1 & C-2, converted to gm/hp-hr using bsfc of 7000 BTU/hp-hr. The emission factors for gasoline equipment were converted directly to lb/hp-hr using the same bsfc and therefore, the emission factors in gm/hp-hr were not shown in the table above.

5) PM2.5 Emission Factors based upon SCAQMD Methodology to calculate Particulate Matter - PM10 to PM2.5 Ratios

6) Sulfur EF [g/bhp-hr] = [lb S/100 lb fuel] [lb fuel/gal fuel] [g S/lb S] [g-mole S/g S] x [g-mol SO2/g-mol S] [g SO2/g-mole SO2] [gal fuel/Btu] [Btu/bhp-hr]
(Used 0.05% Sulfur Fuel, Diesel density of 7.05 lb/gal, 137,000 Btu/gal, & 7000 Btu/bhp-hr)

E&B Natural Resources
RRU Pipeline Construction @ Hwy 166 & Cuyama Pumping Station

Table 6: Assumptions

1	Construction will require 3 days
2	Construction crew travel from Santa Maria (average distance = 61 miles, one way)
3	No additional operational staffing required to maintain the pigging and pipeline after construction
4	Assumed 500 feet between paved road and work site
5	
6	
7	

E&B Natural Resources Corporation
SCU/RRU Interplant Produced Gas Gathering Pipeline Project
Project Description – July 2015 Supplemental

Attachment B
Fugitive Emissions Calculation Detail – Component Leak Path Method

Santa Barbara County APCD Fugitive ROC Emissions Calculation - CLP Method

ADMINISTRATIVE INFORMATION	
Attachment: 6.1 - New Component Leak Paths	
Company: E&B Natural Resources Management Corp.	
Facility: Russell Ranch Unit - SLO Compressor Plant	
Processed by: MFSA	
Date:	7/17/2015
Path & File Name:	

Facility Type (Choose one facility type by marking the box to the right of the facility type with an "x")							
Production Field	x	Gas Processing Plant		Refinery		Offshore Platform	

Component:	Count	THC[1] Emission Factor (lb/day-c/c)	ROC/THC Ratio	Uncontrolled ROC Emission (lb/day)	Control[2,3] Efficiency	Controlled ROC Emission (lb/hr)	Controlled ROC Emission (lb/day)	Controlled ROC Emission (Tons/Qtr)	Controlled ROC Emission (Tons/Yr)
Gas Condensate Service									
Valves - Accessible/Inaccessible	43	0.295	0.31	3.84	0.80	0.03	0.77	0.04	0.14
Valves - Unsafe		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		0.295	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Category A		0.295	0.31	0.00	0.84	0.00	0.00	0.00	0.00
Valves - Category B		0.295	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Valves - Category C		0.295	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category D		0.295	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category E		0.295	0.31	0.00	0.88	0.00	0.00	0.00	0.00
Valves - Category F		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Category G		0.295	0.31	0.00	0.92	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible	136	0.070	0.31	2.85	0.80	0.02	0.56	0.03	0.11
Flanges/Connections - Unsafe		0.070	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.070	0.31	0.00	0.84	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.070	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.070	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.070	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.070	0.31	0.00	0.88	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.070	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.070	0.31	0.00	0.92	0.00	0.00	0.00	0.00
Compressor Seals - To Atm		2.143	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Compressor Seals - To VRS		2.143	0.31	0.00	1.00	0.00	0.00	0.00	0.00
PSV - To Atm/Flare		6.670	0.31	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS	4	6.670	0.31	8.27	1.00	0.00	0.00	0.00	0.00
Pump Seals - Single		1.123	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		1.123	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Sub Total	182			15.05		0.057	1.356	0.082	0.248
Oil Service									
Valves - Accessible/Inaccessible		0.0041	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Valves - Unsafe		0.0041	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		0.0041	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Category A		0.0041	0.56	0.00	0.84	0.00	0.00	0.00	0.00
Valves - Category B		0.0041	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Valves - Category C		0.0041	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category D		0.0041	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category E		0.0041	0.56	0.00	0.88	0.00	0.00	0.00	0.00
Valves - Category F		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Category G		0.0041	0.56	0.00	0.92	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible		0.002	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Flanges/Connections - Unsafe		0.002	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.002	0.56	0.00	0.84	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.002	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.002	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.002	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.002	0.56	0.00	0.88	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.002	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.002	0.56	0.00	0.92	0.00	0.00	0.00	0.00
PSV - To Atm/Flare		0.267	0.56	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		0.267	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Pump Seals - Single		0.0039	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		0.0039	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Sub Total	0			0.00		0.000	0.000	0.000	0.000
Total	**182**			**15.06**		**0.057**	**1.356**	**0.06**	**0.25**

Notes:
1 APCD P&P # 6100.061.1968.
2 A 80% efficiency is assigned to fugitive components Rule 331 implementation.
3 Emission Control efficiencies for the "category x" components are identified in "THC Control Factors (ver 2.0)"

Santa Barbara County APCD Fugitive ROC Emissions Calculation - CLP Method
Table 1

ADMINISTRATIVE INFORMATION
Attachment: B.2
Company: E&E Natural Resources
Facility: RRU Central Tank Farm
Processed by:
Date: 09/30/2015

Facility Type: (Choose one facility type by marking the box to the right of the facility type with an "x")

Production Field		Gas Processing Plant		Refinery		Offshore Platform	

Component:	Count	THC[1] Emission Factor (lb/day-c/e)	ROC/THC Ratio	Uncontrolled ROC Emission (lb/day)	Control[2,3] Efficiency	Controlled ROC Emission (lb/hr)	Controlled ROC Emission (lb/day)	Controlled ROC Emission (Tons/Qtr)	Controlled ROC Emission (Tons/Yr)
Gas Condensate Service									
Valves - Accessible/Inaccessible	7	0.295	0.31	0.64	0.80	0.01	0.13	0.01	0.02
Valves - Unsafe		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		0.295	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Category A		0.295	0.31	0.00	0.84	0.00	0.00	0.00	0.00
Valves - Category B		0.295	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Valves - Category C		0.295	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category D		0.295	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category E		0.295	0.31	0.00	0.88	0.00	0.00	0.00	0.00
Valves - Category F		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Category G		0.295	0.31	0.00	0.92	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible	28	0.070	0.31	0.61	0.80	0.01	0.12	0.01	0.02
Flanges/Connections - Unsafe		0.070	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.070	0.31	0.00	0.84	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.070	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.070	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.070	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.070	0.31	0.00	0.88	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.070	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.070	0.31	0.00	0.92	0.00	0.00	0.00	0.00
Compressor Seals - To Atm		2.143	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Compressor Seals - To VRS		2.143	0.31	0.00	1.00	0.00	0.00	0.00	0.00
PSV - To Atm/Flare		8.670	0.31	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		8.670	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Pump Seals - Single		1.123	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		1.123	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Sub Total	35			1.25		0.010	0.250	0.011	0.045
Oil Service									
Valves - Accessible/Inaccessible	0	0.0041	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Valves - Unsafe		0.0041	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		0.0041	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Category A		0.0041	0.56	0.00	0.84	0.00	0.00	0.00	0.00
Valves - Category B		0.0041	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Valves - Category C		0.0041	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category D		0.0041	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category E		0.0041	0.56	0.00	0.88	0.00	0.00	0.00	0.00
Valves - Category F		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Category G		0.0041	0.56	0.00	0.92	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible	0	0.002	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Flanges/Connections - Unsafe		0.002	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.002	0.56	0.00	0.84	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.002	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.002	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.002	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.002	0.56	0.00	0.88	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.002	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.002	0.56	0.00	0.92	0.00	0.00	0.00	0.00
PSV - To Atm/Flare		0.267	0.56	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		0.267	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Pump Seals - Single		0.0039	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		0.0039	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Sub Total	0			0.00		0.000	0.000	0.000	0.000
Total	**35**			**1.25**		**0.010**	**0.250**	**0.01**	**0.05**

Notes:
1 APCD P&P # 6100.061,1998
2 A 80% efficiency is assigned to fugitive components Rule 331 implementation.
3 Emission Control efficiencies for the "category x" components are identified in "FHC Control Factors (ver 2.0)"

Santa Barbara County APCD Fugitive ROC Emissions Calculation - CLP Method
Table 1

ADMINISTRATIVE INFORMATION
Attachment B.3
Company: E&B Natural Resources
Facility: RRU Wasoja Road Pipeline Transition
Processed by:
Date: 06/30/2015

Facility Type: (Choose one facility type by marking the box to the right of the facility type with an "x")

Production Field		Gas Processing Plant		Refinery		Offshore Platform	
	x						

Component:	Count	THC[1] Emission Factor (lb/day-c/e)	ROC/THC Ratio	Uncontrolled ROC Emission (lb/day)	Control[2,3] Efficiency	Controlled ROC Emission (lb/hr)	Controlled ROC Emission (lb/day)	Controlled ROC Emission (Tons/Qtr)	Controlled ROC Emission (Tons/Yr)
Gas Condensate Service									
Valves - Accessible/Inaccessible	7	0.295	0.31	0.64	0.80	0.01	0.13	0.01	0.02
Valves - Unsafe		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		0.295	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Category A		0.295	0.31	0.00	0.84	0.00	0.00	0.00	0.00
Valves - Category B		0.295	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Valves - Category C		0.295	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category D		0.295	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category E		0.295	0.31	0.00	0.88	0.00	0.00	0.00	0.00
Valves - Category F		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Category G		0.295	0.31	0.00	0.92	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible	28	0.070	0.31	0.61	0.80	0.01	0.12	0.01	0.02
Flanges/Connections - Unsafe		0.070	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.070	0.31	0.00	0.84	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.070	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.070	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.070	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.070	0.31	0.00	0.88	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.070	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.070	0.31	0.00	0.92	0.00	0.00	0.00	0.00
Compressor Seals - To Atm		2.143	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Compressor Seals - To VRS		2.143	0.31	0.00	1.00	0.00	0.00	0.00	0.00
PSV - To Atm/Flare		6.670	0.31	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		6.670	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Pump Seals - Single		1.123	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		1.123	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Sub Total	35			1.25		0.010	0.250	0.011	0.046
Oil Service									
Valves - Accessible/Inaccessible	0	0.0041	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Valves - Unsafe		0.0041	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		0.0041	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Category A		0.0041	0.56	0.00	0.84	0.00	0.00	0.00	0.00
Valves - Category B		0.0041	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Valves - Category C		0.0041	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category D		0.0041	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category E		0.0041	0.56	0.00	0.88	0.00	0.00	0.00	0.00
Valves - Category F		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Category G		0.0041	0.56	0.00	0.92	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible	0	0.002	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Flanges/Connections - Unsafe		0.002	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.002	0.56	0.00	0.84	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.002	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.002	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.002	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.002	0.56	0.00	0.88	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.002	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.002	0.56	0.00	0.92	0.00	0.00	0.00	0.00
PSV - To Atm/Flare		0.267	0.56	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		0.267	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Pump Seals - Single		0.0039	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		0.0039	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Sub Total	0			0.00		0.000	0.000	0.000	0.000
Total	**35**			**1.25**		**0.010**	**0.250**	**0.01**	**0.05**

Notes:
1 APCD P&P # 6100.061.1998.
2 A 80% efficiency is assigned to fugitive components Rule 331 implementation.
3 Emission Control efficiencies for the "category x" components are identified in "FHC Control Factors (ver 2.0)"

Santa Barbara County APCD Fugitive ROC Emissions Calculation - CLP Method

Table 1

ADMINISTRATIVE INFORMATION
Attachment: B-4
Company: E&B Natural Resources
Facility: Cuyama Pumping Station Pipeline Transition
Processed by:
Date: 07/12/2012

Facility Type: (Choose one facility type by marking the box to the right of the facility type with an "x")

Production Field		Gas Processing Plant	x	Refinery		Offshore Platform	

Component	Count	THC[1] Emission Factor (lb/day-Flg)	ROC/THC Ratio	Uncontrolled ROC Emission (lb/day)	Control[2,3] Efficiency	Controlled ROC Emission (lb/hr)	Controlled ROC Emission (lb/day)	Controlled ROC Emission (Tons/Qtr)	Controlled ROC Emission (Tons/Yr)
Gas Condensate Service									
Valves - Accessible/Inaccessible	9	0.295	0.31	0.82	0.80	0.01	0.16	0.01	0.03
Valves - Unsafe		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		0.295	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Category A		0.295	0.31	0.00	0.84	0.00	0.00	0.00	0.00
Valves - Category B		0.295	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Valves - Category C		0.295	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category D		0.295	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category E		0.295	0.31	0.00	0.88	0.00	0.00	0.00	0.00
Valves - Category F		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Category G		0.295	0.31	0.00	0.92	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible	40	0.070	0.31	0.87	0.80	0.01	0.17	0.01	0.03
Flanges/Connections - Unsafe		0.070	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.070	0.31	0.00	0.84	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.070	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.070	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.070	0.31	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.070	0.31	0.00	0.88	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.070	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.070	0.31	0.00	0.92	0.00	0.00	0.00	0.00
Compressor Seals - To Atm		2.143	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Compressor Seals - To VRS		2.143	0.31	0.00	1.00	0.00	0.00	0.00	0.00
PSV - To Atm/Flare		6.070	0.31	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		6.070	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Pump Seals - Single		1.123	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		1.123	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Sub Total	49			1.69		0.014	0.338	0.015	0.062
Oil Service									
Valves - Accessible/Inaccessible	0	0.0041	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Valves - Unsafe		0.0041	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		0.0041	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Category A		0.0041	0.56	0.00	0.84	0.00	0.00	0.00	0.00
Valves - Category B		0.0041	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Valves - Category C		0.0041	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category D		0.0041	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Valves - Category E		0.0041	0.56	0.00	0.88	0.00	0.00	0.00	0.00
Valves - Category F		0.0041	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Category G		0.0041	0.56	0.00	0.92	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible	0	0.002	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Flanges/Connections - Unsafe		0.002	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.002	0.56	0.00	0.84	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.002	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.002	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.002	0.56	0.00	0.87	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.002	0.56	0.00	0.88	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.002	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.002	0.56	0.00	0.92	0.00	0.00	0.00	0.00
PSV - To Atm/Flare		0.267	0.56	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		0.267	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Pump Seals - Single		0.0039	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		0.0039	0.56	0.00	1.00	0.00	0.00	0.00	0.00
Sub Total	0			0.00		0.000	0.000	0.000	0.000
Total	49			1.69		0.014	0.338	0.02	0.06

Notes:

1 APCD P&P # 6100.951.1998

2 A 80% efficiency is assigned to fugitive components Rule 331 implementation

3 Emission Control efficiencies for the "category x" components are identified in "FHC Control Factors (ver 2.0)"

FUGITIVE ROC EMISSIONS CALCULATION

ADMINISTRATIVE INFORMATION
Attachment: B.5
Company: E&B Natural Resources
Facility: Gas Plant 10
Processed by: MFSA
Date: 6/30/2015
Path & File Name:

Facility Type: (Choose one)					
Production Field					
Gas Processing Plant	X	Controlled ROC Emission (lbs/hr)	Controlled ROC Emission (lbs/day)	Controlled ROC Emission (Tons/Qtr)	Controlled ROC Emission (Tons/year)
Refinery					
Offshore Platform					
Component	Count[1]				
Gas Condensate Service					
Valves - Acc/Inacc	21	0.07	1.68	0.08	0.31
Flanges - Acc/Inacc	59	0.00	0.03	0.00	0.01
PSV - To VRS	1	0.01	0.14	0.01	0.03
Total	**81**	**0.08**	**1.85**	**0.08**	**0.34**

Notes:

1. Source:
2. Controlled Emission Factors from SBC APCD PTO 9130-R7
3. APCD P&P # 6100.061.1998
4. A 80% efficiency is assigned to fugitive components Rule 331 implementation.

E&B Natural Resources Corporation
SCU/RRU Interplant Produced Gas Gathering Pipeline Project
Project Description – July 2015 Supplemental

Attachment C
Russel Ranch Unit Gas Analysis

GENERAL GAS ANALYSIS (C-6 +) [2,3,8]

GHG Compliant
Rule (40 CFR Part 98)

ELAP Cert.1396-A

Rev 03/27/13

Customer:	E & B Natural Resources	*Log #:*	27669-4
Address:	34740 Merced Avenue Bakersfield, CA 93308	*Date Received:*	10/14/14
		Date Completed:	10/15/14
Attention:	Ed Fetterman, Curtis Elliott	*Report Date:*	10/15/14
Sample Description:	Trust Pad		

Constituent		Mole %	Wt %	Lv %
Oxygen/Argon	O2 / Ar	0.091	0.115	0.042
Nitrogen	N2	1.897	2.324	1.074
Carbon Dioxide	CO2	1.648	3.173	1.448
Carbon Monoxide	CO	0.000	0.000	0.000
Methane	C-1	76.463	53.653	66.725
Ethane	C-2	8.350	10.982	11.494
Propane	C-3	5.411	10.436	7.673
Iso-Butane	C-4	1.100	2.796	1.853
N-Butane	C-4	1.902	4.836	3.087
Neo Pentane	C-5	0.004	0.013	0.008
Iso-Pentane	C-5	0.697	2.200	1.312
N-Pentane	C-5	0.505	1.594	0.942
Hexanes Plus	C-6 (+)	1.933	7.878	4.341
Hydrogen	H_2	0.000	0.000	0.000
Hydrogen Sulfide	H_2S	0.000	0.000	0.000
	Total	100.000	100.000	100.000

		raw	Grains H2S 100 cu.ft.	**** VOC's	[5] Water Content
[1,2]	Hydrogen Sulfide, H2S =	0.00	0.000	*(% by wt.C-3+)*	*(lbs/MM C.F.)*
		Trace H_2S Not Requested	Grains 'S' 100 cu.ft.	29.752	NR
[1,2]	Total Sulfur, as H2S =	0.00	0.000		

		Gross BTU		Net BTU	
[4,6,7,8]	*Physical Data*	*dry*	*wet*	*dry*	*wet*
	*** BTU cu.ft. ideal =	1,301.42	1,278.78	1,181.84	1,161.27
	*** BTU cu.ft. real =	1,306.83	1,284.09	1,186.75	1,166.10
	BTU/lb, Ideal =	21,606.50	21,230.54		
	(Density) Sp. Gr. Ideal =	0.7894	0.7757		
	(Density) Sp. Gr. Real =	0.7924	0.7786		
	Density lbm/(1000 ft³) =	60.250	59.201		

** GPM C-2+ =	5.9508
** GPM C-3+ =	3.7236
** GPM C-4+ =	2.2368
** GPM C-5+ =	1.2797
z..factor =	0.9959
* F..factor (60°F) DSCF/MM Btu =	8,604
* F..factor (68°F) DSCF/MM Btu =	8,736
Sp.Vol. Cu.Ft./Lb =	16.62
Av. Mol. Wt. =	22.86

C-H-O-N-S	% by Wt.
% Carbon =	74.497
% Hydrogen =	20.756
% Oxygen =	2.423
% Nitrogen =	2.324
% Sulfur =	0.000
Total =	100.000

[4,6,7,8]	Measured	Range
1. Fidelity Ck. =	0.99	(0.97-1.11)
2. Cont area Ck =	-8.7E-06	(8.3 - 9.2)E+6
3. Un-Norm Sum =	99.2	(95 - 105)

Notes:

* *F..factor = dcf/MMBTU (CARB)*

** *GPM = Gallons Per 1000 Ft³*

*** *Hexane (+) BTU Calc. using GPA 2261 Constant*

**** VOC's Volatile Organic Constituents

N.R.= "Not Requested"

Density-Specific Gravity where Air = 1.0000

DSCF = Dry Standard Cubic Feet

MM = 1 Million

References

1. *ASTM D6228-10*
2. *ASTM D1945-03(2010)*
3. *ASTM D1946-90(2011)*
4. *ASTM D3588-98(2011)*
5. *ASTM D1142-95(2012)*
6. *GPA 2172-96*
7. *GPA 2145-09*
8. *GPA 2261-00*

QC_____ Date_____

All Calculations Tabulated @ 60/60 dry, 14.696psia (288.15°K, 101.325kPa)

_____ Date:_____

Kurt R. Buckle, Laboratory Director Midway Laboratory, Inc.

ATTACHMENT 6: PUBLIC COMMENT LETTER

Santa Barbara County
Air Pollution Control District

April 29, 2015

Christine Louie
Santa Barbara County
Planning and Development
Energy and Minerals Division
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: Mitigated Negative Declaration for the E&B Natural Resources – Natural Gas Pipeline Project, 15NGD-00000-00007

Dear Ms. Louie:

The Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Draft Mitigated Negative Declaration for the E&B Natural Resources Natural Gas Pipeline Project. The proposed project consists of constructing a pipeline to transport natural gas from the Russell Ranch Field to a point of sale in the South Cuyama Field. One 3-inch coated steel natural gas pipeline of approximately 1,125 feet in length would be installed. As part of the project, pig launcher and pig receiver valves would be installed to enable the applicant to perform pigging maintenance activities. Grading for the project consists of approximately 406 cubic yards of cut and fill. The subject property, a 7,326-acre parcel zoned AG-II-100, and identified in the Assessor Parcel Map Book as APN 147-030-060, is located adjacent to Highway 166 approximately 0.7 miles east of Aliso Canyon Road in the Cuyama Valley area.

The proposed project will involve modifications to the applicant's stationary source of emissions that is currently subject to APCD permit requirements, operational conditions, and prohibitory rules. Therefore, APCD will be a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the County's CEQA analysis when evaluating APCD permits or permit modifications for the proposed project. APCD staff will work closely with your agency's staff to ensure that the CEQA document that is generated adequately addresses air quality and climate change impacts. The following information will be necessary to evaluate the air quality and climate change impacts of the proposed project in the context of CEQA:

Air Pollution Control District staff provides the following comments on the MND:

1. **Section 4.3, Air Quality, Impact Discussion, Page 7:** The text states the project, *"...would not involve new stationary sources (i.e., equipment, machinery, hazardous materials storage, industrial or chemical processing, etc.) that would increase the amount of pollutants released into the atmosphere."* It should be noted that the project, as proposed, will add additional fugitive components and associated emissions; a valid APCD Authority to Construct is required before construction may commence.

2. **Section 4.3, Air Quality, Impact Discussion, (a-c) Potential Air Quality Impacts, Page 7:** It is recommended that temporary/short-term and long-term emissions be quantified and presented in the environmental document. The long term emissions should be

compared to Santa Barbara County's CEQA significance thresholds. For additional information, please refer to Section 5.2 of the APCD's *"Scope and Content of Air Quality Sections in Environmental Documents"* document, available at www.ourair.org/land-use.

3. **Section 4.3, Air Quality, Impact Discussion, (a-c) Potential Air Quality Impacts, Long-Term Operation Emissions, Page 7:**
    a. The text mentions that *"Long-term emissions are typically estimated using the URBEMIS computer model."* It should be noted that URBEMIS is an outdated model, and the APCD no longer recommends its use.
    b. The text cites the APCD's "screening table." This table, located within the APCD's *"Scope and Content of Air Quality Sections in Environmental Documents"* document, does not address the emissions of natural gas pipelines. Accordingly, this reference should be removed.

Additionally, Air Pollution Control District staff offers the following suggested conditions:

1. Standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities. The name and telephone number of an on-site contact person must be provided to the APCD prior to issuance of land use clearance.

2. APCD Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities* establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site. The text of the rule can be viewed on the APCD website at www.ourair.org/wp-content/uploads/rule345.pdf.

3. Fine particulate emissions from diesel equipment exhaust are classified as carcinogenic by the State of California. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of ozone precursors and fine particulate emissions from diesel exhaust.

4. If the proposed project requires an APCD permit/permit modification, permits must be received prior to commencing construction activities.

5. All portable diesel-fired construction engines rated at 50 bhp or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.

6. At all times, idling of heavy-duty diesel trucks should be minimized; auxiliary power units should be used whenever possible. State law requires that:
    - Drivers of diesel-fueled commercial vehicles shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location.
    - Drivers of diesel-fueled commercial vehicles shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle. Trucks with 2007 or newer model year engines must meet additional requirements (verified clean APS label required).
    - See www.arb.ca.gov/noidle for more information.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8831, or via email at bdk@sbcapcd.org.

Sincerely,

Brent Kraushaar

Brent Kraushaar
Air Quality Specialist
Technology and Environmental Assessment Division

Attachments: Fugitive Dust Control Measures
Diesel Particulate and NO_x Emission Measures

cc: Robert Booher
TEA Chron File

Santa Barbara County
Air Pollution Control District

ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions.

- During construction, use water trucks or sprinkler systems 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 completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.

- 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 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 or builder 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 Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

  Plan Requirements: All requirements shall be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. **Timing:** Requirements shall be shown on plans or maps prior to land use clearance or map recordation. Condition shall be adhered to throughout all grading and construction periods.

  MONITORING: Lead Agency shall ensure measures are on project plans and maps to be recorded. Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

Santa Barbara County
Air Pollution Control District

ATTACHMENT B
DIESEL PARTICULATE AND NO_x EMISSION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is an updated list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

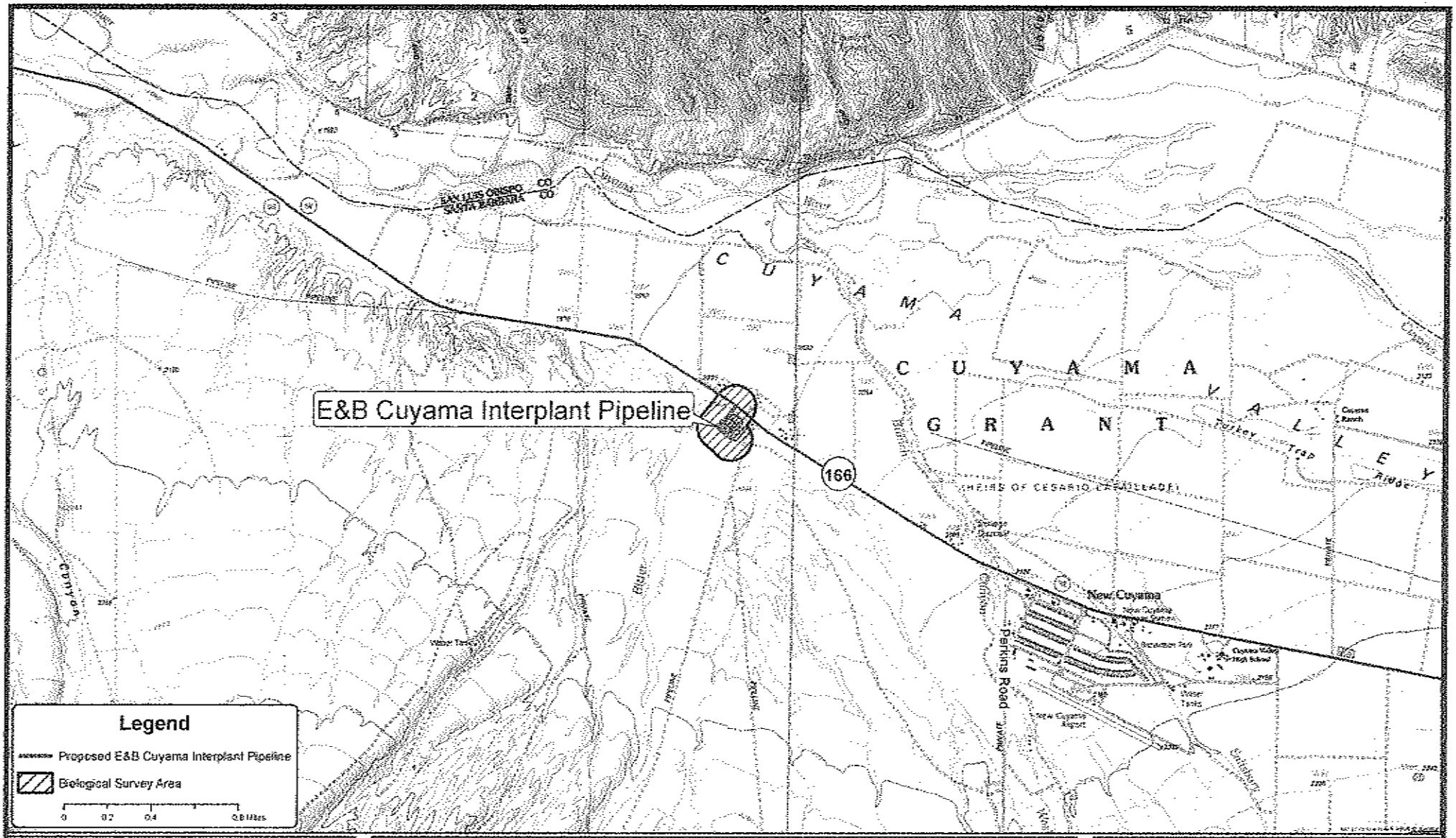
The following measures are recommended:

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- 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.

Plan Requirements: Measures shall be shown on grading and building plans. **Timing:** Measures shall be adhered to throughout grading, hauling and construction activities.

MONITORING: Lead Agency staff shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors shall respond to nuisance complaints.

ATTACHMENT D: SITE PLAN



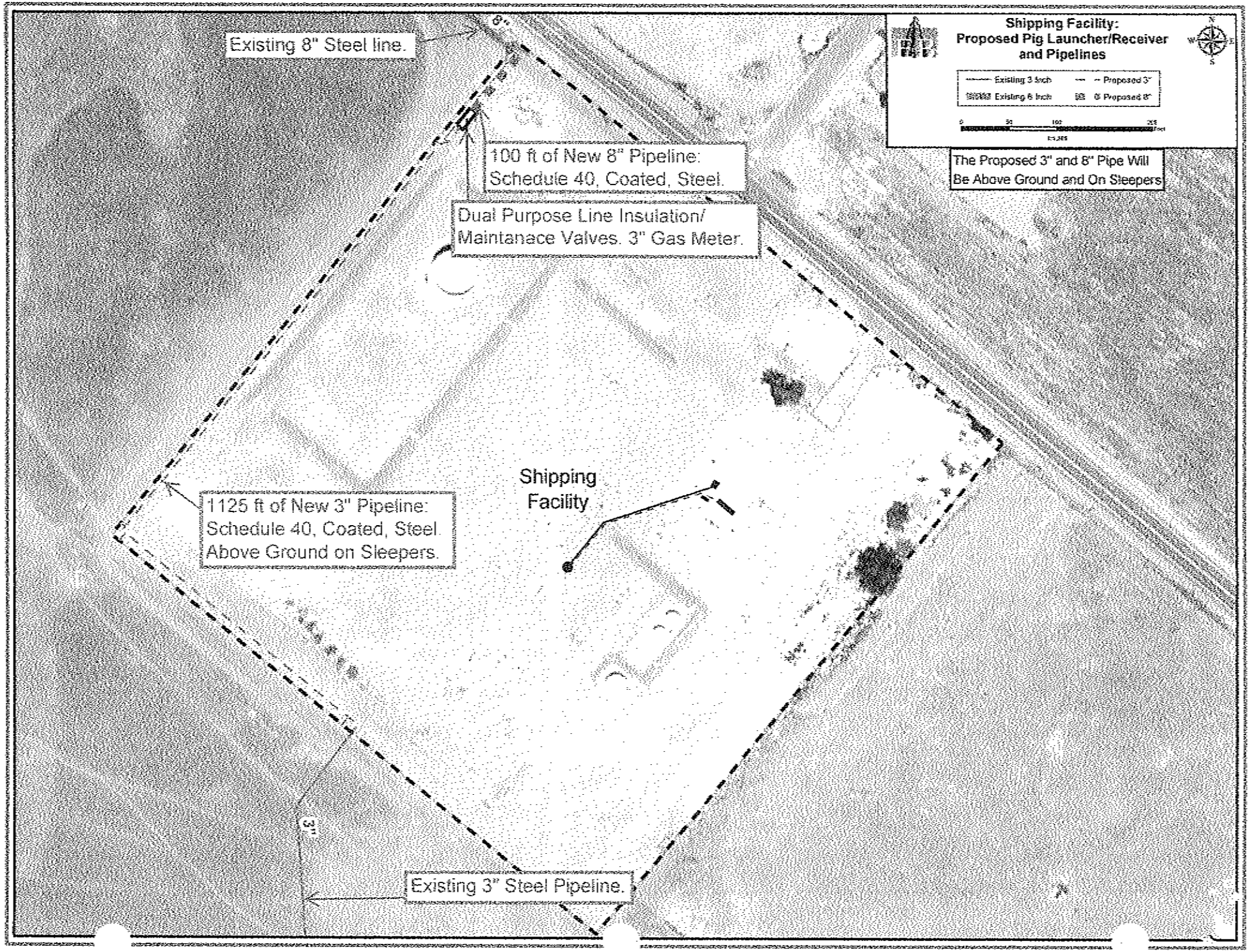
Robert A. Booher Consulting
Environmental Planning & Management
3297 Congressional Court
Fairfield, California 94534
Telephone (707) 399-7835

FIGURE 1

Project Vicinity Map

E&B Natural Resources Management Corporation
1600 Norris Road
Bakersfield, California 93308

N


Existing 8" Steel line.
100 ft of New 8" Pipeline:
Schedule 40, Coated, Steel.
Dual Purpose Line Insulation/
Maintanace Valves. 3" Gas Meter.
1125 ft of New 3" Pipeline:
Schedule 40, Coated, Steel
Above Ground on Sleepers.
Shipping
Facility
Existing 3" Steel Pipeline.
Shipping Facility:
Proposed Pig Launcher/Receiver
and Pipelines
Existing 3 Inch
Proposed 3"
Existing 6 Inch
Proposed 8"
The Proposed 3" and 8" Pipe Will
Be Above Ground and On Sleepers

ATTACHMENT E: RESOLUTION AND ORDINANCE FOR REZONE 15RZN-00000-00007

RESOLUTION OF THE SANTA BARBARA COUNTY PLANNING COMMISSION
COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

IN THE MATTER OF RECOMMENDING TO THE BOARD OF SUPERVISORS THE ADOPTION OF AN AMENDMENT TO SECTION 35-1, THE SANTA BARBARA COUNTY LAND USE AND DEVELOPMENT CODE, THAT AMENDS THE COUNTY ZONING MAP BY REDESIGNATING ASSESSOR'S PARCEL NUMBER 147-030-025 FROM UNLIMITED AGRICULTURE, 10 ACRE MINIMUM LOT AREA (U), TO AGRICULTURE II, FORTY ACRE MINIMUM LOT AREA (AG-II-40).	RESOLUTION NO.: 15 - _____ CASE NO.: 15RZN-00000-00007

WITH REFERENCE TO THE FOLLOWING:

A. Whereas on September 29, 1958 by Ordinance 971, the Board of Supervisors of the County of Santa Barbara adopted the Santa Barbara County Zoning Ordinance, Ordinance 661 of Chapter 35 of the Santa Barbara County Code; and

B. Whereas on November 27, 2007, by Ordinance 4660, the Board of Supervisors adopted the Santa Barbara County Land Use and Development Code, Section 35-1 of Chapter 35, Zoning, of the Santa Barbara County Code which included the County Zoning Map that designates property within the unincorporated area of the County of Santa Barbara with specific zones; and

C. Whereas the County Planning Commission now finds that it is in the interest of orderly development of the County and important to the preservation of the health, safety and general welfare of the residents of the County to recommend that the Board of Supervisors adopt an Ordinance (Case No. 15RZN-00000-00007) amending Section 35-1 of Chapter 35, Zoning, of the Santa Barbara County Code, the Santa Barbara County Land Use and Development Code, by amending the County Zoning Map by redesignating Assessor's Parcel Number 147-030-025 from Unlimited Agriculture, 10 acre minimum lot area (U), to Agriculture II, 40 acre minimum lot area (AG-II-40), as shown on Exhibit 1 of Attachment A attached hereto.

Said Ordinance is attached hereto as Attachment A, and is incorporated by reference.

D. Section 65855 of the Government Code requires inclusion of the reason for the recommendation and the relationship of the zoning map amendment to the applicable general and specific plans. The proposed Ordinance is in the interest of the general community welfare as it will assist in the implementation of a uniform and up-to-date zoning ordinance throughout the inland area by rezoning the subject parcel from U (Unlimited Agriculture) under the outdated Ordinance 661 to the current AG-II-40 zoning under the Santa Barbara County Land Use and Development Code.

E. Whereas this County Planning Commission has held a duly noticed public hearing, as required by Section 65484 of the Government Code, on the proposed ordinance, at which hearing the proposed Ordinance was explained and comments invited from persons in attendance.

NOW, THEREFORE, IT IS HEREBY RESOLVED as follows:

1. The above recitations are true and correct.

2. In compliance with the provisions of Section 65855 of the Government Code, this Planning Commission recommends that the Board of Supervisors of the County of Santa Barbara, State of California, following the required noticed public hearing, approve and adopt the above mentioned recommendation of this Planning Commission, based on the findings included as Attachment A of the Planning Commission staff report dated August 20, 2015.

3. A certified copy of this resolution shall be transmitted to the Board of Supervisors.

4. The Chair of this Planning Commission is hereby authorized and directed to sign and certify all maps, documents, and other materials in accordance with this Resolution to show the above mentioned action by the Planning Commission.

PASSED, APPROVED AND ADOPTED this 9th day of September, 2015 by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:

_____
CECILIA BROWN, Chair
Santa Barbara County Planning Commission

ATTEST:

_____
DIANNE M. BLACK
Secretary to the Commission

APPROVED AS TO FORM:

MICHAEL C. GHIZZONI
COUNTY COUNSEL

By _____
Deputy County Counsel

EXHIBITS:
A. Board of Supervisors' Ordinance

EXHIBIT A

ORDINANCE NO. _____

AN ORDINANCE AMENDING SECTION 35-1, THE SANTA BARBARA COUNTY LAND USE AND DEVELOPMENT CODE, OF CHAPTER 35, ZONING, OF THE SANTA BARBARA COUNTY CODE BY AMENDING THE COUNTY ZONING MAP BY REDESIGNATING ASSESSOR'S PARCEL NUMBER 147-030-025 FROM UNLIMITED AGRICULTURE, 10 ACRE MINIMUM LOT SIZE (U) TO AGRICULTURE II, 40 ACRE MINIMUM LOT SIZE (AG-II-40).

Case No. 15RZN-00000-00007

The Board of Supervisors of the County of Santa Barbara ordains as follows:

SECTION 1

All zoning maps and zone designations previously adopted under the provisions of Section 35.14.020, Zoning Map and Zones, of Section 35-1, the Santa Barbara County Land Use and Development Code, of Chapter 35, Zoning, of the Santa Barbara County Code, State of California, are hereby repealed as they related to Assessor's Parcel Number 147-030-025 shown on the map attached hereto as Exhibit 1 and incorporated by reference.

SECTION 2

Pursuant to the provisions of Section 35.14.020, Zoning Map and Zones, of Section 35-1, the Santa Barbara County Land Use Development Code, of Chapter 35, Zoning, of the Santa Barbara County Code, State of California, the Board of Supervisors hereby amends the County Zoning Map by redesignating Assessor's Parcel Number 147-030-025 from Unlimited Agriculture, 10 acre minimum lot size (U) to Agriculture II, 40 acre minimum lot size (AG-II-40) as shown on Exhibit 1 attached hereto and which is made a part of said section by reference, with the same force and effect as if the boundaries, locations, and lines of the districts and territory therein delineated and all notations, references, and other information shown on said Zoning Map were specifically and fully set out and described therein, as exhibited in Exhibit 1, and which is made part of said action by reference, with the same force and effect as if the boundaries, locations, and lines of the districts and territory therein delineated and all notations, references, and other information shown on said Zoning Map were specifically and fully set out and described therein.

SECTION 3

The Chair of the Board of Supervisors is hereby authorized and directed to endorse said Exhibit 1 to show that said exhibit map has been adopted by this Board.

SECTION 4

Except as amended by this Ordinance, Article 35.4 and Article 35.11 of Section 35-1, the Santa Barbara County Land Use and Development Code shall remain unchanged and shall continue in full force and effect.

SECTION 5

This ordinance shall take effect and be in force 30 days from the date of its passage; and before the expiration of 15 days after its passage it, or a summary of it, shall be published once, with the names of the members of the Board of Supervisors voting for and against the same in the Santa Barbara News Press, a newspaper of general circulation published in the County of Santa Barbara.

PASSED, APPROVED, AND ADOPTED by the Board of Supervisors of the County of Santa Barbara, State of California, this ___ day of _____, 2015 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
JANET WOLF, CHAIR
BOARD OF SUPERVISORS
COUNTY OF SANTA BARBARA

ATTEST:

MONA MIYASATO, COUNTY EXECUTIVE OFFICER
CLERK OF THE BOARD

By: _____
Deputy Clerk

APPROVED AS TO FORM:

MICHAEL C. GHIZZONI
COUNTY COUNSEL

By: _____
Deputy County Counsel

Attachments:

Exhibit 1

EXHIBIT 1