ATTACHMENT A.2

Planning Commission Staff Report
dated April 15, 2008 with Attachments and Errata
and
Public Comment Letters

ERRATA

April 15, 2008 Planning Commission Staff Report and Final EIR
for the
Tranquillon Ridge Oil and Gas Project

The following corrections are made to the April 15, 2008 **Staff Report** to the Santa Barbara County Planning Commission for the Tranquillon Ridge Oil and Gas Project (Case # 06RVP-00000-00001).

Staff Report Page Number	Correction
Page 6, second paragraph	4th line: "… Development Code, the Coastal Zoning Ordinance, the planning and zoning laws…"
Page 9, first paragraph	Line 3: "… federal waters approximately ~~six~~ 4.7 miles west of Point…"
Page 20, Table 2	4th row: "Additional ~~20,000~~ 10,000 bbls produced water…"
Page 22, Table 3	Second row (*Marine Biological Resources*), last column: "~~G-5 (new)~~ CCC purview"
	Sixth row (*Fishing*), third column: "MB-1b (~~tar~~ coastal baseline)" and fourth column: add "G-4" under "P-13".
Page 24, first paragraph	Seventh line: "…Measures MB-1c, MB-2 and MB-4, PXP should …" Eighth line: "~~particurlay~~ particularly to marine mammals and seabirds. This is within the ~~perview~~ purview of the …"
Page 25, second full paragraph	Sixth line: "…5.1.25), with an increase in the probability of a rupture for the 30-year project from 0.9 percent to 11.2 percent and an increase in the probability of a leak from 3.6 percent to 100 percent (EIR Table 5.1.24) due primarily to the addition of pumping capabilities at Valve Site #2. For the reduced-life Tranquillon Ridge project, the probability of a rupture would increase from 0.9 percent to 5.4 percent and the probability of a leak would increase from 3.6 percent to 98.8 percent.
Pages 29-30, Table 4	Fifth row (*Marine Water Quality*), fourth column: "~~G-2~~ **" Footnote to Table 4: "** Within the ~~perview~~ purview of the …"
Page 32, Footnote 2	"…recommendation at its December 6, ~~2006~~ 2007 meeting."
Page 33, third paragraph	6th line: "…per year of carbon dioxide and ~~28.8~~ 28.85 (~~662.4~~ 663.55 T/yr…"
Page 38, "*Staff Conclusion*"	Replace *Staff Conclusion* paragraph with the following: "If the Tranquillon Ridge project is approved, PXP should implement EIR Mitigation Measures MB-2 as described in Section 6.1.1.1, page 24 of this staff report to explore the technical feasibility of injecting muds and cuttings at Platform Irene. This mitigation measure is in the purview of the California Coastal Commission."
Attachment A	Page numbers should begin with Page A-2, not page A-12. (No pages are missing from this Attachment.)

Staff Report Page Number	Correction
Attachment A, page 1	Finding 1.4, 13th line: "… mitigation measures in the purview of other responsible agencies. …"
Attachment D, page D-2	Fifth row from bottom of table: "~~Conservation Element, Mineral Resources – Avoid Significant Impacts~~" *(Policy does not apply)*
Attachment D, page D-7	Third paragraph, third line: "…Environmental Impact Report (EIR) and in the ~~2006~~ EIR for the ~~proposed~~ Tranquillon Ridge…" Third paragraph, fourth line from bottom: "…Impact Reduction Plan (FDP Condition G-2) ~~which restricts helicopter overflights of sensitive bird habitats on Vandenberg Air Force Base~~. It is within the Coastal Commission's ~~perview~~ purview to require additional oil spill prevention, clean up and restoration measures specifically for sensitive habitats, and restrictions on helicopter overflights of sensitive bird habitats on Vandenberg Air Force Base to ~~would~~ further reduce potential impacts to critical bird habitats."
Attachment D, page D-16	(3), fourth line: "…April ~~21~~ 15, 2008 Planning Commission staff report…"
Attachment D, page D-17	MB-2 entry, last column: ~~G-2(A)~~ * MB-4 entry, last column: ~~G-2(B)~~ * CRF/KH-2 entry, last column: ~~R-3~~ * Footnote to table: " * Within the ~~perview~~ purview of the …"
Attachment D, page D-20	Second full paragraph, line 12: "…produced water ~~and drill muds and cuttings~~ in accordance with the requirements of the NPDES…" Third full paragraph, line 4: "…~~perview~~ purview…"
Attachment D, page D-37	Policy 5.7 discussion, line 4: "…(FDP Condition E-10). ~~PXP has also agreed to reduce the greenhouse gas emissions of the project through feasible reduction measures and offset funding.~~ Mobile…"

The following corrections are made to the April 2008 **Final EIR** for the Tranquillon Ridge Oil and Gas Project (SBC# 06EIR-00000-00005; SCH # 2006021055).

FEIR Page Number	Correction
Pages 5.1-54 and 5.1-69	Mitigation Measure Risk-1, first sentence: "The applicant shall install an upgraded state-of-the-art leak detection system on the existing emulsion line ~~and on the sour gas line~~. …"

SANTA BARBARA COUNTY PLANNING COMMISSION
Staff Report for the Tranquillon Ridge Oil and Gas Project

Hearing Date: April 21, 2008
Staff Report Date: April 15, 2008
Case No.: 06RVP-00000-00001
Environmental Document:
SBC# 06EIR-00000-00005; SCH #2006021055

Deputy Director: Doug Anthony (568-2046)
Division: Energy
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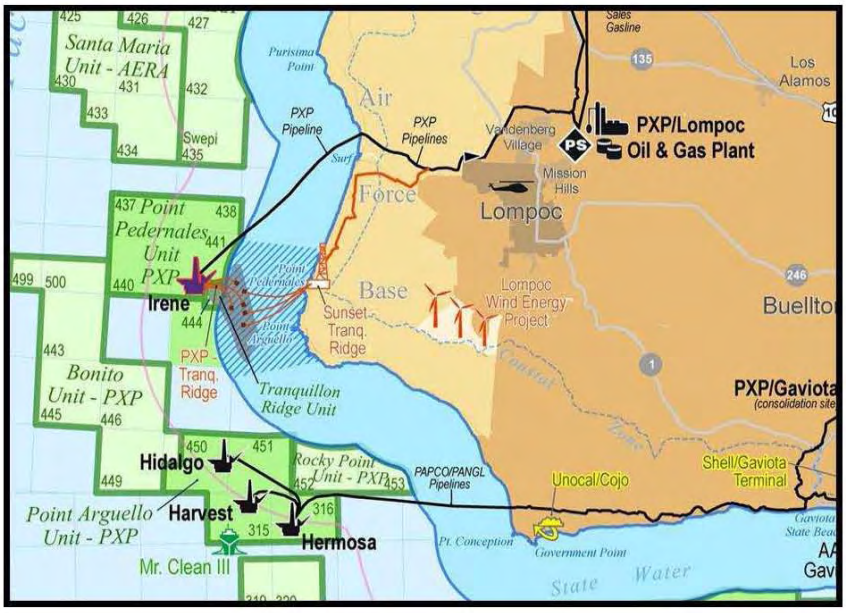

Lompoc Oil and Gas Plant (LOGP): APN 097-360-010, located 2.7 miles northeast of the City of Lompoc and 0.9 miles north of Vandenberg Village. Site address is 3602 Harris Grade Road in the Fourth Supervisorial District.
Platform Irene and Off- to Onshore Oil and Gas Pipelines: APNs (excl. VAFB) 097-350-018, 097-350-021, and 097-360-010; from landfall near Wall Beach, across Vandenberg Air Force Base, to the LOGP. Third and Fourth Supervisorial Districts.

Application Complete: March 10, 2005
Processing Deadline: 180 days from certification of EIR

1.0 REQUEST

Hearing on the request of Plains Exploration and Production Company (PXP) to consider Case No. 06RVP-00000-00001 [application filed on September 30, 2004] for approval of a revised Development Plan under the provisions of Section 35-5 (Energy Facilities) of the County's Land Use and Development Code (various zone districts) and Article II, Division 9 of the Coastal Zoning Ordinance, to allow project modifications and approvals necessary to develop and transport oil and gas from the proposed Tranquillon Ridge lease in State tidelands and process this production at the

Lompoc Oil and Gas Plant (LOGP); and, to certify the Environmental Impact Report (06EIR-00000-00005; SCH #2006021055) pursuant to the State Guidelines for Implementation of the California Environmental Quality Act. As a result of this project, significant effects on the environment are anticipated in the following categories: marine and terrestrial biology, marine and onshore water resources, public safety, and fishing, recreational, cultural, agricultural, visual, and geological resources.

The proposed Final EIR (FEIR) may be reviewed at the Planning and Development Department, Energy Division, 123 E. Anapamu St., Santa Barbara. The FEIR is also available for review at the following public libraries: Lompoc (501 E. North Ave.), Vandenberg Village (3755 Constellation Rd.), Santa Maria (420 S. Broadway), and Santa Barbara (40 E. Anapamu St.). In addition, the Final EIR may be viewed at the Energy Division's website: http://www.countyofsb.org/energy/documents/projects/TranqRidgeFinalEIR/index.htm.

Excluding property within Vandenberg AFB, the application involves Assessor's parcels 097-350-018, 097-350-021, and 097-360-010 (LOGP). The pipelines extend from their landfall at Wall Beach to the LOGP in northern Santa Barbara County, north of Vandenberg Village and the City of Lompoc in the Third and Fourth Supervisorial Districts. The LOGP is located within the Fourth Supervisorial District.

2.0 RECOMMENDATION AND PROCEDURES

Staff recommends that the Planning Commission follow the procedures outlined below and conditionally approve the Tranquillon Ridge project, Case No. 06RVP-00000-00001, 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. Adopt the required findings for the project specified in Attachment A of this staff report and as modified by the Planning Commission, including CEQA findings.

2. Certify the Environmental Impact Report (06EIR-00000-00005; SCH #2006021055) and adopt the mitigation monitoring program contained in the conditions of approval, including any modifications approved by the Planning Commission.

3. Approve the revised Final Development Plan, subject to the conditions included as Attachment B and as modified by the Planning Commission.

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

3.0 JURISDICTION

This project is being considered by the Planning Commission based on Section 35.82.080 of the Land Use and Development Code (LUDC) and Section 35-174.2.4 of Article II, Coastal Zoning Ordinance (CZO) which state that the County Planning Commission has approval authority for Development Plans outside the review authority of the Director or Zoning Administrator, and LUDC Section 35.84.040.E.2 and CZO Section 35-174.10.3.b which specify that a revised Development Plan shall be processed in the same manner as a new Development Plan.

4.0 ISSUE SUMMARY

Extension of Life: PXP has modified its project description and now proposes to terminate Tranquillon Ridge project operations on or before December 31, 2022. This end date will confine the Tranquillon Ridge operations to the same currently expected economic lifetime for the existing Point Pedernales facilities. This will eliminate extending the life of the existing Point Pedernales facilities for the Tranquillon Ridge operations. In accordance with an agreement executed on April 9, 2008 between PXP and the Citizens Planning Association (CPA) and Get Oil Out! (GOO!), PXP will discontinue operations at its existing facilities (Platform Irene, pipelines, and the Lompoc Oil and Gas Plant) by December 31, 2022. Once operations have ended, PXP will pursue the necessary permits for decommissioning and restoration of the onshore project facility sites. The project end date will be enforced through Condition A-6 of the revised final Development Plan.

PXP's originally proposed Tranquillon Ridge project would have extended the life of the LOGP by fifteen years and the life of the offshore facilities by 30 years beyond the expected economic life of those facilities when they were first approved and constructed. This extension of the operating life of these facilities meant that several significant and unavoidable environmental impacts associated with operation of these facilities also would continue for longer than previously expected. The 2017 end-year for the Point Pedernales facilities used in the EIR represents a reasonable mid-point of three different estimates (PXP, Minerals Management Service, and California State Lands Commission) of the remaining economic life of the Point Pedernales Field. Together, these estimates ranged from 2010 to 2022. The Tranquillon Ridge EIR established the year 2017 as the projected economic end of the Point Pedernales Field production to facilitate analysis of the potential impacts associated with extending the use of the Point Pedernales facilities.

Significant impacts that would result from increased oil and gas production would not change with the reduced-life project but would occur for a shorter period of time than was evaluated in the EIR. The reduced-life project is within the scope of the EIR and no additional environmental review is necessary for the Planning Commission to consider it. This reduced Tranquillon Ridge proposal is more fully described in Sections 5.3 and 5.4 of this staff report.

Competing Onshore Proposal: ExxonMobil and Sunset Exploration have submitted applications to the County, the State Lands Commission, and the Air Force to develop the Tranquillon Ridge Field using extended reach drilling from a site located onshore within Vandenberg Air Force Base (Vahevala project). The application to the County is currently incomplete pending

ExxonMobil/Sunset's submittal of evidence of landowner (USAF) decision to proceed with preparation of an Environmental Impact Statement pursuant to the National Environmental Policy Act (NEPA). The application to the Air Force was still under preliminary review when this staff report was released. The State Lands Commission application was deemed complete in January 2007. Further SLC processing also is awaiting a preliminary determination by the Air Force that the project may be compatible with Base mission and operations, as well as the County's determination that the application to the County is complete.

The ExxonMobil/Sunset drillsite is proposed to be located on southern Vandenberg Air Force Base. Water would be removed from the oil/water emulsion at the drillsite and disposed of via injection wells also at the drillsite. The dry oil would then be transported via 17.7 miles of new 16-inch oil pipeline, connecting to the existing ConocoPhillips pipeline system near the Lompoc Oil and Gas Plant (LOGP) for transport to refinery destinations out of the County. Produced gas would be transported for processing to the LOGP via a new 17.7-mile, 6-inch gas pipeline parallel to the new oil line. ExxonMobil/Sunset's production estimates over the projected 30-year project life are 250 million barrels of oil and 30-50 billion standard cubic feet of gas.

The Tranquillon Ridge EIR reviewed a conceptual onshore alternative to using Platform Irene for developing the Tranquillon Ridge Field as proposed by PXP. The components of this "VAFB Onshore Alternative" were developed for the EIR to describe a feasible project that would reduce impacts from those anticipated for PXP's Tranquillon Ridge project. This conceptual alternative resembles the ExxonMobil/Sunset proposal in several respects, but not all. For example, ExxonMobil/Sunset proposes to process the crude oil at the drillsite, rather than at the LOGP, and to construct a new dry oil pipeline to connect to the existing ConocoPhillips pipeline system outside of the LOGP. The VAFB Onshore Alternative discussed in the Tranquillon Ridge EIR included using the existing PXP pipelines from a tie-in point on the Base to transport the wet oil to the LOGP for processing, thus minimizing new construction.

Offshore Pipeline Integrity: When the Tranquillon Ridge proposal was first reviewed by the County in 2002, concerns were raised regarding the structural integrity of the offshore pipelines over an extended operational life of the facilities. Internal corrosion of the crude oil emulsion pipeline, both on- and offshore, was noted in particular. Other concerns cited were manufacturing defects in the flanges, unsupported spans offshore, and internal corrosion of the produced water pipeline. These concerns were especially significant because of the 1997 oil spill from the emulsion pipeline. Soon after the 1997 spill, the operator (then Nuevo/Torch) took several actions to reduce ongoing corrosion in the oil line, including an aggressive corrosion control program, additional inspections to detect and respond to signs of corrosion, and lowering ("derating") of the maximum allowable operating pressure of the pipeline to address the reduced wall thickness of the pipeline. These actions reduced corrosion rates for the emulsion pipeline. Prior to 1997, the pipeline's operating pressure had been derated three times but it has not been derated again since 1997. The defective flanges have been replaced or repaired, and unsupported spans remedied. Annual inspection and regular maintenance of the pipelines, as required by the County-approved Final Development Plan, has helped ensure the pipeline is maintained and operated safely.

In 2002, the County denied the Tranquillon Ridge project. A major finding for that denial was that Nuevo, the operator at the time, was challenging in court the County's authority to regulate safety aspects of both onshore and offshore pipeline operations and platform operations. Given the uncertainty that Nuevo would comply with important safety-related permit conditions, the County found that it could not rely on key safety plans, such as the Safety Inspection, Maintenance, and Quality Assurance Program (SIMQAP) and the Emergency Response Plan (ERP), to mitigate significant environmental and safety-related impacts of the project. When PXP took over as owner and operator of the Point Pedernales project, they dropped Nuevo's challenge of the County's safety conditions and have made consistent efforts to fully comply with all FDP conditions. PXP has accepted and committed to implementing the existing and revised FDP conditions for the Tranquillon Ridge project as well.

Environmental Impacts: The reduced-life Tranquillon Ridge project currently proposed would result in 11 significant and unavoidable (Class I) impacts, for which a Statement of Overriding Considerations must be adopted if the project is approved, and 15 significant but mitigable (Class II) impacts. Several adverse but not significant (Class III) impacts also would occur. The EIR Impact Summary Tables in the EIR Executive Summary list each anticipated impact associated with the Tranquillon Ridge project and the alternatives considered in the EIR. These tables are also attached to this staff report as Attachment C. Please note that the EIR tables refer to the 30-year project analyzed in that document. The EIR identified 13 Class I and 24 Class II impacts for that extended project. A comparison of the impacts for the Tranquillon Ridge project reviewed in the EIR and the now-proposed, reduced-life project is provided in Section 6.0 of this staff report.

For the reduced-life project, Class I impacts result primarily from the potential consequences of a marine oil spill and from the risks to the public from the transport of hazardous gas liquids in tanker trucks on local roadways. Impacts that can be reduced to less than significant levels through implementation of feasible mitigation measures (Class II impacts) would result from emissions of criteria pollutants from drilling, discharges at Platform Irene, oil spills and spill response efforts, and impacts related to construction and operation of new power lines to Valve Site #2 on Vandenberg Air Force Base.

Class I impacts that would continue during project operations, but would not be increased by the reduced-life project, result from the visual intrusiveness and nighttime glare associated with the Lompoc Oil and Gas Plant and the visibility of Platform Irene and the electrical substation at Surf from public viewpoints in the coastal zone. These have been identified as Class I impacts for the project since it was originally reviewed and approved in the late 1980s. Class II impacts that were identified for the original project and which will continue throughout the Tranquillon Ridge project lifetime are primarily related to ground disturbances for pipeline maintenance and repairs.

The Class I and Class II impacts associated with the Tranquillon Ridge project are listed in Tables 3 and 4 of this staff report, along with the EIR-recommended mitigation measures and the Final Development Plan conditions that incorporate those measures, and are discussed further in Section 6.1, below.

PXP/Environmental Group Outreach: PXP undertook and successfully concluded an intensive outreach and collaborative effort with local environmental groups to address significant environmental concerns about the Tranquillon Ridge project raised by the public in response to the draft Environmental Impact Report. On April 9, 2008, this effort resulted in a signed agreement between PXP and the Citizens Planning Association (CPA) and Get Oil Out! (GOO) in which PXP committed to the project end date of December 31, 2022 and to taking other important actions. The results of this collaborative effort include:

- December 31, 2022 operations end date, compared with the originally estimated project life that would terminate in about 2037. This project end date is consistent with PXP's proposal to the County.
- Donation of lands for permanent conservation.
- Termination of permitting efforts for the Purisima Hills residential proposal.
- Greenhouse gas reductions and offset measures.
- Donate $1,500,000 to fund additional greenhouse gas emissions reductions in Santa Barbara County.

County Counsel has advised that the Planning Commission may not rely on the announced terms of the PXP-EDC Agreement as a basis for the issuance of any permit to PXP. The proposed permit for the PXP Tranquillon Ridge project has been processed pursuant to County's Land Use Development Code, the planning and zoning laws of the Government Code, and CEQA. Under California law, findings must be made for the issuance of any permit, including findings under CEQA. CEQA also requires that for any project that will have unmitigated significant adverse environmental impacts, that project may not be approved without the adoption of statements of overriding consideration. As with findings, statements of overriding consideration must be supported by substantial evidence. (CEQA Guidelines § 15093(b).) Any substantial evidence in support of any statement of overriding consideration must be in the administrative record.

PXP and EDC have submitted a letter that summarizes an agreement that they reportedly entered into on April 9, 2008. The general terms of the agreement are described in the letter and have also been announced in the press; however, the County is not a signatory to that agreement and, indeed, does not have a copy of the agreement because the parties have decided to maintain it as confidential. Therefore, the agreement is not part of the administrative record that supports the issuance of the permit to PXP. The letter from PXP and EDC is part of the record; however, in terms of evidentiary value, that letter would be classified as "hearsay evidence." Generally, under California law, hearsay evidence is admissible in administrative proceedings; however, it is not sufficient in itself to support a finding.

Therefore, none of the findings or statements of overriding consideration proposed as part of the issuance of the permit are based on the announced terms of the PXP-EDC agreement. Additionally, County Counsel advises that the Planning Commissioners should not make any statements that suggest that they are issuing a permit to PXP on the basis of the terms of that agreement. It is worth noting that one court struck down an entire permit where certain statements of overriding consideration were not supported by evidence in the record, even though the majority of the statements were supported by evidence. (See *Sierra Club v. Contra Costa County* (1992) 10

Cal.App.4th 1212, 1224.) The Court reasoned that the issuance of a permit where there are unavoidable adverse significant impacts requires a "balancing" and this task cannot be fairly done if some of the statements of overriding consideration are not supported by evidence.

Cabrillo High School Expansion: There is a possibly that Cabrillo High School (Vandenberg Village) facilities could be expanded westward, farther into the hazard zone of PXP's sour gas pipeline. PXP has agreed to work with the school to ensure that the risks associated with operation of this pipeline would not increase over current levels if the school pursues expansion. Reduction of the operational life of the Tranquillon Ridge project as currently proposed will also help reduce the amount of time the school facilities would be exposed to hazards associated with the sour gas pipeline.

5.0 PROJECT INFORMATION

5.1 SITE INFORMATION

Site Information – Tranquillon Ridge Oil and Gas Project	
APNs	LOGP: 097-360-010; Pipelines (excluding VAFB): 097-350-018 and 097-350-021.
Comprehensive Plan Designation	The LOGP site is designated Agriculture with Petroleum Resource Industry Overlay. The majority of the onshore portion of the pipeline right-of-way (ROW) is located within Vandenberg AFB. That portion of the ROW that lies outside of VAFB (from about 4,000 feet northwest of Vandenberg Village to the LOGP) is designated A-II (Agriculture).
Zoning	The LOGP site is zoned **M-CR, Coastal-Related Industry** per the Countywide LUDC. The portion of the pipeline ROW outside of VAFB is zoned **U, Unlimited Agriculture** per County Zoning Ordinance 661.
Site Size	The onshore portion of the project pipeline ROW is approximately 12.4 miles in length from landfall to LOGP. The LOGP covers approximately 22.5 acres of a 2,283-acre parcel.
Present Use & Development	Between the project pipeline landfall at Wall Beach and its departure from VAFB, the ROW traverses undeveloped lands. Exceptions include the federal penitentiary and limited agricultural production. The eastern-most segment of the pipeline ROW is about 2.6 miles long and is located between VAFB and the LOGP, entirely within the state-designated Lompoc Oil Field.
Surrounding Uses/Zoning	For purposes of this summary, the onshore portion of the pipeline has been divided into two segments. **Segment A** refers to that portion of the ROW located between landfall at Wall Beach and its departure from VAFB property, approximately 4,000 feet northwest of Vandenberg Village. **Segment B** refers to the remaining, and eastern-most, 2.6 mile segment of the ROW. Because the pipeline ROW generally trends in an east-west direction, the following description is presented in the context of the north and south sides of the ROW. North Side of ROW: **Segment A -** The majority of lands north of Segment A are developed and undeveloped lands of VAFB, owned by the federal government. This segment includes one underground crossing of Highway 1, near Santa Lucia Canyon, and limited agricultural use, including cultivated fields near VAFB's 13th Street and

Site Information – Tranquillon Ridge Oil and Gas Project	
	Terra Rd. intersection and fields within Santa Lucia Canyon, east of Highway 1. **Segment B** - Land uses north of Segment B are limited to lands dedicated to the onshore oil and gas production of the Lompoc Oil Field. This segment is adjacent to the Burton Mesa Ecological Reserve. South Side of ROW: **Segment A** – The majority of lands south of Segment A are undeveloped lands on VAFB. This segment of the ROW traverses the northern and western borders of the federal penitentiary within VAFB. **Segment B** – Land uses immediately south of Segment B are limited to onshore oil and gas production of the Lompoc Oil field. Residences of Vandenberg Village are approximately 1,800 feet from the pipeline, at their closest proximity to it. This segment also is adjacent to the Burton Mesa Ecological Reserve.
Access	Access to the onshore portion of the pipeline ROW is primarily from private, roadways, both improved and unimproved, on VAFB and mostly unimproved roadways in the Lompoc Oil Field. The ROW also crosses under two public roads: Highway 1 near Santa Lucia Canyon, and Harris Grade Road, west of the LOGP. Access to the LOGP is from Harris Grade Road, a public roadway.
Public Services	Water Supply: Operation and maintenance of the pipeline ROW requires no water supply. Revegetation efforts are watered if needed using water trucks. Domestic water for the LOGP is provided by the Mission Hills Community Services District. Process water for the LOGP is supplied from a PXP-owned well. Sewage: Operation and maintenance of the pipeline requires no sewage disposal. Sewage disposal for the LOGP is provided by the Mission Hills Community Services District. Fire: The closest fire station to the pipeline ROW and LOGP is County Fire Station 51, 3510 Harris Grade Rd., at the intersection of Harris Grade Road and Burton Mesa Blvd. (This station was recently relocated to this address from 749 Burton Mesa Blvd., about ¼-mile to the north. Service levels will remain the same.) Other: The closest County Sheriff's station to the pipeline ROW and the LOGP is the Lompoc Station, 3500 Harris Grade Rd., adjacent to County Fire Station 51. Schools in the project vicinity are Cabrillo High School, Buena Vista Elementary and Los Berros Elementary and are under the administration of the Lompoc Unified School District.

5.2 SETTING

Platform Irene (Figure 1) produces oil and gas from Outer Continental Shelf (OCS) Lease P-0441, which is located in federal waters approximately six miles west of Point Pedernales. Three offshore pipelines (oil, gas, and produced water return) extend from the platform to the landfall at Wall Beach, north of the Santa Ynez River mouth (Figure 2).

The onshore portion of the pipeline right-of-way (ROW) traverses 12.4 miles of terrain between Wall Beach (north of Surf Beach) and the Lompoc Oil and Gas Plant (LOGP) (Figure 3), located on Harris Grade Road, north of the City of Lompoc and the communities of Vandenberg Village, Mesa Oaks, and Mission Hills.

Between landfall and the LOGP, the pipeline predominantly traverses undeveloped lands containing coastal sage scrub, Burton Mesa chaparral, grassland, and oak woodland habitats. These habitats are discussed in detail in Section 5.2.1.1 of the Tranquillon Ridge EIR (06EIR-00005).

Figure 1. Platform Irene

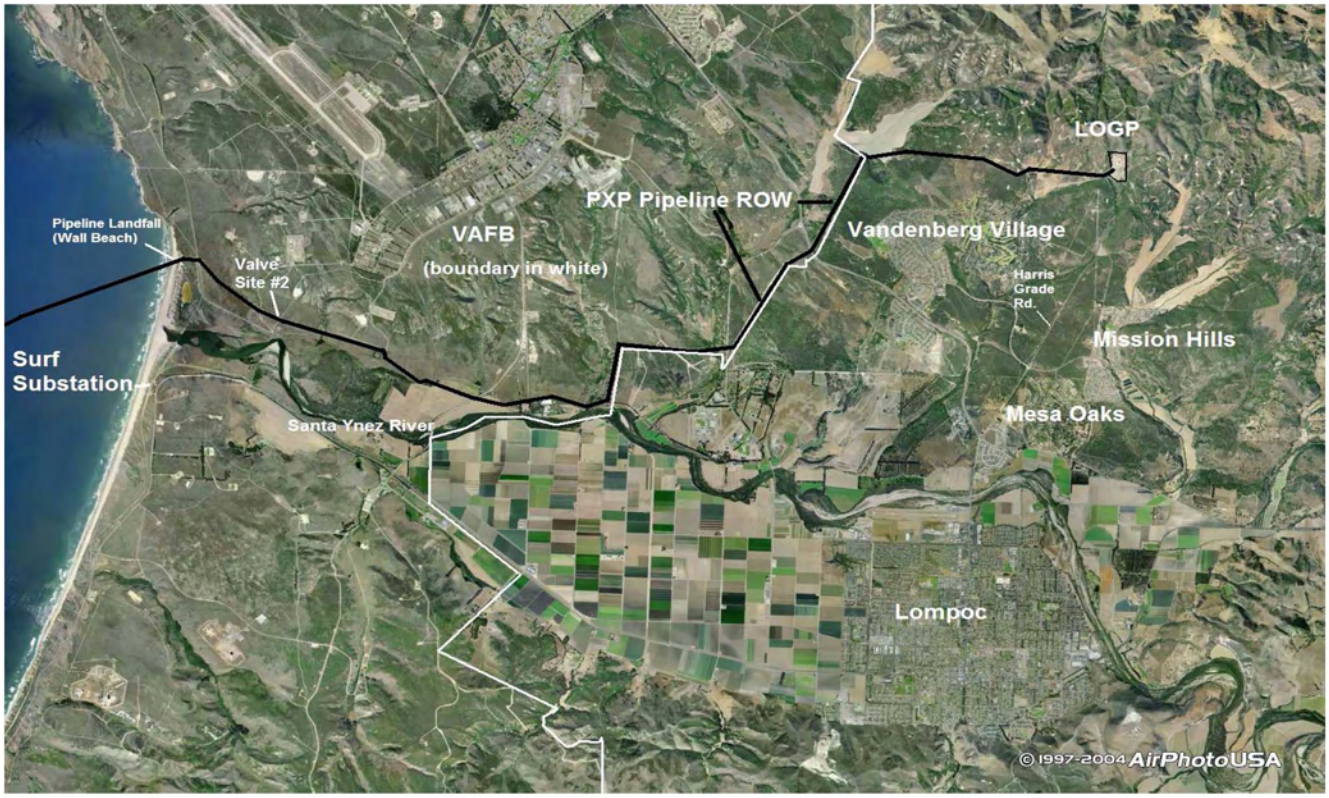

Figure 2. Pipeline ROW from Landfall to LOGP

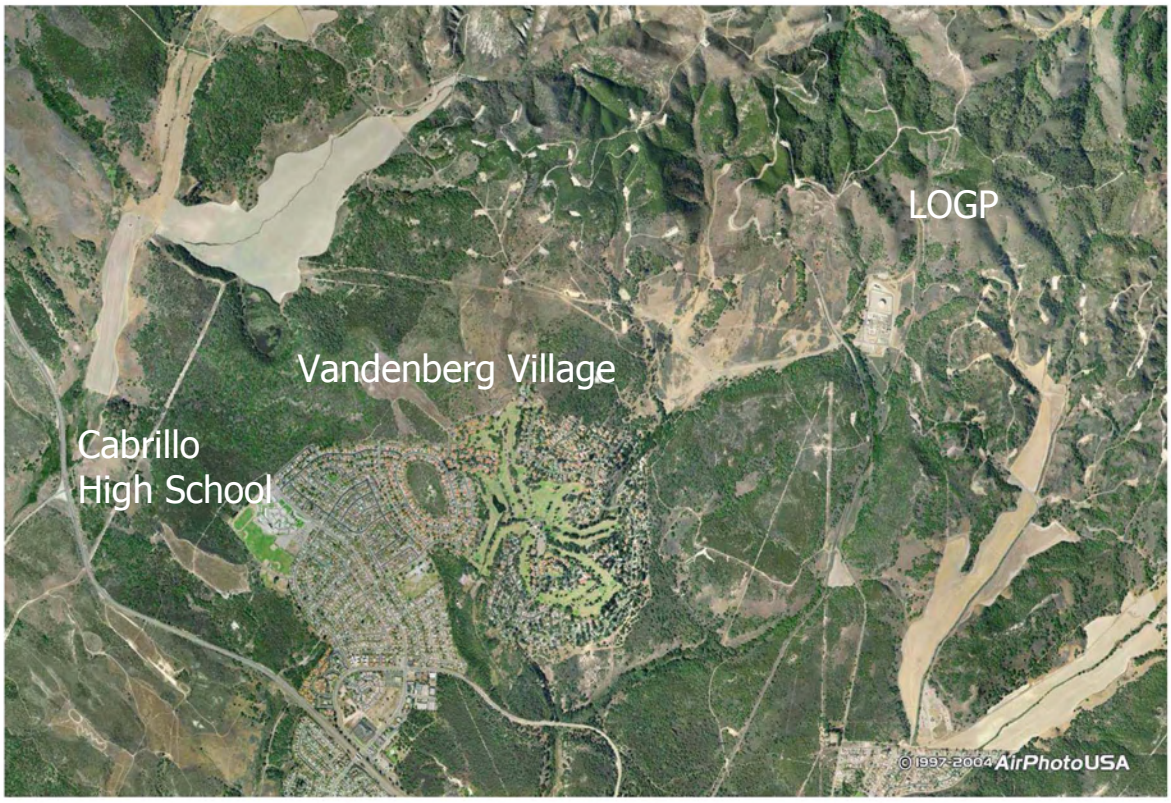

Figure 3. Lompoc Oil and Gas Plant Vicinity

Several cultural resource sites also occur along the pipeline ROW and are described in Section 5.12.1.3 of the EIR. Many of these sites are in proximity to or within the floodplain of the Santa Ynez River. Geologically, the pipeline ROW traverses valley and floodplain deposits and highly erosive Orcutt sand wind deposits.

The Lompoc Oil and Gas Plant (LOGP) is located in the state-designated Lompoc Oil Field, 2.7 miles north of the City of Lompoc and slightly less than a mile north of Vandenberg Village, at 3602 Harris Grade Road. The oil-handling portion of the plant was built in 1987 and the gas handling portion was installed in 1997, when the Battles Gas Plant ceased operating.

Figure 4. Lompoc Oil and Gas Plant

The LOGP occupies about 22.5 acres of a 2,283-acre parcel owned by PXP. Figure 4 is an aerial photo

of the facility looking northeast. The crude oil surge tank is in the top of the picture, the oil plant is to the left (west) and the gas plant is to the right (east), within the blacktopped area. A retention basin is located south of the plant entrance road which comes off of Harris Grade Road to the west.

The LOGP currently processes the oil emulsion (a mixture of oil and water) and natural gas produced from Platform Irene in federal waters. The oil and gas are transported to the LOGP for processing via an existing 20-inch diameter emulsion pipeline and an existing 8-inch gas pipeline. At the LOGP, the oil and water are separated and treated. The oil is sent via the existing ConocoPhillips pipeline system northward to the Santa Maria Refinery (in San Luis Obispo County) where it is further treated and then sent to Bay Area refineries for processing into final products, such as gasoline. The water that is separated from the emulsion is treated and then returned to either Platform Irene for reinjection or the Lompoc Oil Field for injection.

Gas from the offshore Point Pedernales field contains hydrogen sulfide (H_2S), a toxic component commonly occurring in natural gas produced in the region. The H_2S and other impurities are removed from the produced gas at the LOGP. Gas from the onshore Lompoc Oil Field also is processed at the LOGP. Most of the resulting "sales quality" gas is sent to the Gas Company system approximately 7 miles northeast of the LOGP via a "pre-custody transfer" pipeline operated by PXP. Some of the treated gas is used as fuel at the LOGP. The H_2S removed from the incoming gas is reduced to elemental sulfur, a pale yellow, odorless and brittle material, which is hauled from the LOGP by truck. The gas processing also results in the formation of natural gas liquids (NGLs) and liquid petroleum gas (LPG). The NGLs are blended as much as possible into the processed crude oil that is sent offsite via pipeline and remaining NGLs and the LPGs are trucked offsite.

Today, the LOGP is receiving about 8,300 barrels of oil per day (bpd) from the Point Pedernales project and 5 million standard cubic feet of gas per day (mmscfd) from both the Point Pedernales project and the onshore Lompoc Oil Field. The plant's current permitted capacity is 36,000 bpd oil and 15 mmscfd gas. A detailed description of current Point Pedernales operations is in Section 2.3 of the Tranquillon Ridge EIR.

5.3 TRANQUILLON RIDGE PROJECT OVERVIEW AND BACKGROUND

PXP's proposed Tranquillon Ridge project involves development of the Tranquillon Ridge oil and gas field which is located primarily in State waters (see Figure 5)[1]. PXP proposes to access the Tranquillon Ridge Field using extended-reach drilling from Platform Irene. Platform Irene is located in Federal waters and is currently producing the Point Pedernales Field. PXP proposes to use the existing platform, pipeline, and LOGP facilities to produce, transport and process oil and gas from the Tranquillon Ridge Field. PXP also proposes to discharge the treated produced water at the platform, rather than reinjecting it.

[1] Figure 5 is from the original PXP Tranquillon Ridge proposal and shows 22 potential bottom-hole locations. The current Tranquillon Ridge proposal would develop up to 17 new wells.

If the County approves the Tranquillon Ridge project, the State Lands Commission (SLC) would then decide whether to issue the oil and gas lease (or multiple leases) needed for the project. If the

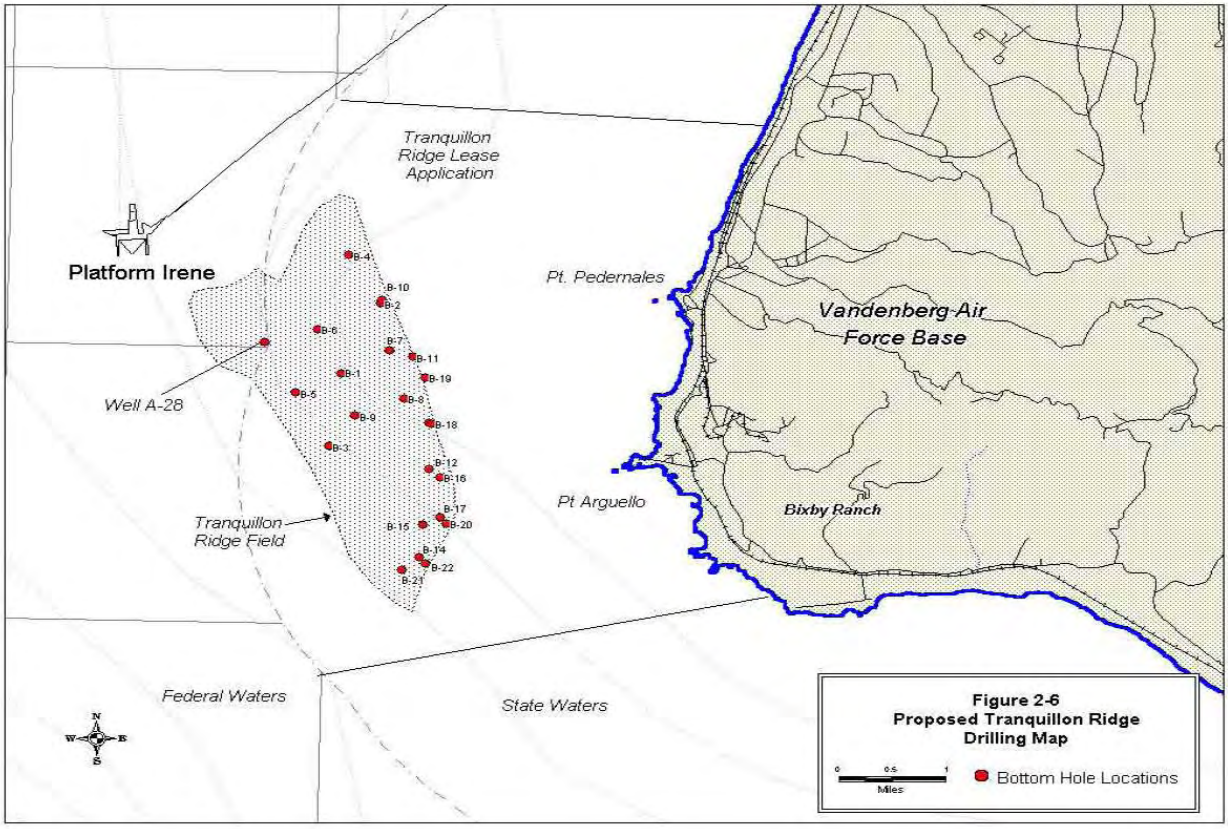

Figure 5. Tranquillon Ridge Drilling

SLC issues the lease(s), the California Coastal Commission would then take action on both a Coastal Development Permit application for portions of the project in the Commission's retained permit jurisdiction and on an amended federal consistency certification. Once the project is approved by the State agencies, the Federal Minerals Management Service would take final action on a revised Development and Production Plan for the project facilities in Federal waters.

The State Lands Commission may issue a new oil and gas lease in State tidelands under a limited set of circumstances. The 1994 California Sanctuary Act (California Public Resources Code §§ 6240 *et. seq.*) prohibits leasing of any State Tidelands for oil and gas development, with three exceptions:

1. A legislative determination that, following a finding of a severe interruption in the supply of energy by the President of the United States, the energy reserves within the sanctuary will contribute significantly toward alleviating such interruption.

2. The State Lands Commission determines that oil and gas deposits contained in tidelands are being drained by means of wells upon adjacent federal lands and leasing of the tidelands for oil or gas production is in the best interest of the State.

3. The State Lands Commission may adjust the boundaries of existing oil and gas leases to encompass all of a field partially contained within the existing lease subject to specific conditions (Public Resources Code § 6872.5).

The State Lands Commission could issue the proposed lease(s) for the Tranquillon Ridge project pursuant to Exception #2, if it first finds that drainage is occurring.

Today, PXP is producing about 8,300 barrels of oil and 4.5 mmscf of gas per day from the Point Pedernales project. PXP would produce and process oil and gas from both the Point Pedernales Unit and the Tranquillon Ridge Field, if the proposed project is approved.

PXP currently proposes to drill up to 17 new wells from Platform Irene for the Tranquillon Ridge project, with 14 of these wells being used for oil and gas production and three for injection. Drilling would occur for five to six years, once the first well is drilled into the formation. PXP also has estimated that peak Tranquillon Ridge oil production would be about 30,000 barrels of oil per day (bpd) and about 7.5 million standard cubic feet per day (mmscfd) of gas. The Tranquillon Ridge project would not exceed the LOGP production levels currently permitted under the PXP Final Development Plan (FDP) for the Point Pedernales project; these levels are 36,000 bpd of oil and 15 mmscfd of gas. However, the proposed project would introduce oil and gas from a new source (State tidelands lease) which is not currently allowed under the FDP, nor was it evaluated in the 1985 Point Pedernales EIR/EIS. Therefore, a revision to the FDP is required for development of the Tranquillon Ridge Field using the existing Point Pedernales facilities.

The existing Point Pedernales project was approved by the County Board of Supervisors in 1986. The Minerals Management Service (MMS) approved the federal portion of the project and the California Coastal Commission (CCC) concurred with the consistency certification in 1985/1986. The Point Pedernales project has operated since 1987. Originally, gas was treated at the Battles Gas Plant in Santa Barbara County and a Heating, Separation & Pumping (HS&P) facility was constructed at the site of the current LOGP to treat the produced oil and transfer it to pipelines that carried it to refinery destinations out of the County. With abandonment of the Battles Gas Plant, gas treating facilities were added to the HS&P in 1997 and the plant became known as the Lompoc Oil and Gas Plant, or LOGP.

Three pipelines connect Platform Irene to the LOGP:

- 20-inch oil emulsion line
- 8-inch gas line
- 8-inch produced water return line (takes treated water from the LOGP to the platform for injection or discharge)

These pipelines are located in a common right-of-way, with valves, valve sites, and other pipeline appurtenances along the pipeline route. The offshore portion of the pipelines is about 10.1 miles long and the onshore portion is about 12.4 miles long. Figure 2 shows the pipeline corridor from landfall at Wall Beach to the LOGP. The oil emulsion and gas lines bring Point Pedernales production to the LOGP for treating and the produced water pipeline carries about 30,000 bpd of the

water separated from the Point Pedernales production and treated at the LOGP back to the platform for injection. The remainder of this treated produced water is injected into the onshore Lompoc Oil Field.

An electrical substation was constructed for the Point Pedernales project and supplies power to Platform Irene via an undersea cable. The substation is located at Surf, near the Amtrak train station, south of the Santa Ynez River mouth (see Figure 2).

Sections 2.1 and 2.3 of the Tranquillon Ridge EIR provide more detailed discussions of the existing Point Pedernales project facilities, PXP's exploration of the Tranquillon Ridge Field, and current Point Pedernales project operations.

5.4 PROJECT DESCRIPTION

The Tranquillon Ridge project currently (April 2008) proposed by PXP is described below. This proposal differs from the one evaluated in the EIR and would not extend the life of the existing Point Pedernales facilities. This reduced-life project is evaluated in Section 6.0 of this staff report.

5.4.1 Facility Modifications

Proposed changes to the existing Point Pedernales facilities that would occur if the Tranquillon Ridge project is approved and implemented are described below.

5.4.1.1 Platform Irene (see EIR Section 2.2.2 and Table 2.2)

PXP proposes to implement the following modifications at Platform Irene in order to accommodate production from the Tranquillon Ridge Field:

- Replace three 600-hp oil transport pumps with three 1250-hp pumps
- Replace two 1300-hp mud pumps with two 1600-hp mud pumps
- Drill up to 14 new production wells over a five- to six-year period and three injection wells, for a total of 17 new wells
- Install approximately 10 750-hp submersible pumps, one on each of approximately 10 of the new wells

The project will also result in the following changes:

- Increase helicopter trips by 26 round trips per year (2006 average: 13 round trips per week)
- 50% increase in maintenance and service with new wells in operation
- Additional one-way boat trips during drilling, up to the permitted maximum of 120 per year (There were 107 trips in 2006)
- 116.9% increase in electrical power demand for drilling and 104% increase for normal operations
- Additional 10,000 bpd produced water (for a total of 40,000 bpd water) shipped back to the platform in the 8-inch water return line for discharge or injection.

PXP proposes to develop the Tranquillon Ridge Field by directionally drilling up to 17 new wells. One well would be drilled at a time using extended reach technology from existing unused well slot locations on the platform. Figure 6 illustrates extended reach drilling from Platform Irene.

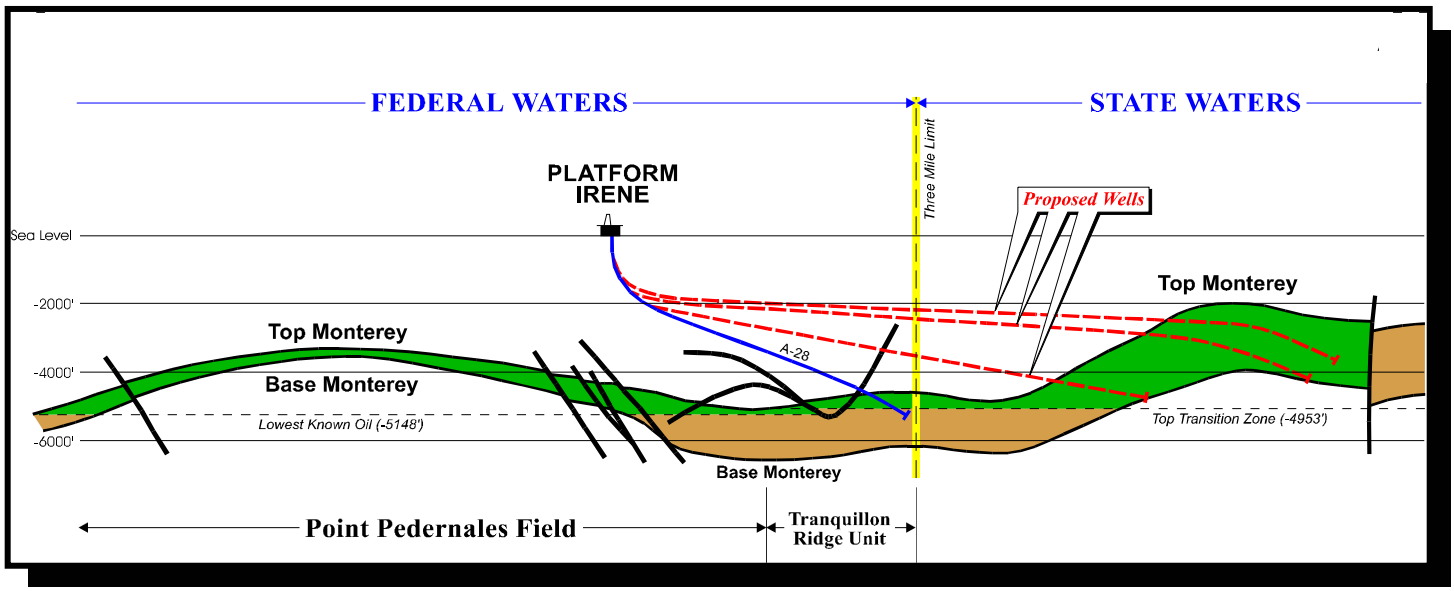

Figure 6. Directional Drilling from Platform Irene

PXP estimates that 14 of the new wells would be production wells and approximately 10 of these wells would require use of a submersible pump to lift the oil in the well; the remaining production wells would use gas-lift technology and would not require pumps. Total measured well lengths would exceed 25,000 feet in some instances, with overall vertical depths below the ocean surface averaging between 3,000 and 5,000 feet.

Recompletion in a well, if needed would likely commence eight to ten years after the initial completion date of the well. Recompletion involves the re-work/drilling of a well to ensure full production levels are achievable.

Total well drilling and completion times are estimated to range between 60 and 120 days per well. The 17-well development plan proposed for the Tranquillon Ridge Field is designed to provide 80-acre well spacing (each well would be centered on an 80-acre area) in the commercial Monterey zones. PXP estimates drilling will occur over a period of five to six years.

Figures 7a and 7b provide estimated oil and gas production the proposed project. These figures also show total estimated production from Platform Irene, which includes both the Tranquillon Ridge and Point Pedernales Fields.

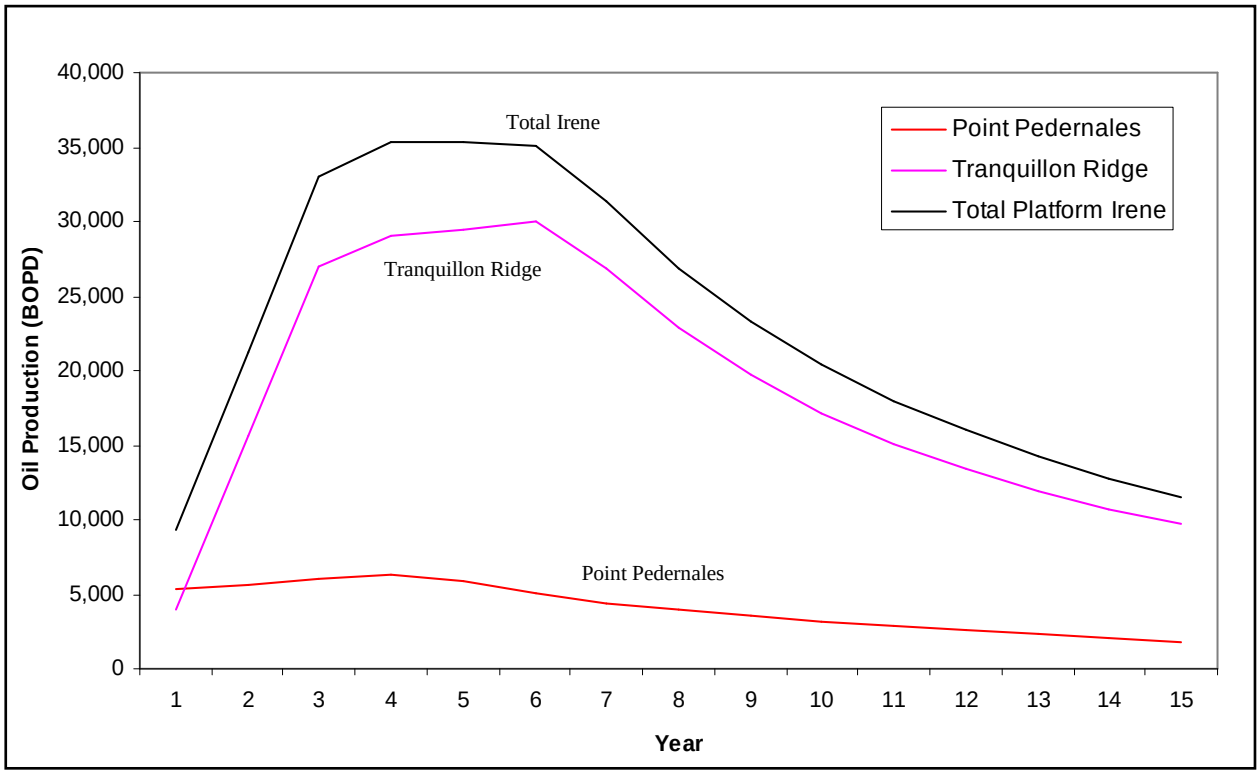

Figure 7a. Estimated Oil Production for the Tranquillon Ridge Field

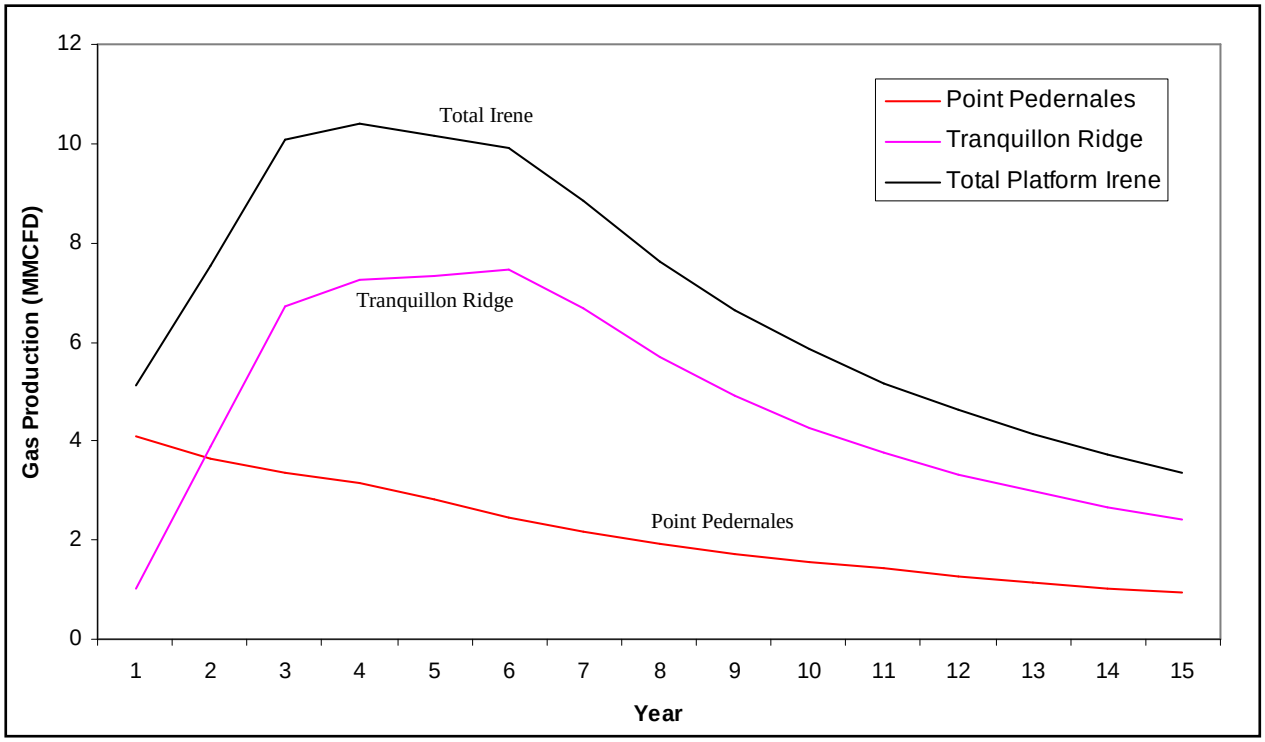

Figure 7b. Estimated Gas Production for the Tranquillon Ridge Field

Production from the Tranquillon Ridge Field is estimated to peak at about 30,000 bpd of oil and 7.5 mmscfd of gas. With the proposed Tranquillon Ridge project, peak production from Platform Irene would be about 35,000 bpd and 11 mmscfd gas. The applicant has estimated the ultimate recovery for the Tranquillon Ridge Field to be about 170 to 200 million barrels of oil and 40 to 50 billion standard cubic feet of gas.

The concentration of hydrogen sulfide (H_2S) gas is estimated to remain at approximately current levels, between 4,000 and 8,000 parts per million (ppm) with the addition of Tranquillon Ridge gas to the Point Pedernales produced gas. If Tranquillon Ridge production is similar to Point Pedernales production, the H_2S concentration in the gas stream is expected to decrease during the initial period of Tranquillon Ridge production.

5.4.1.2 LOGP (see EIR Section 2.2.3 and Table 2.3)

Several relatively minor modifications would need to be made at the LOGP to accommodate the Tranquillon Ridge production. The primary change would be to return two existing plate and frame heat exchangers (heater treaters) to service. (These heat exchangers are used to separate oil from water.) Other modifications that would be made at the LOGP are discussed in the Tranquillon Ridge EIR, in Section 2.2.3 and Table 2.3. Operation of the LOGP for the Tranquillon Ridge project would result in a 30% increase in electrical power demand, a 100% increase in fuel demand, two additional LPG/NGL truck trips per week (for a total of five LPG truck trips per week) and one additional sulfur truck trip per week. PXP expects to take about nine weeks to complete the necessary modifications at the LOGP.

5.4.1.3 Pipelines (see EIR Section 2.2.4 and Table 2.4)

No changes to the existing pipelines are proposed to accommodate the Tranquillon Ridge production, with one potential exception. PXP may need to install additional pumps and electrical service at Valve Site #2 to provide additional pumping capacity for the oil emulsion pipeline. This could occur if the current maximum allowable operating pressure needs to be lowered for safety reasons, or if the characteristics of the crude oil require it. The current operating pressure is sufficient to transport the emulsion produced from both the Point Pedernales and Tranquillon Ridge fields all the way from the platform to the LOGP. However, if this operating pressure needs to be lowered, the decline in pressure would require additional onshore pumping capacity to complete the emulsion transport to the LOGP. If this occurs, or if the characteristics of the crude oil require it, PXP proposes to install three crude oil booster pumps (1250-hp each) at Valve Site #2.

Valve Site #2 is located within Vandenberg Air Force Base, about a mile and a quarter southeast of the pipeline landfall at Wall Beach (see Figure 2 or EIR Appendix A, Detail 1). The existing electrical system would need to be upgraded at Valve Site #2 to supply power to the new booster pumps. This upgrade would include new power lines and poles and possibly a new substation, depending on the location of the power grid tie-in point. Addition of the booster pumps and power line for Valve Site #2 would take about 14 weeks to complete. A new transformer/substation would require four weeks to construct. Approximately 40 people and 15 pieces of construction equipment would be needed to install the electrical system upgrades at Valve Site #2 (see EIR Section 2.2.5 and Table 2.5). PXP is proposing to install this power system upgrade in the future, if and when it is needed. A separate zoning clearance would be issued for construction of this project component.

5.4.1.4 Drilling Schedule and Personnel

Drilling of the new wells from Platform Irene would occur over five to six years. One well would be drilled at a time and each well would take from 60 to 120 days to complete. During well drilling, up to 70 people may be at the platform, consistent with current drilling (well workover) efforts. Normal operations will require about 15 people at the platform, also consistent with current operations.

5.4.2 Operational Modifications

Table 1 summarizes the operational changes at Platform Irene that would occur if the proposed project is approved and implemented. Primary differences from current operations include: (1) well drilling activities would continue for up to about six years and would include the presence of drilling crews on the platform; (2) helicopter trips would increase to accommodate more shift changes due to increased drilling; (3) supply boat trips would increase to support increased drilling. Drill muds and cuttings currently are not discharged at the Platform, nor is produced water. The current general NPDES permit (CAG280000) allows for ocean discharge of the treated produced water and drill muds and cuttings if water quality standards are met.

Table 1: Summary of Changes to Platform Irene with Proposed Project

Parameter (Permitted Level[a])	Platform Irene with Addition of Tranquillon Ridge Project	
	During Normal Operations	**During Drilling of New Wells**
Total Employees	No additional personnel[b] (Currently there are 14-15 personnel).	Up to 70 personnel (15 normal operations + 55 drilling).
Total Boat Trips (1 one-way trip every 3 days)	No increase (Currently [c] – 1 one-way trip every 3 to 4 days annual average or 98 trips per year).	Increase to a total of 1 one-way trip every 3 days or 120 trips per year (at the permitted limit).[d]
Total Helicopter Trips (3 round trips per day)	Increase of 1 one-way trip per week or 26 round trips per year (Currently [c] – 11 round trips per week annual average, or 573 annual round trips)	Increase to a total of 3 round trips per day annual average.
Additional Maintenance and Service of Wells	With addition of new wells could be up to 50% increase in maintenance and service.	None
Additional Electrical Power Requirement	104%[e]	116.9%[e]
Muds and Cuttings Disposal	N/A	Disposal into ocean outfall as per the NPDES permit or offshore injection if feasible.
Produced Water Disposal	Addition of 10,000 bpd for discharge offshore with a total of 40,000 bpd shipped back to the platform for injection or discharge to ocean. (Currently up to 30,000 bpd is injected offshore.)	N/A

N/A – not applicable; hp – horsepower.

a. The permitted level is listed only where it is applicable.

b. Normal current operations include periodic well workover drilling, which takes 8 weeks per year and requires up to 55 personnel to operate the drilling rig and perform other work during the well workovers.

c. Maximum permitted helicopter trips and boat trips are occasionally reached during current operations (e.g., platform shift change).

d. No additional boat trips would be needed for onshore disposal of drill muds and cuttings.

e. Data (provided by PXP) is annualized and does not distinguish between normal operation and operation during drilling.

6.0 PROJECT ANALYSIS

6.1 ENVIRONMENTAL REVIEW

Previous Environmental Documents: Six environmental documents related to the Point Pedernales project have been finalized:

1. **1985**: The original Union Oil Project **Environmental Impact Statement/Environmental Impact Report** (EIS/EIR, SCH# 84062703).
2. **1993**: **Supplemental EIR** for construction and operation of a gas plant at the Lompoc facility to replace the Battles Gas Plant (SCH# 92021083).
3. **1993**: **EIR Addendum** for transportation of natural gas liquids from the Lompoc facility.
4. **1995**: **EIR Addendum** for temporary onshore re-injection of the natural gas produced offshore during the period between closure of the Battles Gas Plant and commissioning and operation of the Lompoc Gas Plant.
5. **1996**: **EIR Addendum** for process and design modifications to the originally proposed Lompoc Gas Plant.
6. **1999**: **EIR Addendum** for increase in H_2S concentration in the offshore-to-onshore gas pipeline from 4,000 ppm to 8,000 ppm.

Current Environmental Document: In 2002, an EIR addressing the first Tranquillon Ridge project proposed by Torch/Nuevo Energy Company was prepared. This project was denied in June 2002 by the County Board of Supervisors and the portion of the 2002 EIR addressing the Tranquillon Ridge project was not certified. (Parts of the EIR addressing two other projects, the Sisquoc Pipeline Bi-Directional Flow request and water treatment system upgrades at LOGP were certified and the projects approved, with conditions.) The current (2008) Tranquillon Ridge EIR is based on the 2002 EIR but reflects substantial revisions to the earlier document to update the analyses for the Tranquillon Ridge project. The EIR evaluates PXP's proposal of 2004.

PXP now requests approval of a reduced-life proposal which differs from that analyzed in the EIR. Table 2 compares certain basic components of the project evaluated in the EIR and the requested reduced-life project.

Table 2: Comparison of Project Components for EIR Project and Reduced-Life Proposal

2008 Tranquillon Ridge EIR (~2037)		Reduced-Life Tranquillon Ridge Proposal (2022)
Platform Irene		**Platform Irene**
Replace 3 600-hp oil pumps with 3 1250-hp pumps		No change
Replace 2 1300-hp mud pumps with 2 1600-hp pumps		No change
Drill 22 oil wells and 8 utility wells – 30 total		Drill 14 oil wells and 3 injection wells – 17 total
15 500-hp submersible pumps		10 750-hp submersible pumps
26 additional helicopter round trips per week; total 3 round trips/day		No change
50% increase in well maintenance and service		No change

Table 2: Comparison of Project Components for EIR Project and Reduced-Life Proposal

2008 Tranquillon Ridge EIR (~2037)		Reduced-Life Tranquillon Ridge Proposal (2022)
Up to 120 one-way boat trips per year		No change
116% power demand increase for drilling; 104% increase for normal operations		No change
Additional 20,000 bbls produced water; 40,000-bbl total for ocean discharge		No change
15-year drilling period		5- to 6-year drilling period
LOGP		**LOGP**
2 heater treaters return to service		No change
30% increase electrical power demand		No change
100% increase fuel demand		No change
2 additional gas liquid trucks per week; total of 5 per week		No change
Valve Site #2 (if needed)		**Valve Site #2** (if needed)
3 booster pumps		No change
Power lines		No change
Substation		No change

With respect to the CEQA review, the primary difference between the project evaluated in the EIR and that now proposed by PXP is the reduced project life. PXP now proposes that the project cease operations by December 31, 2022, coinciding with the expected end of operations for the existing Point Pedernales project. This modified Tranquillon Ridge project would reduce the duration of project-related impacts from that estimated in the EIR to the same period of time the Point Pedernales project would remain in operation if the Tranquillon Ridge project is not approved. Thus, the extension-of-life impacts discussed in the EIR would not occur with the currently proposed Tranquillon Ridge project. The nature and intensity of the Tranquillon Ridge project impacts would remain the same as described in the EIR. Therefore, the 2008 EIR is a complete EIR that adequately evaluates PXP's current Tranquillon Ridge proposal.

The Tranquillon Ridge project would involve one or more state leases which would be under the purview of the California State Lands Commission. Certain components of the project are in either the retained permit jurisdiction or the consistency review jurisdiction of the California Coastal Commission; portions of the pipeline and the LOGP are within the County's jurisdiction. In addition, a large portion of the pipeline right-of-way is within Vandenberg Air Force Base and also subject to Base review. Other federal (Minerals Management Service [MMS]) action also may be required to implement the proposed project because it includes the use of a platform (Irene) located in federal waters. The EIR was prepared under the auspices of a Joint Review Panel (JRP) comprising staff from the County Planning and Development Department, the California Coastal Commission, and the State Lands Commission. Staff of the MMS, Vandenberg AFB, and Santa Barbara County APCD participated on the JRP as advisory members. The County is the Lead Agency and will take the first action on the Tranquillon Ridge permit application.

The Draft EIR was circulated for public review from October 31, 2006 through January 16, 2007. A public workshop on the EIR was held in Lompoc on November 15, 2006 and a public comment hearing was held on December 11, 2006. State Lands Commission staff held a public hearing on the Draft EIR in Santa Barbara on November 13, 2007 to comply with Public Resources Code Section 6873.5, which requires that the SLC hold at least one hearing on the Draft EIR prepared for a proposed lease in a jurisdiction of a local government agency within the coastal zone. Comments on the Draft EIR were received from the public and the responsible, trustee, and interested agencies. These comments, and responses to them, are included in Section 9.0 of the Final EIR. The Final EIR also includes several revisions to the Draft EIR text made primarily in response to comments received.

6.1.1 Tranquillon Ridge Impacts and Mitigation Measures

Environmental impacts of the Tranquillon Ridge project as proposed in 2004 are discussed in the EIR. The EIR Executive Summary section and Tables ES.3a through ES.3d provide detailed summaries of the Class I, II, III, and cumulative impacts that would be expected to result from the Tranquillon Ridge project analyzed in the EIR. A complete evaluation of the potential environmental impacts and mitigation measures is provided in the issue area discussions in Sections 5.1 through 5.16 of the EIR. The following impact summaries refer to the currently proposed (reduced-life) Tranquillon Ridge project.

6.1.1.1 Significant and Unavoidable Project Impacts (Class I)

The reduced-life Tranquillon Ridge project would result in 11 significant and unavoidable environmental impacts. Of these, 10 are related to oil or produced water spills and spill clean-up activities and one public safety impact would result from increased truck transport of gas liquids from the LOGP (Risk.3). The Class I impacts due to oil spills would occur for onshore and offshore biological resources and water quality, fishing, recreation and cultural resources. Potential oil spill volumes associated with the Tranquillon Ridge project would be larger than for existing operations due to the increased amount of oil that would be produced and transported to the LOGP in the oil emulsion pipeline.

Two Class I visual impacts (Visual.1 and Visual.4) resulting from the presence and visibility of the platform and electrical substation in the coastal zone, and the presence of the LOGP, would still occur during the life of the Tranquillon Ridge project, but would not be increased or extended beyond existing levels. These visual impacts exist for the Point Pedernales project and would continue until the project facilities are removed, whether or not the Tranquillon Ridge project is approved.

All of the Class I impacts identified for the Tranquillon Ridge project were previously identified in earlier environmental documents related to the original Point Pedernales project or subsequent modifications. Although feasible mitigation measures have been identified for these Class I impacts, these measures will not fully mitigate the impacts which will remain significant and unavoidable throughout the project lifetime. If the Tranquillon Ridge project is not approved, these Class I impacts will continue at their current levels until the Point Pedernales project is decommissioned, its facilities properly abandoned, and the project facility sites restored.

The Class I impacts and recommended mitigation measures identified in the EIR are summarized in Table 3 and the paragraphs that follow the table. Please refer to Table ES.3a of the EIR Executive Summary and the issue area discussions in the EIR for additional details regarding potential impacts and mitigation measures. Table 3 also includes references to relevant existing Final Development Plan conditions that incorporate the recommended mitigation measures, either as currently written or with the recommended modifications shown in Attachment B (Conditions of Approval) to this staff report.

Table 3: Class I Impacts (from EIR Table ES.3a)

Issue Area	**Impacts** (EIR number)	**Mitigation Measures**	**FDP**
Risk	Risk.3: Increase in **truck transport** of liquid petroleum gas and natural gas liquids.	Risk-3 (TRMPP update)	P-2 P-23
Marine Biological Resources	MB.1: Increase in **oil spill** impacts to marine biota.	MB-1a (contingency planning) MB-1b (coastal baseline) MB-1c (fund)	P-13 G-4 (new) G-5 (new)
Onshore Biological Resources	TB.6, TB.7 and TB.8: Increase in potential for impacts to terrestrial biota and habitats, including individuals and habitats of protected or sensitive species, as a result of an **oil spill and spill clean-up**.	TB-5 (sedimentation) TB-6 (restoration) TB-7 (restoration) TB-11 (spill containment) TB-12 (restoration) TB-13 (clean-up techniques) TB-14 (clean-up training) OWR-2 (berm) OWR-3 (OSRP update) OWR-4 (catch basins) OWR-5 (scour protection)	H-1 H-9 H-15 P-13
Marine Water Quality	MWQ.1: Increase in **oil spill** impacts to marine water quality.	MWQ-1 (pipeline inspection)	P-2
Onshore Water Resources	OWR.2: Increase in potential for impacts to surface and groundwater quality as a result of an **oil or produced water spill and spill clean-up**.	Risk-1 (leak detection) OWR-2 (berm) OWR-3 (OSRP update) OWR-4 (catch basins) OWR-5 (scour protection)	P-2 P-13 P-16 F-5 H-0 H-9 H-15
Fishing	CRF/KH.2: Increase in **oil spill** impacts to commercial and recreational fishing.	MB-1a (contingency planning) MB-1b (tar baseline)	P-13
Traffic	T.4: Increase in potential for disruption of onshore and offshore traffic due to an **oil spill and spill clean-up**.	MB-1a (contingency planning) MWQ-1 (pipeline inspections) MWQ-2***** (equip. inspections) MWQ-3***** (waste disposal)	P-2 P-13
Cultural Resources	CR.3: Increase in potential for impacts to cultural resources as a result of ground disturbance due to an **oil spill and spill clean-up**.	CR-5 (OSRP update)	P-13
Recreation	Rec.1: Increase in potential for impacts to public access to recreational resources as a result of an **oil spill and spill clean-up**.	MB-1a (contingency planning) MWQ-1 (pipeline inspections)	P-2 P-13

Table 3: Class I Impacts (from EIR Table ES.3a)

Issue Area	**Impacts** (EIR number)	**Mitigation Measures**	**FDP**
Visual Resources*	Visual.1*: Visual impacts due to **presence of Platform Irene and substation**. Visual.4*: Visual impacts due to **presence of LOGP**.	Visual-1 (substation screening) Visual-4 (lighting/glare plan)	H-1 H-5 L-2 L-3 L-8

*****_These Class I impacts apply to the existing Point Pedernales project and would not be affected by the reduced-life Tranquillon Ridge proposal._

RISK (Impact Risk.3). The Tranquillon Ridge project poses a number of potential safety impacts (injuries and deaths) due to a variety of potential upset conditions. These upset conditions include leaks or ruptures of the crude oil emulsion pipeline, onshore or offshore; leaks or rupture of the offshore-to-onshore sour gas pipeline; and, transportation of natural gas liquids from the LOGP. These impacts are currently associated with the Point Pedernales project but the severity of the impacts would increase due to the increase in oil and gas production levels with the reduced-life Tranquillon Ridge proposal. Of these potential impacts, only the transportation of gas liquids (natural gas liquids [NGLs] or liquid petroleum gas [LPG]) represents a significant, unavoidable impact to public safety. The remaining impacts are classified as adverse but less than significant with PXP's continued implementation of existing permit requirements.

To minimize potential safety impacts, EIR Mitigation Measure Risk-3 requires that PXP implement the measures identified in County policies regarding gas liquid transport for the Tranquillon Ridge project. These measures include blending natural gas liquids to the extent feasible into the processed crude oil stream and transporting remaining gas liquids in accordance with the requirements of Board of Supervisors Resolution 93-480. These measures are currently implemented for the Point Pedernales project through Final Development Plan Conditions P-2 and P-23 and would apply to the Tranquillon Ridge project if it is approved. The Transportation Risk Management and Prevention Program (Condition P-23) for the LOGP will be updated as necessary and is required to be fully implemented during operation of the Tranquillon Ridge project. All other system safety measures that apply to the Point Pedernales project also would apply to use of the Point Pedernales facilities for the Tranquillon Ridge project. No other feasible mitigation measures have been identified to further reduce this significant, unavoidable impact.

MARINE BIOLOGICAL RESOURCES (Impact MB.1). Oil spills from the Tranquillon Ridge project would adversely affect sensitive marine species, including benthic and intertidal organisms, fish, marine mammals, marine birds, and marine turtles. These impacts are potentially significant, depending on the size and location of an offshore oil spill. The potential worst-case oil spill size would increase with the Tranquillon Ridge project. The potential spill volume for an offshore spill would increase by 5,016 barrels, from 2,913 barrels to 7,929 barrels (EIR Table 5.1.29). The probability of a rupture would increase from 0.6 percent to 9.7 percent. The combined lifetime probability of oil leaks, ruptures, blowouts, and spills from Platform Irene and the offshore portion of the emulsion pipeline would increase from 5.4 percent to 22.1 percent for the 30-year Tranquillon Ridge project (EIR Table 5.1.28). The reduced-life Tranquillon Ridge project would increase the lifetime probability of spills from 5.4 percent to about 11 percent because it would operate for roughly half as long as the project analyzed in the EIR.

Mitigation Measures MB-1a, MB-1b, and MB-1c would reduce, but not eliminate, potentially significant oil spill impacts to marine resources. These measures include updating the PXP's Oil Spill Response Plan (FDP Condition P-13) to specifically address the increased volumes of oil that could be spilled to the ocean due to the increased amount of oil being produced and transported to shore and annual funding of programs to document existing coastline conditions and facilitate real-time spill tracking in the event of a spill (FDP Condition G-4). As recommended in EIR Mitigation Measure MB-4, PXP should implement measures to further reduce impacts on marine biology, particurlay to marine mammals and seabirds. This is within the perview of the California Coastal Commission. Those measures identified are as follows:

A. An assessment of the feasibility of injecting drill muds and cuttings into a reservoir from Platform Irene. This assessment shall include MMS input and shall conform to MMS requirements for such assessment. If the assessment concludes that injection is feasible, PXP shall inject muds and cuttings used for drilling new or extended existing wells from Platform Irene, pursuant to MMS approval. If injection is not feasible, PXP shall ensure that muds and cuttings are properly disposed of at Platform Irene in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit for the platform and shall provide copies of all discharge monitoring reports prepared pursuant to the NPDES permit to Planning and Development, once Tranquillon Ridge production has begun.

B. Provisions for a dedicated marine mammal observer on each vessel servicing Platform Irene during drilling and production of Tranquillon Ridge reserves, including:

1. placement of a dedicated marine mammal observer on all support vessels during the spring and fall gray whale migration periods and during periods or seasons of high concentrations of marine mammals in the area.
2. requirements that restrict the duties and responsibilities of the observer to only marine mammal observations during periods when the vessel is in transit.
3. training for observers focusing on identification of marine mammal species, specific behavior of species common to the project area, and awareness of seasonal concentrations of marine mammals.
4. unobstructed views onboard each vessel.
5. a contingency plan that focuses on avoidance procedures when marine mammals are encountered at sea. At a minimum, this plan shall include the following components:
   a. Vessel operators will make every effort to maintain a distance of 1,000 feet from sighted whales and other threatened or endangered marine mammals or marine turtles.
   b. Support vessels shall not cross directly in front of migrating whales or any other threatened or endangered marine mammals or marine turtles.
   c. When paralleling whales, support vessels shall operate at a constant speed that is not faster than the whales.
   d. Support vessels shall not separate female whales from their calves.
   e. Vessel operators shall not herd or drive whales.
   f. If a whale engages in evasive or defensive action, support vessels shall drop back until the animal moves out of the area.

6. Prompt reporting of any collisions with marine wildlife to the California Coastal Commission, California Fish & Game Department, and the U.S. Fish & Wildlife Service pursuant to each agency's reporting requirements and procedures.

C. A contribution toward establishing a marine mammal and seabird impact mitigation fund to be use for either facilities construction or operating costs associated with the rescue and rehabilitation of injured marine mammals and seabirds.

In addition, FDP Condition G-1 (*Oil Spill Clean-up and Restoration*) requires that PXP clean up any oil spills associated with its onshore or offshore facilities and restore affected coastal and onshore resources and areas to pre-spill conditions. This FDP condition would continue to apply to operation of these facilities for the Tranquillon Ridge project. However, even with implementation of these mitigation measures, the potential impacts of an offshore oil spill to marine biological resources would remain significant. No other feasible mitigation measures have been identified to further reduce these significant, unavoidable impacts.

ONSHORE BIOLOGICAL RESOURCES (Impacts TB.6, TB.7, and TB.8). A pipeline leak or rupture could result in an oil spill and subsequent significant and unavoidable impacts to upland, riparian, and aquatic habitats and injury to plants and terrestrial and aquatic wildlife through direct toxicity, smothering, and entrapment, as well as from spill clean-up efforts. Under the worst case, onshore oil spill volumes would increase by 688 barrels (about 11%, from 6,318 to 7,006 barrels; EIR Table 5.1.25), with an increase in the probability of a rupture from 0.9 percent to 11.2 percent and an increase in the probability of a leak from 3.6 percent to 100 percent (EIR Table 5.1.24) due primarily to the addition of pumping capabilities at Valve Site #2.

An oil spill and subsequent clean-up efforts could directly or indirectly cause the loss of habitat and individuals or colonies of State- or federally listed plant species, including seaside bird's beak, Surf thistle, beach spectacle pod, La Graciosa thistle, Gaviota tarplant, and possibly Pismo clarkia and Lompoc yerba santa. Spills and spill clean-up could also directly or indirectly cause the loss of individuals or habitat for listed wildlife species, including steelhead, western snowy plover, California tiger salamander, California red-legged frog, and El Segundo blue butterfly.

Mitigation Measures TB-5, TB-6, TB-7, TB-11, TB-12, TB-13, TB-14, OWR-2, OWR-3, OWR-4, and OWR-5 would reduce, but not eliminate, potentially significant impacts of oil spills to onshore biological resources. These measures require site-specific spill containment and clean-up techniques and training, maintenance of catch basins along the pipeline route, control of sedimentation into aquatic habitats, restoration of disturbed habitat, and an update to PXP's Oil Spill Response Plan to ensure that containment and clean-up equipment is readily available close to areas with the greatest vulnerability in the event of a spill, such as the mouth of the Santa Ynez River. These mitigation measures have been incorporated into FDP Conditions H-1 (*Northern Mitigated Pipeline Route and Catch Basins*), H-9 (*Restoration and Revegetation Section of OSRP*), H-15 (*Installation of Block Valves and Check Valves*), and P-13 (*Oil Spill Response Plan*). No other feasible mitigation measures have been identified to further reduce these significant, unavoidable impacts.

MARINE WATER QUALITY (Impact MWQ.1). Accidental discharge of hydrocarbons into marine waters would significantly affect marine water quality. The Tranquillon Ridge project would cause an increased risk of oil spill due to the larger volume of crude oil in the pipeline and an increase in the potential for a well blow out if the new wells encounter a pressurized reservoir. The combined probability of oil leaks, ruptures, blowouts, and spills from Platform Irene and the offshore portion of the emulsion pipeline would increase from 5.4 percent to about 11 percent with implementation of the reduced-life Tranquillon Ridge project.

Mitigation Measure MWQ-1 requires that PXP conduct regular inspections of the offshore oil emulsion pipeline to identify unsupported spans or structural anomalies that compromise the integrity of the pipeline and promptly effect repairs. This measure also requires that if the leak detection system causes a shutdown of the pipeline, the oil emulsion flow through the pipeline shall not be resumed until the entire length of the pipeline has been inspected and cleared or repaired as necessary. This measure has been explicitly incorporated into FDP Condition P-2 (*Safety, Inspection, Maintenance, and Quality Assurance Program [SIMQAP]*). No other feasible mitigation measures have been identified to further reduce this significant, unavoidable impact.

Staff recommends that PXP investigate the potential for injecting the waste muds and cuttings at the platform and implement that option if it is feasible (see discussion in Section 6.1.1.5, below). This alternative would eliminate Class III adverse impacts associated with disposing of the muds and cuttings in the ocean, as proposed, and would not create other Class III impacts, as would the onshore disposal option. Staff does not recommend the onshore disposal option as it would only result in different Class III impacts, rather than elimination of impacts. However, if the Planning Commission chooses to adopt the onshore disposal alternative for drilling muds and cuttings, EIR Mitigation Measures MWQ-2 and MWQ-3 should also be adopted as new conditions of the FDP. These measures would require inspections of the equipment used to transfer the muds and cuttings to the vessels and boat cleaning procedures to reduce the potential for spills to the marine environment of the muds and cuttings during transport operations.

ONSHORE WATER RESOURCES (Impact OWR.2). A rupture or leak from the oil emulsion or produced water pipelines could substantially degrade surface and ground water quality and spill clean-up activities could cause erosion or siltation resulting in degradation of surface water quality. The Tranquillon Ridge project would increase the amount of oil that could be spilled from the pipeline over the life of the project.

Mitigation Measures Risk-1, OWR-2, OWR-3, OWR-4, and OWR-5 would reduce the likelihood or severity of these potential impacts, but not to less than significant levels. These measures are incorporated into the PXP FDP, as follows:

- Risk-1, upgraded leak detection system – FDP Condition P-16;
- OWR-2, berm at Valve Site #2 – FDP Condition H-0;
- OWR-4, catch basins – FDP Condition H-0;
- OWR-3, Oil Spill Response Plan update – FDP Condition P-13; and,
- OWR-5, scour protection – FDP Conditions D-2 and F-5.

COMMERCIAL AND RECREATIONAL FISHING (Impact CRF/KH.2). Oil spills potentially could affect commercial and recreational fishing in the project area by damaging fish populations (e.g., sea urchins and lobster). This impact could be significant and unavoidable, particularly with respect to species harvested in the intertidal zone where they are vulnerable to marine oil spills. Access to fishing areas also could be restricted by a spill and by boat traffic related to spill clean-up.

Mitigation Measures MB-1a and MB-1b would help reduce potential impacts to commercial and recreational fishing, but because there are limitations to thorough containment and clean-up of an offshore oil spill, and because commercial fishing areas would be at least temporarily lost to fishing while clean-up operations are underway, this remains a significant and unavoidable impact for fisheries in the intertidal zone. These mitigation measures are included in FDP Conditions G-4 (*Oil Spill Damage Assessment Funding*), M-3 (*Local Fishermen's Contingency Fund*), and P-13 (*OSRP*). No other mitigation measures have been identified to further reduce this significant impact.

TRAFFIC (Impact T.4). An oil spill and related clean-up activities could result in the disruption of commercial shipping, fishing, and recreational marine traffic and onshore transportation infrastructure. An offshore oil spill could result in closure of the Coast Guard's marine traffic corridors and restricted boating along 70 miles of coastline. Offshore traffic could be disrupted for days, depending on the size and extent of the spill, due to clean-up activities. An oil spill could also preclude fishing from areas around the spill until clean-up activities are complete. If a spill reaches the shoreline, onshore traffic could be affected by response-related activities and traffic. Although mitigation measures are required to reduce the likelihood of a spill (inspection, monitoring, and maintenance requirements; FDP Condition P-2) and to enhance spill response (contingency planning; FDP Condition P-13), the risk cannot be reduced to zero. The consequences of an oil spill, including traffic-related impacts, remain significant and unavoidable. No other mitigation measures have been identified to further reduce this significant impact.

CULTURAL RESOURCES (Impact CR.3). Containment and clean-up activities associated with an accidental oil spill could result in ground disturbance and potential impacts to cultural resources. A pipeline leak or rupture could result in an oil spill anywhere along the pipeline corridor. Several archaeological sites are known to occur within and near the pipelines. Spill containment activities that could disturb cultural resources include use of heavy earth-moving equipment and manual excavations to remove oil-contaminated material. Soil removal by manual or mechanized means can cause significant impacts on any cultural resource in the area. Other clean-up techniques and staging containment and clean-up equipment can also result in disturbance. New Condition I-9 (*Oil Spill Clean-up*) incorporates EIR mitigation measure CR-5 into PXP's Final Development Plan and requires PXP to update its Oil Spill Response Plan to specify spill containment and clean-up measures that would minimize impacts to cultural resources in the event of an oil spill. No other mitigation measures were identified that would further reduce this potential significant impact.

RECREATION (Impact Rec.1). The increased oil throughput between Platform Irene and the LOGP for the Tranquillon Ridge project would increase the probability and volume of an oil spill. An offshore oil spill caused by an accident or failure at Platform Irene or in the offshore pipeline could lead to beach closures and boating restrictions during spill response and clean-up, as well as a

lingering perception that recreational resources are polluted, even after clean-up is completed. These effects could result in impacts to local and regional tourism, particularly as they relate to coastal resources and attractions. Facility safety (FDP Condition P-2), spill contingency planning and response (FDP Condition P-13), and restoration requirements (FDP Condition H-9) adopted for the project will serve to reduce the likelihood of a spill and the magnitude of the resulting impacts if one does occur, but this risk cannot be reduced to zero. Therefore, this remains a significant and unavoidable impact of the Tranquillon Ridge project. No additional mitigation measures have been identified to further reduce this impact.

VISUAL RESOURCES (Impacts Visual.1 and Visual.4). These significant visual resource impacts are associated with the presence of Platform Irene and the electrical substation at Surf (Visual.1) in the coastal zone, and nighttime glare from the LOGP (Visual.4) in a rural area. These impacts were identified in previous environmental reviews as Class I impacts for the existing Point Pedernales project. The Tranquillon Ridge EIR identified these impacts as significant and unavoidable for the 30-year Tranquillon Ridge project because they would have been extended into the future until the end of the Tranquillon Ridge project operations. These extension of significant impacts would not occur with the reduced-life Tranquillon Ridge project as it is proposed to end December 2022, the same time as the outer estimates of remaining Point Pedernales project life. Although the facilities would continue to create these significant impacts, they would not be intensified or extended beyond baseline levels by the Tranquillon Ridge project. Nevertheless, FDP Conditions L-2 (*Lighting Plan*) and L-8 (*Facility Screening*) require renewed efforts to reduce lighting at the LOGP and screen the Surf substation to the extent feasible. This will ensure PXP's continued efforts to reduce these significant impacts and provide consistency with certain County policies.

6.1.1.2 Significant and Mitigable Project Impacts (Class II)

Fifteen Class II impacts would result from the proposed Tranquillon Ridge project. These impacts are associated with oil or produced water spills and spill clean-up, or with the modifications at Valve Site #2. These significant impacts would be mitigated to less than significant levels (per County thresholds) with implementation of specific mitigation measures. Nine Class II impacts identified in the EIR would have resulted from extending the life of the existing facilities and are associated primarily with routine operations of both onshore and offshore facilities. These impacts would not increase in severity or be extended as a result of the reduced-life Tranquillon Ridge proposal.

Class II impacts and associated mitigation measures are summarized in Table 4 below. This table also includes references to relevant FDP conditions that address these impacts. Additional details regarding potential impacts and mitigation measures are provided in the issue area discussions in the EIR and Table ES.3b of the EIR Executive Summary.

Table 4: Class II Impacts (from EIR Table ES.3b)

Issue Area	EIR Impact	Mitigation Measures	FDP
Onshore Biological Resources	TB.1: **Ground disturbance** for modifications at **Valve Site #2** and power pole installation could cause loss of native vegetation, wildlife habitat. TB.2: **Ground disturbance** for modifications at **Valve Site #2** and power pole installation could cause impacts to aquatic habitats due to erosion and sedimentation. TB.3*****: **Pipeline maintenance and repair** would result in disturbance and removal of native vegetation and habitat. TB.4*****: **Pipeline maintenance and repair** could harm listed plant species. TB.5*****: **Pipeline maintenance and repair** could harm listed wildlife/fish species.	TB-1 (survey) TB-2 (use bridge, pole design) TB-3 (pre-constr. wildlife relocation) TB-4 (dry season construction) TB-5 (sedimentation) TB-6 (construction restrictions) TB-7 (site-specific measures) TB-8 (pre-construction plant survey) TB-9 (site-specific restoration) TB-10 (avoid breeding season) TB-11 (update OSRP) OWR-1 (SWPPP) GR-1 (BMPs)	F-1 H-1 H-9 H-19 H-24 P-13
Geological Resources	GR.1, GR.2, GR.4*****: **Ground disturbance** for construction, maintenance, or remediation activities associated with a pipeline spill could cause slope failure, gullying, erosion, sedimentation. GR.3: Continued or accelerated **ground settlement at LOGP** due to modifications and upgrades. GR.5*****: **Scouring** along drainage areas could result in impacts to the pipeline and increase the chances of a pipeline failure.	GR-1 (BMPs) GR-2 (grouting) GR-3 (scour mitigation plan)	D-1 D-2 D-3 D-5 H-1 H-9 P-1 P-13
Onshore Water Quality	OWR.1, OWR.3*****, and OWR.4: **Ground disturbance** associated with construction, maintenance, or spill remediation activities associated with a pipeline spill could cause erosion and siltation which could result in degraded surface water quality.	OWR-1 (SWPPP) OWR-6 (streambed restoration) GR-1 (BMPs)	D-5 F-5 H-1
Marine Biological Resources	MB.5: **Increased vessel traffic** may impact marine mammals and marine turtles.	MB-1c (fund) MB-4 (observers)	**
Marine Water Quality	MWQ.2, MWQ.3, and MWQ.4: Reduced marine water quality would result from discharges of drilling fluids, produced water, and additional **discharges at Platform Irene.**	MB-3 (shunt depth) NPDES (US EPA permit)	G-2 G-3
Air Quality	Air.2: **Increased emissions** from drilling.	Air-2 (emission reductions)	E-6 E-9 E-10
Cultural Resources	CR.1*****, CR.2 and CR.4*****: **Ground disturbance** for pipeline maintenance, modifications at Valve Site #2 and power pole installation, or produced water spill could cause impacts to cultural resources.	CR-1 (200-ft monitoring zone) CR-2 (mitigation plan) CR-3 (archaeological survey)	I-2

Table 4: Class II Impacts (from EIR Table ES.3b)

Issue Area	EIR Impact	Mitigation Measures	FDP
Visual Resources	Visual.3: Visual impacts could result from presence of **new transformer station and power poles** for Valve Site #2.	Visual-3 (bridge feasibility)	L-10 L-11
Agricultural Resources	AG.3 and AG.4*****: **Pipeline repair and maintenance or spill-related activities** could result in degradation and reduced productivity of agricultural land.	AG-1 (update OSRP) AG-2 (replanting)	P-13

***The reduced-life Tranquillon Ridge project would not extend impact or increase severity of impact over baseline levels.*
***Within the perview of the California Coastal Commission. See Marine Biological Resources discussion in staff report section 6.1.1.1 for additional information.*

6.1.1.3 Adverse but Insignificant Impacts (Class III)

A number of adverse but less than significant impacts from the Tranquillon Ridge project are discussed in the EIR and summarized in Table ES-3c of the EIR Executive Summary. In some cases, mitigation measures are recommended to reduce or mitigate potential adverse impacts to the maximum extent feasible, even though these impacts did not trigger County CEQA thresholds. Adoption of several of these measures would allow for findings of consistency with certain County policies, as discussed in the EIR and the policy consistency analysis in Attachment D to this staff report.

6.1.1.4 Cumulative Impacts

The EIR assessed the incremental impact of the Tranquillon Ridge project and other reasonably foreseeable projects that could be developed in the future for each issue area. Section 4.0 of the EIR describes the potential offshore oil and gas, commercial, residential, and other development projects included in this analysis. These projects include federal and state offshore oil and gas projects and residential and commercial projects in the unincorporated Lompoc-Orcutt-Santa Maria areas and the City of Lompoc. The proposed Tranquillon Ridge project would contribute a significant portion of several cumulatively significant impacts. Many of the significant cumulative impacts are related to oil spills and spill-related clean-up activities; others include public safety hazards from gas liquids transport on public roadways and visual effects of increased development, both on and offshore. The reduced-life Tranquillon Ridge proposal would contribute to these cumulative impacts in the same way the 30-year project would (as analyzed in the EIR) except for visual impacts associated with project-related structures. The reduced-life proposal would not increase or extend the existing significant visual impacts associated with the Point Pedernales facilities.

The significant cumulative impacts identified in the EIR, and the proposed project's incremental contribution to those impacts, are summarized in Table 5 below. Please refer to EIR Table ES.3d for a summary of the cumulative impact analyses and the EIR issue area discussions for more detailed information regarding cumulative impacts.

Table 5: Significant Cumulative Impacts

Issue Area	Source of Impact	Tranquillon Ridge Contribution
Public Safety	Federal Offshore Oil and Gas Development - NGL/LPG truck transportation - Oil spills and related fires - Natural gas releases Onshore Development - Increased traffic on roadways used for NGL/LPG trucking	 Significant Not significant Not significant Significant
Terrestrial Biology	On- and Offshore Development - Oil spill impacts - Vegetation removal for construction - Introduction of non-native vegetation - Wildlife disturbance from lights, traffic, noise	 Not significant Not significant Not significant Not significant
Onshore Water Resources	Offshore Development - Oil spill impacts	 Significant
Marine Biology	Offshore Development - Oil spill impacts	 Significant
Marine Water Quality	Offshore Development - Oil spill impacts	 Significant
Fishing	Offshore Development - Oil spill impacts	 Significant
Onshore Traffic	Onshore Development - Construction traffic could be significant depending on timing of onshore projects.	 Not significant
Cultural Resources	On- and Offshore Development - Oil spill clean-up activities - Routine construction and operations	 Significant Not significant
Aesthetic Resources	Offshore Development - Visual impacts due to facilities presence Onshore Development - Loss of open space - Visual character change (semi-rural to urban)	 Not significant***** Not significant Not significant
Recreation	Offshore Development - Oil spill impacts	 Significant
Agricultural Resources	On- and Offshore Development - Loss of or disturbance to productive agricultural land - New oil and gas processing facility in North County	 Not significant Not significant
Noise	Onshore Development - Project construction if near sensitive receptors	 Not significant

*******30-year project would be "Significant."*

GREENHOUSE GASES (GHGS). The proposed project would result in increased carbon dioxide (CO_2) and methane emissions due to the increased volume of oil and gas that would be produced and processed. The primary source of CO_2 emissions is operation of the additional heater treaters at the LOGP to process the increased amount of oil that would be produced by the proposed project. The primary source of methane emissions is from fugitive emissions at Platform Irene. The EIR estimates that, at peak production rates, 14,261.8 tons of CO_2 and 28.85 (663.55 CO_2-equivalent) tons of methane would be emitted annually as a result of producing and processing the Tranquillon

Ridge oil and gas. Thus, Tranquillon Ridge project operations would result in approximately 14,925.35 tons (CO_2-equivalent) of greenhouse gas emissions per year.

The total amount of GHG emissions would vary with production rate. That is, the higher the rate of oil and gas production at the platform and processing at LOGP, the higher the amount of GHG emissions would be. While initial production from the Tranquillon Ridge field ramps up, and again once it begins to decline, the amount of greenhouse gases created by project-related activities would be lower than the 14,925.35 tons per year (T/yr) estimated in the EIR. Therefore, if applied to all years of Tranquillon Ridge production and added together, the 14,925.35 T/yr would overestimate the total amount of GHG emissions associated with Tranquillon Ridge production.

The amount of greenhouse gases resulting from production and processing of the Point Pedernales field reserves would add to the total GHGs emitted by Platform Irene and LOGP operations (estimated at 11,762 T/yr) but these are considered to be baseline emissions. Peak greenhouse gas emissions from production of both the Tranquillon Ridge and Point Pedernales fields would be approximately 26,687 tons per year (CO_2-equivalent).

We have not attempted to classify the impact of these additional, direct GHG emissions as either significant or not significant. Santa Barbara County is currently working with its Air Pollution Control District, the California Air Pollution Control Officers Association, and salient California agencies to develop CEQA thresholds of significance that will guide classification of global climate change impacts, including greenhouse gas emissions. Absent such thresholds, CEQA lead agencies must rely on their own careful judgment, based on available information to the extent possible in determining if impacts related to global climate change are significant. To date, the County lacks sufficient information to classify projects with relatively small, incremental contributions to the State's greenhouse gas totals as cumulatively significant or insignificant. Some guidance can be taken from the State's recognition that adverse effects could result if global warming trends are not slowed and reversed. The Findings and Declarations section of AB 32 (California Global Warming Solutions Act of 2006) states, among other things, that *"[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California"* and that global warming will have *"detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry"* (Calif. Health and Safety Code, §38501(a) and (b)). Thus, the State has recognized a need to reduce emissions of greenhouse gases. Under AB 32, the California Air Resources Board (CARB or ARB) is required to promulgate regulations that will lead to reduced statewide emissions of greenhouse gases. One of the State's first mandated targets is to reduce GHG emissions to no more than 1990 levels by the year 2020. The State ARB recently adopted 427 million metric tons per year as the 1990 level.[2] The ARB is also in the process of finalizing the Scoping Plan for achieving the mandates of AB 32, including reaching the 1990 level by 2020. This Plan will identify the measures, including incentive- and market-based approaches and regulatory requirements that will provide for reaching the goals of AB 32.

[2] California Air Resources Board Staff Report, California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, November 16, 2007. The ARB adopted this recommendation at its December 6, 2006 meeting.

Pursuant to an amendment to CEQA adopted August 24, 2007, the State Office of Planning and Research (OPR) is required to develop and transmit to the State Resources Agency *"guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption"* by July 1, 2009. The Resources Agency is required to certify and adopt the guidelines by January 1, 2010 (CEQA §21083.05, approved August 24, 2007).

Although a definitive significance threshold for GHGs has not yet been established specifically for CEQA review, additional context regarding GHG emissions from the Tranquillon Ridge project may be taken from the ARB's recently adopted reporting requirements for several major greenhouse gas sources in the State. One of the ARB's specific tasks identified in AB 32 was to adopt mandatory reporting requirements for the largest industrial and commercial GHG-emitting facilities in the state. On December 6, 2007, the ARB adopted the mandatory reporting requirements for about 800 separate sources, including in the oil and gas exploration and production sector. Under these requirements, operators of oil and gas exploration and production facilities are required to report their GHG stationary combustion, hydrogen production, and co-generation GHG emissions. Operators of petroleum refineries that emit more than 25,000 metric tonnes of CO_2 in any calendar year from the combination of stationary combustion and process sources [§95101(b)(2)[3]] and operators of co-generation facilities larger than 1 MW and emit 2,500 metric tonnes or more of CO_2 [§95101(b)(7)] in a calendar year will be required to report these GHG emissions to the State. There are provisions in the regulations that provide for exclusion from reporting of up to 3 percent of total facility emissions, not to exceed 20,000 metric tonnes CO_2-equivalent emissions. The LOGP may or may not be subject to reporting requirements under these regulations; this will depend on whether the LOGP is subject to reporting or exclusion from reporting as determined by the Air Resources Board. It appears that emissions from the offshore facilities and mobile sources would not be required to be included in PXP's reported GHG emissions under the State's mandatory reporting requirements.

For reference with respect to the Tranquillon Ridge project, in 2006, carbon dioxide and methane emissions were 11,762 tons for both the LOGP and Platform Irene. For the proposed Tranquillon Ridge project, PXP has estimated that carbon dioxide emissions from the LOGP (13,355.5 T/yr) and additional truck trips (29.2 T/yr) would be on the order of 13,384.7 tons per year. Onshore methane emissions would be small (about 0.05 tons per year; 1.15 T/yr CO_2-eq.). Offshore Tranquillon Ridge operations would result in another 877.1 tons per year of carbon dioxide and 28.8 (662.4 T/yr CO_2-eq.) tons per year of methane emissions for total annual GHG emissions of about 14,925.35 T/yr CO_2-eq. (See EIR Table 5.8.9b, *Additional Operation GHG Emissions – Proposed Project Only*).

6.1.1.5 Alternatives

Potential impacts that could result from each of the alternatives evaluated in the EIR are discussed in each issue area in Section 5.0 of the EIR. Section 6.0 of the EIR provides comparisons of each alternative to the proposed project. These comparisons are summarized in the following EIR tables:

[3] See ARB Resolution 07-54, Att. B at http://www.arb.ca.gov/regact/2007/ghg2007/attachbres07_54.pdf. These regulations are awaiting final approval by the Office of Administrative Law later this year; see www.oal.ca.gov/pdfs/2007_RMC.pdf.

- Table 6.1a (VAFB Onshore Alternative)
- Table 6.1b (Casmalia East Processing Site)
- Table 6.1c (Emulsion Line Replacement)
- Table 6.2 (Power Line Routes)
- Table 6.3 (Muds and Cuttings Disposal)
- Table 6.4 (Class I impacts)

Table 6 (below) compares the conclusions of the EIR analyses of the various alternatives to the originally proposed Tranquillon Ridge project. These conclusions reflect the 30-year Tranquillon Ridge project evaluated in the EIR. Two instances where these conclusions may differ for the reduced-life project are noted with an asterisk (*****). More detailed discussions comparing the impacts of the EIR alternatives to the reduced-life Tranquillon Ridge project are provided in the paragraphs following the table.

Table 6: Comparison of Alternatives to Proposed Project (excluding No Project Alternative)

Alternative	**Compared to 30-year Tranquillon Ridge Project**
VAFB Onshore Alternative *Alternative production site, some new pipeline*	***NO CONCLUSION***
	BETTER for visual***** and marine oil spill impacts. **WORSE** for new construction and onshore spill impacts to onshore biology, onshore water resources, cultural resources.
Casmalia East Processing Site *Alternative processing site, 10-15 miles new pipeline*	***WORSE***
	NO CHANGE for significant night-lighting impacts*****; transfers impact from LOGP to new location. **WORSE** for construction impacts to onshore biology, onshore water resources, risk of upset, visual resources, cultural resources.
Emulsion Line Replacement *22 miles pipeline, Irene-LOGP, same corridor*	***WORSE***
	SLIGHTLY BETTER for ~10% reduction in oil spill probability. **WORSE** for construction impacts to onshore biology, onshore water resources, cultural resources.
Power Line Routes to Valve Site #2	***SUBSTANTIALLY THE SAME***
• Option 2a *(New poles, cross SYR overhead)*	**NO CHANGE** in impacts.
• Option 2b *(New poles, cross SYR with bore)*	**WORSE** for significant construction impacts to wildlife species and water quality from frac-outs.
• Terra Rd. Undergrounding *(New poles except bury ~ 2.5 miles along Terra Rd.)*	**SLIGHTLY BETTER** for visual and fire protection impacts. **WORSE** for construction impacts to onshore biology, air quality, cultural resources.
Muds and Cuttings Disposal	***SUBSTANTIALLY THE SAME***
• Injection at Irene	**BETTER** for marine biota and water quality.
• Onshore disposal	**BETTER** for marine biota and water quality (no discharge). **WORSE** for recreation (spills), local traffic and potentially

Table 6: Comparison of Alternatives to Proposed Project (excluding No Project Alternative)

Alternative	Compared to 30-year Tranquillon Ridge Project
	air quality (increased boat and truck traffic).

NO PROJECT ALTERNATIVE. The EIR concluded that the No Project Alternative *"would offer significant environmental advantages over the proposed project"* but *"would not meet the major objective of the project, which is development of the Tranquillon Ridge oil and gas reserves to meet demand primarily for fuels."* When the No Project alternative is identified as the environmentally superior alternative, CEQA requires that the EIR identify which alternative other than the No Project Alternative would be considered environmentally superior to a proposed project. Other major alternatives considered are the VAFB Onshore Alternative, Emulsion Line Replacement, and Casmalia East Processing Site. Project component alternatives considered are three different power line options and two options for disposal of drill muds and cuttings. Each of these is discussed below.

VAFB ONSHORE ALTERNATIVE. At the time the first Tranquillon Ridge proposal was under review (2002), the Air Force indicated that an onshore production site and associated pipelines would not be allowed on VAFB and the 2002 Tranquillon Ridge EIR did not include an assessment of an onshore production site alternative. Some time after that project was denied by the County, Sunset Exploration and ExxonMobil approached the Air Force about developing an onshore project from a specific location on the Base and the Air Force agreed to consider the proposal. Given the Air Force's willingness to consider the Sunset/ExxonMobil proposal, and Sunset's submittal of applications to the County and the State Lands Commission for the project, staff determined that a new EIR with an assessment of an alternative onshore production site needed to be prepared for the County's (and other agencies') consideration of PXP's renewed application for the Tranquillon Ridge project. To do this, we developed a conceptual onshore project for the EIR that includes some elements of the proposed Tranquillon Ridge project (pipeline and LOGP use) and some elements similar to the Sunset/ExxonMobil proposal (drilling and production from VAFB). The EIR also considered several different potential pipeline routes between an onshore site and a tie-in point to the existing Point Pedernales pipelines. VAFB staff provided important assistance to the EIR contractor and County staff, particularly in gathering information that went into the evaluation of the potential impacts that could result from construction and operation of an onshore drilling and production site and associated pipelines within the Base.

The EIR found that the proposed project and the conceptual VAFB onshore alternative project would have some similar significant impacts and some different kinds of significant impacts when compared to the proposed project. Similar impacts include public safety risks associated with gas liquids transportation, night-lighting, and visibility of structures. Major differences in impacts would be that the VAFB onshore alternative project would:

1. substantially reduce the potential for an oil spill to affect marine biological resources, ocean water quality, and commercial fishing;
2. increase risks to VAFB personnel;

3. increase the risk of directional drilling impacts during construction and of an onshore oil spill, resulting in impacts to sensitive biological and cultural resources; and,
4. result in more construction-related impacts such as vegetation removal and disruption of cultural resources.

Greenhouse gases were not specifically evaluated for the alternatives in the EIR. Such analysis would require more detailed information to quantify emissions than is available for conceptual alternatives. Qualitatively, operational greenhouse gas emissions would be expected to be similar for the Tranquillon Ridge project evaluated in the EIR and the VAFB onshore alternative, but the VAFB onshore alternative would result in additional greenhouse gas emissions during construction.

Staff Conclusion: The EIR concluded that there is no clear indication that a new onshore drilling and production site would reduce significant impacts associated with the 30-year Tranquillon Ridge project, with the important exception of marine resource impacts due to a marine oil spill. The reduced-life Tranquillon Ridge project would result in fewer significant impacts than the 30-year Tranquillon Ridge project analyzed in the EIR and would not result in extension-of-life impacts to visual resources associated with the visibility of Platform Irene and the Surf Substation, or night-time lighting at LOGP. With an end date of December 31, 2022, the Tranquillon Ridge project would operate for a maximum of 15 years. Production of the Tranquillon Ridge Field from new facilities at an onshore site presumably would occur for 30 years (perhaps longer), as stated in the Sunset/ExxonMobil Vahevala applications and assumed in the Tranquillon Ridge EIR. The expressed maximum operating life of 15 years for the Tranquillon Ridge project as now proposed by PXP makes it preferable, with respect to environmental impacts, to an onshore production site that would include new construction and a much longer operating life.

A detailed environmental analysis of a specific onshore proposal such as the Sunset/ExxonMobil Vahevala project potentially could provide information supporting a different conclusion. Additionally, the County may determine that the substantial reduction in impacts related to a marine oil spill would outweigh other significant impacts of an onshore project.

EMULSION LINE REPLACEMENT. This alternative involves installation of a new oil emulsion pipeline to replace the existing 20-inch line from Platform Irene to the LOGP. The intent of this alternative is to reduce potential pipeline-related oil spills, such as the one that occurred in 1997 from the existing Point Pedernales emulsion line, by using a newer pipeline. The EIR estimated that use of a new emulsion pipeline would reduce the risk of a pipeline oil spill by about 10 percent, from 11.2 percent to 10.1 percent for the onshore portion of the pipeline and from 9.7 percent to 8.7 percent for the offshore portion. This spill risk reduction is considered to be small and would not reduce potential spill volumes and resulting impacts. This alternative would also result in construction-related impacts. Implementation of this alternative would not substantially reduce or avoid significant oil-spill related impacts associated with the proposed project and would result in additional and potentially significant construction-related impacts.

Staff Conclusion: The resulting reduction in spill risk associated with this alternative would be small and would not outweigh the significant construction-related impacts that would be likely to

occur if it is implemented, in particular when compared to operation of the existing pipeline for another 15 years rather than 30. Therefore, staff does not recommend adoption of this alternative.

CASMALIA EAST PROCESSING SITE. This alternative would not eliminate any Class I impacts associated with the 30-year project and would involve additional construction-related impacts to onshore wildlife and plant species and cultural resources. Implementation of this alternative would relocate the significant impacts associated with night-lighting to the Casmalia location. Some operations at the LOGP site would need to continue and would require some level of night-lighting, though this would be reduced from current levels. Significant impacts to onshore biological and cultural resources also would result from construction of the new processing facility and connecting pipelines.

Staff Conclusion: Overall, this alternative does not offer substantial advantages over either the reduced-life or 30-year Tranquillon Ridge project, and is not recommended for adoption.

POWER LINE OPTIONS. Three new pumps may need to be installed at Valve Site #2. The pumps would provide the necessary pressure to move the oil emulsion from Valve Site #2 to LOGP if the emulsion pipeline's maximum allowable operating pressure is lowered or if characteristics of the Tranquillon Ridge oil require additional pumping capacity. A new power line would be needed to provide power to the new pumps. PXP proposes to install this power line on new and existing poles (to the extent feasible), with short stretches buried under existing VAFB power lines in two locations. The EIR evaluated alternatives for routing the new power line and determined that undergrounding a portion of the power line along Terra Road (within VAFB) would be the slightly environmentally preferred method of providing power to Valve Site #2, due to potentially significant impacts to cultural resources from trenching.

Option 2a would not reduce impacts associated with the proposed power line and Option 2b would result in more impacts than the proposed overhead line. Undergrounding the power line along Terra Road on VAFB could reduce visual resource impacts associated with the new line, but could also result in significant impacts to four known archaeological sites. The EIR identified this as a Class II impact if the sites and a 200-foot buffer area around each site are avoided. The County's and VAFB's first preference is that identified archaeological sites be avoided entirely. Trenching near or within the known sites would require that PXP conduct subsurface testing, resource evaluation, and potentially provide additional mitigation if the sites are significant. At this time, avoidance does not appear to be feasible if the line is placed underground, unless the route is significantly modified (and lengthened) from that evaluated in the EIR. Above-ground placement of the line would provide more flexibility to avoid known archaeological sites.

Staff Conclusion: Staff does not recommend adoption of any of the power line alternatives. Option 2a would not reduce significant visual impacts, Option 2b would result in greater biological and water quality impacts, and undergrounding a portion of the line potentially would result in significant impacts to known archaeological sites.

MUDS AND CUTTINGS DISPOSAL. PXP proposes to discharge muds and cuttings from the well-drilling process into the ocean in accordance with the EPA General NPDES permit that applies to

Platform Irene. The EIR determined this to be a Class III impact, adverse but not significant. The EIR also determined that either reinjecting the muds and cuttings into the formation or transporting the muds and cuttings to shore via marine vessels would be environmentally preferred to discharging into the water column at the platform. Reinjection would need to be approved by the MMS, if a suitable formation can be found. If reinjection is not feasible or is not approved, the muds and cuttings could be disposed of onshore. Although this method would substantially reduce the marine biology impacts associated with discharging, other potential impacts could occur, including increased air emissions and onshore traffic (for transporting the wastes via truck to disposal sites once they are onshore) and the potential for spills from the vessel during transit to shore. These are considered to be Class III impacts as well. These impacts would be the same for the 30-year project evaluated in the EIR and the reduced-life project.

Staff Conclusion: Staff recommends that, if the Planning Commission approves the reduced-life Tranquillon Ridge project, revised FDP Condition G-2 (*Marine Biology Impact Reduction Plan*) be adopted to require that PXP explore the technical aspects of the reinjection option in detail and implement that option if it is feasible. This would render the project more consistent with County policies requiring maximum feasible mitigation, even though the proposed discharge of muds and cuttings, if conducted in accordance with the requirements of the NPDES permit, would result in less than significant impacts to marine resources.

6.2 COMPREHENSIVE PLAN CONSISTENCY

The detailed policy consistency analysis for the Tranquillon Ridge project is presented in Attachment D to this staff report. In summary, the reduced-life Tranquillon Ridge project can be found consistent with applicable County Comprehensive Plan, Coastal Plan and Coastal Act policies, with one exception: Coastal Act Section 30232 (*Oil Spills*). Because oil spill containment and clean-up measures cannot fully mitigate the impacts of an oil spill in the ocean, the criteria of Section 30232 cannot be met. However, Coastal Act Section 30260 (*Industrial Development Location or Expansion*) provides for an override of inconsistencies with other Coastal Act policies for industrial development, if certain other findings can be made. These findings can be made for the Tranquillon Ridge project, as discussed in Attachment D. Therefore, if approved with adoption of certain permit conditions, the Tranquillon Ridge project would be consistent with the County's land use policies. For reference, Table 7 lists the policies evaluated and conclusions regarding consistency with each. This table is repeated at the beginning of Attachment D.

Table 7: Policy Consistency Analysis Summary Table

Policy	Conclusion
Coastal Act Sections	
30230 – Marine Resources	Consistent
30231 – Biological Productivity	Consistent
30232 – Oil Spills	**Not Consistent**[4]
30240 – Environmentally Sensitive Habitats	Consistent

[4] This inconsistency is subject to the override provisions of Coastal Act Section 30260.

Table 7: Policy Consistency Analysis Summary Table

Policy	Conclusion
30244 – Archaeological Resources	Consistent
30250 – Development Location	Consistent
30251 – Visual Resources	Consistent
30253 – Development Requirements	Consistent
30260 – Industrial Development Location or Expansion	Consistent
30262 – Oil and Gas Development	Consistent
SBC Coastal Plan Policies	
2-6 – Adequate Public Services	Consistent
2-11 – Development Near Environmentally Sensitive Habitats	Consistent
3-8 – Geohazard Review	Consistent
3-9 – Fault Crossings (Pipelines)	Consistent
3-10 – Fault Setback	Consistent
3-12 – Flood Hazards	Consistent
3-13 – Minimize Cut and Fill	Consistent
3-14 – Site Development	Consistent
3-19 – Water Quality	Consistent
4-2 – Landscape Plan	Consistent
4-3 – Structure Compatibility	Consistent
4-7 – Underground Utilities	Consistent
6-3 – Environmental Review	Consistent
6-4 – Site Restoration	Consistent
6-6F – Planning Commission Review for Abandonment	Consistent
6-8 – Oil Transportation by Pipeline	Consistent
6-9 – Emergency Response Plan	Consistent
6-14 – Pipeline Corridor Surveys	Consistent
6-14A – Common Carrier Pipeline Use	Consistent
6-15 – Herbicide Ban (Pipeline Construction)	Consistent
6-18 – Pipelines / Shut-off Valves	Consistent
6-19 – Minimize Spill Impacts	Consistent
9-4 – Critical Bird Habitats	Consistent
10-2 – Avoid Archaeological Impacts	Consistent
10-3 – Mitigate Archaeological Impacts	Consistent
10-5 – Native American Consultation	Consistent
SBC Comprehensive Plan Policies	
LUDP 4 – Adequate Public Services	Consistent
LUDP 10 – Common Carrier Pipeline Use	Consistent
LUDP 11 – Gas Plant Siting Study	Consistent
LUDP 12 – Oil Transportation by Pipeline	Consistent
LUDP 13 – Decommissioning and Site Restoration	Consistent
Hillside 1 – Minimize Cut and Fill	Consistent
Hillside 2 – Site Development	Consistent
Hillside 4 – Sediment Basin/Runoff Control	Consistent
Hillside 5 – Soil Stabilization	Consistent
Hillside 6 – Runoff Control	Consistent
Hillside 7 – Water Quality	Consistent
Streams 1 – Minimize Impacts	Consistent
Historical 2 – Avoid Archaeological Impacts	Consistent
Historical 3 – Mitigate Archaeological Impacts	Consistent
Historical 5 – Native American Consultation	Consistent

Table 7: Policy Consistency Analysis Summary Table

Policy	Conclusion
Visual 1 – Landscape Plan	Consistent
Visual 2 – Structure Compatibility	Consistent
Visual 5 – Underground Utilities	Consistent
Lompoc Area Goals - Land Use	Consistent
Lompoc Area Goals – Environment	Consistent
Noise Element, 1 – Maximum Noise Level	Consistent
Noise Element, 9 – Noise Limits	Consistent
Circulation Element, IV.B – Roadway Standards	Consistent
Energy Element, 4.1 – Construction Recycling	Consistent
Energy Element, 5.3 – Cogeneration Systems	Consistent
Agricultural Element, Goal I, Policy I.A – Compatibility	Consistent
Agricultural Element, Goal II, Policy II.D – Conversion Discouraged	Consistent
Hazardous Waste Element, 2-2 – Hazardous Waste Generation	Consistent
Hazardous Waste Element 2-3 – Hazardous Waste Facility	Consistent
Hazardous Waste Element 8-1 – Emergency Response Plan	Consistent
Safety Element, Hazardous Facility 1-A – Risk Estimates	Consistent
Safety Element, Gas Pipeline Safety 1-A – Risk Estimates	Consistent
Safety Element, Hazardous Facility 2-B – Unacceptable Risk	Consistent
Safety Element, Gas Pipeline Safety 2-B – Unacceptable Risk	Consistent
Safety Element, Hazardous Facility 3-A – Siting	Consistent
Safety Element, Gas Pipeline Safety 4-B – Safe Operations	Consistent
Safety Element, Gas Pipeline Safety 4-C – Reduced Hazard Zones	Consistent
Safety Element, Gas Pipeline Safety 5-C – Burial Depth	Consistent
Safety Element, Gas Pipeline Safety 5-D – Marking Pipeline Presence	Consistent
Conservation Element, Mineral Resources – Avoid Significant Impacts	Consistent
Conservation Element, Ecological Systems – Use and Protection	Consistent
Other Plans and Policies	
2007 Clean Air Plan	Consistent
AB 32 (California Global Warming Solutions Act of 2006)	Consistent

6.3 ORDINANCE COMPLIANCE

The LOGP site is zoned Coastal-Related Industry (M-CR) and the pipeline corridor is zoned for agriculture. The modifications to the LOGP required to implement the Tranquillon Ridge project conform to the development standards set forth in the County's Land Use and Development Code (LUDC). Pipelines are permitted in all zone districts. The existing pipelines and their continued operation conform to the requirements of the LUDC and Article II Coastal Zoning Ordinance.

7.0 APPEALS PROCEDURE

The action of the Planning Commission may be appealed to the Board of Supervisors within ten (10) calendar days of said action.

ATTACHMENTS

A. Recommended Findings for Approval
B. Recommended Conditions of Approval
C. EIR Impact Summary Tables
D. Policy Consistency Analysis
E. Assessor Parcel Maps

ATTACHMENT A

RECOMMENDED FINDINGS FOR APPROVAL

ATTACHMENT A: RECOMMENDED FINDINGS FOR APPROVAL

The findings discussed below are staff's suggested findings for approval of the Tranquillon Ridge project as recommended in this staff report, including incorporation of all applicable permit conditions. Should the project decision differ from that recommended herein, these recommended findings may require modification.

1.0 CEQA FINDINGS (Pursuant to PRC §21081 and the CEQA Guidelines §§15090 and 15091)

1.1 CONSIDERATION OF THE EIR: The Planning Commission has considered the Environmental Impact Report (06-EIR-00005; SCH #2006021055) together with comments received and considered during the public review process. The Environmental Impact Report reflects the independent judgment of the Planning Commission, has been completed in compliance with CEQA, and is adequate for the Tranquillon Ridge project.

1.2 FULL DISCLOSURE: Pursuant to Public Resources Code §21081, the Planning Commission finds that, through implementation of feasible conditions placed on the Tranquillon Ridge project, the significant impacts on the environment will be avoided or substantially lessened, and mitigated to the maximum extent feasible.

1.3 LOCATION OF RECORD OF PROCEEDINGS: The documents and other materials that constitute the record of proceedings upon which this decision is based are in the custody of the Secretary to the Planning Commission, County Planning and Development Department located at 123 E. Anapamu Street, Santa Barbara, CA 93101.

1.4 UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE: The Final EIR for the Tranquillon Ridge project identified 13 significant project-related impacts that cannot be fully mitigated and which are therefore considered unavoidable (Class I) impacts for the originally proposed Tranquillon Ridge project. Eleven of these significant impacts would occur for the reduced-life project. These impacts result from the increased volumes of oil and gas over current production levels and are primarily related to marine oil spills or trucking of hazardous materials on local roadways. These impacts were identified as significant, unavoidable impacts when the original Point Pedernales project was approved by the County in 1986. Each of these Class I impacts is listed in Table 3 of the April 15, 2008 Planning Commission staff report. Several mitigation measures have been adopted to address these impacts, as referenced in Table 3 and identified in Attachment B (*Conditions of Approval*) to the April 15, 2008 staff report, as modified by the Planning Commission at the April 21, 2008 public hearing, and through other mitigation measures in other responsible agencies. The Planning Commission finds that these are feasible mitigation measures that will reduce these adverse impacts but not to levels of insignificance and that there are no other feasible mitigation measures that could be required that would further reduce these impacts. Thus, the Planning Commission finds that the unavoidable impacts associated with the Tranquillon Ridge project are mitigated to the maximum extent feasible. The discussion under Coastal Act §30260 (part 3) in Attachment D (*Policy Consistency Analysis*) to the April 15, 2008 staff report to the Planning Commission which enumerates the specific mitigation measures adopted as permit conditions of approval is incorporated herein by reference as further support for this finding.

1.5 FEASIBLE MITIGATION MEASURES ADOPTED AS CONDITIONS OF APPROVAL: In addition to the 13 significant and unavoidable environmental impacts discussed above, the EIR identified 24

significant but mitigable (Class II) impacts that would result from the originally proposed Tranquillon Ridge project. These Class II impacts are identified in Table 4 and discussed in Section 6.1.1 of the April 15, 2008 Planning Commission staff report, along with the adopted mitigation measures that will reduce these potentially significant impacts to less than significant levels. Therefore, the Planning Commission finds that feasible mitigation measures have been adopted as conditions of the approval for the Tranquillon Ridge project.

1.6 **NO FEASIBLE ALTERNATIVE IDENTIFIED**: The Final EIR considers several alternatives to the Tranquillon Ridge project in the impact analyses of Section 5.0. Section 6.0 of the EIR compares the various alternatives to the Tranquillon Ridge project and Table 6 in Section 6.1.1.5, *Alternatives*, of the Planning Commission staff report provides a summary comparison of the project to each alternative addressed in the EIR. Major alternatives evaluated are an onshore drilling and production site instead of using the existing offshore platform, a new oil and gas processing site located further north within Santa Barbara County, and replacement of the oil emulsion pipeline from the platform to the LOGP. The Planning Commission has declined to adopt any of the alternatives, as discussed below.

VAFB Onshore Drilling and Production Site: The EIR analyses describe several significant impacts that could be avoided and several others that would occur with implementation of an alternative drilling and production site located onshore, within Vandenberg Air Force Base. The EIR did not reach a conclusion as to how this conceptual alternative compares overall to the Tranquillon Ridge project because the projects cannot be examined to the same level of detail and their associated impacts are not strictly comparable for every measure (see EIR Section 6.0). The staff report discusses the likely impacts of this alternative relative to the Tranquillon Ridge project (see Staff Report Table 6). The onshore alternative would result in increased risks to VAFB personnel and significant impacts to onshore biological and cultural resources from both construction and operations.

Potential impacts of an oil spill on the marine environment would be substantially less for this onshore alternative than for the Tranquillon Ridge project, particularly once the Point Pedernales project ceases operations. The potential consequences of a marine oil spill are a significant issue for the County and we have favored certain kinds of onshore development (oil transportation via overland pipeline) over offshore options to address these concerns. In this case, however, the Planning Commission finds that, on balance, a new onshore drilling and production site on VAFB is not preferable to use of the existing PXP facilities, with the marine oil spill safeguards adopted herein as conditions of approval, to develop the Tranquillon Ridge reserves.

The Tranquillon Ridge project will cease operations by December 31, 2022. This will avoid significant adverse impacts that would have resulted from extending the life of the existing facilities, as originally proposed and evaluated in the EIR. A new onshore drilling and production project would be expected to operate for approximately twice as long as the Tranquillon Ridge project (30 vs. 15 years). Most of the significant impacts related to extending the life of the Point Pedernales project would be incurred, to some degree, with implementation of an onshore alternative. Thus, the reduced-life Tranquillon Ridge project will result in fewer significant and unavoidable impacts than a new long-term onshore drilling and production project and is preferred to the VAFB Onshore Alternative.

Casmalia East Processing Site: The EIR analyses concluded that the alternative processing plant location would shift, rather than eliminate, most of the significant impacts associated with use of the LOGP and would result in construction-related impacts that would not occur with the project

as proposed by PXP. The current potential for significant new oil and gas production that would benefit from locating a new oil and gas processing plant in the North County does not appear to warrant the construction and operation of a new plant now or in the near future. However, the advantages and disadvantages of locating a new oil and gas processing plant in northern Santa Barbara County to provide for maximum consolidated use of such facilities in the future should be assessed if demand significantly increases. The Tranquillon Ridge project will cease operating by December 31, 2022, avoiding significant impacts associated with extending the life of the Point Pedernales facilities. Therefore, given that a new processing plant in northern Santa Barbara County would entail potentially significant impacts similar to those incurred with operation of the LOGP, though in a different location, and the potential for significant construction-related impacts to occur, the Planning Commission finds that continued use of the LOGP until the project end-date of December 31, 2022, and as conditionally approved herein, is preferable to constructing and operating a new oil and gas processing plant and associated pipelines.

Emulsion Pipeline Replacement: The Planning Commission finds that replacing the entire existing oil emulsion pipeline with a new one would not significantly reduce the potential for a pipeline-related oil spill and could result in several significant construction-related impacts, as discussed in the EIR. The existing pipeline is subject to specific inspection and maintenance requirements for which the County will provide oversight throughout the life of the project. Segments of the existing pipeline may need to be replaced during operation of the project, as is currently the case for the Point Pedernales project. However, the Tranquillon Ridge project will not extend operation of the pipeline beyond its currently expected lifetime, and operation of the pipeline will cease by the end of 2022. The Planning Commission finds that it is preferable to operate the existing pipeline, in accordance with the enhanced safeguards required by this approval, rather than incurring the construction and operational impacts of installing a completely new pipeline. This alternative would not substantially reduce significant impacts associated with either the originally proposed or the reduced-life Tranquillon Ridge project. Therefore, the Planning Commission finds that the emulsion pipeline replacement alternative is not preferable to the Tranquillon Ridge project as conditionally approved herein.

Power Line Undergrounding: Other alternatives discussed in the EIR and summarized in Table 6 of the staff report include power line options and drill muds and cuttings disposal methods. The Planning Commission has declined to adopt any of the power line alternatives. As discussed in Section 6.1.1.5 of the staff report, power line Option 2a would not reduce significant impacts; Option 2b would result in greater significant impacts; and the Terra Road undergrounding alternative would shift potentially significant (Class II) impacts from visual resources to cultural resources, air quality, and biological resources.

1.7 **MITIGATION MONITORING AND REPORTING**: Public Resources Code §21081.6 requires that the County adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment. The approved project description and conditions of approval, with their corresponding permit monitoring requirements, are hereby adopted as the mitigation monitoring program for the Tranquillon Ridge project. The monitoring program is designed to ensure compliance during all phases of project implementation.

1.8 STATEMENT OF OVERRIDING CONSIDERATIONS:

The Final EIR for the Tranquillon Ridge project identifies significant, unavoidable impacts to marine and terrestrial biological resources and water quality, fishing, recreational, and cultural resources due to oil spills and spill clean-up efforts, and significant public safety risks associated with truck transport of gas liquids from the Lompoc Oil and Gas Plant. Several mitigation measures have been adopted to reduce these impacts, but not all significant impacts can be mitigated to less than significant levels. The benefits listed below warrant approval of the project notwithstanding that all identified significant adverse impacts are not fully mitigated.

The Tranquillon Ridge project now proposed by PXP offers unique benefits. Having balanced these benefits, based upon the best available information, against the significant and unavoidable adverse impacts of the project, the Planning Commission hereby determines that these significant and unavoidable impacts are acceptable in light of the project's benefits described below. Pursuant to CEQA Section 15043, 15092, and 15093, any remaining significant effects on the environment are acceptable due to these overriding considerations. This statement is supported by substantial evidence in the record that includes the certified EIR, staff report and analyses, and oral and written testimony.

Use of Existing Coastal-Dependent Infrastructure without Extending Its Life

The proposed project, as revised, offers the best alternative to access Tranquillon Ridge oil and gas reserves, utilizing existing coastal-dependent and coastal-related infrastructure over the next 14 years with a definitive early termination date that reduces risk of mishap generally associated with aging infrastructure. The recovered reserves, in turn, provide an interim source of domestic oil and gas production, while California implements strategies to reduce the State's dependence on fossil fuels and associated greenhouse gas emissions. Recovery of these reserves from an alternative location, such as onshore Vandenberg Air Force Base, would result in operation of two individual production projects at the same time where one will suffice.

Termination Date: PXP has revised its proposal so that operation of the Tranquillon Ridge project will permanently cease by December 31, 2022. This project revision is reflected in Final Development Plan Condition A-6 of the staff-recommended revised permit. As of December 31, 2022, PXP will cease operations of both the Point Pedernales and Tranquillon Ridge projects and will begin the decommissioning process for the Lompoc Oil and Gas Plant (LOGP) and associated pipelines. This project end-date coincides with the outer range of the estimated remaining project life for the existing Point Pedernales project. By limiting the Tranquillon Ridge operations to the same project life as the Point Pedernales project, PXP will avoid extending significant environmental impacts beyond the life of the existing operations. Importantly, this specific end-date identifies a clearly defined limit to increased oil and gas production and processing due to the Tranquillon Ridge project and its associated impacts, and is unprecedented for this kind of project in Santa Barbara County.

Continued Use of an Existing Coastal-Dependent Industrial Facility: The current Point Pedernales project, that would provide the physical infrastructure to produce the Tranquillon Ridge field, is consistent with all but one applicable Coastal Act and County policies, the exception being Coastal Act Policy 30232. However, the Coastal Act provides leeway as regards this exception via Policy 30260 as discussed below. Platform Irene and associated pipelines are considered a coastal-dependent use that "requires a site on, or adjacent to, the sea to be able to function at all" (Coastal Act Section 30101). Section 30260 of the Coastal Act guides the

Coastal Commission and local coastal jurisdictions as to the benefits of limiting coastal-dependent development to existing sites, such as Platform Irene, as follows:

> *Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if (1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.*

The EIR did not draw a conclusion as to whether the conceptual "VAFB Onshore Alternative" or the Tranquillon Ridge project would be environmentally preferable overall because significant impacts would occur in both similar and different issue areas when compared to the Tranquillon Ridge project. We acknowledge that a significant impact associated with the Tranquillon Ridge project related to marine oil spills would be reduced if the resource were to be developed from an onshore site. However, other Class I impacts would still occur and construction-related impacts would be greater for a new onshore facility and the onshore alternative still results in significant adverse impacts from oil spills, thereby resulting in greater environmental impacts to the environment. A new onshore drilling and production facility clearly would involve more construction-related impacts, some of them significant and potentially unavoidable, than the Tranquillon Ridge project. With an onshore drilling and production site, significant impacts from an oil spill originating offshore would be eliminated, but some impacts to marine biota and water quality would still be likely in the event an onshore spill reached the ocean. Other significant impacts from both construction and operation would be likely to occur with an onshore production site. The Planning Commission found (Finding 1.6, above) that potentially feasible alternative locations for the facilities necessary to develop the Tranquillon Ridge Field reserves would not be less environmentally damaging than the Tranquillon Ridge project, primarily due to the type and amount of new construction that would be needed to implement the alternatives.

If the Tranquillon Ridge project were not approved (the "No Project Alternative" in the EIR), the resource could still be developed in the future. If this development occurred after Platform Irene is decommissioned, new construction potentially would result in significant impacts. Operational impacts would be similar to those for the Tranquillon Ridge project, several of them significant and unavoidable. In addition, as approved, the Tranquillon Ridge project will operate for, at most, 15 years. The price of crude oil today is at all time highs and is expected to remain at these (or higher) levels for the foreseeable future. Given these market conditions, it is reasonable to assume that any new facilities built to develop the Tranquillon Ridge resources would remain in operation for substantially longer than 15 years, perhaps 30 years or more. Significant and unavoidable impacts that would occur from such development would thus be extended well into the future. For these reasons, the Planning Commission finds that the public welfare is better served by developing the Tranquillon Ridge reserves using the existing facilities for a defined period of time, as approved herein.

Continued Use of Existing Coastal-Related Facilities: The LOGP is zoned M-CR, Coastal-Related Industry, and is contained within the boundaries of the onshore Lompoc Oil Field, inland of the Coastal Zone. Coastal-related development refers to uses that are "dependent on a coastal-dependent development or use" (Coastal Act Section 30101.3). This Coastal Act policy is not

applicable to the LOGP due to the facility's location outside of the Coastal Zone, however, the pipelines connecting Platform Irene and the LOGP traverse lands both within and outside of the Coastal Zone. The LOGP is not designated as Coastal-Dependent, nor is it a Consolidated Oil and Gas Processing Facility, but it does serve offshore oil and gas development and is the only existing facility in northern Santa Barbara County that is approved for this purpose. It has operated since 1987 as an oil processing facility, and since 1997 as a gas processing facility as well. All of these existing facilities will be used to implement the Tranquillon Ridge project. New project components associated with the Tranquillon Ridge project are limited to the potential addition of booster pumps at Valve Site #2, which is at the eastern boundary of the Coastal Zone, and installation of additional power lines and poles and possibly a new substation to operate the new pumps. The substation and many of the power poles would be located outside of the Coastal Zone.

The County has long-standing policies encouraging consolidation of industrial facilities within the County where possible. The project adjustments PXP has made will allow it to develop the Tranquillon Ridge oil and gas reserves without extending the life of its existing facilities and without incurring environmental impacts associated with significant new construction. As approved, the Tranquillon Ridge project will use existing facilities almost entirely and only minor new construction would occur. No other existing facilities in the region could develop the Tranquillon Ridge reserves with fewer impacts. Production of the Tranquillon Ridge reserves from any other site would require construction of a new platform or onshore drilling and production facility, new pipelines, and potentially a new gas processing plant. The Tranquillon Ridge EIR assessed the relative impacts of (1) constructing a new oil and gas drilling and production site and using the existing LOGP for processing, and of (2) constructing a new onshore oil and gas processing plant in the Casmalia Oil Field and new pipelines from the LOGP site to this plant. The EIR concluded that this "Casmalia East Alternative" would not reduce significant impacts of the proposed project and would result in additional environmental damage, primarily from construction.

Interim Source of Domestically Produced Oil and Gas: California is undertaking serious efforts to reduce its greenhouse gas emissions to 1990 levels by the year 2020., as enacted in the California Global Warming Solutions Act of 2006 (Health and Safety Code §§ 38500 *et. seq.*). Reducing the State's dependence on fossil fuels is part-and-parcel of this effort, and will be accomplished through several strategies, including promotion of clean-energy alternatives to fossil fuels, energy conservation, and more efficient use of energy. In the interim, development of the Tranquillon Ridge oil and gas reserves between now and the year 2022 helps California to meet short-term demand for fossil fuels from domestic supplies as the State implements strategies to reduce its carbon footprint by reducing dependence on fossil fuels. In doing so, the Tranquillon Ridge project has the potential to avoid some greenhouse gas emissions into the atmosphere should this oil and gas reduce demand for imported crude oil and natural gas, or reduce demand for domestic production that that relies on high CO_2 -emitting enhanced oil recovery methods to extract heavy crude oil.

2.0 DEVELOPMENT PLAN FINDINGS

The Tranquillon Ridge project is subject to the requirements of both the County's Coastal Zoning Ordinance (CZO) and the County's Land Use and Development Code (LUDC), which covers portions of the project inland of the Coastal Zone. Pursuant to Section 35-174.7 (Permit Procedures - Development Plans, Findings Required for Approval) of the CZO, a revised Final Development Plan shall be approved

only if findings 35-174.7.1.a through 35-174.7.1.h are made. Similarly, pursuant to Section 35.82.080.E (Permit Review and Decisions - Development Plans, Findings Required for Approval) of the LUDC, findings 35.82.080.E.1.a though 35.82.080.E.1.h must be made in order to approve a revised Final Development Plan. These CZO and LUDC findings are identical or very similar to one another and are presented and discussed together here.

1.a ***CZO: That the site for the project is adequate in size, shape, location, and physical characteristics to accommodate the density and level of development proposed.***
LUDC: The site for the subject project is adequate in terms of location, physical characteristics, shape, and size to accommodate the density and intensity of development proposed.

The Tranquillon Ridge project comprises several "project sites." These are Platform Irene, the Lompoc Oil and Gas Plant (LOGP), and the pipeline corridor connecting the platform and the LOGP. The Tranquillon Ridge oil and gas will be produced, transported, and processed within these existing Point Pedernales facilities which are currently used in the same way for production of the offshore Point Pedernales Field and are located in rural areas of the County, away from population centers. None of these facilities will require significant physical expansion or modifications to accommodate oil and gas production from the Tranquillon Ridge field. The potential addition of three new pumps at Valve Site #2 would occur within the existing valve site on Vandenberg AFB. A small electrical substation would be located on agricultural land and the new power line and poles would be installed between the substation and Valve Site #2. Much of the power line route would parallel existing lines and/or roadways. Because the existing production platform, pipelines and processing facilities are sufficient to accommodate the Tranquillon Ridge project with relatively minor modifications, the project sites are found to be adequate in size, shape, location and physical characteristics to accommodate the project.

1.b ***CZO: That adverse impacts are mitigated to the maximum extent feasible.***
LUDC: Adverse impacts will be mitigated to the maximum extent feasible.

Section 6.1.1 of the April 15, 2008 staff report to the Planning Commission discusses the significant impacts that would result from implementation of the Tranquillon Ridge project as well as specific mitigation measures which have been adopted to mitigate each of these impacts. Impacts that cannot be mitigated to less than significant levels are related to marine oil spills and spill clean-up and truck transport of gas liquids from the LOGP. Conditions of approval have been adopted to mitigate these impacts. These include requirements for PXP to update and implement its Oil Spill Response Plan, Transportation Risk Management and Prevention Plan (for gas liquids trucking), Fire Protection and Emergency Response Plans; to enhance and continue monitoring, inspection and maintenance of the oil, gas, and produced water pipelines and other facilities associated with the project; to continue to blend the heavier gas liquids (NGLs) into the crude oil stream to the maximum extent feasible to minimize truck transport of these gas liquids; and, to continue to provide funding for California Highway Patrol patrolling of State Highway 166 which the NGL trucks are required to use.

Certain permit conditions have also been adopted to mitigate adverse impacts that would not be considered significant under CEQA even without the additional mitigation. However, these additional, feasible mitigation measures help to ensure that the Tranquillon Ridge project will be implemented consistent with this finding. In addition, Final Development Plan Condition B-2 provides for the County to assess the effectiveness of the adopted mitigation measures throughout the life of the project and allows for imposition of additional or revised mitigation measures where such measures would mitigate adverse environmental impacts more effectively. Based on the analyses in the EIR and as discussed in the staff report, the Planning Commission finds that with implementation of the adopted conditions of approval,

adverse impacts associated with the reduced-life Tranquillon Ridge project will be mitigated to the maximum extent feasible.

1.c ***CZO: That streets and highways are adequate and properly designed to carry the type and quantity of traffic generated by the proposed use.***
LUDC: Streets and highways will be adequately and properly designed.

The Tranquillon Ridge project will generate a small increase in truck traffic during operations. Truck trips to haul gas liquids from the LOGP would increase from about three per week to five trips per week. The EIR determined that this increase in truck traffic would not change the level of service on Harris Grade Road, the primary affected roadway. An adopted condition of approval (Condition O-10) for the project requires PXP to ensure that all trucks enter or leave the LOGP facility during non-rush hour times to minimize interference with other traffic on the local roadways. The County has not identified any physical improvements to local roadways that are necessary to accommodate traffic associated with the Tranquillon Ridge project and therefore the Planning Commission finds that streets and highways are adequate and properly designed to carry the type and quantity of traffic generated by the Tranquillon Ridge project, as conditionally approved herein.

1.d ***CZO: That there are adequate public services, including but not limited to fire protection, water supply, sewage disposal, and police protection to serve the project.***
LUDC: There will be adequate public services, including fire and police protection, sewage disposal, and water supply to serve the proposed development.

Current levels of service are adequate for the existing Point Pedernales project and will continue to be adequate for the Tranquillon Ridge project as well. The Tranquillon Ridge project will not result in population growth in the area, or expansion of the LOGP facility such that the need for public services would increase. Water use and sewage disposal requirements will be similar to those for existing operations. The increased truck trips to transport natural gas liquids from the LOGP from three per week to five per week will not drive a need to increase California Highway Patrol activity on Highway 166 and will be accomplished in accordance with safety measures included in PXP's updated Transportation Risk Management and Prevention Program required by FDP Condition P-23. Pursuant to FDP Condition P-8, PXP currently provides partial funding for one fire-fighter position at County Fire Station #51 and will continue to provide this funding throughout the life of the Tranquillon Ridge project. Based on the foregoing, the Planning Commission finds that there are adequate public services to serve the reduced-life Tranquillon Ridge project.

1.e ***CZO: That the project will not be detrimental to the health, safety, comfort, convenience, and general welfare of the neighborhood and will not be incompatible with the surrounding area.***
LUDC: The subject 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 areas.

The Tranquillon Ridge project will exacerbate an existing significant risk to public safety due to the increased transportation of gas liquids from the LOGP. This risk to public health and safety will be reduced but not eliminated through implementation of an updated Transportation Risk Reduction and Management Plan. The requirements for this Plan are described in Final Development Plan Condition P-23 and include, among other things, maximum blending of heavier gas liquids into the crude oil stream that is transported via pipeline, provisions for carrier safety and training audits, defined routes, and certain truck loading procedures. Other potential health and safety risks associated with operation of the

Tranquillon Ridge project are due to the presence of hydrogen sulfide in the gas pipeline from Platform Irene to the LOGP and the potential for fire or explosion hazard associated with the oil emulsion pipeline. Based on the EIR analyses, these two hazards were determined to be adverse but less than significant public safety impacts.

The Tranquillon Ridge project will increase the amount of oil and gas in the pipelines that connect Platform Irene to the LOGP. The integrity of the crude oil pipeline has been problematic in the past, with some defective flanges on the subsea portion of the line and corrosion problems on the onshore portion of the line. Potential leaks or ruptures of this pipeline, such as the 1997 spill of 163 to 1,242 barrels[5] of oil, could be detrimental to the comfort, convenience, and general welfare of Lompoc area residents and the public in general. Pipeline spills could significantly damage biological, agricultural, cultural, and recreational resources in the project area and adversely affect the public's use and enjoyment of these resources. Since the 1997 oil spill, PXP has implemented pipeline repairs and safety measures to reduce the likelihood that such an incident will be repeated. The Planning Commission has adopted revised FDP Condition P-2, which requires, among other thing, that PXP implement certain procedures prior to re-starting the pipeline in the event of an unexplained or emergency shutdown. These procedures were instituted after the 1997 oil spill and will continue to be implemented for the Tranquillon Ridge project. Potential impacts will be reduced through existing and additional mitigation measures that have been adopted for the Tranquillon Ridge project to protect persons and property in the area. These measures include pipeline inspection and repairs (FDP Condition P-2, *SIMQAP*), an updated pipeline leak detection system (FDP Condition P-16, *Leak Detection*), SSRRC review of pipeline operations (FDP Conditions P-1, *SSRRC* and P-2, *SIMQAP),* and implementation of updates to the Oil Spill Response Plan (FDP Condition P-13).

In addition to the appearance and function of project-related facilities, two factors to be considered in determining the overall land-use compatibility of the onshore portions of the project include the County's policies encouraging consolidation of oil and gas processing facilities to minimize land disturbances throughout the County and the need to locate processing facilities away from more populated areas due to system safety issues. The Tranquillon Ridge project will use the existing LOGP and associated pipelines, which were found to be compatible with the surrounding area in previous approvals for the Point Pedernales project and, overall, not detrimental to the public health, safety and general welfare. The industrial features of the LOGP are partially screened from public viewing points along Harris Grade Road by landscaping and revegetation efforts previously required and which will continue in effect for the Tranquillon Ridge project. The pipelines are buried and the right-of-way has been restored for most of its length. The rural character of the area is not affected by the buried pipelines. For these reasons and because PXP has committed to implementing several safety measures and continued landscaping and revegetation efforts as required by the County, the Planning Commission finds that the Tranquillon Ridge project will not be detrimental to the health, safety, comfort, convenience and general welfare and will not be incompatible with the surrounding area.

1.f ***<u>CZO</u>: That the project is in conformance with 1) the Comprehensive Plan, including the Coastal Land Use Plan, and 2) with the applicable provisions of this Article and/or the project falls within the limited exception allowed under Section 35-161.7.***
<u>LUDC</u>: The proposed project is in conformance with the Comprehensive Plan, including any applicable community or area plan and the applicable provisions of this Development Code

[5] The State's official spill volume from the Torch Point Pedernales pipeline was 163 barrels. The 1,242-barrel estimate is from Santa Barbara County and is based on additional factors that were not taken into account with the CDFG official number (see EIR Section 2.3.1.3).

and/or the project falls within the limited exception allowed in compliance with Chapter 35.10 (Nonconforming Uses, Structures, and Lots).

The project's consistency with the Comprehensive Plan, including the Coastal Plan, is discussed in detail in Attachment D to the April 15, 2008 staff report to the Planning Commission. As described therein and including any amendments made by the Planning Commission, the Commission finds the Tranquillon Ridge project to be consistent with the County's Comprehensive Plan, with the exception of Coastal Act Section 30232, *Oil Spills*. This Coastal Act policy inconsistency can be overridden under the provisions of Coastal Act Section 30260, *Industrial Development Location or Expansion*, as discussed in Attachment D.

1.g ***CZO: That in designated rural areas, the use is compatible with and subordinate to the scenic, agricultural, and rural character of the area.***
LUDC: In designated rural areas, the use will be compatible with and subordinate to the agricultural, rural, and scenic character of the rural area.

The LOGP is in a designated rural area. Although oil field operations have existed in the area for decades, the noise, lighting (especially at night), and appearance of industrial equipment and facilities are not entirely compatible with the scenic and rural nature of the area. Previous landscaping and revegetation efforts have not completely screened equipment at the LOGP from all public viewing points, as noted in EIR Section 5.13.1.2, though landscaping has somewhat reduced visual exposure of the facilities to the public and will continue to do so in the future. Approval of the Tranquillon Ridge project includes adoption of revised FDP Condition L-8 to require visual impact mitigation plans for the LOGP and the Surf Substation. PXP is also required to provide a painting plan for the LOGP (FDP Condition L-4) to improve the facility's compatibility with the surrounding area and to develop an updated lighting plan (FDP Condition L-2) to identify feasible opportunities to reduce lighting at the LOGP. Limited industrial development can be compatible with the rural character of an area where it is spatially confined, screened to the extent feasible, and does not significantly interfere with scenic vistas or other rural uses. The scenic, agricultural, and rural character of the area has not been significantly or irretrievably affected by the presence of the LOGP for the last 20 years and would not be affected differently by operation of the Tranquillon Ridge project. In addition, the County's Safety Element Supplement requires remote locations for hazardous industrial facilities, such as the LOGP (see policy consistency discussion for Safety Element Supplement, *Policy HAZARDOUS FACILITY SAFETY, 3-A, SITING* in Attachment D to this staff report). Based on the foregoing and to balance competing County goals in favor of safety, the Planning Commission finds that use of the existing LOGP to process Tranquillon Ridge oil and gas is compatible with and subordinate to the scenic, agricultural and rural character of the area.

1.h ***CZO: That the project will not conflict with any easements required for public access through, or public use of a portion of the property.***
LUDC: The project will not conflict with any easements required for public access through, or public use of a portion of the property.

There are no access public easements through, or for the use of, the portions of the project sites that are outside of the coastal zone. The Surf electrical substation is located near the Amtrak Station at Wall Beach (within Vandenberg Air Force Base) but does not interfere with any public access associated with use of that train station. Therefore, the Planning Commission finds that the Tranquillon Ridge project will not conflict with any public easements or uses of the property.

In addition to the findings discussed above, a revised Final Development Plan for an onshore processing facility outside of the South Coast Consolidated Planning Area shall not be approved unless the review

authority also makes certain findings listed in LUDC Section 35.55.040 – Treatment and Processing Facilities - Findings for Development Plans. These findings are made for the Tranquillon Ridge project, as discussed below.

A.1 Consolidation or collocation on or adjacent to an existing processing facility to accommodate the proposed production is not feasible or is more environmentally damaging.

A new oil and gas processing facility was not proposed, nor has one been approved. The Planning Commission finds that use of the existing LOGP processing facilities, as proposed by PXP and conditionally approved herein, is feasible and less environmentally damaging than construction of new facilities to process Tranquillon Ridge oil and gas.

A.2 There are no feasible alternative locations for the proposed processing facility that are less environmentally damaging.

The Planning Commission finds that the use of the existing LOGP processing facilities, as proposed by PXP and conditionally approved herein, is feasible and less environmentally damaging than construction of new facilities to process Tranquillon Ridge oil and gas. An alternative location in the North County for a new oil and gas processing plant (Casmalia East alternative) was evaluated in the EIR to determine the potential for reducing potentially significant project-related impacts, including safety issues, incident response, and visual resources. This alternative was found to be more environmentally damaging than use of the existing PXP facilities for the Tranquillon Ridge project. The discussion and conclusions presented under CEQA Finding 1.6 above are incorporated herein by reference. Thus, the Planning Commission finds that there are no feasible alternative locations for the processing the Tranquillon Ridge oil and gas that are less environmentally damaging than use of the LOGP.

A.3 Where consolidation or collocation on or adjacent to an existing processing facility is not proposed, for Coastal areas east of the City of Santa Barbara, there are no existing processing facilities within three miles of the proposed site.

(This finding is not applicable to the Tranquillon Ridge project.)

A.4 The proposed facility is compatible with the present and allowable recreational and residential development and the scenic resources of the surrounding area.

As discussed in Findings 1.e and 1.g, above, the continued use of the LOGP is compatible with the scenic quality and land uses of the surrounding area and will not be a detriment to the public health, safety and general welfare. The LOGP site is surrounded by PXP-owned land and a 5,000-acre parcel that Unocal deeded to the State as an ecological preserve. This preserve is about 2,000 feet from the LOGP property and could be used for passive recreational purposes. The nearest residence is about 4,800 feet from the LOGP. Mitigation measures have been adopted to ensure continued and improved safety measures are in place to reduce potential risks of the project. These measures include requirements for transporting gas liquids from the LOGP (FDP Condition P-23), requirements to update the pipeline leak detection systems (FDP Condition P-16), and reduction of significant visual impacts to the extent feasible (FDP Conditions H-1, H-5, L-2, L-4, L-8). Based on the location of the LOGP and adoption of mitigation measures to reduce significant safety and aesthetic impacts to the extent feasible, the Planning Commission finds that the Tranquillon Ridge project as approved herein is compatible with the present and allowable recreational and residential development and the scenic resources of the surrounding area.

A.5 Gas processing facilities proposed in the North County Consolidation Planning Area (NCCPA), including expansion of existing facilities, have been sited in compliance with criteria in the Comprehensive Plan study entitled Siting Gas Processing Facilities. Additionally, sites are selected with adequate consideration of future gas processing needs in the NCCPA to optimize siting and consolidation strategies. The "expansion" of an existing facility shall mean structural modifications, alterations, expansions, or enlargements that result in increases in facility capacity, or changes in facility use, operation, or other limitations imposed by permit or other law. The "expansion" of an existing facility shall also mean introduction of production from a field not served by the processing facility since January 1, 1986, or from a new production well that increases the current extent of a field presently served by the facility. Expansion shall not include modification to existing facilities that is required to comply with current health and safety regulations and codes.

The existing Lompoc Oil and Gas Plant was permitted in accordance with County policies. Prior to installation of gas processing equipment at the LOGP site, the gas plant proposal and six alternatives were evaluated in a Supplemental Environmental Impact Report and assessed according to the siting and screening criteria of the Siting Study. In approving the construction and operation of the gas plant at the LOGP site, the County found that locating a gas processing component at this site met 36 of the 38 *Siting Study* criteria. One criterion that could not be met was related to air quality and it could not be met by any of the six alternative sites that were also assessed. The other criterion that could not be met for the gas plant is Siting Criterion #6, which recommends avoidance of sites that would introduce truck transportation of hazardous materials on County or City roadways of high risk. The County found that, with incorporation of mitigation measures and as compared to the alternatives, the LOGP site afforded the most consistency with the screening and siting criteria for the gas plant. Although the Tranquillon Ridge project would increase the number of gas liquids truck trips from about 3 per week to about 5 per week, this would be less than the 2.3 truck trips per day associated with the gas plant as approved by the County in 1996. The Tranquillon Ridge project meets the definition of expansion of the gas plant because it involves introduction of production from a field that has never been served by the LOGP. However, the permitted capacity of the gas plant (15 million standard cubic feet per day), its location, and basic gas processing equipment will not change as a result of introducing Tranquillon Ridge production. Based on the original findings for the gas plant for approval of the LOGP site, the analysis of the Casmalia East processing site alternative in the EIR (see CEQA Finding 1.6 and Development Plan Finding A-2, above), and the continuance of gas throughput below the permitted plant capacity, the Planning Commission finds that the use of the existing LOGP for processing gas from the Tranquillon Ridge Field is consistent with the criteria in the County's Comprehensive Plan study entitled *Siting Gas Processing Facilities*.

ATTACHMENT B

RECOMMENDED CONDITIONS OF APPROVAL

(Revisions to Point Pedernales Final Development Plan, 94-DP-027)

PXP POINT PEDERNALES and TRANQUILLON RIDGE PROJECTS
FINAL DEVELOPMENT PLAN 94-DP-027
CONDITIONS OF APPROVAL

Revised April 8, 2003; December 9, 2004; April 21, 2008

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PXP POINT PEDERNALES / TRANQUILLON RIDGE PROJECTS
FINAL DEVELOPMENT PLAN 94-DP-027
CONDITIONS OF APPROVAL

Revised April 8, 2003; December 9, 2004, April 21, 2008

The conditions of the original Point Pedernales Project Final Development Plan (FDP), Case Number 85-DP-071 as modified by 91-DP-017, have been split into three different FDPs reflecting three different owners and operators of three different projects. The original Point Pedernales condition numbers have been retained for clarity. The PXP Point Pedernales Project FDP includes all of the components identified in the project descriptions set forth and analyzed for each of the County's environmental documents on the project, approved project applications (including the Tranquillon Ridge project) and diagrams, programs, procedures, demonstrations, letters of commitment, final route realignment, and operating procedures detailed in the project's approved compliance plans.

To date, ~~seven~~ eight environmental documents have been prepared for the project pursuant to the California Environmental Quality Act (CEQA). They include reviews for:

(1) the originally proposed project (an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) finalized in 1985);

(2) construction and operation of a gas plant at the Lompoc facility to replace the Battles Gas Plant (a Supplemental EIR finalized in 1993);

(3) transportation of natural gas liquids (NGLs) from the Lompoc facility (an EIR Addendum finalized in 1993);

(4) temporary onshore re-injection of the natural gas produced offshore during the period between closure of the Battles Gas Plant and commissioning and operation of the Lompoc Gas Plant (an EIR Addendum finalized in 1995);

(5) process design and capacity modifications to the originally proposed Lompoc Gas Plant (and EIR Addendum finalized in 1996);

(6) an increase in the H_2S concentration of the off- to onshore natural gas pipeline from 4,000 ppm to 8,000 ppm (an EIR Addendum finalized in February 1999);

(7) an expansion and upgrade of the LOGP Produced Water Treatment Plant (94-DP-027 RV04) with a treatment design capacity of 85,000 barrels/day of produced water (prepared as part of the 2002 Tranquillon Ridge EIR, 01-EIR-04); and

(8) drilling, production, and processing of the Tranquillon Ridge field reserves located in State waters (06RVP-00001; Tranquillon Ridge EIR, 06EIR-00005).

The physical components of the project include:

- An oil and gas drilling and production platform, Platform Irene, located on OCS Lease P-0441;
- An oil dehydration and gas processing facility located north of the City of Lompoc, known as the Lompoc Oil and Gas Plant (hereafter the LOGP);
- Three pipelines, in one corridor, connecting Platform Irene with the LOGP: a 20" wet oil pipeline, an 8" gas pipeline, and an 8" produced water return pipeline for discharge at the platform. The pipelines reach landfall just north of the Santa Ynez River and cross Vandenberg Air Force Base;

- A power supply system consisting of an electrical substation located on Southern Pacific Railroad property at Surf, a subsea power cable from the substation to Platform Irene, and an up-graded transmission line from the substation to the Pacific Gas and Electric power line north of Lompoc;

- A 12" sales gas pipeline from the LOGP to the Righetti Valve Box, and a 6" sales gas pipeline from the Righetti Valve Box to Southern California Gas Company (SoCal Gas) transmission line #1010; and

(Modified June 20, 2002)

- Approved but not yet constructed facilities include the addition of three 1,250-hp electrical booster pumps at Valve Site #2 and a new power line, poles, and substation to provide additional power to Valve Site #2. If it is determined these modifications are necessary, PXP shall obtain a zoning clearance from the County prior to construction of these facilities.

(Modified April 21, 2008)

A. GENERAL

The owner, operator, and guarantor for this project is Plains Exploration and Production Company, referred to herein as "PXP". *(Modified December 9, 2004)*

A-1 GROUNDS FOR PERMIT MODIFICATION OR REVOCATION

Failure to abide by and faithfully comply with any conditions for the granting of this permit shall constitute grounds for the modification or revocation of this permit.

A-2 PERMIT DEFENSE AND COURT COSTS

PXP agrees as a condition of the issuance and use of this permit to defend at its sole expense any action brought against the County because of issuance of this permit. PXP will reimburse the County for any court costs and attorneys fees which the County may be required by a court to pay as a result of such action where PXP defended or had control of the defense of the suit. County may, at its sole discretion, participate in the defense of any such action, but such participation shall not relieve PXP of its obligation under this condition. County shall bear its own expenses for its participation in the action.

A-3 COSTS OF IMPLEMENTING AND ENFORCING CONDITIONS

PXP shall make an initial deposit to a fund to permit the County to adequately implement and enforce the conditions imposed on PXP by applicable County ordinances and/or the conditions of this permit, if such a fund is established. If the Board of Supervisors determines that an enforcement fund is needed, the Director of Planning and Development shall present a plan for enforcement within one year from the effective date of this permit to both the Board of Supervisors and PXP. This plan shall set forth the staffing requirements and materials necessary for such enforcement costs within 30 days of invoicing by County. This plan shall provide that all reasonable expenses incurred by the County or County contractors, for permit condition implementation, reasonable studies, and emergency response, directly and necessarily related to enforcement of these permit conditions, shall be reimbursed by PXP within 30 days of invoicing by County.

A-4 CIVIL PENALTY AND REIMBURSEMENT

In the event that PXP fails to comply with any order of the ~~Administrative Officer~~ County Executive Officer or the Board of Supervisors issued hereunder or any injunction of the Superior Court, it shall be liable for a civil penalty for each violation to the extent imposition of such civil penalty is authorized by applicable laws, rules, or regulations. Said civil penalty shall be in addition to PXP's obligation to reimburse the County of Santa Barbara (and others) for actual damages suffered as a result of PXP's failure to abide by the conditions of this permit or by the orders of the ~~Administrative Officer~~ County Executive Officer, the Board of Supervisors, or any court of competent jurisdiction.

A-5 ACCESS TO RECORDS AND FACILITIES

For any condition requiring for its effective enforcement the inspection of records or facilities by County or its agents, PXP will make such records available or provide access to such facilities upon reasonable notice from County. County agrees to keep such information confidential where permitted by law and requested by PXP in writing.

A-6 PROJECT DESCRIPTION AND ~~MODIFICATIONS~~END DATE

Project Description: The procedures, operating techniques, design, equipment and other descriptions (hereinafter procedures) described by PXP in its application to the County (#83-GP-17, 83-RZ-27, 83-CUP-68) and in subsequent clarifications and additions to that application and the Final Development Plan (as described in the project description on page 1 of the project's FDP conditions of approval are incorporated herein as permit conditions and shall be required elements of the project. Since these procedures were part of the project description on which the environmental analyses and permit approvals were based, a failure to include such procedures in the actual project could result in significant unanticipated environmental impacts. Therefore, modifications of these procedures will not be permitted without a determination of substantial conformity or a new or modified permit. The use of the property and the size, shape, arrangement and location of buildings, structures, walkways, parking areas and landscaped areas shall be in substantial conformity with the approved Development Plan." *(Modified November 8, 2000)*

End date: On or before December 31, 2022, all oil and gas production, transportation, and processing associated with Platform Irene, the Lompoc Oil and Gas Plant, and the oil, gas, and produced water return pipelines operated under this Final Development Plan shall permanently cease. *(Modified April 21, 2008)*

A-7 AUTHORITY FOR CURTAILMENT ORDER

In addition to the authority to enforce and secure compliance with the provisions of this permit under Division 12, Coastal Zoning Ordinance and Article III of the Santa Barbara County Codes, the County ~~Administrative Officer~~Executive Officer, or in his/her absence a designated appointee, may order that curtailment of activities is required to protect the public health and safety. Said action may include, but is not limited to, ordering temporary, partial or total facility shutdown.

Such an order shall be made only in the event that the ~~Administrative Officer~~County Executive Officer has reasonable and probable cause to believe that continued unrestrained activities of permittee will likely result in or threaten to result in danger to public health, welfare, or safety, or the environment and provided such violations can be expected to

continue or recur unless operations are in whole or in part shut down or reduced pending the necessary corrections.

Before issuing any curtailment order, the County ~~Administrative Officer~~Executive Officer shall set a public hearing and shall give written notice of the time and place of the hearing and of the alleged violations. Such notice shall be given to the person in charge of the operation of the facility at least 24 hours before the hearing, at which time there will be an opportunity for all concerned parties to present evidence regarding the alleged violations.

The notice may be served in person, by facsimile, or by certified mail. In the event the ~~Administrative Officer~~County Executive Officer, or in his/her absence the designated appointee, determines that there is an imminent danger to public health and safety resulting from violations, he/she may summarily order the necessary curtailment of activities without prior notice or hearing. Such order shall be obeyed upon notice of same, whether written or oral. At the same time that order is issued, the ~~Administrative Officer~~County Executive Officer shall set a date, time and place for a publicly noticed hearing and review of said order as soon as possible.

The date of the hearing shall be no later than 48 hours after such order is issued or served. Said hearing shall be conducted in the same manner as a hearing on prior notice. After such hearing, the ~~Administrative Officer~~County Executive Officer may modify, revoke, or retain the emergency curtailment order.

Any order of the ~~Administrative Officer~~County Executive Officer may be appealed to the Board of Supervisors within three working days after such order is made.

If such appeal is not filed with the Board of Supervisors, the ~~Administrative Officer~~County Executive Officer's order becomes final. If there is an appeal, the order of the ~~Administrative Officer~~County Executive Officer shall remain in full force and effect until action is taken by the Board of Supervisors. The decision of the Board of Supervisors shall be a final administrative action. Such decision shall not preclude PXP from seeking judicial relief.

Once PXP has shown that the conditions of violation no longer exist and are not reasonably likely to recur, the ~~Administrative Officer~~County Executive Officer shall modify the curtailment order to account for such compliance and shall entirely dissolve the order. *(Modified November 8, 2000)*

A-8 CONDITIONS SEPARATELY REMAIN IN FORCE

In the event that any condition contained herein is determined to be invalid or legally unenforceable, then all remaining conditions shall remain in force.

A-9 CONFLICTS BETWEEN CONDITIONS

In the event that any condition contained herein is determined to be in conflict with any other condition contained herein, where principles of law do not provide to the contrary, the condition most protective of natural resources and public health and safety shall prevail to the extent feasible.

A-10 INJUNCTIVE RELIEF

In addition to any administrative remedies or enforcement provided hereunder, the County may seek and obtain temporary, preliminary, and permanent injunctive relief to prohibit violation of the conditions set forth herein or to mandate compliance with the conditions herein. All remedies and enforcement procedures set forth herein shall be in addition to any other legal or equitable remedies provided by law.

A-11 OWNER LIABILITY

The facility owners shall be jointly and severally liable without regard to fault for all legally compensable damages or injuries suffered by any property or person that result from or arise out of any oil, brine or water spillage, fire, explosion, odor, or air pollution, in any way involving oil or gas or the impurities contained therein or removed therefrom and which arises out of construction or operation of PXP's facilities. For the purpose of this condition, the "facility" shall be deemed to include all components of the Point Pedernales Project as described on page 1 of the project's FDP conditions of approval, including the Tranquillon Ridge project. This condition shall not inure to the benefit of any of the owners of the Point Pedernales Field, including the United States Government. The extent of this strict liability and the limitations upon it shall be governed by the applicable law of California on strict liability. *(Modified November 8, 2000 and April 21, 2008)*

A-12 CAPACITY

The Lompoc Oil and Gas Plant (LOGP), constructed under this permit and as described on page 1 of the FDP conditions of approval, shall have a nominal processing capacity of 36,000 BPD dry oil and 15 MMSCFD of raw natural gas. Gas re-injection capacity under this permit shall be limited to 9.205 MMSCFD, and shall only be permitted to occur during upset conditions. Re-injection of 9.205 MMSCFD and processing of 15 MMSCFD are not permitted to occur simultaneously. The subject oil volume will be produced from the Point Pedernales Field, leases OCS-P 0441, -P 0437, -P 0438 and -P 0440. The subject gas volume will be produced from the Point Pedernales Field leases OCS-P 0441, -P 0437, -P 0438, -P 0440, and from the Lompoc onshore fields. PXP shall provide daily total volumes of gas and oil processed at the facility in its monthly operations reports. In the case of gas re-injection, PXP shall report the volume of gas re-injected as a result of each incident.

Gas processing at the LOGP will be limited to these sources unless the County finds that gas produced from other offshore leases and onshore fields meets the following criteria: (1) the method of transporting the produced natural gas is consistent with the intent of the County's Siting Gas Processing Facilities study; and (2) processing of the produced natural gas at the LOGP is environmentally preferred, including health and safety issues, over processing the gas at another new or existing gas plant.

PXP shall obtain a new or modified permit or a Substantial Conformity Determination prior to undertaking any of the following activities: significant facility modifications, changes in facility throughput, introduction of production from sources other than Point Pedernales and Lompoc Fields, or other changes which in the County's judgment have the potential to cause significant impacts to the County. The Planning Commission shall be the decision maker if PXP proposes modifying its project or the operation of its project so as to increase the permitted throughput above 15 MMSCFD of raw natural gas or LPG/NGL truck transportation above the monthly average of 2.3 truck trips per day. *(Modified November 8, 2000)*

A-13 PERMIT VIOLATIONS

Any person, firm or corporation, whether as a principal, agent, employee, or otherwise, found to be in violation of any provisions of this permit or conditions of County ordinances, shall be punishable as set forth in the applicable section of the Coastal Zoning Ordinance and Article III Zoning Ordinance.

Each and every day during any portion of which any violation of the applicable zoning ordinance or the rules, regulations, orders, or permits issued thereunder, is committed, continued, or permitted by such person, firm or corporation shall be deemed a separate and distinct offense.

A-14 AUTHORITY TO CHANGE RESPONSIBLE DEPARTMENT

The Santa Barbara County Board of Supervisors, in a noticed public hearing, shall have the authority to specify or change the Santa Barbara County Department responsible for any conditions contained herein.

A-15 ALTERNATE MITIGATIONS IF COUNTY CANNOT ASSESS FEES

Should circumstances, including legal or legislative action, cause the County to lose its authority or have its authority fundamentally reduced to assess fees as a method to mitigate project-related impacts, then other feasible mitigation measures shall be imposed which will substantially lessen the significant impact formerly mitigated by the imposition of fees. Within six months of the County's loss of such authority, feasible alternative mitigation measures shall be imposed as replacement permit conditions. In the alternative, the Board of Supervisors must find that no feasible mitigation measures are available and that the benefits of the project outweigh the significant environmental impacts.

A-16 DELETED

A-17 APPLICABILITY OF PERMIT CONDITIONS

These permit conditions are intended to apply to PXP during all phases of development including drilling, construction, operation, and abandonment of the permitted facilities. The term "operations" shall be understood to encompass ~~both~~ drilling, construction, and operation phases unless such an interpretation would be inappropriate.

With the exception of this Condition A-17, all entitlements and permit conditions approved on April 21, 2008 for the Tranquillon Ridge project shall expire under any of the following circumstances:

1. PXP does not obtain all other necessary permits, leases, and entitlements to proceed with the project by April 21, 2013; or

2. If the FDP is allowed to expire on April 21, 2013 per Condition A-27; or

3. PXP permanently ceases production of all oil or gas from the Tranquillon Ridge lease(s) within one (1) year of completion of the first new Tranquillon Ridge well and notifies County in writing within 30 days of such cessation.

Should the Final Development Plan (FDP) modifications approved for the Tranquillon Ridge project expire, the FDP (94-DP-027) shall revert to the form existing prior to April

21, 2008 and shall remain in force and effect for the Point Pedernales project. *(Modified April 21, 2008)*

A-18 USER COMPLIANCE WITH ALL APPLICABLE CONDITIONS

As a condition precedent for use of the subject facilities, including transportation and processing of oil, PXP shall require a commitment to the County by all other prospective users that they will comply with all applicable conditions to the same extent as PXP. Should PXP permit any other producer the use of its facility without requiring the user's commitment to the County, then PXP will be liable for any breach of these conditions committed by that user. Depending on the magnitude of the breach, the penalty may include the reduction of throughput capacity in an amount sufficient to offset any environmental impacts of the breach.

Any producer using PXP's facilities shall be required to demonstrate to County's satisfaction that the significant impacts to the County caused by the construction, installation or operation of any of the producer's project facilities have been and will be fully mitigated to the extent feasible.

Prior to its execution, PXP shall submit to P&D a copy of any proposed agreement with potential users of the facilities. P&D shall review the proposed agreement to determine that it includes adequate provisions to require the user's compliance with the permit conditions. Such proposed agreement or portions of it may be withheld from public review as a confidential document upon a written request and justification from PXP.

Prior to using PXP's facilities, each future applicant or operator must receive from the Planning Commission a determination of substantial conformity with all relevant procedures and permit conditions applicable to PXP's facilities. For this determination the Planning Commission must be able to make a finding that the significant impacts to the County caused by construction, installation, operation or use of any project facilities by each applicant have been and will be fully mitigated to the maximum extent feasible, as recommended by the original PXP project EIS/EIR (84-EIR-7) or any appropriate supplemental environmental documents.

A-19 OWNER/OPERATOR OF FACILITIES

The term "PXP" shall be understood to apply to Plains Exploration & Production Company and/or any other owner or operator of these permitted facilities unless such a meaning would be inappropriate. *(Modified December 9, 2004)*

A-20 MITIGATION IMPLEMENTATION OUTSIDE THE COUNTY

As to mitigation where implementation occurs outside of the County, PXP may adopt the measures recommended in the EIS/EIR (84-EIR-7) or alternatively demonstrate to County's satisfaction that the impacts which would occur within the County will be substantially mitigated by other measures acceptable to the County.

A-21 CONSOLIDATED GAS PLANT SITING STUDY

Prior to approval of the Final Development Plan, PXP shall enter into an agreement with Santa Barbara County to determine the scope, scheduling and funding of a siting study to determine a suitable location for a consolidated gas processing facility for combined Central and Northern Santa Maria Basin gas production. The study would analyze both the

technical and environmental feasibility of locating a consolidated gas plant to accommodate estimated gas production. PXP and the County would coordinate with other local governments in the scoping of the study as appropriate.

PXP shall be responsible for initial funding of the siting study. As future operators in the Northern and Central Santa Maria Basin file applications to develop gas reserves, they shall reimburse PXP on a pro rata basis. *(Modified July 10, 1996)*

A-22 FORCE AND EFFECT OF DOCUMENTS, PLANS AND MODIFICATIONS

All plans, procedures, programs, demonstrations, letters of commitment, final route realignments as detailed in the Final EIS/EIR (84-EIR-7) and subsequent modifications of this permit, including supplemental environmental documents (including the 92-EIR-13, the gas reinjection application and SEIR Addendum dated April 26, 1995, the PXP gas plant application and Addendum dated July 1, 1996, and the PXP off- to onshore natural gas pipeline hydrogen sulfide concentration increase application and Addendum dated February 8, 1999), and the above referenced plans, programs, procedures, demonstrations, realignments and letters prepared pursuant to this permit are incorporated herein and have the force and effect of a permit condition. The remedies available to the County upon applicant's failure to comply with such plans, procedures, etc. include but are not limited to those remedies which are available to the County upon Applicant's failure to comply with a permit condition. *(Modified March 1, 1999)*

A-23 FORCE AND EFFECT OF SUBSEQUENT MITIGATION REQUIREMENTS

Additional mitigation required pursuant to this permit, which has been adopted by the Planning Commission or Board of Supervisors in a noticed public hearing, shall have the force and effect of a permit condition. The remedies available to the County upon applicants failure to comply with such additional mitigation includes but is not limited to those remedies which are available to the County upon Applicant's failure to comply with a permit condition.

A-24 PUBLIC HEARING TO ASSURE PERMIT COMPLIANCE

Prior to the issuance of the Land Use Permit, the Planning Commission shall hold a public hearing, in order to receive evidence to assure compliance with the conditions of the Final Development Plan. The information received shall be forwarded to the Director of Planning and Development for consideration in the issuance of the Land Use Permit. A public hearing will not be required prior to issuance of a Land Use Permit for the HS&P Gas Processing Facilities.

A-25 CONTRIBUTIONS TO GAS PIPELINE SAFETY POLICY PROGRAM

PXP shall provide its prorated share of cost to Planning and Development for the development of policies and implementing actions regarding gas pipeline safety, not to exceed a total cost of $4,000.00. This policy program mitigates impacts of gas pipelines by providing guidelines for risk analysis and by addressing issues associated with development near the existing sour gas pipeline. Proration shall occur as other onshore gas pipelines are permitted and if voluntary contributions are received from other pipeline operators.

A-26 ACCEPTANCE OF PERMIT CONDITIONS

Acceptance of this permit shall be deemed as acceptance of all conditions of this permit, and a knowing and voluntary waiver of any objections thereto. *(Adopted July 10, 1996)*

A-27 DEVELOPMENT PLAN EXPIRATION

Approval of the revised Final Development Plan shall expire five (5) years after approval by the Planning Commission, unless prior to the expiration date, substantial physical construction has been completed on the development or a time extension has been applied for by the applicant. The decisionmaker with jurisdiction over the project may, upon good cause shown, grant a time extension for one year.

A-28 DEVELOPMENT PLAN EXTENSION

If the permit-holder requests a time extension for this Final Development Plan or revised Final Development Plan, 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. Mitigation fees shall be those in effect at the time of approval of the zoning clearance or coastal development permit.

B. PERMIT REVIEW

B-1 CONSTRUCTION REVIEW BY SSRRC

Prior to construction of each project component (such as the electrical substation, onshore pipelines, valve station, dehydration facility, gas plant, sales gas pipeline), and prior to making subsequent modifications to such components, PXP shall submit to the System Safety and Reliability Review Committee (Condition P-1) relevant construction drawings and supporting text demonstrating compliance with relevant conditions. Construction may not commence until County has approved this submittal and all necessary construction permits are issued. County shall either give written notice to proceed with construction or indicate in writing conditions which have not been met. When such conditions have been met, construction approval shall be granted. Within 15 days of submittal, County shall give written or oral progress of the review. If construction commences prior to County approval, the County may issue a Stop Work Order and a Notice of Violation. SSRRC may require post-construction inspections or review of as-built drawings, as necessary to confirm consistency with the approved submittals. PXP shall submit as built drawings by the deadline agreed upon by the SSRRC. PXP shall submit final as built drawings that meet the SSRRC's approval within six months of the date of the first submittal deadline. Failure to do so shall constitute a violation of this permit. *(Modified November 8, 2000)*

B-2 CONDITION EFFECTIVENESS REVIEW

If at any time County determines that these permit conditions are inadequate to effectively mitigate significant environmental impacts caused by the project, or that recent proven technological advances could provide substantial additional mitigation, then additional reasonable conditions shall be imposed to further mitigate these impacts. Imposition of such conditions shall only be considered and imposed as part of the County's comprehensive review of the project conditions. County shall conduct a comprehensive review of the

project conditions and consider adding reasonable conditions which incorporate proven technological advances three years after permit issuance and at appropriate intervals thereafter. A comprehensive review of conditions which are not effectively mitigating impacts may be conducted at any appropriate time. Upon written request, the Board of Supervisors shall determine whether the new condition required is reasonable considering the economic burdens imposed and environmental benefits to be derived.

B-3 COUNTY AUTHORITY TO REVIEW AND IMPOSE MITIGATIONS FROM OTHER AGENCIES

This permit is premised upon findings that where feasible, all significant environmental effects of the project identified in the EIS/EIR (84-EIR-7), 92-EIR-13, the gas reinjection application and SEIR Addendum dated April 26, 1995, the PXP gas plant application and Addendum dated July 1, 1996, ~~and~~ the PXP off- to onshore natural gas pipeline hydrogen sulfide concentration increase application and Addendum dated February 8, 1999, and the Tranquillon Ridge EIR (06EIR-00005) will be substantially mitigated by the permit conditions. Prior to approval of the Final Development Plan, County shall review any findings that identify certain mitigation measures as being in the primary jurisdiction of another agency. County shall determine either (1) that such mitigation has or is being implemented by such other agency or (2) that such other agency and County determine such mitigation to be infeasible. If County determines that no other agency is implementing such feasible mitigation measures, then County may impose feasible measures within its jurisdiction to mitigate those environmental impacts. *(Modified March 1, 1999)*

B-4 PRELIMINARY DEVELOPMENT PLAN EXPIRATION

The Preliminary Development Plan shall expire two years after approval, except that for good cause shown, it may be extended for one year by the Planning Commission.

B-5 FINAL DEVELOPMENT PLAN REVIEW BY PLANNING COMMISSION

The Planning Commission shall review and consider the Final Development Plan in a noticed public hearing for conformance with the Preliminary Development Plan and permit conditions and shall approve, conditionally approve or deny the Final Development Plan. The Planning Commission's action shall be final, subject to appeal to the Board of Supervisors.

Those conditions requiring compliance prior to Final Development Plan approval may be modified to permit compliance at a date other than that specified in the condition only if the Planning Commission finds, in a noticed public hearing, that PXP has shown good cause for such modification and that compliance at a designated later date will not increase environmental impacts or cause substantial detriment to the County.

C. MANAGEMENT

C-1 ENVIRONMENTAL QUALITY ASSURANCE PROGRAM

PXP shall prepare an Environmental Quality Assurance Program (EQAP) for Planning and Development approval prior to approval of the Final Development Plan. The program shall include (or if separate plans exist, reference) all plans relevant to construction and operations of the proposed facilities specified by these conditions and shall describe the steps PXP will take to assure compliance with these conditions. This plan is intended to provide a framework for all other programs and plans specified by these conditions as required prior to

approval of the Final Development Plan. As such, it will become a comprehensive reference document for the County, other agencies, and the public regarding the PXP project. The plan shall also provide a structure for data collection, environmental monitoring, and management coordination by a contractor selected by the County after consultation with PXP. The contractor will be under contract and responsible to the County. Preparation and implementation of the plan shall be funded by PXP.

As part of this plan, PXP shall provide semi-annual reports throughout construction and annual summary reports during operations to Planning and Development. These reports shall describe:

a) Project status, including but not necessarily limited to:
   i) extent to which construction has been completed,
   ii) the rate of production/throughput during operation,
   iii) environmental planning and implementation efforts, and
   iv) any revised time schedules or timetables of construction and operation that will occur within the next one year period.

b) Evidence of compliance, including letters of commitment, written approvals, Memoranda of Agreement as identified in various permit conditions.

c) Results and analyses of all data collection efforts being conducted by PXP pursuant to these permit conditions.

Construction
The program shall include all plans relevant to construction activities such as the Restoration, Erosion Control and Revegetation Plan and the Cultural Resources Mitigation Plan. The program shall include provisions for at least one managing Environmental Coordinator with overall responsibility, and if necessary, one Onsite Environmental Coordinator per construction site during the construction phase. These coordinators shall be funded by PXP and hired by and be responsible to Planning and Development.

Operations
The program shall include all plans related to operations, such as the Emergency Response Plan, Oil Spill Contingency Plan, and Landscaping Plan, as well as specific conditions not required in formal plans. It may also include any procedures not specified by these conditions but relevant to environmental protection and safety. This portion of the EQAP shall be approved prior to operations.

Energy Division shall advise PXP on a quarterly basis, or upon other frequency as merited, of the status of all conditions, including any actions, documentation, operational data, or information updates which are necessary for ascertaining compliance and will provide timetables for PXP's response. Conditions and issues whose status has changed since the previous reporting period shall be identified. *(Modified January 8, 1992)*

C-2 24-HOUR EMERGENCY CONTACTS

Prior to the issuance of the Land Use Permit or Coastal Development Permit, PXP shall provide to Planning and Development and the County Emergency Services Coordinator the current name and position, title, address, and 24-hour phone numbers of the field agent, person in charge of the facility, and other representatives who shall receive all orders and notices, as well as all communications regarding matters of conditions and permit compliance at the site and who shall have authority to implement a facility shutdown

pursuant to Condition A-7 in this Ordinance. There shall always be such a contact person(s) designated by the permittee. One contact person shall be available 24 hours a day during all phases of the project in order to respond to inquiries received from the County, or from others in case of an emergency. If the address or phone number of PXP's agent should change, or the responsibility be assigned to another person or position, PXP shall provide to Planning and Development the new information within seven days.

C-3 PROVIDE COPIES OF PERMITS TO P&D

PXP shall furnish to Planning and Development copies of all County permit applications relative to the project once submitted, and of permits within 30 days of receipt by PXP.

D. GEOLOGY

D-1 GEOLOGIC INVESTIGATION, DESIGN AND MITIGATION PROGRAM

Prior to the approval of the Final Development Plan, PXP will conduct and submit a route-specific Geologic Investigation, Design, and Mitigation Program. This program shall contain three basic components: 1) a detailed geologic investigation component which defines specific hazards, 2) an engineering design component which details specific engineering plans for each identified hazard along the route, and 3) a geohazards mitigation component which demonstrates how and to what extent each hazard is reduced. PXP shall provide copies of information submitted under this condition to VAFB for review.

1) Detailed geologic investigation component: Where specific hazards could occur along the pipeline route or at facility locations, PXP will conduct appropriate detailed geologic, seismic, and geotechnical studies to further characterize the specific geologic hazard. These studies will be conducted under the direction of a State of California registered geologist or engineering geologist and will be subject to approval by Planning and Development, Building & Safety and Energy Divisions. These studies will include but not be limited to investigations of unstable slopes, erodible slopes, lurch/liquefaction susceptible substrate, surface rupture, and creek and river scour characteristics (depth and lateral extent). Methods of investigation shall conform to appropriate geotechnical techniques applicable to each specific hazard. Draft results will be subject to review by the County Building & Safety Division and Flood Control Agency as appropriate prior to finalization of the engineering design. The final report will be submitted with the final engineering design component, prior to the issuance of the Land Use Permit or Coastal Development Permit.

PXP shall submit a tsunami safety plan to P&D for review and approval prior to approval of the zoning clearance for the Tranquillon Ridge project. This plan shall initially include:

- tsunami hazard training for employees;
- provisions for employees to receive tsunami warning notifications from the Pacific Tsunami Warning Center (operated by NOAA);
- protocols for workers to follow in the event of a tsunami.

PXP's updated project Emergency Response Plan (ERP; Condition P-3) for the Tranquillon Ridge project shall include the three items listed above in a discussion of tsunami-induced flooding in the Flood section of the ERP and elsewhere in the ERP if appropriate.

In addition, within one year of issuance of the zoning clearance for the Tranquillon Ridge project, PXP shall submit to the County for review and approval of the item below as an update to the tsunami safety plan in the project ERP:

- an assessment of the probable maximum tsunami and potential resulting flooding and scour in the Santa Ynez River Valley in the vicinity of project facilities, including the Surf substation and the minimum burial depth to protect the pipeline.

(Modified April 21, 2008)

2) Engineering design component: PXP shall incorporate appropriate geotechnical information from component a) and other applicable recommendations into final engineering design of pipeline and facilities construction. This includes but is not restricted to: the development of appropriate ground motion parameters for use in seismic design of critical structures and equipment, unstable slope construction or avoidance techniques, burial depth at river and major drainage crossings, modification of instrumentation, or use of the dual contingency level/operating level earthquake concept, or its equivalent. The designs will be subject to review by the Building & Safety Division and third party technical review as specified in Condition P-1. The final engineering design shall be approved by the Building & Safety Division and Flood Control Agency prior to the issuance of the Land Use Permit or Coastal Development Permit.

3) Geohazards mitigation component: Prior to the issuance of the Land Use Permit or Coastal Development Permit, PXP will submit to Planning and Development a detailed geologic hazard mitigation report. The report will outline the hazards identified in part a) of this program and will address how engineering designs as detailed in part b) of this program reduce each specific hazard. This component will also be submitted to the Building & Safety Division and Flood Control Agency and will be subject to third party review as specified in Condition P-1.

D-2 GEOLOGIC HAZARDS MONITORING PROGRAM

PXP will develop a Monitoring Program for the operations phase to be funded by PXP and staffed as necessary with at least one State of California registered engineer, or engineering geologist, in order to evaluate any hazards identified by routine monitoring. The program will be designed to verify adequate performance or condition of the project components in hazard areas such as river and active fault crossings, and will be subject to approval of Planning and Development prior to construction. The monitoring program may in part be incorporated into routine aerial and/or ground reconnaissance.

If the monitoring indicates a potential or actual hazard, appropriate action including, but not limited to, operations curtailment and repairs, will be taken by PXP to mitigate the hazard. PXP will report to the Emergency Services Coordinator and Vandenberg Air Force Base any potentially hazardous situations discovered during monitoring.

If deemed necessary by the County Systems Safety and Reliability Review Committee (SSRRC), based on equipment weights and foundation requirements, an elevation survey shall be conducted prior to and during any equipment additions or modifications, including the return-to-service of existing equipment at the LOGP, followed by routine monitoring after the changes are implemented, as deemed appropriate by the SSRRC. The elevation survey shall use existing benchmarks to continue the subsidence monitoring currently conducted at the LOGP. Subsidence monitoring and remediation shall continue at the LOGP as directed by the SSRRC and P&D.

PXP shall incorporate creek and drainage maintenance in the geological hazards monitoring program to provide for monitoring and repair of potential scour areas that could affect the pipeline integrity. The creeks and drainages along the pipeline route and any adjacent drainages within 500 and upslope of the pipeline right-of-way shall be surveyed annually. Any areas that exhibit scouring shall be documented. Areas that exhibit increased scour shall be shall be remediated through stabilization or other permanent erosion control measures. PXP shall submit the annual survey report to P&D for review and approval and shall implement stabilization measures in a timely manner as directed by P&D. PXP shall submit an updated geologic hazards monitoring program to P&D for review and approval prior to introduction of Tranquillon Ridge oil or gas production to the pipeline system between Platform Irene and the LOGP. *(Modified April 21, 2008)*

D-3 PIPELINE TRENCH OR TRENCH SPOIL INSPECTIONS

Inspection of the pipeline trench or trench spoil (as identified in Condition D-1) to identify any potential geologic hazards shall be made by a professional geologist or soils engineer approved by Planning and Development prior to installation of the pipeline. If hazards not previously accounted for in the pipeline design are encountered, appropriate mitigation measures must be developed and must be incorporated into part c) of Condition D-1 prior to installation of pipeline. The results of the inspection will be reported to the engineering geologist of the Building & Safety Division who will approve prior to, and the supervising environmental coordinator who will insure, application of the necessary mitigation measures. The timing of such inspections shall not result in any unreasonable delays in installation of the pipeline.

D-4 HAZARD MITIGATION AT FAULT CROSSINGS

At all places where the pipeline crosses an active fault, according to the Department of Geology and Mining definitions, PXP will place isolation valves on either side, or design and construct appropriate devices or use measures of equal effectiveness to mitigate the hazard of the fault crossing. Location and nature of these designs must be approved as part of the Final Development Plan.

D-5 GRADING, DRAINAGE AND EROSION CONTROL PLANS

Prior to land use clearance, Coastal Development Permit, or Development Plan, PXP shall submit final Grading, Drainage and Erosion Control Plans approved by the Building & Safety Division. These plans shall be consistent with or based on information contained in the geologic investigation required in Condition D-1.

E. AIR QUALITY

E-1 STATEMENT OF SCOPE

Nothing contained herein shall be construed to permit a violation of any applicable air pollution law, rule, or regulation.

E-2 AUTHORITY TO CONSTRUCT

Prior to initiation of construction, including grading, of any facilities approved pursuant to this Development Plan, PXP shall obtain Authority to Construct from the County Air Pollution Control District.

E-3 CURTAILMENT PLAN

Prior to approval of the Final Development Plan, PXP shall file with Planning and Development, a construction emission air pollution curtailment plan which has been approved by the Air Pollution Control District (APCD). The plan shall address both regional ozone levels and local inert pollutant concentrations. The plan shall describe procedures PXP shall take to reduce emissions if directed to do so by the APCD to ensure that no APCD Rule, air quality standard or increment is violated. It shall include, but not be limited to temporary reductions or curtailments of construction activities. At any time during project-related construction, if onshore air quality monitors as determined by APCD indicate an imminent violation of any federal, state, or local air quality standard, increment or regulation, PXP shall implement the air pollution curtailment plan. APCD's decision to require implementation of the curtailment plan shall be based on written guidelines of general application as developed based on workshops between industry, agencies and the public. Should such a reduction be required, County shall make all reasonable efforts to assure that it will be made on an equitable basis with other contributing sources including other producers sharing PXP's ~~HS&P Facility~~Oil and Gas Plant. This condition is not intended to address long term air quality problems. Such situations shall require additional control measures. Where such situations require the implementation of additional mitigation, measures shall be recommended pursuant to Condition B-2. *(Modified January 8, 1992)*

E-4 AMBIENT AIR QUALITY MONITORING STATIONS

Within 120 days of approval of the Preliminary Development Plan, PXP shall install ambient air quality monitoring stations in reasonable numbers and in reasonable locations to be specified by the APCD. APCD shall take into consideration other project monitoring stations. These monitors shall be installed to examine onshore effects of project related construction and operation emissions, and regional ozone impacts and shall be equipped with remote high level alarms and recorders. PXP shall install telemetry or modem connections and terminals within facilities accessible to APCD such that ambient air quality level can be monitored by the APCD at all times.

E-5 IMPLEMENTATION OF AIR POLLUTION CONTROL PROCEDURES

PXP shall implement all air pollution control procedures identified in the EIS/EIR (84-EIR-7) Class I and Class II Impact Summary Tables (pages R-E-2, R-E-18, R-E-19); Table 5.2-2 (page R-5.2-15); Table 5.2-13 (page R-5.2-38) and page R-5.2-28. Class I impacts must be mitigated to the maximum extent feasible using those measures identified in the text of the EIS/EIR. Class II impacts must be mitigated to a level of insignificance by implementing

those measures identified in the EIS/EIR or substitute measures, determined by the APCD to be equally effective. Prior to approval of the Final Development Plan, PXP shall demonstrate to the County that the above mentioned measures, with the exception of the recommended scrubber for the calciner in San Luis Obispo County, have been incorporated into the project. PXP shall implement mitigation measures required outside County jurisdiction, including OCS waters, where necessary to prevent significant impacts within the County's jurisdiction.

For the San Luis Obispo (SLO) calciner, SLO APCD is considering a rule-making process to limit SO_2 emissions which may achieve the required mitigation. However, in order for Santa Barbara County to assure implementation of all required mitigation measures, PXP and the County of Santa Barbara shall, prior to approval of the Final Development Plan, enter into an agreement(s) which commits PXP to monitor potential impacts and implement measures to mitigate significant SO_2 impacts of the SLO calciner within Santa Barbara County.

PXP shall install air quality monitors to provide additional data as to the SO_2 impacts in Santa Barbara County from the calciner. As part of the agreement, the number, location, and operation duration of these monitors shall be specified by the SBCAPCD. If SO_2 concentrations are measured at any time during the operation of the monitors which equal the level specified under the agreement, and the SBCAPCD determines the calciner has contributed all or part of the measured SO_2, PXP shall reduce SO_2 emissions as per the agreement. The SLO APCD rule-making process will not be relied upon to achieve the required mitigation should SO_2 violations be monitored in Santa Barbara County.

E-6 MITIGATION OF OZONE-FORMING ~~PROJECT~~ EMISSIONS

Emissions from any project component that contribute to ozone standard violations must be completely mitigated pursuant to the rules and regulations of the SBCAPCD. Prior to the issuance of the Land Use Permit offsets shall be identified by PXP and approved by SBCAPCD.

E-7 VALIDATION INFORMATION

Prior to approval of the Final Development Plan, PXP shall submit to Planning and Development updated estimates of the type and size of helicopters, and any support vessels to be used during Point Pedernales Field operations. The information shall also include the estimated operating schedules, frequency and duration of port calls and other information as required by APCD to validate the accuracy of project data used in the EIS/EIR air emission modeling. The County may require validation and updating of this information as needed. Should this information reveal significant differences between the estimated air emissions and those analyzed in the EIS/EIR, the APCD and County may modify air quality permit conditions as necessary to assure consistency with the Air Quality Attainment Plan and Reasonable Further Progress goals.

E-8 FUTURE CONSOLIDATION

Prior to approval of Final Development Plan, PXP shall file with the Director of Planning and Development a written statement approved by APCD demonstrating that no portion of the proposed project, including operation of transportation, processing and production facilities and construction emissions, alone or in combination with other existing and proposed sources, will preclude future consolidation of oil and gas facilities at the Lompoc site. The statement shall be based on the results of APCD approved air quality modeling on

a reasonable consolidation scenario. The plan shall include emissions from 100 KBPD oil treating and 80 MMSCFD gas treating facilities within the vicinity of the Lompoc ~~HS&P Facility~~Oil and Gas Plant, construction emissions, offshore platforms in State and Federal waters, and marine vessels. The plan shall show that these sources will not individually or in conjunction with any other source, result in violation of any federal, state or local air quality standards, increments or regulations, including ozone standards. If modeling indicates that any portion of the proposed project would violate standards or would preclude such consolidation of facilities in the vicinity of the Lompoc ~~HS&P Facility~~Oil and Gas Plant, no portion of the project described herein shall be constructed until additional mitigation measures or changes in the project design are included, so that such consolidation of facilities is no longer projected to cause the violation. Compliance with this condition may be satisfied by the analysis in the EIS/EIR (84-EIR-7), as long as there are no substantial changes in the current project description.

E-9 REASONABLE FURTHER PROGRESS EMISSIONS COMPLIANCE AND EFFECTIVENESS

Prior to the issuance of the Land Use Permit, PXP shall demonstrate to the County and to the APCD that all emissions associated with the Point Pedernales Project, including emissions from platforms, crew and supply boats, onshore facilities and helicopters are fully mitigated so as to maintain compliance with the reasonable further progress provisions of the Santa Barbara County AQAP. Effectiveness of the mitigation will be confirmed by APCD approved methodology.

E-10 EMISSIONS OFFSETS AND MITIGATION STRATEGIES

Prior to the issuance of the Land Use Permit, PXP must present to the APCD and Director of Planning and Development an identification of offsets and mitigation strategies sufficient to offset and fully mitigate onshore impacts as required by the APCD and Planning and Development. Offsets shall be provided for all emissions occurring within APCD jurisdiction, consistent with requirements of the APCD. PXP must implement emission reduction strategies which are sufficient to ensure that the project does not interfere with the attainment and maintenance of air quality standards. Mitigation of all onshore impacts occurring in the County caused by NOx and HC emissions from sources outside APCD jurisdictional boundaries shall also be provided by PXP. The potential for retrofit and replacing existing facilities shall also be included.

Prior to the issuance of the Land Use Permit, PXP shall complete all emission offset source tests and demonstrate to the APCD that PXP's required emission reductions are in place. Prior to the issuance of the Land Use Permit PXP shall also enter into an agreement with Santa Barbara County specifying that the reductions will be in place for the life of the project. Prior to approval of the zoning clearance for the Tranquillon Ridge project, PXP shall demonstrate to P&D that emissions reductions and/or offsets are in place to fully mitigate increases in criteria pollutant emissions associated with the Tranquillon Ridge project, consistent with SBCAPCD Rules and Regulations. Operation of the Tranquillon Ridge project shall not commence until PXP has obtained SBCAPCD approval of new or modified Permits to Operate, if required. *(Modified April 21, 2008)*

E-11 CONSTRUCTION AIR QUALITY IMPACTS MITIGATION PLAN

Prior to the approval of the Final Development Plan, PXP shall submit to the Director of Planning and Development a plan, approved by the APCD, which includes scheduling of onshore and offshore construction, minimizing soil handling, and other measures to mitigate construction air quality impacts. The plan shall include APCD approved analysis which

demonstrates that local, state and federal air quality standards and increments will not be violated as a result of construction and/or operation activities. The plan shall also include but not be limited to the following measures:

a) During clearing, grading, earth moving, excavation, and transportation of cut or fill materials, water trucks or sprinkler systems are to be used in sufficient quantities to prevent dust from leaving the site and to create a crust after each day's activities cease. At a minimum, this would include wetting down such areas in the late morning and after work is completed for the day and whenever wind exceeds 15 miles per hour.

b) After clearing, grading, earth moving, or excavation is completed, the entire section of disturbed soil shall be treated immediately by watering or revegetating or spreading soil binders to minimize dust generated on the site from leaving the site until the area is paved or otherwise restored to its previous state.

c) To the maximum extent feasible, the maximum width of the corridor shall be reduced.

d) Seeding and watering to revegetate graded areas as discussed in the revegetation plan and the application of soil binders shall be included.

e) If grading activities are discontinued for over 2 weeks, applicant shall contact both Onsite Environmental Coordinator (OEC) and Grading Inspector to inspect revegetation/soil binding at the site.

f) Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.

g) To reduce construction-related NO_x emissions, PXP shall submit a plan to SBCAPCD which shall include a commitment to implement 2^o engine timing retard, high pressure fuel injectors, and the use of reformulated diesel fuel. The plan shall be reviewed and approved by SBCAPCD.

h) Any other methods to reduce PM_{10} emissions resulting from construction deemed appropriate by the SBCAPCD or P&D.

i) Trucks transporting fill/excavated material to or from the site shall be tarped from the point of origin.

j) If the construction site is larger than five acres, gravel pads shall be installed at all access points to minimize tracking of mud onto public roads.

PXP shall designate a person or persons to monitor the dust control program and to order increased watering as necessary, to prevent transport of dust off-site. The monitor shall perform duties on holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the OEC and SBCAPCD prior to issuance of Land Use Permit for construction. Prior to approval of the zoning clearance for onshore construction-related activities associated with the Tranquillon Ridge project, PXP shall submit a plan specifying all dust control measures for the activity to P&D for review and approval. *(Modified April 21, 2008)*

(There is no Condition E-12)

E-13 FUGITIVE INSPECTION AND MAINTENANCE PROGRAM

Prior to operations of the modified ~~HS&P Facility~~Oil and Gas Plant, PXP shall commit to implementing an SBCAPCD-approved Fugitive I&M Program for the project consistent with SBCAPCD rules and regulations.

E-14 EMISSIONS OFFSETS FOR MODIFIED LOGP

The existing emission offset requirements, specified in Permit to Operate (PTO) 6708, Condition 9C.1039, shall be extended to include the ~~modified HS&P~~Lompoc Oil and Gas Plant with the exception of the NAROC requirements.

F. ONSHORE WATER RESOURCES

F-1 RUNOFF WATER QUALITY MONITORING PROGRAM

A runoff water quality monitoring program for the Lompoc ~~HS&P Facility~~Oil and Gas Plant shall be developed to ensure that contaminated runoff is not discharged into site drainages. The program shall provide for the characterization of runoff for potential contaminants and steps to be taken should contaminant levels rise above specified thresholds approved by the Regional Water Quality Control Board and County Environmental Health Services. The program shall include acceptable procedures to P&D for monitoring and controlling discharge, and verification of compliance with these water quality thresholds. This program shall be submitted and approved by the Regional Water Quality Control Board, County Environmental Health Services and Planning and Development prior to construction of the Lompoc Facility.

Prior to construction of the gas processing facility, PXP shall submit an engineering study for increasing the retention basin capacity at the ~~HS&P~~LOGP site to Public Works Department, Flood Control Agency and Planning and Development, Building and Safety Division for review and approval. *(Modified July 10, 1996)*

PXP shall identify and implement site-specific Best Management Practices (BMPs), such as silt fencing, straw bales, and sand bags, to minimize soil loss, sedimentation, and other construction-related sources of water pollution as a result of any construction associated with the Tranquillon Ridge project. The BMPs shall be submitted to P&D for review and approval, and shall be installed, prior to initiation of construction-related ground disturbance. *(Modified April 21, 2008)*

F-2 CONSTRUCTION WATER SOURCE

Prior to approval of the Final Development Plan, PXP shall identify the freshwater source considered for supplying pipeline and facility construction activities, including hydrostatic test water, and shall estimate the total quantity required. Any water obtained from coastal or inland sources shall not significantly disrupt streamflows, groundwater resources, or habitat resources. Water conserving devices shall be used where feasible. Any water used during construction (exclusive of hydrostatic test water) shall contain no more than 5,000 parts per million total dissolved solids. Disposal of hydrostatic test water within the County shall be according to a plan approved by the Regional Water Quality Control Board, or by the County Flood Control Agency. This information shall be provided to and approved by Planning and Development as part of the Final Development Plan.

F-3 HYDROGEOLOGIC INVESTIGATIONS OF SENSITIVE AREAS

Prior to approval of the Final Development Plan, PXP will perform detailed hydrogeologic investigations for the sensitive areas (Class I-III) identified in the EIS/EIR (Figures 2.3-2

and 2.3-3). These investigations will be conducted by a State of California registered geologist or engineer and will include but not be limited to:

a) Inventory of existing wells from State or County Flood Control Agency records in an area extending down-gradient from the pipeline in the aquifer equal to the distance groundwater would move in one year at a velocity calculated from the maximum hydraulic conductivity of the specific aquifer, hydraulic gradient, and porosity. The down-gradient sensitive area will be determined by a registered geologist.

b) Sampling and analysis of background water quality of existing wells located in sensitive areas.

This information will be reviewed by Planning and Development and used by PXP to formulate the Groundwater Contamination portion of an Oil Spill Contingency Plan, Condition P-13. This portion of the Plan will include:

- plans for monitoring and early detection of groundwater contamination, including aerial and ground surveys, pipeline pressure monitoring, and water sampling of strategic wells;
- plans for notification of affected groundwater users, and the County Emergency Services Coordinator;
- clean-up response, reparations, restorations, and methods to determine and correct the contamination source; and
- identification of emergency alternate water supplies.

F-4 DAM OR DITCH PLUGS

At the base of slopes where the ROW approaches sensitive aquifers as identified in the EIS/EIR (84-EIR-7) that are at risk from oil spills and leaks, a dam or ditch plug will be used in the pipeline trench. The sensitive areas are those where the ROW follows 1) topographic slopes toward basins with shallow depth to water, 2) high vertical permeabilities, and 3) a high degree of groundwater use as indicated by the hydrogeologic investigations required as per Condition F-3. These areas shall be identified in the Final Development Plan.

F-5 CREEK AND RIVER CROSSINGS

Prior to land use clearance or the approval of a Coastal Development Permit or a Final Development Plan, the System Safety and Reliability Review Committee shall review and approve submitted plans of all creek and river crossings as reviewed under Condition H-1. Permitted development shall not cause or contribute to flood hazards or lead to the expenditure of public funds for flood control works. The pipeline alignment shall avoid the floodplain of the Santa Ynez River to the maximum extent feasible.

Pipeline replacements within stream beds shall be engineered such that the pipeline and any support structures are protected from scour and erosion effects of at least a 100-year flood discharge. PXP shall submit plans demonstrating this requirement to P&D for review and approval prior to County approval of such pipeline replacement projects. *(Modified April 21, 2008)*

F-6 WATER-CONSERVING DEVICES

PXP shall install water-conserving devices throughout the Lompoc ~~HS&P Facility~~Oil and Gas Plant.

G. MARINE BIOLOGY

G-1 OIL SPILL CLEAN-UP AND RESTORATION

In the event of an oil spill associated with the onshore or offshore PXP project facilities, PXP shall be responsible for the cleanup of all affected coastal and onshore resources, and for the successful restoration of all affected areas and resources to pre-spill conditions (e.g. restocking of tidewater gobies, reintroduction of least tern pairs). Subject to applicable law, PXP shall be responsible for cleanup of any spills caused by other parties in service to PXP at the time of the spill. PXP shall provide County with copies of its Certificates of Financial Responsibility related to its offshore Santa Barbara operations previously filed with the U.S. Coast Guard. Prior to operations at any proposed facilities, PXP shall demonstrate to the County that PXP and all users of its facilities are in compliance with any ordinance which requires all operators and users of marine terminals located in the County to produce evidence of sufficient financial responsibility. Demonstration of financial responsibility shall include, but not be limited to Certificates of Insurance, to the Board of Supervisors for the clean-up of oil spills or other petroleum products offshore Santa Barbara County. The Board of Supervisors shall consult with applicable State agencies, the U.S. Coast Guard, U.S. Fish and Wildlife Service and the Federal Minerals Management Service in developing such ordinance.

G-2 MARINE BIOLOGY IMPACT REDUCTION PLAN

Prior to approval of the Final Development Plan, PXP shall submit and obtain approval of a site-specific marine biology impact reduction plan to mitigate impacts to marine resources due to offshore construction as identified in the EIS/EIR (84-EIR-7). The plan shall be approved by a committee consisting of the California Coastal Commission, California Department of Fish and Game, the Environmental Planning Branch of Vandenberg Air Force Base, and Planning and Development.

This plan will consist of procedures to avoid important biological and commercial marine resources near the landfall, such as subtidal reefs. PXP shall also submit the study results of the current littoral transport study. Should results show that blasting is necessary, PXP shall identify additional procedures to mitigate impacts to marine resources. Options to avoid these resources as recommended in the EIS/EIR (84-EIR-7) shall be considered in this plan. It shall also include a construction schedule designed to avoid gray whale migration and least tern breeding and local post-breeding dispersal seasons. Based on the plan and in consultation with the Environmental Planning Branch of Vandenberg Air Force Base, Coastal Commission, Fish and Game, and affected fishermen, the County shall require compensation for any remaining unmitigable impacts. Compensation options include enhancement and replacement of damaged resources and payments to the Fisheries Enhancement Fund (condition M-7) and Coastal Resource Enhancement Fund (Condition N-1). The primary goal of this condition is enhancement and/or replacement of resources damaged during construction. Monetary compensation would be considered a secondary measure and would be in addition to fees required pursuant to Conditions N-1 and M-7.

G-3 PRODUCED WATER QUALITY

Prior to facility operation, PXP shall provide a list of chemical constituents for treatment of produced water at the Lompoc ~~HS&P Facility~~Oil and Gas Plant and demonstrate to the satisfaction of Planning and Development that there will be no toxic effects due to

substances in the discharge water. Water quality modeling, using dilution factors equivalent to those used in the EIS/EIR (84-EIR-7), shall be conducted at the platform to ensure that toxic levels are not being exceeded. In addition, toxicity thresholds of the additives used on marine biota characteristic of the area shall be identified and provided to Planning and Development. All produced water discharges shall be in compliance with the requirements of the National Pollution Discharge Elimination System (NPDES) permit for Platform Irene. PXP shall provide copies of all discharge monitoring reports prepared pursuant to the NPDES permit to Planning and Development during Tranquillon Ridge operations. *(Modified April 21, 2008)*

G-4 OIL SPILL DAMAGE ASSESSMENT FUNDING

Assessment of damages to natural resources in the event of an offshore oil spill from Tranquillon Ridge project operations requires information about existing oceanographic conditions at the time of the spill, and existing coastline conditions. PXP shall contribute to the funding of program(s) designed to provide information relevant to coastline conditions and real-time oil spill tracking in the event of an oil spill from project facilities. Specific uses for the funds shall be evaluated annually by the Planning and Development Department and approved by the County Board of Supervisors. PXP shall submit its annual assessed amount for each year of Tranquillon Ridge operations upon County request. PXP's contribution shall not exceed $100,000 per year.

H. TERRESTRIAL BIOLOGY

H-0 NORTHERN MITIGATED PIPELINE ROUTE AND CATCH BASINS

PXP shall use the Northern Mitigated Pipeline Route, north of the Santa Ynez River, described in PXP's application to the County and Sections 10.1, 10.1.1.1 and 10.1.1.2 of the EIS/EIR (84-EIR-7). As major integral components of the Northern Mitigated Route, PXP agrees to implement the following:

a) Relocate Beach Boulevard (Terra Road) beside the realigned route to reduce proximity of public access and noise to the Least Tern nesting area.
b) Construct berms and catch basins at appropriate locations along the pipeline route.

The detailed design and location of the berm and catch basin system shall be submitted to the County prior to Final Development Plan approval.

PXP shall submit a construction plan for the berm/catch basin at Valve Site #2 to P&D for review and approval prior to construction of pumping capabilities at Valve Site #2 approved as part of the Tranquillon Ridge project. The berm/catch basin shall be installed prior to operation of the new pumps at Valve Site #2 and shall be capable of holding 150 percent of the maximum spill volume for this portion of the pipeline.

PXP shall ensure that all catch basins along the pipeline corridor are cleaned and surveyed periodically to ensure they are capable of holding at least 110 percent (150% for catch basin at Valve Site #2) of the associated release volumes for nearby pipeline segments. PXP shall provide volume calculations to P&D for each of these catchment basins for the following leak scenarios:

1. 11 minutes of pumping time for a worst-case leak in accordance with the MMS OSRP, Volume 2, worst-case scenario; and,

2. 20 minutes of pumping time for a small leak as detectable by the PXP upgraded leak detection system.

Total pipeline emulsion fluids, including produced water, shall be included in the calculations. If it is determined that any of the catchment basins is insufficient to fully contain the leak scenarios analyzed, the basin shall be expanded. The calculations and any necessary plans for catch basin expansion shall be submitted to P&D for review and approval prior to introduction of Tranquillon Ridge crude oil emulsion or produced water into the pipeline system between Platform Irene and LOGP. *(Modified April 21, 2008)*

H-1 RESTORATION, EROSION CONTROL AND REVEGETATION PLAN (RECRP)

Prior to the issuance of the Land Use Permit, PXP shall submit a Restoration, Erosion Control, and Revegetation Plan for the approved pipeline route, the Lompoc ~~HS&P Facility~~Oil and Gas Plant, and electrical substation sites. The plan shall be submitted to Planning and Development for approval. Once approved, the plan shall be implemented by PXP and monitored by Planning and Development through advanced written weekly updates of construction status and plans. Success of the restoration and revegetation plans ~~should~~ shall be monitored by a qualified independent biologist, in addition to the onsite Environmental Coordinator (Condition C-1) and representatives of the Environmental Planning Branch of Vandenberg AFB. ~~The plan shall contain, but not be limited to, the following:~~

Prior to approval of the zoning clearance for the Tranquillon Ridge project, PXP shall update the RECRP for the Tranquillon Ridge project, taking into consideration the current level of disturbance and the condition of adjacent habitats, to incorporate the mitigation measures specified in the Tranquillon Ridge EIR, including but not limited to the following:

a) Procedures for salvaging, stockpiling, protecting, and replacing topsoil, replacing and stabilizing backfill, such as at stream crossings, steep or highly erodible slopes and in coastal dune areas. This shall include, at a minimum, the upper 6 to 12 inches of topsoil in all open lands, other than road shoulders. Stockpiles shall not be placed in biologically sensitive areas and specific provisions for protecting topsoil, such as covering, use of a tackifier, or temporary hydromulch, shall be identified. Additionally, provisions ~~should~~ shall be made for recontouring to approximate the original topography. Excess fill shall be disposed of off-site unless suitable arrangements are made with the property owner. Excess fill shall not be deposited in any drainage, or on any unstable slope. Site-specific construction plans shall designate areas for topsoil storage and protection and procedures for handling any excess trench spoils. In wetland areas, wetland topsoil shall be stored separately from other stockpiles and shall be labeled as wetland topsoil.

b) Specific plans for control of erosion, gully formation, and sedimentation, including, but not limited to, sediment traps, check dams, diversion dikes, catch basins, culverts and slope drains. The RECRP~~Plan~~ shall identify all areas with high erosion potential and the specific control measures for these sites. In particular, areas of 20 percent or greater slopes along the pipeline corridor shall be identified and specific measures, such as jute or excelsior netting, detailed that will stabilize soil and sand and encourage revegetation of steep slopes.

c) Procedures for containing sediment and allowing continued downstream flow at stream or biologically significant drainage crossings (identified in the EIS/EIR (84-EIR-7)), including scheduling construction activities during periods of historical low-flow and having erosion control structures or sediment retention devices in place prior to start of construction. Existing water levels in all streams shall be maintained at all times during construction.

d) Procedures for timely re-establishment of vegetation that replicates indigenous and naturalized communities disturbed. These ~~should~~ shall include: measures preventing invasion and/or spread of undesired plant species; restoration of wildlife habitat; restoration of native communities and native plant species propagated from locally-acquired existing plant species, including any sensitive species such as sand mesa manzanita, La Purisima manzanita, and black-flowered figwort; and replacement of trees at the appropriate rate.

e) Procedures for minimizing tree removal, tree root and branch damage and removal of or damage to other significant plant species including confining disturbance to the approved right-of-way; providing for onsite monitoring of construction by a qualified independent local biologist; and flagging significant species and areas that should be avoided.

f) Special procedures for oak woodlands, since County policy requires that these trees be preserved where feasible, including reducing the right-of-way (Condition H-10) to the minimum width possible and minimizing the impact to the root zone. (Condition H-11 identifies additional recommended measures.)

g) Procedures for restoration of riparian corridor stream banks and streambed substrates and elevation, emphasizing natural and existing materials, shall be included as well as methods for minimizing exposure of riparian habitats to disturbance during construction.

h) A soil conservation program, to be applied in areas of 20 percent (or greater) slopes along the pipeline corridor, detailing site specific techniques, such as use of jute or excelsior netting, to stabilize soil and sand and encourage revegetation of steeper slopes.

i) Specific plans for revegetation, erosion control and maintenance procedures for all berms, dikes and catch basins proposed along the pipeline route, to ensure protection and maintenance of the height of berms and containment capacity of the basins, for the life of project.

j) Limitation of ground-disturbing activities, to the dry season (generally April 1 through November 1), when feasible. Work can continue during the rainy season if a County-approved erosion and sediment control plan specific to the site(s) is in place.

k) Updated performance criteria for weed invasion to require action to control any and all invasive noxious weeds listed as of 2008 by the California Invasive Plant Council (for example, Cape ivy (*Delairea odorate*) and onion weed (*Asphodelus fistulosus*)) that could interfere with revegetation efforts.

l) Monitoring procedures and performance criteria for each vegetation type, including percent coverage that must be achieved, monitoring methods and frequencies, and quantitative thresholds for success, re-evaluation, and remedial action. Monitoring of revegetation efforts shall continue for 3 to 5 years, depending on habitat, or until performance criteria are met. Appropriate remedial measures, such as replanting, erosion control or weed (including invasive exotic species) control, shall be identified, using the RECRP as a guideline and implemented if P&D determines that performance criteria have not been met.

Site-specific plans: Site-specific measures listed in the RECRP shall be updated and implemented as applicable for discrete ground-disturbing activities along the pipeline right-of-way throughout the life of the project. Prior to County approval of ground-disturbing activities during operations, PXP shall submit site-specific measures to be implemented. Such measures shall be identified in consultation with P&D and other appropriate agencies, such as the California Coastal Commission, California Department of Fish & Game, VAFB and U.S. FWS, and the Army Corps of Engineers. Site-specific plans for restricting work areas, delineating construction zones (including staging and access areas), site-specific biological surveys of disturbance areas, impact minimization efforts, including scheduling, and erosion and sediment control measures. Where ground disturbances are required, these site-specific plans shall include:

1. Restriction of construction activities, equipment and personnel to previously disturbed areas, such as roads, pads, or otherwise disturbed areas to the maximum extent feasible.

2. Clearly marked and delineated limits of the construction zone, including staging and access areas. Personnel or equipment in native habitats outside the construction limits shall be prohibited.

3. Biologically sensitive resources, such as occurrences of sensitive plant species, including federal- or state-listed species, sand mesa manzanita, La Purisima manzanita, Gaviota tarplant, coast buckwheat, and black-flowered figwort, as well as individual oak trees, shall be identified through site-specific surveys conducted by a qualified biologist acceptable to the County, Coastal Commission, California Department of Fish and Game, VAFB biologists, and U.S. Fish & Wildlife Service, as appropriate, and shall be clearly marked for avoidance on work or construction plans and in the field prior to ground disturbance. To the extent feasible, construction areas and access roads shall avoid loss of individual plants and damage to habitats supporting federal- or state-listed plants or wildlife.

4. Where avoidance of biologically sensitive resources is infeasible, the site-specific plan shall specify impact minimization measures and measures to facilitate survival and recovery of the affected plant or wildlife species.

5. Species-specific plant salvage, propagation, replanting and monitoring plan consistent with the RECRP and that uses both seed and salvaged plants constituting an ample and representative sample of each colony of the species that would be affected. The plan shall include measures designed to perpetuate to the maximum extent feasible the genetic lines represented on the affected sites by obtaining an adequate sample prior to ground disturbance, propagating them and using them in the restoration of the site(s).

6. Provisions for re-creating suitable habitat and measures for re-establishing self-sustaining colonies of seaside bird's beak, beach spectacle-pod, and Surf thistle, should they be affected on the site. The plan shall include provisions for monitoring and performance assessment including standards that would allow for an annual assessment of progress and provisions for remedial action, should the species fail to re-establish successfully.

7. Erosion control measures and devices, which may include, but are not limited to, water bars, silt fencing, and dust control and which shall be used at any drainage, along portions of the project area that intersect slopes greater that 2:1, and within 200 feet of downslope water bodies. These measures shall be installed as necessary prior to ground disturbance and maintained until vegetation has re-established in the disturbed areas.

(Modified April 21, 2008)

H-2 POST-CONSTRUCTION SURVEY

One year after construction, a survey will be conducted, at PXP's expense, to determine the actual impact caused by construction. This survey shall include aerial photography, and appropriate color stereo and infrared photography and field studies. The report will identify areas with potential for further impact; e.g. high erosion area, that will require immediate remedial measures. The survey shall also contain an examination of previous mitigation measures and present a list of additional feasible mitigations based on the impacts during construction and potential impacts caused by operation.

The Environmental Planning Branch of VAFB and Planning and Development, in consultation with PXP, shall agree to additional feasible mitigations. This process shall be repeated as often as necessary by Planning and Development, but not more than annually.

H-3 NO USE OF HERBICIDES OR PESTICIDES

PXP shall not use ~~no~~ herbicides ~~n~~or pesticides in or near riparian wetland areas along the pipeline corridor.

(There is no Condition H-4)

H-5 LANDSCAPING PLANS

Prior to approval of their Final Development Plan, PXP shall submit to Planning and Development site-specific plans for landscaping of the Lompoc Oil and Gas Plant, and electrical substation sites. This plan shall, at PXP's expense, be reviewed by a qualified landscape architect and a biologist approved by Planning and Development to ensure the proper plant materials and procedures identified in these conditions are implemented. The plan shall include:

a) Specifications of any potential seed mixtures to be utilized, including the plant species in the mixture and the pounds of seed per acre to be applied; type of mulch (fiber, chemical tackifier, or straw); and the type and amount of fertilizer to be used.

b) Confirmation that all native plant materials proposed in the revegetation plan are compatible with indigenous vegetation and that none of the plants used is known to be weedy or invasive. The plan shall provide for plantings that will screen facilities

from view as well as reduce nighttime lighting and noise. Near chaparral or other high fire hazard areas, the seeds or seedlings will consist of native or non-native species, shown to be fast growing and to contain fire retardant properties.

c) Specifications for native seeds and seedlings that will have wildlife habitat and food value. Replacements of perennial or woody plants, native trees and large shrubs (particularly in riparian and oakwood communities) are to be propagated from material obtained from the same area. Native plant material is to be obtained from a revegetation contractor. All native materials will be ordered from the contractor in advance of construction activities.

d) Confirmation that non-native material is to be confined to disturbed areas immediately adjacent to structures needing visual screening. Such screening is to include fast growing trees adequate to screen the facility from direct view.

e) A detailed irrigation plan for the facility site and any other revegetated areas requiring irrigation for establishment of plant materials.

f) Procedures for the timely revegetation of all areas temporarily disturbed by PXP upon completion of construction activities in such areas.

g) Commitment for continual monitoring of the revegetation until plantings are established, so that weeds will be minimized. All weeds will be removed by hand clearing. Mechanical means will be used only where necessary.

h) Post fire restoration component that includes provisions for enhanced habitat recovery.

The landscaping plan is a dynamic document and may require changes and improvements to respond to issues that arise in the field. Landscaping changes recommended by the Environmental Quality Assurance Plan monitor, made in consultation with PXP Operating Company's landscape consultant, and approved by Santa Barbara County shall be implemented by PXP in a timely manner. *(Modified November 8, 2000)*

H-6 LANDSCAPE PERFORMANCE SECURITY

Prior to issuance of a permit for this development, a performance security in an amount to be determined by Planning and Development that will guarantee the installation and a two year maintenance period of the proposed landscaping, shall be filed with the Planning and Development Department. Performance securities shall be released at the time of approval of planting installation by Planning and Development. The remaining performance security for maintenance shall be released at the end of the two year period, provided that the planting has been adequately maintained, as determined by the County. *(Modified July 10, 1996)*

H-7 POST-LANDSCAPING AND REVEGETATION FIELD REVIEW

Prior to issuing a release from the bond or other security agreement, a biologist and landscape architect hired by the County, at PXP's expense, shall conduct a field review of all revegetated and landscaped areas, to insure consistency with the intent and specification of the revegetation and landscape plan. Necessary repairs or changes in landscaping or revegetation shall be made at PXP's expense.

H-8 DEPARTMENT OF FISH AND GAME CONSTRUCTION IMPACTS DETERMINATION

Prior to construction, PXP shall submit written determination from the California Department of Fish and Game that construction activities will not interfere with reproductive activities of regionally rare, threatened or endangered bird, amphibian and fish species, or other species of special concern in environmentally sensitive habitats identified in the EIS/EIR (84-EIR-7) and/or the Tranquillon Ridge EIR (06EIR-00005), to Planning and Development for confirmation. If the Department of Fish and Game determines that the construction schedule will have an impact, PXP will not begin pipeline construction activities until after the spring reproductive period; shall finish construction in sufficient time to have site restoration and revegetation measures in place prior to the start of the rainy season; and shall follow any other directives of the Department of Fish and Game.

H-9 RESTORATION, REVEGETATION AND IMPLEMENTATION SECTION OF ~~OSCP~~OSRP

PXP shall prepare a Restoration, Revegetation and Implementation section as part of the Oil Spill Contingency Plan (renamed Oil Spill Response Plan; P-13). The section shall be reviewed and accepted prior to start-up by Planning and Development and a biologist approved by Planning and Development. Reasonable costs of review shall be borne by the applicant. The section shall contain site-specific restoration information for all habitat types; including stream crossings, wetlands/lagoons, oak woodlands, grasslands, riparian zones, and other environmentally sensitive habitats. The section shall be divided into three major areas: a) Coastal; b) Streams and Rivers; and c) Terrestrial Habitats. Each of these sub-sections shall discuss the various habitats in the categories listed above. Site-specific m~~M~~ethods to achieve restoration of all affected areas (including creeks and streams) and native plant and wildlife communities to prespill conditions shall be discussed and shall be implemented as necessary in the event of a spill. The goal of this plan should be to minimize the ecological impacts of oil spills, with removal of visible oil for aesthetic reasons a secondary consideration. Relevant sections of the Plan shall be updated for the Tranquillon Ridge project, as described in Condition P-13, prior to approval of the zoning clearance for the Tranquillon Ridge project. The following actions and procedures ~~should~~ shall be included:

a) Mapped locations of sensitive biological resources, including rivers and streams.

b) Site-specific oil containment procedures for sensitive areas; for example, barrier deployment at the mouth of the Santa Ynez River to prevent oil entry in the event of an offshore spill or berm placement on ocean facing foredunes.

c) Location of containment and clean-up equipment in an accessible area near sites of potential use; for example, at Surf or at the old water treatment facility at Vandenberg, with the goal of decreasing response time to less than two hours. Specific access and egress points, staging areas, and material stockpile areas that avoid sensitive habitats shall be identified where containment and clean-up can be initiated under different scenarios. Access points shall be identified immediately adjacent to pipeline river crossings and points where spilled oil could enter into the Santa Ynez River, or other drainages of special biological significance as identified in the County Supplement to the OSRP.

d) Guidelines/schedules for conducting regular drills so that personnel are familiar with the area and equipment.

e) Evaluation of the no-clean-up option for ecologically vulnerable habitats, such as, dunes and sandy beaches, salt marshes, lagoons, and riparian areas.

f) Procedures for use of low-impact, site-specific clean-up techniques consistent with current technology in or near Barka Slough, Santa Ynez River estuary and San Antonio Creek and other estuarine, riparian or otherwise sensitive habitats, including hand cutting of contaminated vegetation and low-pressure water flushing from boats. These procedures shall be reviewed and revised as appropriate during future Plan updates to include best available practices.

g) Guidelines/procedures for chasing sensitive wildlife from oiled areas or leaving special oiled plants in areas for seed rejuvenation. Species- and site-specific procedures for the collection, transportation, and treatment of all potentially affected native wildlife, including sensitive species, shall be identified.

h) Plans for early deployment of booms around the Least Tern nesting site in the event of an onshore spill.

i) Procedures for topsoil salvage and replacement in sensitive habitats and procedures to minimize the loss of native seedbanks and prevent the spread of non-native weeds.

j) Best Management Practices (BMPs), such as temporary berms and sedimentation traps, silt fencing, straw bales and sand bags, to be installed to minimize erosion of soils and sedimentation in drainages that may be affected by an oil or produced water spill and/or subsequent clean-up efforts. The BMPs shall include maintenance and inspection of the berms and sedimentation traps during rainy and non-rainy periods, as well as revegetation of affected areas, consistent with other requirements of the approved RECRP.

H-10 CONSTRUCTION DISTURBANCE CORRIDOR LIMITATIONS

Prior to the issuance of the Land Use Permit, PXP must submit plans which shall limit the width of the construction disturbance corridor through all dune, estuarine and riparian habitats to the extent feasible. In those areas where trees or other habitats are to be avoided within the approved corridor, PXP shall ensure contractor compliance with this condition by marking and/or fencing those areas to be avoided. All vehicular traffic, storage of equipment and foot traffic outside the ROW shall be restricted. PXP shall indicate, as part of Condition H-1, the location and size of the construction ROW through these habitats. PXP will allow vegetation to recover in the permanent ROW where feasible. In the Bishop Pine Forest, at the top of the Purisima Hills, PXP will allow the entire construction ROW to revegetate, using the nearby utility road for pipeline access.

H-11 TREE REMOVAL AND REPLACEMENT

The construction ROW shall be routed to avoid trees to the maximum extent feasible. When this is not possible, dying or diseased trees shall be removed preferentially over healthy trees. Where tree removal is unavoidable PXP shall implement the following procedures under the supervision of the monitoring biologist:

a) Conserve topsoil during installation to be spread over cleared areas. Subject to approval by the County Fire Department, the ground surface layer could be charred to promote seed germination in Chaparral habitats;

b) Replace oak woodland communities removed by pipeline installation using the following procedures:

- Replace each tree with saplings at the ratio, and in the size, required by County standards.
- Protect newly planted young trees from deer and rodent browsing by enclosing them within cylinders of wire mesh, or other equally effective measures approved by P&D, for three to five years or until over 6 feet tall. Check newly planted oaks periodically to ensure survival rates.
- Clear grass and weeds to protect newly sprouting trees from competitive inhibition.

c) Cut up Bishop pines removed from the right-of-way and burn under Fire Department supervision in controlled fires. Charred branches and cones will be spread over cleared areas to provide a source of fertilizer and seed for a new generation of trees. Shrubs on the margins of the cleared area will be trimmed by hand to reduce shading.

(There is no Condition H-12 or Condition H-13)

H-14 PIPELINE ROUTE THROUGH BURTON MESA CHAPARRAL

PXP shall realign the proposed pipeline route to the west into the cleared firebreak (100 ft wide) on the border of VAFB and the PXP property to reduce disturbance to Burton Mesa Chaparral by clearing and equipment movement.

H-15 INSTALLATION OF BLOCK AND/OR CHECK VALVES

PXP shall install block and/or check valves at locations identified in the EIS/EIR (Figures 10.1-1 and 10.1-2) along the pipeline route.

H-16 INSTALLATION OF H_2S MONITORS

In the event that produced gas becomes sour (50 grains per 100 cubic feet hydrogen sulfide H_2S concentration, as per County Petroleum Ordinance Standards), PXP shall install H_2S monitors on the pipeline along the Santa Ynez estuary at each of the block valve sites and at one additional site midway between the railroad and 35th Street.

H-17 RELOCATION OF BADGERS

Prior to commencement of construction and in the presence of a monitoring biologist, PXP shall use best efforts to relocate badgers present at the proposed oil and gas facility site. Displaced badgers (a declining species) shall be used to repopulate other suitable habitats. *(Modified July 10, 1996)*

H-18 BLACK FLOWERED FIGWORT SEEDS

PXP, under the auspices of the monitoring biologist, shall ensure that seeds (present June - September) from fruiting Black Flowered Figwort plants (a Federal Candidate species)

within the pipeline ROW are collected before clearing and grading. The seeds shall be scattered outside of the construction area where they may germinate.

H-19 ~~TRANSMISSION POLES~~POWER LINES AND POLES

PXP shall use existing transmission poles where possible when installing new transmission lines. New poles shall be installed in existing holes or holes directly adjacent to existing holes to avoid disturbance to wetland areas during construction. All construction sites associated with pole installation and/or line stringing shall be restored in accordance with the requirements of FDP Condition H-1 and H-5.

Upon determining that the power line to Valve Site #2 is necessary, PXP shall enter into discussions with VAFB to determine the feasibility of placing the power line on the 13th Street Bridge or using the existing VAFB power poles for crossing the Santa Ynez River. PXP shall report to P&D on this feasibility investigation prior to approval of the zoning clearance for any power line installation. If neither approach is feasible, PXP shall then provide a power pole siting and installation plan to P&D that (1) places the power poles outside the limits of the Santa Ynez River riparian vegetation; (2) uses raptor-safe pole designs that either discourage raptor nesting or make the poles suitable for nesting (3-ft x 3-ft platforms placed at least four feet above the tops of the poles or other CDFG- and USFWS-approved design) and with conductors spaced as far apart as possible to minimize the potential for bird wings to span them, (3) install poles and lines outside of the bird breeding season (March 1 through August 15); (4) cover augered holes if the poles are not installed immediately after the hole is dug; (5) elevate the power line above the tree canopy; and, (6) fit the wires with devices to make them more visible to birds. PXP shall consult with CDFG, USFWS, VAFB, and P&D in the design of the power poles and shall submit the plan to P&D for review and approval prior to approval of the zoning clearance for installation of the power line, poles and substation.

Prior to construction of new power lines, PXP shall conduct a survey of the power line corridor to verify the locations of sensitive plants, including, but not necessarily limited to the following species: Gaviota tarplant, La Purisima manzanita, sand mesa manzanita, and dune vegetation that includes coast buckwheat. Power poles shall be sited and installed to avoid these resources. PXP shall solicit input from P&D, the California Department of Fish & Game, VAFB biologists, and the U.S. Fish & Wildlife Service for the survey design. The County's EQAP monitor shall monitor power line installation for compliance with this condition. Prior to approval of zoning clearance for power line installation, PXP shall provide the results of the plant survey to the agencies named above and to P&D for review and approval.

Immediately prior to (not more than 48 hours before) each critical pole placement activity, including excavation, foundation installation, pole placement, and line stringing, PXP shall ensure that a County- and VAFB-approved wildlife biologist documents and removes individuals of wildlife species encountered, including reptiles, amphibians, badgers or other burrowing animals to suitable habitat outside of the construction area. During construction, the area shall be monitored to ensure the wildlife species do not enter areas where they would be exposed to hazards from the construction activities. *(Modified April 21, 2008)*

H-20 ADDITIONAL CONDITIONS OF MITIGATION

Additional reasonable and feasible conditions of mitigation, consistent with Condition H-1 and to the extent necessary, shall be identified and observed as developed during the archaeological mitigation program (Conditions I-1, I-2, I-4, I-5, I-6), and as identified by the

managing environmental coordinator in consultation with PXP's Onsite Construction Representative (Condition C-1).

H-21 CONSTRUCTION FUELING AND LUBRICATION

Fueling and lubrication of construction equipment will not occur within 0.25 miles of any flowing streams. No more than 2 barrels of fuel shall be kept at construction sites, exclusive of pipeline construction equipment fuel tanks, within 0.25 miles of all perennial creeks. As part of the oil spill response plan, PXP will submit plans for clean-up and restoration of affected areas in the event of a construction fuel spill.

(There is no Condition H-22)

H-23 BOND FOR REVEGETATION COSTS

Prior to the issuance of any Land Use Permit, PXP shall amend its existing bond or other security agreement based on an estimate of revegetation costs, that was previously approved by County Counsel to ensure that PXP's revegetation plan is completed to the County's specifications including those areas impacted by pipeline construction activities.

The bond or other security agreement will be released after a biologist and landscape architect hired by the County, at PXP's expense, conduct a field review of all revegetated and landscaped areas, including those areas impacted by pipeline construction activities to insure consistency with the intent and specifications of the revegetation plan. Necessary repairs or changes in revegetation shall be made at PXP's expense.

H-24 CONSTRUCTION AND MAINTENANCE WITHIN ENVIRONMENTALLY SENSITIVE HABITATS

In those environmentally sensitive habitats identified in the EIS/EIR (84-EIR-7), PXP may not begin pipeline-related construction activities until after the spring period of reproductive activities of regionally rare or rare, threatened, or endangered bird, amphibian, and fish species and shall finish construction in sufficient time to have site restoration and revegetation measures in place prior to the start of the rainy season.

Prior to initiating construction, PXP shall obtain County approval of site-specific contingency plans to be implemented in the event construction activities could occur during the spring reproduction period of sensitive species. These plans shall include: (1) a prioritized schedule allowing for the incremental completion of work at individual ESHs; (2) protocols for delaying construction, applying the necessary stabilization measures through the period of concern, and restarting construction at the appropriate time; (3) phased restoration and revegetation measures to provide immediate protection from erosion and enhance the long-term chances of successful revegetation; and (4) supplemental monitoring of sensitive species to identify additional mitigation to remedy any unmitigated impacts. These requirements shall extend to upland habitats immediately adjacent to riparian areas. *(Adopted January 8, 1992)*

All routine pipeline repair and maintenance activities occurring within the beach and foredune habitats shall be scheduled to avoid the breeding season of the western snowy plover and the California least tern (March 1 through September 30). A contingency plan for emergency repairs in this area during the nesting season shall be developed by PXP in coordination with VAFB, U.S. Fish & Wildlife Service, the California Department of Fish & Game, California Coastal Commission, and P&D. Such contingency plans shall be approved by the California Coastal Commission. Impact avoidance measures shall be

included in the event that emergency repairs cannot be scheduled to avoid the breeding/nesting season. This condition is not intended to limit maintenance and monitoring activities, such as pipeline pigging, ultrasonic testing, diver surveys in the surf zone, or other similar minor maintenance activities not involving ground disturbance, use of mechanized equipment, or human presence within the beach and foredune habitats during the breeding season. *(Modified April 21, 2008)*

H-25 DESIGNATED WASH-OFF AREAS

During construction, washing of concrete, paint, or equipment shall occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Washing shall not be allowed near sensitive biological resources. PXP shall designate a wash off area, acceptable to P&D, on the construction plans. The wash off area shall be designated on all plans prior to the issuance of a Land Use permit. The wash off area shall be in place throughout the construction period to ensure proper use.

H-26 OAK TREE REPLACEMENT PLAN

For all oak trees subject to disturbance, a tree replacement plan shall be prepared and shall include the following:

a) All trees shall be mapped at their drip lines. Pipeline construction shall be designated on all parcels located outside the drip lines of all oak trees. All ground disturbances including grading shall be prohibited outside areas designated for development of final plans.
b) All oak trees within 25 feet of proposed ground disturbances shall be temporarily fenced with chain-link or other material satisfactory to P&D located six feet outside their drip lines prior to and throughout all grading and construction activities. The fencing shall be staked every eight feet. Trees and fencing shall be designated on all grading and building plans.
c) No construction equipment shall be operated or parked within a six foot radius of all oak tree drip lines. Equipment storage and staging areas shall be designated on the tree protection plan and shown on all grading and building plans.
d) No equipment or construction materials shall be stored within a six foot radius of the drip line of any oak tree.
e) The plan shall provide for revegetation of graded areas.
f) Any roots encountered shall be cleanly cut and sealed with a tree-seal compound. This shall be done under the direction of a P&D approved arborist/biologist.
g) Drainage plans shall be designed so that oak tree trunk areas are properly drained to avoid any ponding. These plans shall be subject to review and approval by P&D or a P&D qualified biologist/arborist.
h) Any unanticipated damage that occurs to trees or sensitive habitats during construction activities shall be mitigated in a manner approved by P&D. This mitigation can include but is not limited to tree replacement on a 10:1 ratio, and hiring an outside consultant biologist to assess the damage and recommend mitigation. The required mitigation shall be done immediately under the direction of P&D prior to any further work occurring on site. *(Modified July 10, 1996)*

H-27 BROWN-HEADED RUSH

Existing stands of brown-headed rush *(Juncus phaeocephalus)* within and near areas planned to be disturbed shall be flagged prior to construction. Where feasible, construction shall avoid impacts to established *Juncus* and any seep areas. *Juncus* individuals that cannot

be avoided shall be salvaged immediately prior to construction and kept temporarily in damp soil in a plastic pool. After construction, these plants shall be replanted into the corridor and maintained until they become established. *(Modified July 10, 1996)*

H-28 TOPSOIL PROTECTION

The top six to 12 inches of topsoil shall be salvaged from the construction corridors, stockpiled and protected during construction, and respread onto the corridor(s) after construction is complete, consistent with the requirements of Condition H-1(a).

I. CULTURAL RESOURCES

I-1 ~~PHASE II~~ CULTURAL RESOURCES SURVEYS

Prior to approval of the Final Development Plan, PXP shall complete a Phase II (site importance assessment) cultural resources survey for the entire final pipeline route. The results of this survey shall be submitted to and approved by Planning and Development as part of the Final Development Plan. PXP shall avoid to the maximum extent feasible all known cultural resource sites along the pipeline or power line routes or near other construction sites unless safety (e.g., seismic or engineering practices) considerations or sensitive biological habitats preclude avoidance.

A Phase I (surface survey) archaeological survey shall be conducted prior to ground disturbance where new construction, power line installation, or pipeline maintenance and repair activities could affect areas that have not been previously surveyed. If a cultural resource is encountered during the survey, it shall be avoided by construction activities. If such avoidance is technologically infeasible due to topographic or engineering constraints, the site's potential significance shall be evaluated pursuant to County Cultural Resource Guidelines and CEQA Guidelines Section 15064.5 and consistent with Condition I-2 below. Resources considered significant and unavoidable shall be subject to a Phase III (data recovery) program, with Native American monitoring if the resource is pre-historic. If such resources are located on VAFB, the Phase III program shall also incorporate investigation methodology reviewed and approved by VAFB environmental management staff. Any trenching or excavation activities in a floodplain on VAFB shall include archaeological monitoring.

Prior to approval of a zoning clearance for ground-disturbing construction, maintenance, or repair activities in previously unsurveyed areas, PXP shall submit documentation of the required archaeological survey(s) to P&D for review and approval prior to approval of the zoning clearance for the activity. *(Modified April 21, 2008)*

I-2 CULTURAL RESOURCES MITIGATION PLAN

Prior to the issuance of the Land Use Permit or Coastal Development Permit, PXP, in consultation with the Native American Community, shall commence the Cultural Resources Mitigation Plan (CRMP), in accordance with CEQA Appendix K, County approved Prehistoric Archaeological Guidelines, and Section 5.5 of Technical Appendix G, Cultural Resources, of the EIS/EIR (84-EIR-7). Implementation of the mitigation plan shall proceed on an expeditious and effective schedule in order to minimize or to avoid conflicts with other construction scheduling requirements delineated in other permit conditions. The CRMP shall remain in effect and shall be implemented as appropriate throughout the life of the project. The main components of the mitigation plan shall include:

a) Identification of a qualified archaeologist approved by Planning & Development in consultation with Native American representatives. The archaeologist shall be available on an as-needed basis through the completion of pipeline construction. The archaeologist shall be funded by PXP and shall be responsible to Planning and Development. Compensation shall cover all excavation, analysis, and report preparation for all areas investigated including those found during construction;

b) Procedures for avoidance of known sites wherever feasible and test excavations of known sites that cannot be avoided. If site boundaries have not been established by subsurface testing, extended Phase 1 (presence or absence) subsurface testing shall be conducted to assess whether site materials are present within the area of ground disturbance. In the event it is not possible to avoid the archaeological sites, additional work to determine site significance and minimize impacts to significant resources shall be conducted in compliance with the *Santa Barbara County Regulations Governing Archaeological and Historical Projects Undertaken in Conformance with CEQA and Related Laws: Cultural Resource Guidelines*, and in compliance with other applicable requirements (for example, Section 106 of the National Historic Preservation Act).~~These test excavations will assess the importance of each site according to CEQA Guidelines Section 15064.5 criteria and/or other established regulatory requirements and will result in appropriate data recovery as a mitigation measure;~~

c) Local Native American representatives will be included in all monitoring and field excavation activities;

d) Additional sub-surface sampling (use of shovel test pits) in defined sensitive areas that will be affected by project construction to confirm the presence/absence of previously unknown (undiscovered) sites. Any new sites found shall be treated as per Condition I-2(b);

e) Written commitment to inform the County of any additional plans for site avoidance following determination of site importance. For those sites not avoided, the consulting archaeologist shall, in consultation with the Native American community, prepare site-specific mitigation (excavation/data recovery) plans in accordance with applicable state, federal and/or County guidelines; and

f) Implementation and completion of the field work aspects of the site-specific mitigation plans prior to construction in the vicinity of the resource. *(Modified November 8, 2000)* For ground disturbing activities within 200 feet of a known archaeological site, PXP shall submit a site-specific grading plan to P&D for review and approval prior to approval of the zoning clearance for the activity. Such grading plans shall note that a Native American observer and a County-qualified archaeologist will be onsite to monitor all ground disturbance, unless the resource has been previously determined to have no potential for significance because it is re-deposited, an isolated occurrence, modern, or otherwise lacks data potential. Grading plans for ground-disturbance shall include notes explaining protocols to be followed in the event of unexpected discovery of archaeological resources. These protocols shall include but are not limited to halting or re-directing work to other areas until the discovery has been documented by a County-qualified archaeologist and its potential significance evaluated consistent with County Cultural Resource Guidelines. If feasible, the project shall be re-designed to avoid significant resources. If avoidance is not feasible, a Phase III data recovery

program shall be implemented, with Native American monitoring and consistent with County Cultural Resource Guidelines and the CRMP.

The CRMP shall be updated to incorporate all requirements adopted as part of the Tranquillon Ridge project approval. The updated CRMP shall be submitted to P&D for review and approval prior to approval of the zoning clearance for the Tranquillon Ridge project. (Modified *April 21, 2008)*

I-3 CONSTRUCTION AND PIPELINE INSTALLATION WORKSHOPS

Prior to pipeline installation or other earth-disturbing activities in previously undisturbed areas, PXP shall sponsor a workshop for its contractors and Native American consultants to review and explain the mutual concerns, responsibilities, and activities of the parties during power line or pipeline installation and/or other earth-disturbing activities. *(Modified November 8, 2000 and April 21, 2008)*

I-4 CULTURAL RESOURCE MONITORS

During all ground-disturbing activities in previously undisturbed areas, a Planning and Development approved archaeologist and Native American consultant(s) will work with the contractor to ensure continued avoidance of cultural resources. Adequate monitors shall be provided pursuant to an agreement between the Native American representatives and PXP, and the archaeologist retained. *(Modified January 8, 1992)*

I-5 NON-BURIAL ASSOCIATED CULTURAL ARTIFACTS

If non-burial associated cultural resource artifacts are recovered during pipeline installation (the location of such artifacts being unknown prior to installation), upon the determination of the origin of the materials, the Native American Community shall have the first option for ownership. The disposition of the artifacts shall be carried out as per approved County guidelines.

I-6 BURIALS

If burials or burial associated artifacts (that were unknown prior to excavation) are found during project construction, operation, or emergency response activities and cannot be avoided because of safety considerations, there shall be no further excavation or disturbance of the site. PXP, in conjunction with the Native American representatives and Planning and Development, shall adhere to the guidelines in CEQA Guidelines Section 15064.5 and the County Archaeological Guidelines prior to continued project-related activity in the site area. *(Modified November 8, 2000)*

I-7 MODIFICATION OF COUNTY ARCHAEOLOGICAL GUIDELINES

If County Archaeological Guidelines are modified and approved in a noticed public hearing prior to any new pipeline construction, repair, maintenance, or other earth-moving activities, PXP shall abide by the requirements set forth in the modified guidelines. *(Modified November 8, 2000)*

I-8 AVOIDANCE OF CULTURAL RESOURCE SITES

PXP shall avoid all known cultural resource sites along the pipeline route and near other construction sites associated with the project unless safety considerations (i.e., seismic or

engineering practices) or sensitive biological habitats preclude avoidance. *(Modified November 8, 2000 and April 21, 2008)*

I-9 OIL SPILL CLEAN-UP

PXP shall update the SBC Supplement to its Core Oil Spill Response Plan (OSRP; FDP Condition P-13) to include procedures for minimizing impacts to cultural resources during oil spill containment and clean-up activities. These procedures shall include contacting a County-qualified archaeologist and Native American monitor in the event of a spill that could directly or indirectly affect significant cultural resources along the oil pipeline route between landfall and the LOGP. To the extent possible, heavy earth-moving equipment or manual excavation shall be minimized at archaeological sites. If unanticipated cultural resources are discovered during containment and clean-up activities, then a County-qualified archaeologist shall document the discovery at the earliest time it is deemed safe to do so. PXP shall conduct post-clean-up archaeological excavations, with Native American monitoring as applicable and in accordance with County Cultural Resource Guidelines and the CRMP, if directed by the County to do so in order to mitigate impacts from the containment/clean-up ground disturbances. The revised OSRP shall be submitted to P&D for review and approval prior to the introduction of Tranquillon Ridge oil production into the pipeline system between Platform Irene and the LOGP. *(Added April 21, 2008)*

J. SOCIOECONOMICS

J-1 SOCIOECONOMIC MONITORING AND MITIGATION PROGRAM

PXP shall participate in an industry-wide socioeconomic monitoring and mitigation program to address significant environmental impacts in the Counties of Santa Barbara, Ventura and San Luis Obispo, attributable to their project. The costs for administering the monitoring and mitigation program and its requirements will be uniformly applied to all industry participants, mitigation costs for individual projects will, of course vary. The monitoring, impact and mitigation elements of the program will be equivalent to those described in the Chevron Gaviota Project conditions.

The intent of this program is to obtain realistic information regarding project related impacts identified in the EIS/EIR (84-EIR-7), and to identify appropriate mitigation measures for impacted jurisdictions. Mitigation of impacts through other planning programs, and/or through existing administrative infrastructure shall be taken into account. The scope of this program is currently being developed by the County Association of Governments. As details in the structure of the Program are developed by the County, such details shall supersede portions of this Condition as appropriate.

At any point when the Board of Supervisors determines that the monitoring program demonstrates that previous mitigation funds paid by PXP exceed the valuation of the impacts at issue, PXP shall be granted a credit against any other current or future mitigation fees imposed on PXP for this permit by the County. PXP shall be entitled to accrued interest at the prevailing legal rate which shall continue to accrue until the credit is used.

The applicant agrees in accepting this permit to participate in the program in good faith. There shall be a review of the socioeconomic project conditions on an annual basis from the date of this permit, unless the Board of Supervisors deems it unnecessary.

J-2 HOUSING IMPACTS AND MITIGATION

To mitigate the potential impacts from project induced demand for low and moderate income housing, PXP will participate in the Socioeconomic Monitoring and Mitigation Program. The Program will provide the framework for verifying the housing demand estimates in the EIS/EIR (84-EIR-7) and will determine appropriate mitigations; such as, in lieu of fees, rental subsidies and/or direct financing, as agreed to by the County Association of Governments and the Technical Advisory Committee. All mitigations will be consistent with Housing Element Policies and programs on low and moderate income housing currently being developed. Use of local labor force will be encouraged (see Condition J-5) and will be applied toward the mitigation of impacts.

J-3 TEMPORARY HOUSING OF CONSTRUCTION WORKERS

Prior to approval of the Final Development Plan, PXP shall submit to the County Association of Governments a plan which details how it plans to house temporary construction workers during construction. This plan, to be implemented by PXP, shall demonstrate how PXP plans to reduce the housing impacts identified in the EIS/EIR (84-EIR-7) including, but not limited to, the following elements:

a) Identification and use of existing under-utilized hotel/motel space during the months of September through May to provide for temporary living quarters for direct and direct-support workers during peak of construction activities.
b) Identification of incentives to all construction workers directly related to PXP's project, such as rent subsidies and/or shuttle service to the site from existing residence for all workers commuting to the job site.
c) Identification of any available temporary housing to be used outside the Lompoc area for all workers associated with the project, during the summer months when visitor-serving facilities in the County are near capacity. Steps taken to ensure worker doubling-up or use of shared accommodations (3 to 4 person rooms or suites) should be discussed.

J-4 CONSTRUCTION SCHEDULING

Construction periods will be scheduled so as not to coincide with peak tourist seasons in Santa Barbara County, provided that this scheduling does not interfere with any other conditions in this permit with respect to timing, for example, Least Tern nesting periods, gray whale migration and requirements regarding construction during stream and river low-flow. If such a conflict is found, than additional measures must be taken to provide the temporary housing needs for construction workers.

J-5 LOCAL LABOR

PXP shall, to the extent permittable by law, include provisions in its contractor agreements specifically to encourage and promote employment from local labor so as to reduce the impacts associated with the in-migration of workers.

J-6 ADDITIONAL MITIGATIONS

Except as otherwise provided herein, if the Socioeconomic Monitoring Program shows that project related revenues will not compensate for needed capital or operating expenditures necessary to provide project-related utilities and services, additional mitigations will be imposed.

J-7 WATER DISTRICTS

PXP shall provide water directly to impacted water districts through approved programs, such as desalination or other water programs of the district's choice, or make a payment toward local water development projects within the County in an amount not to exceed $38,000, for that amount of water necessary to support the increased water demand induced by growth attributable to their project, and $32,000 for growth attributable to Exxon's project. This fee shall be made to the County of Santa Barbara as trustee for the impacted Water Districts. The fee shall be based on estimated peak water needs of 19 acre feet per year (AFY) due to PXP project-related growth and 16 AFY due to Exxon project-related growth as identified in the EIS/EIR (84-EIR-7), multiplied times the estimated average cost per acre foot for new water projects, such as desalination, wastewater reclamation and conjunctive use projects. Whereas a District employs several different types of projects with varying costs per project, the average of the project costs to supply this additional water will be used to determine PXP's fee. Where current project costs differ more than twenty percent (20%) from recent historical costs, the Water District shall fully justify the reasonableness of such increase.

In addition, PXP shall provide $20,000 to the County of Santa Barbara as trustee for the Mission Hills Community Services District to offset direct project water needs. This amount is based on both peak water needs (3 AFY) and reduced recharge capabilities (7 AFY) at the Lompoc ~~HS&P Facility~~Oil and Gas Plant.

Should a desalination project be implemented by Mission Hills Community Services District (MHCSD) during the life of the project, PXP shall donate no less than 2000 AFY of usable produced water from onshore fields (to be determined by the MHCS District) to the facility and will remove and dispose of any waste associated with the desalination process. At that time, PXP shall be entitled to a credit of the aforementioned fee ($20,000) in exchange for this contribution of water.

Thirty percent (30%) of these fees shall be collected prior to construction, only if approved water projects are in place or scheduled. The fee is understood to be a one-time capital expense with subsequent operating and maintenance expenses the responsibility of water purveyors and consumers, not the applicant. Any subsequent need for mitigation of impacts on affected water districts shall be determined by the County on an annual basis. *(Modified November 8, 2000)*

Any other user of PXP's facility shall comply with this condition to the extent the user's portion of the project induces additional water demand.

J-8 COUNTY REVIEW OF TAXES, REVENUE SHARING AND FEES

In the event that state and/or federal revenue sharing legislation directed at distributing oil related revenues to state or local governments is approved or Santa Barbara County levies a tax (special or otherwise) on oil and/or gas processed or transported under this permit, then any condition within section J ~~or Condition P-8,~~ requiring payments or other items of value by PXP to Santa Barbara County or any political subdivision thereof shall automatically be suspended pending a review by the County to determine the extent, if any, which the tax, revenue sharing, or any of the fees imposed are duplicative or unwarranted either as to the level of government services provided or the level of burdens imposed on the public.

J-9 CONTRIBUTION TO OIL RELATED JOB TRAINING PROGRAMS

PXP shall agree to provide reasonable funds and/or other means of support to those organizations who can develop oil related job training programs. Examples of such organizations are the County of Santa Barbara Employment Training Programs, Private Industry Council, and local community colleges. Prior to the start up of facilities, PXP shall submit to the County Association of Governments, a plan for contributions to such programs which includes the type of contribution, (i.e., scholarships, dollar contributions, donation of equipment, use of facilities as training grounds, apprenticeship programs) and the number of years such contributions take place.

J-10 PARTICIPATION IN SOCIOECONOMIC PROGRAMS FOR SLO AND VENTURA COUNTIES

PXP shall also participate in the Socioeconomic Monitoring and Mitigation Program elements developed specifically for the Counties of San Luis Obispo and Ventura.

J-11 CONSULTATION WITH VANDENBERG AIR FORCE BASE

PXP shall consult on a regular basis with Vandenberg Air Force Base (VAFB) officials to coordinate pipeline construction, inspection, repair/maintenance, emergency response and abandonment activities so as not to interfere with VAFB operations, and to ensure adequate access to the pipeline right-of-way." *(Modified November 8, 2000)*

J-12 WRITTEN AGREEMENT FROM MISSION HILLS COMMUNITY SERVICES DISTRICT FOR WATER SERVICE

Prior to issuance of Zoning Clearance, PXP shall provide a written agreement from the Mission Hills Community Services District for approval by the Department of Environmental Health Services, stating that said district can and will provide domestic water service upon demand without exception, and that all financial arrangements guaranteeing extension of service have been made to the satisfaction of the district and Department of Health Care Services.

J-13 PROVISION OF WATER AND SANITARY FACILITIES DURING CONSTRUCTION

PXP shall provide a source of potable water and portable sanitary facilities on site during construction activities.

J-14 SOILS PERCOLATION TEST REPORT

Prior to issuance of Zoning Clearance, PXP shall file a soils percolation test report with the Department of Environmental Health Services which shall include all required information outlined in their letter of June 7, 1985 to Planning and Development.

J-15 DELETED (NOVEMBER 8, 2000)

K. NOISE

K-1 NOISE MONITORING AND CONTROL PLAN

Prior to construction of facilities, PXP shall file with the Planning and Development Department a Noise Monitoring and Control Plan which has been approved previously by the Department of Health Care Services, the Planning and Development Department and the

Parks Department. The program shall include an updated baseline noise level survey, to include measurements at the facility and in Mission Hills and Vandenberg Village, conducted by an independent acoustic engineer. The program shall describe steps PXP will take to reduce noise impacts associated with the project to the maximum extent feasible. The best available technology, including but not limited to muffling equipment, sound barriers, and landscaping measures shall be used to minimize noise impacts. The Plan shall apply to project-related activities onshore and offshore, within the three-mile limit, in particular the vicinity of Mission Hills, Vandenberg Village, Cabrillo High School, the Santa Ynez River estuary, Clark Street in Orcutt, and Ocean Beach County Park. The plan shall also include provisions to ensure that items K-2 through K-5 below are included.

Prior to approval of the Final Development Plan, a memorandum of agreement (MOA) shall be approved by P&D with agreement by Lompoc and Santa Maria airport authorities, local governments, helicopter contractors and the FAA. The MOA shall include procedures to reduce helicopter noise such as establishing flight corridors and height limitations. PXP shall establish and adhere to an overland flight altitude minimum of 1,000 feet when feasible, with the approval of the FAA, and shall not fly over Oso Flaco Lake. Similar conditions will be placed upon future operators using PXP's facilities. Future users of the facility shall be required to update this plan or, depending upon the location of the heliport, participate in a similar agreement to reduce helicopter noise in the vicinity of the Santa Barbara Airport. A revised Noise Monitoring and Control Plan shall be submitted to P&D for review and approval prior to approval of the zoning clearance for the Tranquillon Ridge project. *(Modified April 21, 2008)*

K-2 MAXIMUM NOISE LEVELS

Except for motor vehicles and motorized construction equipment, all facilities shall be designed, constructed, operated and maintained such that sound levels during operation do not exceed 70 dBA at or beyond the property line or pipeline easement, as measured on the "A" weight scale at slow response on approved sound level measuring instruments. Affected property owners along the onshore pipeline route shall be notified by PXP at least 48 hours in advance of any planned testing or maintenance of the line. The facility shall comply with all standards established in the Noise Element of the Comprehensive Plan, Article III Zoning Ordinance and the Coastal Zoning Ordinance. No nearby residents shall be subjected to greater than a 9 dBA increment above the baseline ambient noise level, nor greater than a 3 dBA increase in day-night sound levels. No helicopter landings at the Lompoc ~~HS&P Facility~~Oil and Gas Plant will be permitted, except for emergency purposes. The best available technology, including but not limited to muffling equipment, sound barriers, and landscaping measures shall be used to minimize noise impacts.

K-3 CONSTRUCTION HOURS AND NOISE LIMITATIONS

Construction activities for all project facilities~~, except for the gas processing facilities,~~ shall be limited to the hours between 7:00 a.m. and 4:00 p.m. Monday through ~~Saturday~~Friday. ~~Construction of the gas processing project shall be limited to the hours of 7:00 a.m. and 7:00 p.m., Monday through Sunday.~~ Non-noise generating construction activities, such as interior painting, are not subject to these time restrictions. Signs stating these restrictions shall be posted at the construction site, shall prominently display information for a filing a complaint, and shall remain onsite and legible for the duration of grading and construction activities. PXP shall forward all noise complaints to P&D Energy Division within 24 hours of their receipt. In addition, i~~f~~ any noise complaints are received by PXP or the County during construction activities~~of the gas plant~~, PXP shall immediately attempt to identify the source of the noise and abate the noise. ~~If noise complaints continue, PXP shall revert to the~~

~~original construction hours (between 7:00 a.m. and 4:00 p.m., Monday through Saturday). To mitigate noise disturbances during construction near the Righetti residence, PXP shall make temporary housing available for occupants of that residence.~~ During the construction and operation phases, project-related noise near all sensitive receptors identified in either the EIS/EIR (84-EIR-7) or the Tranquillon Ridge EIR (06EIR-00005) shall be limited to 65 dBA between the hours of 7:00 a.m. and 10:00 p.m., and 50 dBA between the hours of 10:00 p.m. and 7:00 a.m., consistent with the County Noise Element, Coastal Zoning Ordinance and Article III Zoning Ordinance. *(Modified July 10, 1996 and April 21, 2008)*

K-4 MINIMIZATION OF EQUIPMENT NOISE AND VIBRATION

All construction and operation-related equipment shall be operated and maintained to minimize noise generation, ground vibration, and to avoid interference with radio or video communications.

K-5 NIGHTTIME RESTRICTION IN RESIDENTIAL DISTRICTS

Except in an emergency, no materials, equipment, tools, or pipes used for plant operation shall be delivered to or removed from the facility site through streets within a residential district between the hours of 9:00 p.m. and 7:00 a.m. of the next day. If complaints arise concerning activities occurring during these hours, PXP shall take additional feasible steps to reduce the noise levels or further restrict the offending activity.

L. VISUAL RESOURCES

L-1 BOARD OF ARCHITECTURAL REVIEW APPROVAL

All facility design, including buildings, structures, landscaping and signs, shall be in accordance with the plans approved by the County Board of Architectural Review (BAR), Section 35-184 of the Coastal Zoning Ordinance and Section 35-329 of Article III Zoning Ordinance, and amendments made to these plans by the Planning Commission. Prior to land use clearance, PXP shall submit to the BAR and Planning and Development and obtain their approval of a plan demonstrating that Conditions L-3 through L-10 are met. *(Modified July 10, 1996)*

L-2 LIGHTING PLAN

No unobstructed or unshielded beam of exterior lighting shall be directed toward any area outside the exterior boundaries of the PXP property. Any lighting along roadways within the project shall utilize low intensity, ground level, shielded fixtures. Prior to the issuance of a Land Use Permit, a Lighting Plan shall be prepared by PXP and reviewed and approved by P&D to ensure that all feasible measures are taken, including but not limited to reducing wattage, reducing the number and height of light standards, installation of motion detection sensors on light standards to minimize obtrusive night lighting and glow from the facilities provided that the reduction in night lighting and glow from the facility shall not sacrifice the safety of the operating personnel and plant operations. PXP shall submit an updated Lighting Plan to P&D for review and approval prior to approval of the zoning clearance for the Tranquillon Ridge project. This updated Plan shall evaluate facility lighting placement and design, in addition to other measures identified in this condition, and shall identify all opportunities to reduce lighting at the LOGP, consistent with safe operations of the plant.

PXP shall implement lighting reduction measures as directed by P&D prior to commencement of drilling for the Tranquillon Ridge project. *(Modified April 21, 2008)*

L-3 GLARE OR OTHER RADIATION

No glare or other radiation resulting from facilities, other than lighting fixtures or gas flares, constructed pursuant to this Development Plan shall be detectable at any point along or outside the exterior boundaries of the Lompoc ~~HS&P Facility~~Oil and Gas Plant site.

L-4 PAINTING ~~OF FACILITIES AND PIPELINE~~PLANS

Prior to the operation of any facilities, all existing and proposed oil and gas facilities at the project sites visible from Harris Grade Road and 246, and all exposed portions of the pipeline shall be painted to harmonize with the surrounding area. All equipment visible from public areas shall be painted in colors that are compatible with the surroundings. PXP shall submit a painting plan and schedule for the LOGP to P&D for review and approval prior to approval of the zoning clearance for the Tranquillon Ridge project. Future painting plans for new facilities shall be submitted to P&D for review and approval prior to approval of the zoning clearance for the new facility construction/installation. *(Modified April 21, 2008)*

L-5 ODORS, FUMES, GASES, LIQUIDS OR VISIBLE EMISSIONS

PXP will ensure that all normal facility operations will be conducted in such a manner so as not to generate offensive odors, fumes, noxious gases or liquids or visible emissions of smoke.

L-6 PLAN FOR REMOVAL OF PAVEMENT AT SURF

PXP shall submit plans for removal of existing pavement on the east side of the electrical substation at Surf to both Planning and Development and Vandenberg Air Force Base (VAFB) for review. Pending VAFB approval, PXP shall restore the paved area to its natural state.

L-7 USE OF GRAVEL AND MINIMUM PAD SIZES

PXP agrees to use darkly colored grey-brown gravel as a ground covering at all ten existing valve station sites and any sites approved in the future, and will reduce the size of the actual pads to the minimum requirement necessary to house equipment. *(Modified November 8, 2000)*

L-8 FACILITY SCREENING

Open storage of equipment and materials shall be screened from public view. No above-surface structures, except necessary pipeline markers and valves, shall be visible along the pipeline route after the completion of pipeline construction. Facility signs shall not detract from scenic areas or views from public roads to the extent feasible.

PXP shall submit visual impact mitigation plans for the Surf Substation and for the LOGP that provide for better screening of the facilities. The plans shall address measures to reduce the visibility of the facilities, including, but not limited to, painting of equipment and substation substructures and re-landscaping. The plans shall be consistent with the requirements of FDP Conditions H-1 and H-5 for restoration and revegetation of the sites and with the LOGP painting plan required by FDP Condition L-4. The plans shall be

submitted to P&D for review and approval prior to approval of the zoning clearance for the Tranquillon Ridge project. *(Modified April 21, 2008)*

(There is no Condition L-9)

L-10 CONSOLIDATION OF ELECTRICAL LINES

Prior to Final Development Plan approval, PXP shall demonstrate to the County that the proposed 70 KV electrical transmission line, existing electrical distribution lines, and other utility lines (e.g. telephone cables) are consolidated on common poles between Surf and the PG&E electrical substation in the City of Lompoc.

L-11 HEIGHT OF ELECTRICAL POWER POLES

New electrical power poles at the Lompoc ~~HS&P Facility~~Oil and Gas Plant shall be no higher than 45 feet above ground surface. Height measurements shall be included on all plans to be submitted to Planning & Development prior to land use clearance.

M. COMMERCIAL FISHING

M-~~10~~ COASTAL DEVELOPMENT PERMIT CONDITIONS

If the California Coastal Commission does not impose conditions determined by County to be substantially equivalent to those specified in M-2 through M-9 when issuing their Coastal Development Permit for this project, such conditions may be imposed by County pursuant to permit condition B-3.

M-1 JOINT OIL/FISHERIES COMMITTEE

PXP shall participate in and provide reasonable financial support for the Joint Oil/Fisheries Committee and Joint Oil/Fisheries Liaison Office (JO/FLO) formed to improve communications between the industries, notify fishermen of oil-related activities (including changes to the project or activity schedule that could affect fishermen, seismic surveys, and tanker traffic changes), facilitate filing of damage claims by fishermen, and resolve potential conflicts between the industries until such time as the Point Pedernales/Tranquillon Ridge project is fully abandoned and the site restored. PXP shall share in the costs of establishing and maintaining the JO/FLO to the extent other entities are required to participate in the funding. If no other entities contribute to the funding of the JO/FLO, PXP shall be responsible for the full costs. PXP shall demonstrate compliance with this condition by reporting its payments annually to P&D. *(Added April 21, 2008)*

M-2 NOTICE OF CONSTRUCTION ACTIVITIES

Not less than 30 days before commencing any significant offshore construction, repair, maintenance, testing or inspection activities (including seismic testing or exploratory drilling), PXP shall give notice thereof to those commercial fishermen operating in Santa Barbara County waters with commercial licenses from the California Department of Fish and Game. Such notice shall be given by PXP via the Oil/Fisheries Liaison Office in the following manner:

a) by posting at the Harbor Master's offices at Santa Barbara, Ventura, Avila, and Morro Bay;
b) by daily announcement until construction is completed over VHF marine radio; and
c) by U.S. mail to all such licensed commercial fishermen who have made a written request for such notification.

Forty five (45) days prior to construction of any offshore components, PXP shall demonstrate to P&D plans for compliance with this condition." *(Modified November 8, 2000)*

M-3 LOCAL FISHERMEN'S CONTINGENCY FUND

PXP shall cooperate with other oil companies, the fishing industry, and the Coastal Commission to develop a Local Fishermen's Contingency Fund administered through the existing Fisheries/Oil Liaison Office or other appropriate office. This fund shall be set up as a loan program to provide speedy equipment replacement for commercial fishermen in order to minimize economic loss while awaiting payment on Federal Fishermen's Contingency Fund claims and for those claims by fishermen for damage attributable to the Point Pedernales/Tranquillon Ridge project which are not covered under the federal program. The fund shall be a revolving industry-supported contingency fund and shall operate to loan or reimburse fishermen for lost/damaged gear within 15 working days of submission of reasonable claims. PXP shall use the guidelines established through the Joint Oil/Fisheries Committee to resolve disputes over damage to commercial fishing gear resulting from support vessel traffic to and from Platform Irene. The JO/FLO shall facilitate dispute resolution as necessary. Said program shall be operational prior to offshore construction activities and shall continue through the life of the project or until the utility of the program is no longer deemed valid by the County. *(Modified April 21, 2008)*

M-4 POST-CONSTRUCTION SURVEY OF OCEAN BOTTOM

Disturbance to the ocean bottom from pipeline installation shall be minimized so as not to alter trawling activity. PXP shall conduct a post-construction survey for both pipeline and platform for location of construction debris, ocean bottom alterations, and pipeline surface protrusions. Structural plans and sonar survey results will be submitted to Planning and Development (P&D) for approval prior to operation. The results of the survey will be used to ensure that disturbances that could inhibit trawling are corrected. Any project-related scarring of the ocean bottom identified in the post-construction report shall be remediated to the satisfaction of P&D, and all debris shall be removed. *(Modified November 8, 2000)*

M-5 FISHERIES TRAINING PROGRAM

PXP shall require all oil- and gas-related support boat operators to participate in an agency-approved Fisheries Training Program, such as that required by the Minerals Management Service.

M-7 CONTRIBUTION TO FISHERIES ENHANCEMENT FUND

Annual payments to a Fisheries Enhancement Fund, the purpose of which is to mitigate identified financial impacts on the commercial fishing industry by oil development activities, shall be made by PXP based on the PXP and Exxon impacts defined in the EIS/EIR (84-EIR-7). For offshore construction of the platforms and pipelines, PXP's permit fees shall be $5,000. During production, PXP's permit fees shall be $3,250 (base amount to

be adjusted annually per the Consumer Price Index) annually for the life of the project. Prior to using PXP's facilities, Exxon shall contribute $100,000 to offset construction related impacts to the fishing industry caused by Project Shamrock. Exxon shall be required to contribute $3,250 annually for the life of the project, once production begins. Collection or recovery of fees from any other user of the Lompoc ~~HS&P Facility~~Oil and Gas Plant shall be the responsibility of PXP.

The Fund shall provide for capital and operating expenditures for enhancing the fishing industry's ability to catch, land and process commercially valuable fish stocks. Proposals for the use of the Fund will be accepted and evaluated by Planning and Development, through PXP on the basis of their ability to mitigate or offset the impacts, and approved by the Board of Supervisors. Subject to the funding limitations expressed above, such expenditures shall include, but are not limited to, fisheries enhancement, pier, dock and harbor improvements, providing seafood hoisting equipment and promoting marketing of local fish resources.

M-8 COOPERATION WITH SANTA BARBARA CHANNEL/SANTA MARIA BASIN VESSEL TRAFFIC CORRIDOR PROGRAM

~~If PXP should use any other support base other than that presently proposed,~~ PXP shall cooperate with the Santa Barbara Channel/Santa Maria Basin Offshore Oil Service Vessel Traffic Corridor program as set forth by the Joint Oil/Fisheries Committee ~~of oil industries and commercial fisheries representatives~~ and monitored by the Joint Oil/Fisheries Liaison Office. The corridors shall be reduced to 50 feet in width through historical kelp bed resource areas as identified in the EIS/EIR (84-EIR-7). PXP shall require that support vessels from Port Hueneme use the U.S. Coast Guard's recommended marine traffic corridors to the maximum extent feasible. Any vessel maneuvers that must be made in accordance with the requirements of FDP Condition G-2 shall not constitute violations of this condition. Prior to approval of the zoning clearance for the Tranquillon Ridge project, PXP shall submit a plan for implementing this requirement to P&D for review and approval. *(Modified April 21, 2008)*

M-9 MOORING OF SUPPORT VESSELS

All support vessels, when moored, shall be moored according to a plan developed by PXP that would minimize disturbance to commercial fishing activities and hard bottom habitats while maintaining safety standards.

N. RECREATION

N-1 CONTRIBUTION TO COASTAL RESOURCE ENHANCEMENT FUND

PXP shall contribute to the Coastal Resource Enhancement Fund (CREF), developed by the County and designed to be used for enhancement of coastal recreation, aesthetics, tourism and/or environmentally sensitive resources. Guidelines for determining applicant fees are now being established as part of the County Oil and Gas Policy Analysis and should be in place prior to facility startup. Once a specific fee is determined, based on project-specific impacts, PXP will be required to make annual fee payments of said amount. PXP's contribution to the fund shall not exceed $325,000 annually for the life of the project. County will consider other applicant contributions and mitigations in developing appropriate pro-rata contributions. Proposals for the use of this Fund will be solicited, accepted and evaluated by Planning and Development and approved by the County Board of Supervisors in noticed public hearings.

O. TRANSPORTATION

O-1 PROGRAMS TO MINIMIZE TRAFFIC-RELATED IMPACTS

Prior to the approval of the Final Development Plan, two worker transportation programs designed to minimize traffic-related impacts shall be approved by Planning and Development and the Department of Public Works, Roads Division. Both programs must consider both PXP employees and contractors.

a) Construction Plan: Plan shall identify on- and off-site parking areas, access routes, shuttle program to reduce number of working vehicles on and along onshore pipeline construction corridor, measures to avoid traffic conflicts with local residents and VAFB personnel using affected roads, number of vehicles accessing the Lompoc ~~HS&P Facility~~Oil and Gas Plant site and incentives for ride-pooling/van-pooling to the site. Construction worker traffic and parking shall not interfere with normal and reasonable uses of private property, military or recreational areas. The Construction Traffic Mitigation Plan shall be submitted by PXP and approved by County in consultation with affected property owners prior to initiation of onshore construction.

b) Production/Operation Plan: Plan shall identify relationship between onsite parking availability and carpool/vanpool program; shift change parking requirements; need and use of off-site parking areas, and the scheduling of routine truck traffic to avoid peak hours of traffic at the Lompoc ~~HS&P Facility~~Oil and Gas Plant.

O-2 OFFSITE ROAD FEE

Under the existing County program, an offsite road fee will be required for peak hour trips generated by permanent workers associated with the PXP project. This fee shall be based on the projected peak hour trips estimated in the EIS/EIR (84-EIR-7) of 28, multiplied by the fee developed for the Lompoc area for the PXP project of $300, and 23 peak-hour trips multiplied by the fee developed for the Goleta area of $1,100 for the Exxon project. The amount of payment shall be reviewed and approved by the County Department of Public Works, Roads Division three months after approval of the Final Development Plan to reflect any credits associated with improvements to area roads as identified in the conditions of approval and when more information is available on plans for van-pooling. Said payment will be deposited by the Road Division of the Public Works Department into the Road Improvement Trust Fund. Said payment shall be used for traffic related road improvements in the impacted areas specified in the EIS/EIR (84-EIR-7). Funds directed to improvements in the specified area shall be used to offset and/or reimburse any County expenses to accomplish both engineering and construction of the improvements.

If said payment has not been made within one year of approval of the Final Development Plan, the amount of said payment shall be adjusted by the amount equal to the change in the construction cost index for the preceding year, or increased to the then current fee adopted by the Board of Supervisors, whichever is less.

O-3 SCREENING OF PARKING AREAS

Any new permanent parking areas shall be screened from public view pursuant to the landscape plan approved by the Board of Architectural Review. Any parking areas

developed for use during construction shall be screened from public view to the maximum extent feasible.

O-4 COMPLIANCE WITH PARKING REQUIREMENTS

Prior to approval of the Final Development Plan, PXP shall demonstrate compliance with the provisions of the parking requirements of Division 6, "Parking Regulations," of Article III Zoning Ordinance.

O-5 INSTALLATION OF WARNING SIGNS

During the construction period of the Lompoc ~~HS&P Facility~~Oil and Gas Plant, PXP shall install warning signs, to be used to warn approaching motorists of truck traffic where the site access road meets Harris Grade Road. All plans and procedures for designing and/or installing warning signs must be approved by Caltrans and the Department of Public Works, with notification of such approval submitted to Planning and Development prior to construction at the site.

O-6 PLANS AND PROCEDURES FOR PIPELINE ROAD CROSSINGS

The final engineering plans and procedures for all pipeline crossings of County roads must be approved as part of the Final Development Plan by the Department of Public Works. Notification of such approval must be submitted to Planning and Development prior to construction at the site.

O-7 MITIGATION PLAN FOR IMPACTS TO COUNTY ROADS

Prior to the Final Development Plan, PXP must submit to the Department of Public Works for approval a plan to mitigate impacts to all County roads which will be used during construction. This plan will include the type of vehicles and machinery which will traverse the roads, the frequency of road use for each piece of equipment and vehicle, and the gross vehicle weights loaded and unloaded. This includes the above information for trucks carrying pipe, fuel, construction supplies, or construction crews through the County to the construction spreads. This plan shall include an agreement with the County to repair any obvious damage to the satisfaction of the Public Works Director and any reasonable fees associated with eventual reconstruction caused by project related damages of the public roads. Prior to drafting this agreement, County shall coordinate with PXP in compiling a list of County roads which will be used for construction of the pipeline. PXP shall demonstrate property owner approval of private road maintenance plans or terms to the Planning and Development and Public Works Departments prior to approval of the Final Development Plan.

Prior to construction of the gas processing facility, PXP shall submit to Public Works, Roads Division for review and approval all engineering and construction drawings for the deceleration lane on Purisima Road. Prior to operation of the gas plant, the Purisima Road deceleration lane shall be engineered and constructed by PXP to the satisfaction of Public Works.

Prior to construction, PXP shall also coordinate with Public Works to install a deceleration lane on Harris Grade Road at the ~~HS&P Facility~~Oil and Gas Plant entrance. Prior to operation of the gas plant, PXP shall either design and construct or contribute funding to include the Harris Grade Road deceleration lane addition into the County Harris Grade Road widening project, currently being designed by Roads Division. Public Works shall complete

an additional evaluation of Harris Grade Road south of Burton Mesa Boulevard and make a recommendation regarding the necessity for additional shoulder improvements. PXP shall either design and construct or contribute funding to implement recommendations by Public Works. *(Modified July 10, 1996)*

O-8 CONSTRUCTION EQUIPMENT PARKING

For the Lompoc Oil and Gas Plant ~~HS&P~~ construction activities, construction equipment parking shall be restricted to the immediate vicinity of the ~~HS&P Facility~~Oil and Gas Plant site. This area shall be identified on the construction drawings. *(Modified July 10, 1996)*

O-9 IMPROVEMENT OF INGRESS/EGRESS AT LOGP

Working with a Planning and Development-approved biologist, PXP shall trim the height of existing vegetation 200 feet south of the entrance to the Lompoc Oil and Gas Plant prior to construction to improve sight distance for ingress and egress of construction equipment and workers. PXP shall evaluate sight distance annually to determine the need to trim vegetation or implement alternative traffic safety measures. Any trimming of vegetation shall be conducted under the direction of a P&D-approved biologist. *(Modified November 8, 2000)*

O-10 LIMITATIONS ON TRUCK TRIPS

Truck trips associated with hauling of excess site soils shall occur on pre-approved haul routes outside of peak traffic periods, and shall be limited to between 8:30 a.m. and 4:00 p.m.

During operation, PXP's gas plant shall be limited to a maximum of 75 truck trips per month. This limitation shall apply to all trucks servicing the gas plant, including NGL/LPG, sulfur cake, and amine solution transportation. PXP shall submit monthly reports on the number and type of truck trips to P&D. *(Modified July 10, 1996)*

P. SYSTEMS SAFETY AND RELIABILITY

P-1 SYSTEM SAFETY AND RELIABILITY REVIEW COMMITTEE

PXP shall submit all project-related onshore facility and pipeline construction and process diagrams and operating procedures, Process and Hazard Analysis acceptable to the Systems Safety and Reliability Review Committee (SSRRC). This committee may employ a third-party technical review in order to help identify and correct possible design hazards and to ensure mitigation of potential public risk prior to construction and subsequent design modification. This review shall also evaluate all mitigations identified in the project's permit applications and environmental review documents, as described on page 1 of the project's FDP conditions of approval. The SSRRC consists of representatives from Planning & Development, Building & Safety and Energy Divisions, the APCD, the County Fire Department Protection Services Division, Hazardous Materials Unit, and Office of Emergency Services. Other County departments are also expected to be represented for specific issues as needed. Design recommendations resulting from this review shall be incorporated into PXP's plans prior to construction or other appropriate time as determined by the SSRRC. Recommendations concerning operating procedures shall be adopted for the affected onshore facilities prior to operation. Recommendations identified for the proposed facilities shall be implemented prior to operations. All reasonable costs associated with any

review shall be borne by PXP. PXP shall be entitled to participate fully in the review process. The SSRRC may require as-built inspections or the submittal of as-built drawings for approval prior to the operation of any plant modifications. Any failure by PXP to comply with any requirement listed in this condition shall be subject to a Stop Work Order and shall constitute a violation of this permit. *(Modified November 8, 2000)*

P-2 SAFETY INSPECTION, MAINTENANCE AND QUALITY ASSURANCE PROGRAM

Prior to the issuance of Land Use Permits, PXP shall submit a detailed Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP) for all onshore and offshore (within 3 miles of shore) facilities and pipelines and which shall be implemented during construction and operations. The plan is a dynamic document and, as such, updates including the relevant recommendations and mitigations of the project's various environmental review documents and approved modifications (84-EIR-7, 92-EIR-13, the gas reinjection application and SEIR Addendum dated April 26, 1995, the PXP gas plant application and Addendum dated July 1, 1996, ~~and~~ the PXP off- to onshore natural gas pipeline hydrogen sulfide concentration increase application and Addendum dated February 8, 1999, and the Tranquillon Ridge Final EIR, 06EIR-00005), new procedures, safety and maintenance technologies and processes shall be reviewed jointly by PXP and the County through the Operations EQAP (Condition C-1) and the SIMQAP shall be revised as appropriate.

The Program shall include, but not be limited to, establishing procedures for review of safety inspection records, regular maintenance and safety inspections, periodic safety audits, development of safety system testing protocols, training and experience standards for personnel and use of simulators in training programs, inspections of all trucks carrying hazardous and/or flammable material prior to loading, monitoring of critical safety devices and systems, and risk analysis review of the routing of all trucks carrying hazardous material. The Program shall include provisions for inspection of the oil emulsion pipeline on a regular basis and at least annually, as determined by the County and other appropriate regulatory agencies through the life of the project. Inspections shall use the Best Available Technology (BAT) to identify any deteriorating or inadequate welds and corrosion. The Program shall also include inspections for unsupported spans at least every two years. Where identified structural anomalies or unsupported spans that compromise the integrity of the pipeline as determined by the County and/or other appropriate regulatory agency, flow through the pipeline shall cease until repairs can be effected to restore pipeline integrity. The Program also shall include provisions to shut down the pipeline if the control system detects an upset condition. Following an unintended shutdown, the pipeline shall not be restarted until the appropriate steps have been completed pursuant to Appendix A, *Response Procedure for Unintended Shutdown of Platform Irene and the 20" Oil Emulsion Pipeline*, of PXP's June 2005 Operating Manual for Platform Irene to LOGP Pipeline System. The Program shall be reviewed and approved by the System Safety and Reliability Review Committee and/or its consultants prior to start up. PXP shall implement the approved plan and shall provide for involvement of the Onsite Environmental Coordinator (Condition C-1), County staff or its consultants involvement in all inspections. All costs associated with this review process shall be borne by PXP.

Prior to operation of the sales gas pipeline, PXP shall hydrotest the pipeline from the ~~HS&P~~LOGP to the Righetti Valve Box. Prior to operation of the gas plant, PXP shall smart-pig the sales gas pipeline from the ~~HS&P~~LOGP to Righetti Valve Box. Smart pig results shall be submitted to the SSRRC for review. Sections of the pipeline showing defects or evidence of corrosion shall be replaced or repaired as determined by SSRRC. In

the event a smart-pig cannot be run in the sales gas pipeline, the SSRRC, in consultation with PXP, shall determine a technically feasible alternative. *(Modified March 1, 1999)*

Prior to approval of the zoning clearance for the Tranquillon Ridge project, the SIMQAP shall be revised to incorporate, among any other necessary updates, the upgraded leak detection system required in FDP Condition P-16 and other specific components described above. *(Modified April 21, 2008)*

P-3 FACILITY EMERGENCY RESPONSE PLANS

Prior to the issuance of Land Use Permits, for the Lompoc Oil and Gas Plant (LOGP) and pipelines, PXP shall submit an Emergency Response Plan (ERP) for each of these facilities. The intent of this plan is to detail response procedures to be implemented by PXP for accidental events that pose potential significant threats to life, property, and the environment. This plan shall be based on a comprehensive risk analysis. The plan shall be reviewed and approved by the Office of Emergency Services (OES), the Fire Department, and Planning and Development (P&D) prior to startup. OES shall consult with County Fire Department, Protection Services Division prior to OES approval of the Emergency Response Plans.

Emergency Response Plan documents are dynamic and, as such, it shall be reviewed jointly by PXP and the County and revised, as appropriate, to incorporate the relevant recommendations of the project's various environmental review documents and approved modifications (as described in the project description on page 1 of the FDP conditions of approval), new planning strategies or changes in procedures, new technologies, and the acquisition and implementation of more effective feasible recovery and containment equipment as it becomes available. PXP shall demonstrate the effectiveness of the Emergency Response Plan by responding to surprise drills which may be called by the County on the property or along the pipeline route or along product transportation routes. If critical operations are underway, PXP need not respond but shall explain the nature of the critical operations and why response is not possible. PXP shall implement reasonable changes as required by the County's ERP-reviewing agencies (Office of Emergency Services, County Fire Department, and P&D) after review of PXP's drill performance. *(Modified November 8, 2000)*

PXP shall submit an updated ERP to P&D, OES, and the Fire Department for review and approval prior to approval of the zoning clearance for the Tranquillon Ridge project. This update shall address equipment and operational modifications due to implementation of the Tranquillon Ridge project, as well as any other necessary or timely revisions. *(Modified April 21, 2008)*

P-4 COUNTY EMERGENCY RESPONSE PLAN

Prior to approval of the Final Development Plan, PXP shall enter into an agreement, acceptable to County Counsel, to provide its reasonable pro-rata share of funds to the County (administered by the Emergency Service Coordinator) in order to develop and implement a feasible County Emergency Response Plan for oil and gas industry related emergencies. Said plan shall be developed to assure that County emergency response procedures adequately interface with the PXP emergency response procedures. As appropriate, the County shall request funds from other oil and gas industry operators to aid in funding of the County Emergency Response Plan.

P-5 HAZARDOUS MATERIAL AND WASTE MANAGEMENT PLAN

Prior to start-up of facilities approved in 91-DP-17 and any subsequent modifications or additions to facilities within the meaning of Condition A-11, PXP shall submit a Hazardous Material and Waste Management Plan to the County Fire Department, Protection Services Division and Planning and Development for all facilities modified under this action. The Plan shall be reviewed and approved by the Fire Department, Protection Services Division and Planning and Development, prior to start up.

The Plan shall demonstrate compliance with the provisions of the Uniform Fire Code as adopted in Chapter 15 of the Code of Santa Barbara County and the provisions of the Health and Safety Code §25500 et seq, Chapter 6.95 Business Plan Requirements, with the exception of emergency response procedures which are complied with in Condition P-3. The Hazardous Material and Waste Management Plan shall include but not be limited to the following:

a) The requirements of a hazardous materials management plan as identified by the County Environmental Health Services condition letter of June 7, 1985.
b) Locations and methods for storing hazardous materials and wastes.
c) Treatment procedures, or justification where none are used, to reduce the hazardous nature of the materials before they are permitted to leave the site.
d) Specific routes for transportation of hazardous waste materials to Class I disposal sites consistent with County policy.
e) Letter of commitment that the materials are transferred by a carrier licensed in hazardous material transport.
f) Letter of commitment ensuring complete accounting of intake, processing, and exit of hazardous material and wastes.
g) Detailed description of a monitoring system to be installed, capable of detecting hazardous material and wastes that may escape from primary storage devices.

(Modified November 8, 2000)

P-6 CRUDE OIL SAMPLES FOR IDENTIFICATION

Within 60 days of Tranquillon Ridge operation, PXP shall provide to the County Petroleum Office separate representative samples of the Point Pedernales crude oil, the Tranquillon Ridge crude oil, and the commingled emulsion for use in source identification of any accidental oil spill. Updated samples shall be submitted biannually or as needed to reflect current oil characteristics. PXP agrees to reimburse County for its share of the cost of samples analysis.

P-7 APPROVED SITE SECURITY PLAN

Prior to approval of the Final Development Plan, PXP shall submit to the Santa Barbara County Sheriff's Department for review and approval a site security plan. The plan shall describe procedures to be implemented by PXP which will minimize intentional damage to onshore and offshore facilities which may result in environmental damage or public safety hazards. The plan shall be reviewed and revised as appropriate every five years or when warranted to require incorporation of new planning strategies, new technologies or changes in plant operation, and changes in notification procedures. *(Modified January 8, 1992)*

P-8 COUNTY FIRE DEPARTMENT MITIGATION FUND

Prior to approval of the Final Development Plan, PXP shall enter into an agreement with the County Fire Department to establish a funding mechanism to mitigate and bring up to operational standards Firefighter Service capability (staffing level) of Lompoc Fire Station #51. The property tax contribution of the Program Participants to the Santa Barbara Fire Protection District from this project, as well as additional funding, should it become available, shall be credited to the Santa Barbara County Fire Department/District.~~fund annually, through provisions of Condition J-8.~~ Implementation of this mitigation measure shall be prior to operation of the Lompoc ~~HS&P Facility~~Oil and Gas Plant. *(Modified April 21, 2008)*

P-9 INSTALLATION OF FIRE PROTECTION FEATURES

All facilities shall have fire protection features installed in accordance with the provisions of the Fire Protection Plan (Condition P-10). All facilities, construction activities, process equipment, and fire protection equipment shall comply with the standards of the National Fire Protection Association, American Petroleum Institute, Uniform Fire Code and the Santa Barbara County Fire Department. Construction of new facilities and/or modification of existing facilities must meet these current fire protection standards.

In the event of a conflict between these standards, the Fire Marshal in consultation with PXP shall make a cost benefit decision regarding which standards shall apply. *(Modified November 8, 2000)*

P-10 FIRE PROTECTION PLAN

Prior to the issuance of the Land Use Permit, PXP shall submit and obtain approval from the County Fire Department for a Fire Protection Plan for the Lompoc ~~HS&P Facility~~Oil and Gas Plant. The Fire Protection Plan shall address, but not be limited to the following criteria as they apply to the project:

Introduction
Project Description
Process Description
Identification of Plan Design Team
Fire Risk Analysis and Fire Hazard Assessment
Fire Protection Concepts
Training
Fire Prevention and Inspection Program
Fire Protection and System Maintenance Program
Ignition Control
Flammable Vegetation Management Plan
Access Roadway, both internal and external to facilities
Water Supply
Fire Pumps
Pump House
Fire Flow
Water Mains
Water System Valving
Fire Hydrants
Monitors

Hose Reels
Water Spray Systems
Loading Areas
NGL and LPG Loading Areas
Sulfur Loading Area
Methanol Tank and Loading
Waste Water Retention Tank
Protection for Main Office Structures
Construction
Control Rooms
Flame, Gas and Smoke Detection and Monitoring
Dike, Drainage and Sewer Systems
Drainage
Protection for Piping
Mobile Fire Equipment
Fire Extinguishers
Notification of Fire Department of Fire and other Emergencies
Emergency Shut Down and Isolation Features and SCADA systems
Product Identification
Relief Valves and Flare Identification
Identification of Piping, Tanks and Vessels
Naming of Streets and Access Roadways
Compressor Protection
Boiler Protection

PXP shall submit an updated Fire Protection Plan to the Fire Department and for review and approval and shall provide a copy of the updated and approved Fire Protection Plan to P&D prior to approval of the zoning clearance for the Tranquillon Ridge project. This update shall address equipment and operational modifications related to the Tranquillon Ridge project, an updated Flammable Vegetation Management Plan and Fire Prevention and Inspection Program to minimize possibility of a brush fire, and any other necessary or timely revisions. PXP shall update the Fire Protection Plan as necessary to incorporate the modifications at Valve Site #2, including new power lines and substation, approved as part of the Tranquillon Ridge project prior to approval of the zoning clearance for these modifications. (*Modified April 21, 2008*)

(There is no Condition P-11)

P-12 VESSEL/PLATFORM COLLISION

Prior to Final Development Plan approval, PXP shall file with Planning and Development, for informational purposes only, Coast Guard approved plans, when such plans are required, to ensure that the risks of a vessel/platform collision are minimized.

P-13 OIL SPILL CONTINGENCY PLAN (OIL SPILL RESPONSE PLAN - OSRP)

Prior to Final Development Plan approval, PXP shall submit an Oil Spill Contingency Plan (renamed Oil Spill Response Plan) detailing cleanup procedures and restoration procedures to be employed in the event of a spill. This plan shall be reviewed and approved by Planning and Development, Fire Department, and the Office of Emergency Services prior to startup. Procedures and techniques shall be selected to augment the Emergency Response Plan, and are in addition to federal and state requirements for Spill Prevention, Control, and

Countermeasure or Oil Spill Contingency Plans. PXP shall demonstrate spill response capability and familiarity with sensitive terrestrial biological resources by responding to not more than two surprise oil spill drills each year which may be called on the property or along the pipeline route. Bird and wildlife rehabilitation centers within the area shall be included in at least one drill (planned or surprise) each year. If such center is not available in the area prior to operation of the Tranquillon Ridge project, PXP shall contribute a pro-rata share of funds necessary to cover the costs of establishing and operating a bird and wildlife rehabilitation center. The intent of the Oil Spill Contingency Plan is to detail spill site restoration subsequent to emergency response on the property, or along the pipeline route. In addition, the Oil Spill Contingency Plan shall incorporate the portions of the plan mentioned in previous sections. The plan is a dynamic document and, as such, it shall be reviewed jointly by PXP and the County and revised as appropriate to incorporate new planning strategies or changes in procedures, new technologies, and the acquisition and implementation of more effective feasible recovery and containment equipment as it becomes available. *(Modified January 8, 1992 and April 21, 2008)*

PXP shall update its Oil Spill Response Plan (OSRP) to specifically address the increased volumes of oil that could be spilled to the ocean and in sensitive habitats, including rivers and streams, due to the increased amount of oil being produced at the platform and transported to the LOGP for the Tranquillon Ridge project. In addition, the updated OSRP shall address the following:

1. Detailed spill response strategies/techniques to reduce the likelihood and/or severity of a spill reaching sea otters and pinniped colonies (e.g., staging of containment equipment near colonies for rapid deployment; detailed protocols for handling and rehabilitation of oiled otters and pinnipeds, and identification of site-specific methods to avoid disturbing known pinniped colonies during clean-up activities);

2. Detailed spill response strategies/techniques and site-specific measures to reduce the likelihood and/or severity of a spill along watercourses and at other sensitive onshore habitats and to incorporate other biological resource protection requirements of FDP Conditions H-0 and H-9;

3. Identification and evaluation of low-impact clean-up procedures, as discussed in Condition H-9.

4. Provisions for restoration to pre-spill conditions in the event soil excavation is needed to expose buried pipeline or to clean-up a spill within a stream bed.

5. Maintenance of and annual (or more frequent) inspection of spill containment and clean-up equipment to ensure equipment is at full readiness at all times;

6. Re-evaluation of Corexit 9527 as a potential dispersant;

7. Updated training requirements for oil spill response personnel to specifically include training on the updated response techniques (including non-clean-up options), protocols, and equipment and annual refresher trainings, and at least one drill per year;

8. The upgraded leak detection system required for the Tranquillon Ridge project pursuant to FDP Condition P-16;

9. The cultural resource protection provisions required in FDP Condition I-9;

10. Identification of bird and wildlife rehabilitation centers in area; or, if none exist, plans for establishing and contributing to a fund to provide for such center.

This updated OSRP shall be submitted to P&D for review and approval prior to the introduction of Tranquillon Ridge oil or gas production into the pipeline system between Platform Irene and the LOGP.
(Modified April 21, 2008)

(There is no Condition P-14)

P-15 SOUR ~~PRODUCED~~ GAS PIPELINE

If produced gas becomes sour, PXP shall assign priority attention to the hazards associated with the production and transport of hydrogen sulfide gas through the implementation of programs described in Conditions P-1, P-2, and P-3. To the extent appropriate, State regulations dealing with the handling of this gas and other hazardous substances shall be included as conditions of this permit.

Operation of the sour gas pipeline shall not exceed 600 pounds per square inch and 8,000 parts per million hydrogen sulfide throughout the life of the project. As part of any application to increase the pipeline operating pressure and/or hydrogen sulfide concentration, the operator shall conduct a risk assessment to demonstrate to the County's satisfaction that such increase would not create an increased public risk associated with the sour gas pipeline. If such demonstration cannot be made, the proposed increase in operating pressure/concentration shall not be approved or implemented.

Should Cabrillo High School choose to expand its facilities, PXP shall take appropriate measures, approved by the System Safety and Reliability Review Committee, to ensure that any risk to the expansion from the sour gas pipeline remains at a level of insignificance. Such measures may include, among other things, relocation of the pipeline or lowering its operating pressure. Relocation of the pipeline or other physical modifications will require appropriate permit approval.

P-16 ~~SUPERVISORY CONTROL AND DATA ACQUISITION SYSTEM~~PIPELINE LEAK DETECTION

PXP shall design the project such that the entire project will integrate the supervisory control and data acquisition (SCADA) or other monitoring system for all the components of this project in a manner so as to provide timely and efficient detection, shutdown, notification and response to an emergency involving any of the project components. In addition, a telephone *Hotline* shall be provided between each component. All components, and their operators, shall be linked together by radio for purposes of emergency response. Gas pipelines shall have adequate safety measures to provide rapid detection of small or large leaks, and undelayed shutdown. Any break, rupture, and/or damage to the pipeline shall result in the orderly shutdown of the pumping operations, and will activate shut off valves in a manner which will minimize environmental damage.

Prior to approval of the zoning clearance for the Tranquillon Ridge project, PXP shall submit plans to P&D for review and approval for installation of an upgraded, state-of-the-art leak detection system on the existing oil emulsion pipeline. The upgraded system shall use the Best Available Technology (BAT) for detection of small leaks in the pipeline. PXP shall provide the County's Systems Safety and Reliability Review Committee (SSRRC)

with an engineering evaluation of the technologies that have been used in applications similar to the Tranquillon Ridge project and the demonstrated effectiveness and reliability of the systems selected by PXP. The SSRRC shall review and approve the leak detection technologies prior to their installation. PXP shall validate the detection capabilities of the leak detection systems through testing with SSRRC oversight during operation of the Tranquillon Ridge project and report on the testing to the SSRRC. The upgraded leak detection system shall be in place and operational prior to the introduction of Tranquillon Ridge oil into the pipeline system between Platform Irene and the LOGP. *(Modified April 21, 2008)*

P-17 BEST AVAILABLE AND SAFEST TECHNOLOGY SAFETY AUDITS

The Lompoc ~~HS&P Facility~~Oil and Gas Plant shall be subject to 5-year safety audits conducted by the Systems Safety and Reliability Review Committee and/or an approved third party consultant for the purpose of incorporating changes in procedures and/or equipment to implement Best Available and Safest Technology (BAST) standards at the facility. All reasonable costs for the review shall be the responsibility of PXP.

P-18 AS-BUILT PIPELINE ROUTE MAPS

Upon completion of pipeline construction, PXP shall provide all jurisdictional agencies (Santa Barbara County Fire, Planning and Development, United States Fish and Wildlife Service, Department of Fish and Game, VAFB) with at least two copies of maps showing the finished pipeline routes and shall include locations accessible by fire department emergency response vehicles. Said maps shall be 7 1/2 minute quadrangle scale (one inch equals 24,000 inches) and shall represent topographical features.

P-19 REVIEW OF PROCESS ALARM AND EMERGENCY SHUTDOWN SYSTEMS

Prior to the issuance of a Land Use Permit, PXP shall provide to the System Safety and Reliability and Review Committee a comprehensive explanation of all existing and new process alarm systems and emergency shutdown systems within the Lompoc Oil and Gas Plant. The Systems Safety and Reliability Review Committee (SSRRC), which may employ a third-party technical consultant, shall regularly review both existing and new process alarm systems and emergency shutdown systems, as warranted. The systems review may take place during the SSRRC's annual facility audit of the LOGP or at other times, as appropriate. The review shall evaluate the adequacy of the complete system in providing warning of impending dangerous conditions and in shutting down processes in emergency situations, and PXP's response to the systems' activation.

The recommendations of the SSRRC shall be implemented by PXP prior to processing gas products from the Point Pedernales Project, and start-up of new and modified facilities as a result of approval of this project. All reasonable costs associated with any review shall be borne by PXP who shall be entitled to participate fully in the review process. *(Modified November 8, 2000)*

(There is no Condition P-20 or Condition P-21)

P-22 UNDERGROUND PIPELINE WARNING MARKER

For any pipeline that extends beyond the Lompoc Oil and Gas Plant facility (i.e., sales gas line and gas/NGL injection line to well Purisima #33 and #73) a ribbon of plastic, or other suitable material, shall be buried 12 to 18 inches below the surface of the trench fill by PXP.

The warning ribbon shall be of the standard width used in the industry and shall extend the entire length of the pipeline. The material shall be brightly colored and be labeled with a warning that the digger is excavating in a hazardous gas pipeline trench. *(Modified November 8, 2000)*

P-23 LOGP NGL TRANSPORT

During operation of a 15 MMSCFD gas processing facility (LOGP), all NGLs, including LPGs, shall be shipped in accordance with Board of Supervisors Resolution No. 93-480 and any subsequent amendments. To assure maximum blending of NGLs, including butanes, into a crude oil pipeline pursuant to Resolution 93-480, such blending shall occur downstream of crude oil storage at the Lompoc Oil and Gas Plant (LOGP), unless another method of blending does not diminish the amount of NGLs, including butanes, that could be blended downstream of storage. Any alternative method other than downstream blending must be approved by the Director of Planning & Development (P&D).

To ensure the maximum amount of NGL is transported by oil pipeline, propane shall be removed from the raw NGL stream prior to blending the NGL with the crude oil. In addition, butane shall be removed from the NGL stream if doing so reduces the number of weekly NGL truck trips by two or more. The propane and butane removed from the NGL stream can be transported by highway or rail. In accordance with Resolution 93-480, the volumes of NGLs shipped from the facility shall be reported quarterly to P&D by type of byproduct and mode of transportation.

LPG/NGL truck transportation shall be limited to a monthly average of 2.3 truck trips per day with a maximum capacity of 9,000 gallons per truck. More frequent truck trips utilizing smaller capacity trucks are not allowed. Excess LPG/NGLs may be re-injected into gas wells 33 or 73.

LPG/NGL and sulfur ~~All LPG and NGL~~ truck transportation between Buellton and the LOGP shall be limited to off-peak traffic hours to avoid potential conflicts with commuter traffic and reduce the potential for and consequences of an accident. Peak traffic hours shall be defined as 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m. This restriction shall be specified in PXP's contracts with appropriate vendors. PXP shall document truck arrival and departure times and provide this documentation to P&D upon request.

All LPG and NGL transportation shall utilize the following route from the (LOGP): Harris Grade Road to Purisima Road, Purisima Road to Mission Gate Road, Mission Gate Road to HWY 246, and HWY 246 to HWY 101.
Any product shipped via highway shall follow the provisions of a County-approved Transportation Risk Management and Prevention Program (TRMPP). Pursuant to Resolution 93-480, the TRMPP shall contain the following components:

a) Provisions for conducting comprehensive audits of carriers biennially to assure satisfactory safety records, driver hiring practices, driver training programs, programs to control drug and alcohol abuse, safety incentive programs, satisfactory vehicle inspection and maintenance procedures, and emergency notification capabilities. All documentation of such audits shall be available to the County for inspection upon request. A summary of any audits that were conducted during each calendar year shall be submitted to P&D annually. This summary shall include the name of the carrier and a brief description of the rating given to the carrier.

b) Provisions for allowing only carriers that receive a satisfactory rating under the audit described in part (a) to transport NGLs from the facility, whether the operator is also the shipper or sells NGLs at the facility.

c) Truck loading procedures for ensuring that the loading rack operator and the truck driver both conduct, and document in writing, a visual inspection of the truck before loading, and procedures to specify action to be taken when problems are found during the visual inspection.

d) Provisions for requiring shippers to use carriers with Vehicle Monitoring Systems or comparable systems for governing or monitoring vehicle speed for long distance trips of 100 miles or more one-way.

e) Provisions requiring shippers to use carriers with cellular phones for shipments via State Route 166.

PXP shall submit a plan to P&D for review and approval indicating the maximum blending levels that are achievable with Tranquillon Ridge project operations prior to the introduction of Tranquillon Ridge gas into the pipeline between Platform Irene and the LOGP. *(Modified November 8, 2000 and April 21, 2008)*

Q. FACILITY DESIGN

Q-1 REMOVAL OF DEBRIS

During the life of the project, PXP will remove any and all above ground debris located on the property, including any abandoned oil and gas pipelines, tanks, pumps and separators not in use.

Q-2 FLARING REPORT

If flaring at the Lompoc ~~HS&P Facility~~Oil and Gas Plant occurs during startup or operation, PXP shall submit a report within 7 working days describing the reasons for flaring and corrective actions to be approved by P&D. If corrective action is unacceptable to P&D, the County may impose additional corrective measures to be implemented by PXP. Planning and Development shall coordinate with APCD on required corrective actions. *(Modified January 8, 1992)*

Q-3 COMPLIANCE WITH COUNTY ZONING ORDINANCES

The Final Development Plan shall demonstrate compliance with Santa Barbara County Coastal Zoning Ordinance and Article III Zoning Ordinance.

Q-4 ENERGY CONSERVATION

Feasible~~Cost-effective~~ energy conservation techniques shall be incorporated into project design.

PXP shall prepare and Energy Efficiency Study for the LOGP to:

1. Address current and future energy consumption by function (i.e., heater treater, etc.);

2. Assess available and feasible options to optimize energy efficiency of existing equipment and operations;

3. Include a cost-benefit analysis of installing cogeneration capabilities at the LOGP;

The Energy Efficiency Study report shall be submitted to P&D prior to the introduction of Tranquillon Ridge oil or gas into the pipeline system between Platform Irene and the LOGP. Feasible energy-saving techniques or modifications at the LOGP shall be implemented as directed by Planning and Development. *(Modified April 21, 2008)*

Q-5 TRANSPORTATION OF PROCESSED OIL

All oil processed by the Lompoc ~~HS&P Facility~~Oil and Gas Plant shall be transported from the facility in accordance with County Local Coastal Plan Policy 6-8. Transportation by a mode other than pipeline may be permitted only in accordance with Coastal Zoning Ordinance Section 35-154.5 (i), applicable Local Coastal Plan policies and control measure R-12 of the Air Quality Attainment Plan, to the extent it is applicable.

Q-6 COMPLIANCE WITH COUNTY PETROLEUM ORDINANCE

PXP shall comply with all applicable policies in Section 25 of the Santa Barbara County Petroleum Ordinance No. 2795.

Q-7 MARINE TERMINAL TRANSPORT OF PROCESSED OIL

Any oil processed in PXP facilities that is eventually transported through a marine terminal shall only be transported through facilities and with vessels equipped with Best Available Control Technology (BACT), including vapor control systems that are acceptable to the APCD.

Q-8 USE OF OIL AND GAS PIPELINES ON COMMON CARRIER BASIS

PXP agrees that the oil and gas pipelines from Platform Irene to Lompoc will each be constructed, operated, and maintained as a common carrier, and will accept from non-owners of the pipeline, tenders for the transportation of oil or gas on reasonable terms and conditions and at just and reasonable rates, which terms, conditions, or rates are published and no less favorable than those applied to shipments by owners of the line, and with no requirement that the tendered oil or gas be sold, exchanged or otherwise transferred to the pipeline or its owners.

When and if oil transported through Tosco Corporation's Lompoc to Orcutt pipeline connects to the All American Pipeline or other common carrier pipeline exiting Santa Barbara County, such pipeline shall be operated as a common carrier or multiple user pipeline, providing for equitable pro-rata access to all producers." *(Modified November 8, 2000)*

Q-9 CONSOLIDATION OF OIL AND GAS FACILITIES

PXP shall operate its facilities as consolidated oil and gas facilities, including gas reinjection facilities, with access for use available on a nondiscriminatory and equitable basis. County retains the right to verify that the use of the facility is conforming with State and County policies on consolidation and to impose additional permit conditions where necessary to

assure these policies are being fulfilled to the extent feasible. The intent of this condition is to ensure the multi-company use of oil and gas transportation and processing facilities.

Regarding the consolidation of oil and gas processing, and gas reinjection facilities, in the event that the need for such facilities is demonstrated by other developers to the Planning Commission, PXP shall make available to such other developers any excess capacity of the PXP project facilities. In the event that sufficient excess capacity does not exist within the PXP project facilities to serve the needs of such other developers as demonstrated to the Planning Commission, PXP shall make its Lompoc Heating, Separating, and Pumping Facility property available to other developers for the construction of additional permitted oil and gas-related facilities. In the event that such necessary facilities are not permittable pursuant to the County's consolidation policies, PXP shall reduce its throughput on a pro-rata basis to accommodate such other developers.

Prior to the issuance of the Land Use Permit for the ~~HS&P Gas Plant~~Lompoc Oil and Gas Plant and at any time thereafter, as requested by the County, PXP shall submit to the Director of Planning and Development terms under which other producers in the area would be permitted to enter and use either the facilities or property for oil and/or gas processing or storage facilities, or ancillary facilities including but not limited to electrical substations, water treatment facilities, and wastewater loading facilities. If these terms are determined to be unacceptable to potential users of the facility and if agreement cannot be reached, the County reserves the right to impose additional conditions as described above to amend the permit. The intent of this condition is to ensure the efficient and maximum multi-company use of oil and gas transportation and processing facilities.

R. ABANDONMENT

R-1 REDUCTION OF OIL OR GAS PROCESSING THROUGHPUT

When oil or gas processing throughput is reduced to three percent (3%) or less of permitted capacity, the County of Santa Barbara shall review the facility permits and conduct a public hearing to determine if abandonment or other actions are appropriate.

R-2 DEMOLITION AND RECLAMATION PERMIT

Pursuant to Section 35.56 (Abandonment and Removal Procedures) of the County's Land Use & Development Code (LUDC) and Section 35-170 of Article II, Coastal Zoning Ordinance, PXP shall submit an application to P&D to either defer abandonment or to obtain a Demolition and Reclamation Permit upon the occurrence of certain conditions specified in Section 35.56.030 (Requirement to File an Application) of the LUDC and Section 35-170 of Article II. In addition to required elements of the Application for a Demolition and Reclamation Permit, PXP shall incorporate procedures to implement Condition R-3, below. *(Added April 21, 2008)*

R-~~2~~3 SITE RESTORATION

Immediately following permanent shutdown of the facility, PXP shall remove any and all abandoned processing facilities and unburied portions of the pipeline between Surf and Orcutt constructed under this permit, remediate (if necessary), recontour and revegetate the site ~~and revegetate the site~~ in accordance with a County-approved ~~revegetation plan~~Demolition and Reclamation Permit. ~~within one year of shutdown.~~ Underground

pipelines that have the potential to become exposed, as determined by P&D, shall also be removed. Any soils that are found to be contaminated as a result of the project shall be remediated to the satisfaction of the County. ~~PXP shall post a performance bond to insure compliance until site restoration is complete, as determined by the County.~~

As part of decommissioning the gas processing at the LOGP, ~~the gas plant project~~PXP shall remove all above ground portions of the 6-inch sour gas pipeline from the LOGP to the Gas Company sales gas pipeline tie-in. The remaining underground portions of the 6-inch sour gas pipeline that do not have the potential to become exposed shall be permanently abandoned. *(Modified November 8, 2000)*

R-4 ABANDONMENT FINANCIAL ASSURANCE

PXP shall post a performance security in an amount sufficient to guarantee equipment removal and site restoration pursuant to Condition R-3 above and which is consistent with County requirements for Abandonment Financial Assurance that are in effect at any time during project operations. The security shall be released upon PXP's completion of required abandonment activities to the County's satisfaction.

PXP shall post this financial assurance in an amount and form acceptable to the County within the time frame required by any Abandonment Financial Assurance requirements adopted by the County, but no later than prior to the introduction of hydrocarbons from the Tranquillon Ridge project into the pipeline system between Platform Irene and the LOGP. *(Added April 21, 2008)*

S. LAND USE

S-1 STAKING AND NOTIFICATION OF PIPELINE ROUTE

Prior to construction, the entire pipeline ROW corridor shall be prominently staked. All affected property owners along the pipeline route shall be notified in writing at least 30 days prior to the commencement of any pipeline construction on their property, and at least 15 days in advance of any deviation from the staked corridor which crosses their property.

S-2 PIPELINE CONSTRUCTION HOURS

Pipeline construction activities shall be prohibited between 4 p.m. and 7 a.m., Monday through ~~Saturday~~ Friday in the vicinity of any residence or sensitive biological area. Except for emergency services, construction activities shall not take place on Saturdays or Sundays or any recognized holiday, unless previous arrangements have been made with the affected property owners.

S-3 MAINTENANCE AND SECURITY AGREEMENTS FOR AFFECTED PROPERTIES DURING CONSTRUCTION

Prior to approval of the Final Development Plan and prior to approval of the zoning clearance for the substation and power lines for the new pumps at Valve Site #2, PXP shall consult with affected property owners to develop reasonable and mutually satisfactory controls for maintaining the privacy, security and activities of affected properties while construction is in progress. *(Modified April 21, 2008)*

S-4 INTERRUPTION OF UTILITY SERVICES

Interruption of telephone, electrical power, water or other utility services shall be minimized to the extent feasible during the pipeline construction period. PXP, or its contractors, shall contact each property owner or the appropriate utility regarding the location of utility lines, and all such utility line locations shall be staked by PXP or its contractors prior to the start of construction on the affected property.

S-5 COMPLIANCE WITH COUNTY REGULATIONS

During pipeline-related activities in the County, including pipeline construction, repair, maintenance, inspection, and testing, PXP and its contractors shall comply fully with all applicable statutes, ordinances, rules and regulations, including traffic regulations, of the County. (Modified November 8, 2000)

S-6 PROCUREMENT OF RIGHTS-OF-WAY

Prior to the issuance of the Land Use Permit or Coastal Development Permit, PXP shall demonstrate to Planning and Development that all rights-of-way necessary for construction of the project facilities have been obtained.

S-7 RESTRICTED USE OF RIGHT-OF-WAY

Following installation of the pipeline, use of the right-of-way is restricted to operational maintenance of the pipeline except where expressly permitted by the easement or landowner and consistent with other regulations and conditions.

S-8 SCHEDULING CONFLICTS

In the event that scheduling requirements among or between conditions in this permit (or with this permit and conditions imposed by other agencies) conflict with respect to timing, Planning and Development (in consultation with other agencies as appropriate) shall resolve such conflict.

S-9 CONSOLIDATION OF LOGP TO ORCUTT PIPELINE SEGMENT

PXP shall install the proposed produced water line, originating in the Orcutt Hills Oil Field within the same or adjacent pipeline trench as the proposed Lompoc to Orcutt pipeline segment (12 inch oil line) approved in this permit. The intent of this condition is to encourage consolidation of the pipeline corridor and to avoid further disturbance to terrestrial biology, geologic and cultural resources along the ROW. Under no circumstances will Unocal be permitted to use the produced water pipeline for the transport of any fluids until a specific permit for such use has been granted by the County. (Adopted July 10, 1996 - *Previous Unocap condition for 12-inch line to be used for sales gas transmission.*)

ATTACHMENT C

EIR IMPACT SUMMARY TABLES

Table ES.3a
CLASS I Impacts of the Proposed Project
Impacts that may not be Fully Mitigated to Less than Significant Levels

(Impacts that must be addressed in a "statement of overriding consideration" if the project is approved in accordance with Sections 15091 and 15093 of the State CEQA Guidelines.)

Table ES.3a: Class I Impacts of the Proposed Project

Impact #	Project Phase	Description of Impact	Mitigation Measures	Residual Impact
HAZARDOUS MATERIALS/RISK OF UPSET (Section 5.1)				
Risk.3	*Increased Throughput Extension of Life*	The proposed project could generate risks to public safety by exposing the public to transportation hazards.	Risk-~~2~~3 The applicant shall implement all of the measures identified in the SBC's policies regarding the transportation of gas liquids that were developed as part of the LPG/NGL Transportation Risk Assessment, including the blending of gas liquids into the crude oil to the maximum extent feasible. (The policies are included in the Point Pedernales Final Development Plan permit conditions P-2 and P-23). The applicant shall submit a plan to SBC for review and approval indicating maximum blending levels that are achievable with the proposed operations prior to land use clearance.	Significant
TERRESTRIAL AND FRESHWATER BIOLOGY (Section 5.2)				
TB.6	*Increased Throughput Extension of Life*	A pipeline leak or rupture could result in an oil spill and subsequent degradation of upland, riparian and freshwater aquatic habitats and injury to plants and terrestrial and aquatic wildlife through direct toxicity, smothering, and entrapment as well as through resultant cleanup efforts. An offshore spill may affect the terrestrial environment if oil is transported to the shoreline. Oil could be transported up creeks and rivers that are open to tidal influence. The modeled trajectory for a worst-case offshore oil spill (Appendix G) indicates that shorelines, lagoons, estuaries, and river mouths may be directly affected. Surrounding terrestrial areas may be affected by cleanup efforts.	In addition to clean-up measures identified in the Core Oil Spill Response Plan (OSRP), measures identified in Section 5.4, Onshore Water Resources, have the potential to reduce impacts on biological resources. Where a spill or clean up results in the loss of native vegetation, implementation of Mitigation Measures TB-6 and TB-7 would reduce impacts to native vegetation. Mitigation measures described above would also apply to a produced water spill. The following measures are recommended to further reduce impacts to terrestrial and aquatic biota. Note that these mitigation measures apply to the proposed project pipeline sections only. TB–11 The November 2004 Core Oil Spill Response Plan and July 2005 Supplement shall be revised and updated to address increased potential spill volumes and updated procedures for oil and produced water spill clean up beneath ground surface and in sensitive habitats including rivers and streams. This plan shall include updated, site-specific measures for spill containment along watercourses and at other sensitive habitats. It shall specify that sensitive habitats shall be avoided to the maximum extent feasible during oil spill clean up activities. It shall include specific measures to avoid impacts on listed endangered and threatened species during response and repair operations and minimize impacts on riparian and other native habitats. The plan shall include identification of specific access points at locations where containment and clean up efforts can be initiated under different scenarios. ~~The~~Access points shall be reviewed and, if necessary, additional access points shall be ~~need to be~~identified immediately adjacent to pipeline river crossings and points where spilled oil could enter the Santa Ynez River, San Antonio Creek, Santa Maria River, Nipomo Creek, and Los Berros Creek. These updates~~This plan~~ shall be reviewed and approved by SBC ~~the P&D Department~~ prior to land use permit approval.~~construction.~~	Significant

Table ES.3a: Class I Impacts of the Proposed Project				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measures**	**Residual Impact**
			TB-12 The Core Oil Spill Response Plan and its Supplement include species- and site-specific procedures for collection, transportation, and treatment of all potentially affected native wildlife, including sensitive species, for topsoil salvage and replacement, and procedures to minimize the loss of native seedbanks and prevent the spread of non-native weeds. Where disturbance to any habitats ~~disturbance~~ cannot be avoided as determined by a P&D-approved biologist, ~~the November 2004 Core Oil Spill Response Plan and July 2005 Supplement shall be updated to provide stipulations for development and implementation of site-specific habitat restoration plans and other site-specific and species-specific measures appropriate for mitigating impacts on local populations of sensitive wildlife species and to restore native plant and animal communities to pre-spill conditions~~these stipulations for development and implementation of these site-specific habitat restoration plans and other site- and species-specific measures for mitigating impacts on local populations of all sensitive wildlife species and to restore native plant and animal communities to prespill conditions shall be implemented. Access and egress points, staging areas, and material stockpile areas that avoid sensitive habitats shall be identified, prior to ground disturbance.~~The Core Oil Spill Response Plan and its Supplement shall include species- and site-specific procedures for collection, transportation, and treatment of oiled wildlife, particularly sensitive species. The plan shall be reviewed by the federal, state, and local agencies identified in Measure TB-11 prior to approval by the lead agencies.~~ TB-13 Prior to construction or any ground disturbance activity, the applicant shall ~~develop~~ identify low impact clean up procedures ~~for inclusion in~~from the Core Oil Spill Response Plan, and/or updated measures to be implemented. Where feasible, low-impact site-specific clean up techniques such as hand cutting contaminated vegetation and using low-pressure water flushing from boats shall be specified ~~in the Oil Spill Response Plan~~to remove spilled material from particularly sensitive wildlife habitats (e.g., coastal estuaries), because procedures such as shoveling, bulldozing, raking, and draglining can cause more damage to a sensitive habitat than the oil spill itself. As described in the Oil Spill Response Plan, ~~shall evaluate~~the non-clean up option for ecologically vulnerable habitats such as coastal estuaries shall be considered. Prior to approval of the Land Use Permit, the applicant shall revise the OSRP to update the low-impact clean up procedures consistent with current technology. These strategies shall be reviewed and revised during the required future Plan updates to include best available practices. TB-14 The applicant shall ~~develop and implement~~ update the OSRP to ensure that~~pill response training program. S~~ spill response personnel ~~shall be~~are adequately trained for response in terrestrial environments and spill containment and recovery equipment shall be inspected at least annually and maintained at full readiness. Drills shall be conducted at least annually and the results evaluated so that spill response personnel are familiar with the equipment and with the project area, including sensitive terrestrial biological resources. Rehabilitation centers, within the project area, for birds and other wildlife species affected by spilled material shall be involved in the drills. If a rehabilitation center is not available in	

Table ES.3a: Class I Impacts of the Proposed Project				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measures**	**Residual Impact**
			the project area, the applicant shall contribute a pro-rata share of funds necessary to cover the costs of establishing and operating a bird and wildlife rehabilitation center.	
TB.7	*Increased Throughput Extension of Life*	A spill and/or subsequent cleanup efforts may directly or indirectly cause the loss of habitat and individuals or colonies of state-or federally-listed plant species including seaside bird's beak, Surf thistle, beach spectacle pod, La Graciosa thistle, Gaviota tarplant, and possibly Pismo clarkia or degrade designated critical habitat for the Lompoc yerba santa and La Graciosa thistle. An offshore spill may affect listed plant species in coastal dunes and foredune habitat due to resultant containment or cleanup efforts.	Impacts to listed species would be reduced through implementation of Mitigation Measures TB-11 through TB-14, which include, but are not limited to, minimization of habitat disturbance during clean up, the use of low-impact clean up techniques, and restoration of the site to pre-spill conditions. Mitigation Measure TB-5 would reduce the effects of sedimentation in the event clean up activities disturb soil and increase erosion. Implementation of Mitigation Measures TB-6 and TB-7, which address, in part, the restoration of native plant species would also reduce impacts in areas where spills or cleanup results in the loss of native vegetation. These measures described above would also apply to a produced water spill.	Significant
TB.8	*Increased Throughput Extension of Life*	An oil spill and/or subsequent cleanup effort may directly or indirectly cause the loss of individual state or federally-listed wildlife species or cause the loss or degradation of sensitive species habitat. An oil spill and/or subsequent cleanup effort may impact designated critical habitat for steelhead, western snowy plover, California tiger salamander, and California red-legged frog. ~~An offshore spill may affect listed fish and wildlife that inhabit shorelines, beaches, lagoons, estuaries, and river mouths.~~	Impacts to listed wildlife species would be reduced through implementation of Mitigation Measures TB-11 through TB-14, which include, but are not limited to, updating the OSRP, minimizing habitat disturbance during clean up, using low-impact clean up techniques, and restoring of the site to prespill conditions. Implementation of Mitigation Measures TB-6 and TB-7, which address, in part, the restoration of native plant species would also reduce loss of foraging and breeding habitat in areas where spills or cleanup results in the loss of native vegetation. Mitigation Measure TB-5 would reduce the effects of sedimentation in the event clean up activities disturb soil and increase erosion. Mitigation measures identified in Sections 5.4 (Onshore Water Resources) and 5.6 (Marine Water Quality) would also reduce the impacts of oil spill on state and federally listed species in the project area. These mitigation measures would also apply to a produced water spill.	Significant
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.2	*Increased Throughput Extension of Life*	A rupture or leak from the emulsion, produced water or dry oil pipelines could substantially degrade surface and groundwater quality.	In addition to Mitigation Measure Risk-1, the following mitigation measures are proposed. OWR-2 The applicant shall construct a berm around Valve Site #2 with sufficient capacity to retain 150 percent of the maximum spill volume associated with this portion of the onshore pipeline (see Section 5.1, Risk of Upset). The applicant shall submit specific plans for the catchment basin at Valve Site #2 to SBC/CCC for review and approval prior to land use clearance. The berm shall be installed prior to operations. OWR-3 Update the Oil Spill Contingency Plan and the November 2004 Oil Spill Response Plan and July 2005 Supplement to address the SCADA system and GR.1-related requirements for the proposed project. Conduct annual readiness exercises and audits to	Significant

Table ES.3a: Class I Impacts of the Proposed Project				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measures**	**Residual Impact**
			ensure that containment and cleanup equipment is readily available close to areas with greatest vulnerability to spills (e.g., along the lower sections of the Santa Ynez River). OWR-4 PXP shall ensure that catchment basins located along the Santa Ynez River section of the pipeline are cleaned and surveyed periodically to ensure that they are capable of holding at least 110 percent of the associated release volume from nearby pipeline segments. Prior to land use clearance, PXP shall provide volume calculations to SBC for each of the catchment basins for the following leak scenarios: (1) 11 minutes of pumping time for a worst case leak in accordance with the MMS Oil Spill Response Plan, Volume 2, worst case scenario, and (2) 20 minutes of pumping time for a small leak as detected by the PXP leak detection system. The total pipeline emulsion fluids, including produced water, shall be included in the calculations. If it is determined that the volume of any of the catchment basins is insufficient to fully contain the leak scenarios analyzed, the catchment basin(s) shall be expanded. Plans for catchment basin(s) expansion shall be submitted to SBC for review and approval prior to land use clearance. OWR-5 Ensure that any pipeline replacement within stream beds is engineered such that the replacement pipeline and any pipeline support structures are protected from scour and erosion effects of a 100-year flood discharge. Plans demonstrating these requirements shall be submitted to SBC/CCC for review and approval prior to land use clearance.	
MARINE BIOLOGICAL RESOURCES (Section 5.5)				
MB.1	*Increase Throughput Extension of Life*	Oil spills from the project may impact benthic and intertidal organisms, fish, marine mammals, marine birds, and marine turtles.	MB-1a The November 2004 Core OSRP and July 2005 Supplement shall be updated to incorporate changes in platform activities that result from the proposed project. For example, the plan shall incorporate detailed response procedures for marine oil spills resulting from a blowout if wells producing the Tranquillon-Ridge field are expected to be free flowing. Worst-case discharge scenarios shall be updated accordingly. In addition, lessons learned from the cleanup of the 1997 oil spill shall be incorporated into the Response Plan. The efficacy of various containment and cleanup techniques applied during the 1997 spill shall be evaluated with regard to potential future spills. Hindcasts of the observed oil-spill trajectory shall be used to improve site-specific trajectory models. Potential ecological damage resulting from cleanup techniques applied in 1997 shall be discussed. The updated OSRP shall specifically detail methods to reduce impacts to sea otters and pinniped colonies should a spill occur. This discussion should include methods for preventing oil from reaching places where otters congregate and pinniped colonies. It should detail protocols for handling and rehabilitation of oiled otters and pinnipeds, and should specify methods to avoid disturbing pinniped colonies during cleanup activities. Finally, the updated OSRP shall re-evaluate the toxicity of Corexit 9527 and its inclusion as a potential dispersant for the Tranquillon Ridge project based on current information. The personnel and training sections of the OSRP shall be updated to identify training requirements for all personnel who would respond to oil spills. At a minimum, new personnel shall be trained immediately in the overall operational aspects of oil spill response,	Significant

Table ES.3a: Class I Impacts of the Proposed Project				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measures**	**Residual Impact**
			including the proper use of all equipment that would be utilized in spill response. Annual training for all personnel shall also be included in the OSRP. The annual training shall include training in the operation of new equipment that may be utilized in oil spill response, retraining in the operation of existing equipment, and review of the oil spill response requirements that are identified in the OSRP. MB-1b In order to provide a baseline for shoreline clean-up efforts in the event of a spill, the applicant shall contribute to the funding of a program to document the amount, variability, and chemical fingerprint of the tar normally present in the intertidal zone within the potential oil spill zone. The program shall include both visual observations and chemical sampling of tar along five segments (less than or equal to one-mile each) of shoreline located within the area of the coast located between Point Sal and Point Conception. The program shall continue for as long as Tranquillon Ridge Field development is occurring or until analysis of the collected data indicates that extension of sampling will not significantly increase understanding of the pattern of tar deposition and improve documentation of the baseline. The amount of tar shall be estimated and its chemical fingerprint determined, based on the shoreline tar sampling protocol used by the U.S. Geological Survey (USGS) in its MMS-funded study "Submarine Oil and Gas Seeps of the Southern Offshore Santa Maria Basin, California" (2001-2004). The program shall document visual observations and chemical sampling. The samples shall be analyzed for chemical fingerprint in the USGS laboratory. If analysis by the USGS is not available, another comparable fingerprinting method may be substituted. Annual cost of the applicant's contribution to this program shall not exceed $100,000. The program shall be developed in cooperation with Santa Barbara County's Department of Planning and Development, and shall be coordinated by the Energy Division. The Energy Division shall evaluate the program on an annual basis in coordination with staffs of the California State Lands Commission, California Coastal Commission, Department of Fish and Game Office of Spill Prevention and Response, and Minerals Management Service. If new information indicates that changes to the methodology or protocol would improve the efficiency or accuracy of determining baseline oiling conditions, the County shall revise the program. Any revisions to the program shall not cause the annual cost to the applicant to exceed the $100,000 limitation. MB-1c PXP shall make a yearly contribution of $90,000 toward establishing a marine mammal and sea bird impact mitigation fund. The funding shall be used for either facilities construction or operating costs associated with the rescue and rehabilitation of injured marine mammals and sea birds. This yearly contribution shall be in lieu of the applicant's annual three (3) point Coastal Resource Enhancement Fund (CREF) assessment for biological resource impacts, as currently required by Condition N-1 of PXP's Final Development Plan for the Point Pedernales Project.	

Table ES.3a: Class I Impacts of the Proposed Project				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measures**	**Residual Impact**
			Mitigation Measure TB-14 would also apply to this impact to address impacts to marine birds from an oil spill. Mitigation Measure OWR-2, which covers the leak detection system, would also serve to reduce the likelihood of a spill to the marine environment.	
OCEANOGRAPHY AND MARINE WATER QUALITY (Section 5.6)				
MWQ.1	*Increased Throughput Extension of Life*	Accidental discharge of petroleum hydrocarbons into marine waters would adversely affect marine water quality.	MWQ-1 Offshore inspections of the wet-oil pipeline shall continue to be conducted on a regular basis as determined by the County and/or other regulatory agency throughout the life of the project. Inspections shall use the best available technology to identify unsupported spans and deteriorating or inadequate welds. When structural anomalies or unsupported spans are identified that compromise the integrity of the pipeline as determined by the County and/or other regulatory agency, flow through the pipeline flow shall cease until repairs can be effected, spans can be supported, or problematic pipeline components can be replaced. If the leak detection system causes an unexplained shutdown of flow through the offshore pipeline, flow shall remain shutdown until the entire length of pipe is inspected. The applicant shall submit annual inspection reports the parities responsible for verification. These requirements shall be referenced in the project's Safety, Inspection, Maintenance, and Quality Assurance Program (SIMQAP).	Significant
COMMERCIAL AND RECREATIONAL FISHING/KELP HARVESTING (Section 5.7)				
CRF/ KH.2	*Increased Throughput Extension of Life*	Oil spills may potentially impact commercial and recreational fishing in the proposed project area.	See Mitigation Measures MB-1a and MB-1b in Section 5.5, Marine Biology.	Significant
TRAFFIC (Section 5.9)				
T.4	*Increased Throughput Extension of Life*	An oil spill from the proposed Tranquillon Ridge project could result in the disruption of commercial shipping, fishing, and recreational marine traffic and onshore transportation infrastructure.	Refer to Sections 5.5, Marine Biology, and 5.6 Oceanography and Marine Water Quality of this EIR for specific spill-related mitigation measures. Mitigation measures directly applicable include MB-2 (contingency planning), MWQ-1 (updated Oil Spill Response Plan), and MWQ-3 (increased inspection frequency).	Significant
CULTURAL RESOURCES (Section 5.12)				
CR.3	*Increased Throughput Extension of Life*	Containment and cleanup activities associated with an accidental oil spill would result in ground disturbance and potential impacts on cultural resources.	CR-5 The OSRP shall be revised to include procedures for minimizing impacts on cultural resources during oil spill containment and cleanup activities. These procedures shall include contacting a County-qualified archaeologist and Native American monitor in the event of a spill. To the extent possible, heavy earth moving equipment or manual excavation shall be minimized at archaeological sites. If unanticipated cultural resources are discovered during containment and cleanup activities, then a county-qualified archaeologist shall document the discovery at the earliest time it is deemed safe to do so. It is possible that post-cleanup archaeological excavations (with Native American monitoring, if applicable) shall be necessary to help mitigate impacts from the containment/cleanup ground disturbances. The revised OSRP shall be submitted to P&D prior to issuance of coastal development permit or land use clearance for grading.	Significant

Table ES.3a: Class I Impacts of the Proposed Project				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measures**	**Residual Impact**
AESTHETICS/VISUAL RESOURCES (Section 5.13)				
Visual.1	*Extension of Life*	Visual impacts due to long-term continued presence of the project facilities visible from Coastal Zone (Platform Irene and Surf Substation).	Visual-1 The applicant shall prepare and implement a visual mitigation plan for the Surf Substation that provides for better screening of the facility. The plan shall address measures to reduce the visual impact of the facility including, but not limited to, painting of substation substructures and re-landscaping. The plan shall be submitted to SBC P&D for approval prior to land use clearance.	Significant
Visual.4	*Extension of Life*	Visual impacts due to long-term continued presence of the LOGP.	Visual-4 The applicant shall implement a lighting plan that would minimize nighttime glare. The applicant shall submit the plan to SBC P&D for review and approval prior to land use clearance. The plan shall include the facility lighting placement and design.	Significant
RECREATION/LAND USE (Section 5.14)				
Rec.1	*Increased Throughput Extension of Life*	The proposed project would increase the likelihood and volume of an oil spill, which could result in public access restrictions to coastal and inland recreational resources.	See Marine Biology Mitigation Measure MB-2, and Marine Water Quality Mitigation Measures MWQ-1, MWQ-2, MWQ-3. ~~and Commercial and Recreational Fishing Mitigation Measures CRF/KH-1.~~	Significant

Table ES.3b
CLASS II Impacts of the Proposed Project
Impacts that can be Mitigated to Less than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Section 15091 State CEQA Guidelines.)

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
Construction and Operations				
TERRESTRIAL AND FRESHWATER BIOLOGY (Section 5.2)				
TB.1	*Construction New Operations*	Modification of Valve Site #2 and installation of power poles and transformer station would result in disturbance or loss of less than one acre of native vegetation and wildlife habitat, as well as disturbance and possible injury to wildlife.	TB-1 Prior to construction, a survey of the power line corridor shall be conducted to verify the locations of sensitive plants, including Gaviota tarplant, La Purisima manzanita, sand mesa manzanita, and dune vegetation that includes coast buckwheat (Eriogonum parvifolium), and thus may support El Segundo blue butterfly. Power poles shall be sited to avoid impacting these resources. TB-2 Prior to constructing the power line to Valve Site #2, the ~~applicant~~operator shall enter into discussions with VAFB to determine the feasibility of placing the power line on the 13th Street bridge or using the existing VAFB power poles for crossing the Santa Ynez River. If placing the power line on the bridge or the existing poles is determined to be not feasible, the applicant shall site the power poles outside the limits of the Santa Ynez River riparian vegetation, use "raptor-safe" pole designs with the conductors spaced as far apart as possible to minimize the potential for bird wings to span them, install poles and lines outside the breeding season of birds (March 1 through August 15), cover the augered holes if the poles are not installed immediately, elevate the power line above the level of the tree canopy, taking into consideration future growth of the canopy, and fit wires with some type of device to make them more visible, such as bright-colored plastic balls. Pole designs will either discourage raptor nesting or be made suitable for nesting by ~~If the pole lines are of a type that raptors might nest on, investigate the feasibility of~~ fitting the poles with 3 ft. by 3 ft. nesting platforms a minimum of 4 feet above the tops of the poles as recommended by the California Department of Fish and Game (CDFG). CDFG and the U.S. Fish and Wildlife Service (USFWS) will be contacted for review and approval of pole design at the time the power line to Valve #2 is deemed necessary. TB-3 ~~Prior to construction~~ Immediately (within 48 hours) prior to each critical pole placement activity, including excavation, foundation installation, pole placement, and stringing, applicant-funded surveys within the disturbance area shall be conducted by a SBC- and VAFB-approved wildlife biologist to document and remove individuals of wildlife species encountered, including reptiles, amphibians, and badgers and other burrowing animals, as appropriate to suitable habitat outside the area of impact. The construction area shall ~~should~~ be regularly monitored to ensure that wildlife species do not enter areas where they would be exposed to hazards.	Insignificant

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
TB.2	*Construction*	Modification of Valve Site #2, modifications at LOGP, and installation of power poles and the transformer station have the potential to increase erosion and sedimentation in aquatic habitats.	TB-4 All ground disturbance activities shall occur, if feasible, during the dry season (generally April 1 through November 1). Work can continue during the rainy season if a County and CCC (if required) approved erosion and sediment control plan is in place. The applicant shall submit construction plans and schedules to SBC and CCC (if required) for review and approval prior to land use clearance. TB-5 Site-specific measures consistent with the Restoration, Erosion Control, and Revegetation Plan (RECRP) approved under Point Pedernales FDP Condition H-1 shall be updated and implemented as applicable to new areas of ground disturbance along the existing ROW. Erosion and sediment control measures (e.g., water bars, silt fencing, dust control, and/or other appropriate measures) shall be implemented at any drainages; along portions of the affected project area that intersect slopes greater than a 2-to-1 incline; and within 200 feet of downslope water bodies. Appropriate erosion and sediment control measures shall be installed prior to ground disturbance and maintained until after the rainy season or until vegetation has become re-established in the disturbed areas. The applicant shall submit erosion and sediment control plans and specifications to SBC for approval prior to land use clearance.	Insignificant
GEOLOGIC RESOURCES (Section 5.3)				
GR.2	*Construction*	Ground-disturbing construction activities could result in geologic disturbances such as slope failure, gullying, erosion, and sedimentation.	GR-1 Best Management Practices (BMPs), such as temporary berms and sedimentation traps, such as silt fencing, straw bales, and sand bags, shall be installed to minimize erosion of soils and sedimentation in nearby drainages. The BMPs shall be included in the Oil Spill Response Plan (OSRP). The BMPs shall include maintenance and inspection of the berms and sedimentation traps during rainy and non-rainy periods, as well as revegetation of impacted areas. Revegetation shall address plant type as well as monitoring to ensure appropriate coverage of exposed areas and shall be consistent with existing project revegetation plans.	Insignificant
GR.3	*Construction*	Upgrades and modifications of facilities at LOGP could result in new, continued or accelerated ground settlement.	GR-2 The 2007 grouting program shall be completed prior to any equipment additions/modifications at the LOGP. If deemed necessary by the County System Safety and Reliability Review Committee (SSRRC), based on equipment weights and foundation requirements, an elevation surveys shall be conducted before and during the equipment additions~~recommissioning~~/modification period followed by routine post-construction monitoring as deemed appropriate by the SSRRC. The elevation survey should use existing benchmarks to continue the subsidence monitoring currently being conducted at LOGP~~and a pre- and post-recommissioning monitoring plan shall be developed. The plan shall require a baseline survey 30 days prior to construction and once per month during LOGP equipment recommissioning/ modifications. Post-commissioning survey frequency shall be based on the settlement results measured during recommissioning. The plan shall include contingencies for soil grouting or other ground stabilization measures to prevent damage to the facility.~~	Insignificant

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
GR.5	*Extension of Life*	Scouring along drainage areas could cause impacts to the pipeline and increase pipeline failure probabilities.	GR-3 The applicant shall implement a creek and drainage maintenance program to monitor and repair potential scour areas that could affect the pipeline integrity. The plan shall include annual surveys of the pipeline route and any adjacent drainages within 500 feet that are up slope of the pipeline right-of-way. Any areas that exhibit scouring or erosion shall be documented. Areas that exhibit increased scour should be addressed through stabilization or other appropriate permanent erosion control measures.	Insignificant
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.1	*Construction*	Project-related construction could cause erosion or siltation resulting in substantial degradation of surface water quality.	Mitigation Measures OWR-1, GR-1, AG-6, AG-7, TB-18 and TB-22 would reduce the magnitude of potential impacts to onshore water quality associated with disturbances to soils and vegetation during construction. OWR-1 Prepare a Stormwater Pollution Prevention Plan (SWPPP) that describes Best Management Practices (BMPs) to be implemented for the purpose of minimizing soil loss and other construction-related sources of water pollution for any new construction associated with the project. The SWPPP will be prepared in accordance with RWQCB guidelines and will designate BMPs that will be followed during construction activities. Erosion-minimizing efforts may include measures such as avoiding excessive disturbance of steep slopes; using drainage control structures (e.g., coir rolls or silt fences) to direct surface runoff away from disturbed areas; strictly controlling soil stockpiling and vehicular traffic; implementing a dust-control program during construction; restricting access to sensitive areas; using vehicle mats in wet areas; and revegetating disturbed areas following construction. Erosion-control measures will be installed before extensive clearing and grading begins, and before the onset of winter rains. The SWPPP BMPs shall specify that the staging of construction materials, equipment, and excavation spoils, and refueling of equipment will be performed at least 100 feet outside of drainage channels and intermittent streams, where these receive overland runoff. Mulching, seeding, or other suitable stabilization measures will be used to protect exposed areas during and after construction activities. If required, concrete washout stations will be established to avoid direct release to surface water or to areas where groundwater could become contaminated. The SWPPP shall be submitted to SBC/CCC for review and approval prior to construction..	Insignificant
MARINE BIOLOGICAL RESOURCES (Section 5.5)				
MB.5	*Drilling* *Extension of Life*	Increased vessel traffic resulting from the proposed project drilling, production, and oil clean up response may impact marine mammals and marine turtles.	In addition to Mitigation Measure MB-1c, the following mitigation measure is required: MB-4 A marine mammal observer shall be employed on each vessel servicing Platform Irene as described herein. The observer shall be provided training which focuses on the identification of marine mammal species, the specific behavior of species common to the project area, and awareness of seasonal concentrations of marine mammals. The marine mammal observer shall be placed on all support vessels during the spring and fall gray whale migration periods and during periods/seasons having high concentrations of marine mammals in the project area, such as the early summer blue whale migration. The observer shall have no other responsibilities during periods when the vessels are in transit.	Insignificant

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
			The observer shall have unobstructed views onboard each vessel and serve as lookout so that collisions with marine mammals can be avoided. Additionally, vessel operators or the applicant shall develop, submit for approval, and implement a contingency plan that focuses on avoidance procedures when marine mammals are encountered at sea. Minimum components of the plan include: a) Vessel operators will make every effort to maintain a distance of 1,000 feet from sighted whales and other threatened or endangered marine mammals or marine turtles. b) Vessel operators shall avoid travelling through blue whale feeding grounds and shall adjust transit routes to avoid large-scale krill populations during the annual blue whale migration period in the Santa Barbara Channel. ~~Support vessels will not cross directly in front of migrating whales or any other threatened or endangered marine mammals or marine turtles.~~ c) When paralleling whales, support vessels will operate at a constant speed that is not faster than the whales. d) Female whales will not be separated from their calves. e) Vessel operators will not herd or drive whales. f) If a whale engages in evasive or defensive action, support vessels will drop back until the animal moves out of the area. g) Any collisions with marine wildlife will be reported promptly to the Federal and State agencies listed below pursuant to each agency's reporting procedures. Stranding Coordinator, Southeast Region National Marine Fisheries Service Long Beach, CA 90802-4213 (310) 980-4017 Enforcement Dispatch Desk California Department of Fish and Game Long Beach, CA 90802 (562) 590-5132 or (562) 590-5133 California State Lands Commission Environmental Planning and Management Division Sacramento, CA 95825-8202 (916) 574-1890 ~~MB-5 PXP shall make a yearly contribution of $90,000 toward establishing a marine mammal and sea bird impact mitigation fund. The funding shall be used for either facilities construction or operating costs associated with the rescue and rehabilitation of injured marine mammals and sea birds. This yearly contribution shall be in lieu of the applicant's annual three (3) point Coastal Resource Enhancement Fund (CREF) assessment for biological resource impacts, as currently required by Condition N-1 of PXP's Final Development Plan for the Point Pedernales Project.~~	

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
AIR QUALITY (Section 5.8)				
Air.2	*Drilling Increased Throughput Extension of Life*	Increased oil processing and drilling of the new Tranquillon Ridge Unit wells at Platform Irene would result in an increase in operational air emissions.	Air-2 PXP shall ensure that emission reductions are provided to fully mitigate increases in operational criteria pollutant emissions associated with the proposed project consistent with SBCAPCD Rules and Regulations. The documentation supporting the available emission mitigations for operations shall be submitted to the SBCAPCD prior to land use clearance. No operations shall occur until the applicable project Permits to Operate are modified.	Insignificant
CULTURAL RESOURCES (Section 5.12)				
CR.2	*Construction*	Modifications to Valve Site #2 and installation of power poles would result in ground disturbance and potential impacts on cultural resources.	CR-2 PXP shall revise grading plans to include note for protocols to follow during unexpected discovery of archaeological resources. The grading plans shall be submitted to P&D prior to issuance of coastal development permit or land use clearance for grading. Prior to construction all crew members shall receive training on unanticipated cultural resource discovery protocols. In the event of an unanticipated cultural resource discovery during construction, all ground disturbances within 200 feet of the discovery shall be halted or re-directed to other areas until the discovery has been documented by a county-qualified archaeologist, and its potential significance evaluated consistent with Santa Barbara County Cultural Resource Guidelines. Resources considered significant shall be avoided by project redesign. If avoidance is not feasible, the cultural resource shall be subject to a Phase 3 data recovery mitigation program (with Native American monitoring, if applicable), consistent with Santa Barbara County Cultural Resource Guidelines. CR-4 A Phase I archaeological surface survey shall be conducted at unsurveyed areas of ground disturbance associated with installation of the power pole line across the Santa Ynez River and proposed trenching areas prior to land use clearance to identify any cultural resources that may be affected during construction. If a cultural resource is encountered during the survey, it shall be shall be avoided by power pole and/or trench relocation. If archaeological site avoidance is technologically infeasible due to topographic or engineering constraints, the site's potential significance shall be evaluated pursuant to Santa Barbara County Cultural Resource Guidelines and CEQA Guidelines Section 15064.5 criteria. Resources considered significant and unavoidable shall be subject to a Phase 3 data recovery program (with Native American monitoring, if prehistoric), consistent with Santa Barbara County Cultural Resource Guidelines, and if located on VAFB, shall incorporate the investigation methodology reviewed and approved by VAFB environmental management staff. To comply with VAFB requirements, any trenching or excavation in a floodplain on VAFB shall require archaeological monitoring.	Insignificant
AESTHETICS/VISUAL RESOURCES (Section 5.13)				
Visual.3	*Operations*	Visual impacts due to the new transformer station and power lines to Valve Site #2.	Visual-3 Prior to constructing the power line to Valve Site #2, the applicant shall enter into discussions with VAFB to determine the feasibility of placing the power line on the 13th Street bridge or using the existing VAFB power poles for crossing the Santa Ynez River. The applicant shall also use existing poles to the maximum extent feasible for approaching the existing pipeline corridor's dirt road. The applicant shall utilize one of these options if they are allowed by VAFB. The applicant shall submit documentation to	Insignificant

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
			the SBC P&D from VAFB detailing their position on using the 13th Street bridge or the existing power poles for crossing the Santa Ynez River by the power line to Valve Site #2. This documentation shall be submitted to SBC P&D prior to land use clearance for construction of the power line to Valve Site #2.	
Accidental Releases (e.g. Oil Spills and Gas Releases)				
GEOLOGIC RESOURCES (Section 5.3)				
GR.1	*Increased throughput Extension of Life*	Remediation activities associated with a pipeline spill could increase slope failures, erosion, sedimentation, and gullying.	See Mitigation Measure GR-1 above.	Insignificant
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.4	*Increased throughput Extension of Life*	Remediation activities associated with a pipeline spill could increase erosion and siltation and substantially degrade surface water quality.	Implementation of Mitigation Measures OWR-1, GR-1 and OWR-6 would reduce the potential for causing significant erosion or siltation associated with spill remediation activities along the pipeline right-of-way.	Insignificant
AGRICULTURAL RESOURCES (Section 5.15)				
AG.3	*Increased Throughput Extension of Life*	Potential degradation and reduced productivity of agricultural land from a pipeline leak or rupture resulting in an oil or produced water spill.	AG-1 PXP shall revise the Point Pedernales Oil Spill Response Plan (OSRP) and submit to SBC for review and approval. The Plan to include specific cleanup techniques for agricultural lands, focusing on minimizing removal of top soil. ~~The OSRP shall include a compensation plan for the purchase of agricultural crops lost/damaged and for replacement of removed top soil with equivalent imported soils.~~	Insignificant
Maintenance and Repairs				
TERRESTRIAL AND FRESHWATER BIOLOGY (Section 5.2)				
TB.3	*Extension of life*	Pipeline maintenance and repair, if needed, would result in potential <u>disturbance and</u> removal of native vegetation and wildlife habitat and erosion and sedimentation as a result of ground disturbance.	TB-6 Applicant shall prepare and submit ~~a Standard Maintenance and Repair Plan that will include~~ <u>as an update to the RECRP (FDP Condition H-1 and applicable CDP conditions),</u> plans for restricting work areas, delineating construction zones, biological surveys of disturbance areas, and impact minimization efforts, including scheduling. Where ground disturbances are required, the Plan would specifically include: • Restrict construction activities, equipment and personnel to existing disturbed areas (such as roads, pads, or otherwise disturbed areas) to the maximum extent feasible. • Clearly mark and delineate in the field the limits of the construction zone. Personnel or equipment in native habitats outside the construction limits shall be prohibited. • Biologically sensitive resources, such as occurrences of sensitive plant species including sand mesa manzanita, La Purisima manzanita,Gaviota tarplant, coast buckwheat (which may support El Segundo blue butterfly) and black-flowered figwort as well as individual oak trees, shall be identified through surveys conducted by a qualified biologist acceptable to the resource agencies prior to ground disturbance and shall be clearly marked on work or construction plans so they may be avoided. • Where avoidance of biologically sensitive features is infeasible, the plan shall specify	Insignificant

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
			means by which impacts on the features would be minimized and their survival and recovery facilitated (such as preserving the root system and root crown of resprouting species such as sand mesa manzanita). TB-7 Site-specific measures listed in the approved RECRP (FDP Condition H-1 and applicable CDP conditions) shall be updated and implemented as applicable for new areas of ground disturbance along the existing pipeline right-of-way. Prior to the issuance of a Land Use Permit, an updated RECRP ~~Habitat Revegetation, Restoration, and Monitoring Plan (HRRMP)~~shall be submitted to Planning and Development for approval. Once approved, the plan shall be implemented by PXP and monitored by Planning and Development through advanced written updates of construction status and plans. Success of the restoration and revegetation plans should be monitored by a qualified independent biologist. The plan shall contain, but not be limited to, the following: • Procedures for stockpiling and replacing topsoil, replacing and stabilizing backfill, such as at stream crossings, steep or highly erodible slopes, and in dune areas. Additionally, provisions ~~should~~ shall be made for recontouring to approximate the original topography. Excess fill shall be disposed of offsite unless suitable arrangements are made with the property owner. Excess fill shall not be deposited in any drainage, or on any unstable slope. Topsoil shall be salvaged, protected, and replaced. This shall include at a minimum the upper 6-12 inches of topsoil in all areas of open land, other than road shoulders. Final construction plans shall designate areas of topsoil storage and protection, and procedures for handling excess trench spoils. Within wetland areas, topsoil salvage shall be as described above except that wetland topsoil shall be stored separately from all other spoil piles. It shall be labeled with signs as "wetland topsoil." The plan shall contain specific provisions for protection of topsoil stockpiles (such as covering them or using a tackifier or temporary hydromulch) if the soil is to be left for an extended period of time to prevent loss of topsoil due to erosion. Stockpiles shall not be placed in biologically sensitive areas. • Specific plans for control of erosion, gully formation, and sedimentation, including, but not limited to, sediment traps, check dams, diversion dikes, culverts, and slope drains. Plans would also include, where applicable, dikes and catch basins proposed along the pipeline route, to ensure protection and maintenance of the height of berms and containment capacity of the basins, for the life of project. A soil conservation program, to be applied in areas of 20 percent (or greater) slopes along the pipeline corridor, detailing site specific techniques, such as use of jute or excelsior netting, to stabilize soil and sand and encourage revegetation of steeper slopes. Plans shall identify areas with high erosion potential and the specific control measures for these sites. • Procedures for containing sediment and allowing continued downstream flow at stream or biologically significant drainage crossings (identified in the EIS/EIR [84-EIR-7]), including scheduling construction activities during periods of historical low-flow and having erosion control structures or sediment retention devices in place prior to start of construction. Existing water levels in all streams shall be maintained at all	

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
			times during construction. • Procedures for timely re-establishment of vegetation that replicates indigenous and naturalized communities disturbed. These should include: measures preventing invasion and/or spread of undesired plant species; restoration of wildlife habitat; restoration of native communities and native plant species propagated from locally-acquired existing plant species, including any sensitive species (such as sand mesa manzanita, La Purisima manzanita, and black-flowered figwort); and replacement of trees at the appropriate rate. RECRP performance criteria for weed invasion shall be updated to require action to control any and all invasive noxious weeds (listed as of 2007 by the California Invasive Plant Council that could interfere with revegetation efforts. Examples include, but are not limited to, Cape ivy (*Delairea odorate*) and onion weed (*Asphodelus fistulosus*). • Procedures for minimizing tree removal, tree root and branch damage, and removal of or damage to other significant plant species including confining disturbance to the approved right-of-way; providing for onsite monitoring of construction by a qualified independent local biologist; and flagging significant species and areas that should be avoided. • Procedures for restoration of riparian corridor stream banks and streambed substrates and elevation, emphasizing natural and existing materials, shall be included as well as methods for minimizing exposure of riparian habitats to disturbance during construction. • Monitoring procedures and minimum performance criteria to be satisfied for revegetation and erosion control are specified in Table 5 of the existing RECRP. These criteria shall be updated as necessary for each vegetation type, including percent coverage that must be achieved, monitoring methods and frequencies, and quantitative thresholds for success, reevaluation, or remedial action. Updates to the existing RECRP~~The performance criteria should~~ shall consider the current level of disturbance and the condition of adjacent habitats. Consistent with the RECRP, monitoring ~~should~~ shall continue for 3-5 years, depending on habitat, or until performance criteria are met. Appropriate remedial measures, such as replanting, erosion control or weed (including invasive exotic species) control, shall be identified, using the existing RECRP as a guideline, and implemented if it is determined that performance criteria are not being met.	
TB.4	*Extension of Life*	Pipeline repair may injure or eliminate individuals or colonies and habitat of state or federally listed plant species including seaside bird's beak, Surf thistle, beach spectacle pod, La Graciosa thistle, Gaviota tarplant, and possibly Pismo clarkia.	TB–8 Prior to ground disturbance or other activities, a qualified botanist shall survey all proposed construction, staging and access areas for presence of state or federally-listed plant species and for coast buckwheat, which may support El Segundo blue butterfly. Colonies shall be mapped and clearly marked and numbers of individuals in each colony and their condition determined and recorded. To the maximum extent feasible, construction areas and access roads shall avoid loss of individual plant and or damage to habitats supporting federal or state-listed plants. TB-9 Where impacts to these species are unavoidable, the applicant shall develop and implement a site- and species-specific salvage, propagation, replanting, and monitoring	Insignificant

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
			~~program~~ plan consistent with the requirements of the RECRP that would utilize both seed and salvaged (excavated) plants constituting an ample and representative sample of each colony of the species that would be impacted. The ~~program~~ plan shall include measures to perpetuate to the maximum extent feasible the genetic lines represented on the impacted sites by obtaining an adequate sample prior to construction, propagating them and using them in the restoration of that site. The ~~program~~ plan shall be approved by the County, CCC, ~~U.S. Fish and Wildlife Service (~~USFWS~~)~~ and CDFG prior to its implementation. Activities involving handling of federal and/or state-listed plant species may require permits including a memorandum of understanding from USFWS and/or CDFG. The plan shall incorporate provisions for recreating suitable habitat and measures for re-establishing self-sustaining colonies of seaside bird's beak, beach spectacle-pod and Surf thistle should they be impacted on the site. The plan shall include provisions for monitoring and performance assessment including standards that would allow annual assessment of progress, and provisions for remedial action, should the species fail to re-establish successfully.	
TB.5	*Extension of Life*	Pipeline repair or maintenance may cause disturbance, injury or mortality to individuals and affect habitat of common and federally and state-listed fish and other sensitive wildlife species including western snowy plover, California least tern, California red-legged frog, California tiger salamander, southwestern pond turtle, tidewater goby, and steelhead.	Implementation of Mitigation Measures OWR-1, GR-1, and TB-4, scheduling the work during the dry season; TB-5, controlling erosion; TB-6, minimizing disturbance to native habitats; and TB-7, preparing and implementing of an approved Habitat, Revegetation, Restoration and Monitoring Plan would reduce impacts to native wildlife, including sensitive wildlife species. Pre-project surveys by a qualified biologist to determine presence/absence of sensitive species, and monitoring to ensure that sensitive species do not enter the construction area are additional appropriate species protection measures. These and other applicable measures are described more fully under the pipeline replacement alternative (see Mitigation Measures under Impacts TB.12 through TB.16). Scheduled maintenance and repair activities would normally be conducted after specific environmental review conducted as part of issuance of a grading permit or other permit by the Counties of Santa Barbara or San Luis Obispo, as applicable. Emergency repairs are subject to a different set of guidelines. Implementation of the following measure would further reduce impacts to wildlife species: TB-10 All routine pipeline repair and maintenance activities occurring within the beach and foredune habitats at landfall (Wall/Surf Beach) need to be scheduled to avoid the breeding season (March 1 to September 30) of the western snowy plover and California least tern. A contingency plan for emergency repairs in this area during the nesting season needs to be developed in coordination with 30 CES/CEVPN at VAFB and with the USFWS. This may require Section 7 consultation. Schedule and timing restrictions for this shall be included in the updated RECRP ~~Standard Maintenance and Repair Plan~~ (Mitigation Measure TB-6) to be submitted for SBC review and approval prior to land use clearance. The plan shall include impact avoidance measures to be implemented in the event that emergency repairs cannot be scheduled to avoid the breeding season.	Insignificant

Table ES.3b: Class II Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
GEOLOGIC RESOURCES (Section 5.3)				
GR.4	*Extension of Life*	Ground-disturbing maintenance activities could result in geologic disturbances such as slope failure, gullying, erosion, and sedimentation.	See Mitigation Measure GR-1 above.	Insignificant
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.3	*Extension of Life*	Continued monitoring and pipeline maintenance and replacement activities associated with the onshore pipeline system could cause disturbances to soils that could cause erosion and subsequent siltation resulting in degradation of surface water quality.	Implementation of Mitigation Measure OWR-1 and GR-1 would reduce potentials for causing significant erosion or siltation associated with excavation along the pipeline right-of-way, along with the following measure: OWR-6 If soil excavation is needed to expose buried pipeline or cleanup a spill within a stream bed, the area shall be restored to the maximum extent feasible to pre-spill conditions after excavation is completed.	Insignificant
OCEANOGRAPHY AND MARINE WATER QUALITY (Section 5.6)				
MWQ.2	*Drilling*	Reduced marine water and sediment quality would result from increased oceanic discharge of drilling fluids.	No additional mitigation is required beyond the requirements imposed by the NPDES discharge permit.	Insignificant
MWQ.3	*New Operations*	Reduced marine water quality would result from the oceanic discharge of produced water.	In addition to implementation of NPDES permit requirements, Mitigation Measure MB-3 would also apply to this impact.	Insignificant
MWQ.4	*Drilling* ~~*Extension of Life*~~*New Operations*	Reduced marine water quality would result from additional discharges of sanitary wastes, desalinization brine, and other materials from Platform Irene.	No mitigation measures beyond the NPDES permit restrictions currently imposed on the offshore facility are required.	Insignificant
CULTURAL RESOURCES (Section 5.12)				
CR.1	*Extension of Life*	Pipeline maintenance and repair would result in ground disturbance and potential impacts on cultural resources.	CR-1 PXP shall prepare and submit grading plans showing all ground disturbances within 200 feet of a recorded archaeological site. The grading plans shall be submitted to P&D prior to issuance of coastal development permit or land use clearance for grading. All ground disturbance within 200 feet of a recorded archaeological site shall be monitored by a County-qualified archaeologist and, if prehistoric, by a Native American observer, unless the resource has been previously determined to have no potential for significance because it is re-deposited, an isolated occurrence, modern, or otherwise lacks data potential. CR-2 PXP shall revise grading plans to include note for protocols to follow during unexpected discovery of archaeological resources. The grading plans shall be submitted to P&D prior to issuance of coastal development permit or land use clearance for grading.	Insignificant

Table ES.3b: Class II Impacts of the Proposed Project

Impact #	Project Phase	Description of Impact	Mitigation Measures	Residual Impact
			Prior to construction all crew members shall receive training on unanticipated cultural resource discovery protocols. In the event of an unanticipated cultural resource discovery during construction, all ground disturbances within 200 feet of the discovery shall be halted or re-directed to other areas until the discovery has been documented by a county-qualified archaeologist, and its potential significance evaluated consistent with Santa Barbara County Cultural Resource Guidelines. Resources considered significant shall be avoided by project redesign. If avoidance is not feasible, the cultural resource shall be subject to a Phase 3 data recovery mitigation program (with Native American monitoring, if applicable), consistent with Santa Barbara County Cultural Resource Guidelines. CR-3 If pipeline maintenance and repair are planned on a segment of the unsurveyed pipeline route, then a Phase I archaeological surface survey shall be conducted prior to land use clearance for grading to identify any cultural resources that may be affected. If a cultural resource is encountered during the survey, it shall be documented by a County-qualified archaeologist and its potential significance evaluated in terms of applicable criteria prior to maintenance and repair work. Resources considered significant shall be avoided or subject to a Phase 3 data recovery program (with Native American monitoring, if applicable), consistent with Santa Barbara County Cultural Resource Guidelines.	
CR.4	*Extension of Life*	Pipeline repair associated with an accidental produced water spill from the pipeline would result in ground disturbance and potential impacts on cultural resources.	Mitigation Measures CR-1 and CR-2 would be applicable.	Insignificant
AGRICULTURAL RESOURCES (Section 5.15)				
AG.4	*Extension of Life*	Potential loss of agricultural productivity during pipeline repair and maintenance.	~~**AG-2** Monetary Payment for Lost Agricultural Productivity. Landowners shall receive compensation for the loss of any crops directly resulting from pipeline replacement activities. Compensation will take into account the duration of lost agricultural productivity~~ AG-2~~3~~ Soil Replacement and Replanting. All soils within agricultural lands disturbed by pipeline replacement activities shall be replaced and if necessary enriched to support their former crops (or cattle grazing areas). All disturbed areas shall be restored in accordance with land owner agreements ~~replanted at a 1:1 ratio. Applicant shall prepare and submit for SBC review and approval, a soil preservation plan that describes activities, including soil replacement, soil enrichment, and replanting (at a 1:1 ratio) to take place after pipeline replacement activities~~.	Insignificant

TABLE ES.3c
CLASS III IMPACTS OF THE PROPOSED PROJECT
Impacts that are Adverse but Insignificant
(In accordance with State and local policy, impacts are to be mitigated to the maximum extent feasible.)

Table ES.3c: Class III Impacts of the Proposed Project

Impact #	Project Phase	Description of Impact	Mitigation Measures	Residual Impact
Construction and Operations				
GEOLOGICAL RESOURCES (Section 5.3)				
GR.6	*Operation*	Earthquake-induced tsunami could cause scour and endanger worker safety.	GR-4 The applicant shall conduct a study to determine the probable maximum tsunami and evaluate potential flooding and scour in the Santa Ynez River valley and at project facilities, as appropriate. The scour analysis shall determine a minimum burial depth to protect the pipe. In addition, the Applicant shall include in the Project Safety Plan a discussion of tsunami hazards, training and ensure that work crews receive tsunami-warning notifications from the Pacific Tsunami Warning Center (operated by NOAA) in accordance with the safety plan. If no such Project Safety Plan is prepared, a tsunami safety plan is herein required and shall include a protocol for workers to follow in the event of a tsunami. The tsunami plan shall be submitted to SBC P&D for review and approval prior to land use clearance.	Insignificant
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.5	*Extension of Life*	Increased water injection rates could potentially infiltrate fresh water aquifers.	No mitigation measures are proposed because of existing regulatory oversight of injection wells.	Insignificant
OWR.6	*Extension of Life*	~~Continued use of groundwater by LOGP~~The project could contribute or lead to groundwater basin~~an~~ overdraft~~condition~~.	No mitigation measures are ~~been~~ proposed because of the nominal contribution of the LOGP.	Insignificant
MARINE BIOLOGICAL RESOURCES (Section 5.5)				
MB.1	*Increase Throughput Extension of Life*	Oil spills from the project may impact plankton.	No mitigation measures have been identified.	Insignificant
MB.2	*Drilling*	The discharge of drilling muds and cuttings from Platform Irene may potentially impact marine organisms in the project area.	MB-2 The shunt depth (150 feet below the sea surface) for the discharge of drilling muds and cuttings shall be continued for the proposed project. The shunt depth shall be stated in the development plan that is submitted to MMS prior to drilling.	Insignificant
MB.3	*Operations*	Discharge of produced water from Platform Irene may potentially impact marine organisms in the project area.	MB-3 The shunt depth (180 feet [55 m] below the sea surface) for the discharge of produced water shall be continued for the proposed project. The shunt depth shall be stated in the development plan that is submitted to MMS prior to drilling.	Insignificant
MB.4	*Drilling*	Noise caused by drilling activities may potentially disturb marine mammals and marine birds in the project area.	No mitigation measures have been identified.	Insignificant

Table ES.3c: Class III Impacts of the Proposed Project

Impact #	Project Phase	Description of Impact	Mitigation Measures	Residual Impact
MB.6	*Operations*	The uptake of sea water may result in impingement and entrainment of marine organisms.	No mitigation measures have been identified.	Insignificant
MB.7	*Operations*	Lighting on Platform Irene may have adverse effects on fishes and zooplankton.	No mitigation measures have been identified	Insignificant
COMMERCIAL AND RECREATIONAL FISHING/KELP HARVESTING (Section 5.7)				
CRF/ KH.3	*Drilling*	The discharge of drilling muds and drill cuttings from Platform Irene may potentially impact kelp communities in the project area.	No mitigation measures have been identified.	Insignificant
CRF/ KH.4	*Drilling Extension of Life*	Marine Vessel traffic to and from Platform Irene could cause loss or damage to commercial fishing gear in the project area.	CRF/KH-1 Disputes over damage to commercial fishing gear resulting from support vessel traffic to and from Platform Irene shall be submitted to the Joint Oil/Fisheries Committee for resolution.	Insignificant
CRF/ KH.5	*Drilling Extension of Life*	The deposition of shells, or shell mounds, could prevent commercial trawling activities beneath Platform Irene.	CRF/KH-2 At the time of platform abandonment, the Applicant shall ensure that the environmental review of the abandonment activities pursuant to the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA), as appropriate, includes an analysis as to whether or not the shell mounds should be removed or modified so they do not interfere with commercial trawling activities. This subsequent NEPA/CEQA review shall evaluate the best available technologies for removal or modification of the shell mounds. The best available technology shall be determined by the Applicant and the permitting agencies, in consultation with the Joint Oil/Fisheries Liaison Office and shall be implemented.	Insignificant
AIR QUALITY (Section 5.8)				
Air.1	*Construction*	Construction activities would generate air emissions.	Air-1 PXP shall prepare and submit Dust Control and Reduction Plan to SBCAPCD prior to land use clearance. PXP shall implement dust reduction measures during construction. The following APCD Standard Dust Mitigation Measures shall be implemented: 1. Dust generated by the development activities shall be retained onsite and kept to a minimum by following the dust control measures listed below. Reclaimed water shall be used whenever possible. a. During clearing, grading, earth moving or excavation, water trucks or sprinkler systems are to be used in sufficient quantities to prevent dust from leaving the site and to create a crust, after each day's activities cease. b. After clearing, grading, earth moving or excavation is completed, the disturbed area must be treated by watering, or revegetating; or by spreading soil binders until the area is paved or otherwise developed so that dust generation would not occur. c. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency will be required whenever the wind speed exceeds 15 mph. 2. Importation, exportation and stockpiling of fill material:	Insignificant

Table ES.3c: Class III Impacts of the Proposed Project

Impact #	Project Phase	Description of Impact	Mitigation Measures	Residual Impact
			a. Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. b. Trucks transporting fill material to and from the site shall be tarped from the point of origin. c. If the construction site is greater than five acres, gravel pads must be installed at all access points to minimize tracking of mud onto public roads. 3. Activation of increased dust control measures: a. 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 APCD.	
Air.3	*Increased Throughput Extension of Life*	Increased health risks from the increased air emissions due to the expected increase in equipment operation and oil volumes processed.	No mitigation measures have been identified.	Insignificant
TRAFFIC (Section 5.9)				
T.1	*Construction*	Onshore construction associated with the project would temporarily add to local road traffic.	T-1 PXP shall include a restriction on delivery of equipment and supplies to non-rush hour periods (rush hour periods are considered to be 7a.m. to 9a.m. and 4p.m. to 6p.m.) in the project construction plans that are sent out in the contractor bid packages. The construction plans shall be submitted to SBC Planning and Development for approval prior to land use clearance.	Insignificant
T.2	*Increased Throughput Extension of Life*	Increased production at LOGP would increase facility truck traffic on local roads.	T-2 PXP shall include a restriction on LPG/NGL and sulfur truck traffic at the LOGP to non-rush hour periods (rush hour period are considered to be 7a.m. to 9a.m. and 4p.m. to 6p.m.) in their contracts with vendors. The applicant shall also document arrival and departure times for these trucks. This requirement shall be include in the Traffic Management Plan (TMP). The revised TMP shall be submitted to SBC Planning and Development for approval prior to land use clearance.	Insignificant
T.3	*Drilling*	Increased offshore drilling activity would increase offshore traffic.	T-3 Require supply boats from Port Hueneme to use the Coast Guard's recommended marine traffic corridors to the maximum extent feasible.	Insignificant
NOISE (Section 5.10)				
N.1	*Drilling*	Drilling associated with the proposed project would increase ambient noise levels due to drilling rig operation and additional helicopter and supply boat trips.	N-1 PXP shall adhere to ~~establish~~ overland flight height minimums of 1,000 feet when feasible with the approval of the FAA, and shall not fly over Oso Flaco Lake.	Insignificant
N.2	*Construction*	Construction noise would temporarily increase ambient daytime noise levels.	*N-2 Construction activities shall be limited to 7:00 a.m. and 4:00 p.m., Monday through Friday. Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions. Signs shall note appropriate contact information for a complaint to be filed. Signs stating these restrictions shall be provided by the applicant and posted on site. Signs shall be in place prior to issuance of Land Use*	Insignificant

Table ES.3c: Class III Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
			Permit and throughout grading and construction activities. All complaints received shall be forwarded to SBC within 24 hours of receipt by PXP.	
N.3	*Extension of Life*	Operations noise from pumps would increase long-term ambient noise levels.	No mitigation measures have been identified.	Insignificant
AESTHETICS/VISUAL RESOURCES (Section 5.13)				
Visual.2	*Operations*	**Visual impacts due to installation of new equipment at Valve Site #2 and the LOGP.**	Visual-2 To minimize visual effects, all new equipment shall be painted in colors that are compatible with the surroundings. The applicant shall submit the painting plans for the new facilities to SBC P&D before land use clearance. In addition, future painting plans for any existing portions of the LOGP shall be submitted to SBC for review and approval prior to commencing with painting.	Insignificant
AGRICULTURAL RESOURCES (Section 5.15)				
AG.1	*Construction*	Addition of power poles and substation to Valve Site #2 could disturb farm operations.	No mitigation measures have been identified.	Insignificant
AG.2	*Construction Increased Throughput Extension of Life*	Increased truck trips during construction and operation. Increased traffic unlikely to interfere with farm operations.	No mitigation measures have been identified.	Insignificant
ENERGY AND MINERAL RESOURCES (Section 5.16)				
Energy.1	*Construction*	Impacts to energy resources due to electricity and fuel consumption during construction phase.	No mitigation measures have been identified.	Insignificant
Energy.2	*New Operations Increased Throughput Extension of Life*	Impacts due to increased electricity and natural gas consumption by additional or upgraded equipment and due to increased operation of the existing equipment.	Energy-1 PXP ~~The applicant~~ shall prepare an energy efficiency Study ~~to~~ be reviewed and approved by SBC and then implemented by PXP. The Study shall address future energy consumption by function (i.e., heater treaters, etc.) and assess available options to optimize energy efficiency utilizing existing equipment and operations. The Study shall also include a cost-benefit analysis for cogeneration. The Study shall be submitted to SBC for review and approval prior to land use clearance for the Tranquillon Ridge Project modifications at the LOGP facility. Energy efficiency measures deemed feasible by the County shall be incorporated into the LOGP modifications.	Insignificant

Table ES.3c: Class III Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
Accidental Releases (e.g. Oil Spills and Gas Releases)				
HAZARDOUS MATERIALS/RISK OF UPSET (Section 5.1)				
Risk.1	*Increased Throughput Extension of Life*	The proposed project could generate risks to public safety by exposing the public to crude oil spills and subsequent fires.	Risk-1 ~~The applicant shall install an upgraded SCADA system on the existing emulsion line and a new system on the produced sour gas line. The new system shall have improved sensitivity to detect leaks, similar to the upgrade installed on PXP's Point Arguello facility. The new SCADA system should be able to detect 0.08 percent of flow leaks in less than 48 minutes and be able to detect leaks as small as 1/16 inch in diameter in less than two minutes.~~ The applicant shall install an upgraded state-of-the-art leak detection system on the existing emulsion pipeline and on the sour gas pipeline. The upgraded system shall use the Best Available Technology (BAT) for detection of small leaks (less than 0.5 inches in diameter) in the emulsion pipeline. The applicant shall provide the County with a comparative analysis of available technologies that have been used in applications similar to this project and the demonstrated effectiveness and reliability of those systems. The County shall review and approve the leak detection technology prior to its installation. Review and approval of the comparative analysis and installation of the approved leak detection system shall occur prior to land use permit approval.	Insignificant
Risk.2	*Extension of Life*	The proposed project could generate risks to public safety by exposing the public to produced gas releases from the sour gas pipeline from Platform Irene to the LOGP.	Risk-2 The ~~applicant~~ operator shall ensure that pipeline operation does not exceed 600 pounds per square inch (psig) and 8,000 parts per million (ppm) hydrogen sulfide. If any increase in pipeline operating pressure and/or hydrogen sulfide concentration is proposed, the operator shall conduct a risk assessment to demonstrate to the County's satisfaction that such increase would not expand the existing hazard footprint associated with the sour gas pipeline. If such demonstration cannot be made, the proposed increase in pressure/concentration shall not be approved or implemented. Mitigation Measure Risk-1 would also apply.	Insignificant
COMMERCIAL AND RECREATIONAL FISHING/KELP HARVESTING (Section 5.7)				
CRF/ KH.1	*Increased Throughput Extension of Life*	Oil spills may potentially impact commercial and recreational kelp harvests in the proposed project area.	Mitigation Measures MB-1a and MB-1b in Section 5.5, Marine Biology, would mitigate Impact CRF/KH.1 to the maximum extent feasible in accordance with County policies.	Insignificant
FIRE PROTECTION/ EMERGENCY RESPONSE (Section 5.11)				
Fire.1	*New Operations*	Due to equipment modifications at the Valve Site #2 the increased potential for upset conditions at the site could create impacts to fire protection and emergency response resources.	Fire-1 PXP shall review and revise the Fire Protection Plan, Emergency Response Plan, and Oil Spill Response Plan that apply to all the facilities which will have equipment or operations modifications due to the proposed project. The plans shall be submitted to the SBC Fire Department and P&D for review and approval prior to land use clearance.	Insignificant
Fire.2	*Operations*	Operation of the new power line to Valve Site #2 could result in impacts to fire protection and emergency response resources due to addition of an ignition	Fire-2 The applicant shall update the LOGP Fire Protection Plan (FDP Condition P-10) to include the power line, in particular, the Flammable Vegetation Management Plan and Fire Prevention and Inspection Program parts of the plan, to minimize possibility of a brush fire. The applicant shall submit the updated Fire	Insignificant

Table ES.3c: Class III Impacts of the Proposed Project				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
		source into a high fire hazard area.	Protection Plan to SBC Fire Department for review and approval prior to land use clearance.	
Fire.3	*Increased Throughput Extension of Life*	Increased risk of upset due to increased oil flow rates through the project pipelines and pipeline facilities could create impacts to fire protection and emergency response resources.	No mitigation measures have been identified.	Insignificant
Fire.4	*Operations Increased Throughput Extension of Life*	Increased likelihood of upset conditions due to equipment modifications at the LOGP and potential increase of wet oil and sour gas quantities processed at the facility could create impacts to fire protection and emergency response.	No mitigation measures have been identified.	Insignificant

Table ES3.d
Cumulative Impacts of the Proposed Project

HAZARDOUS MATERIALS/RISK OF UPSET
Offshore development of the potential federal Outer Continental Shelf (OCS) oil and gas projects would be expected to result in cumulative public safety impacts related to: oil spills and related fires; natural gas releases, including sour gas releases due to pipeline ruptures and leaks; and exposure to hazardous materials, including Natural Gas Liquids (NGLs) and Liquid ~~Natural~~ Petroleum Gases (~~LNG~~LPGs) due to truck transportation risks. Although the degree of significance associated with these cumulative impacts cannot be reasonably predicted within the context of this document due to a lack of information regarding these potential federal OCS projects, based upon the proposed project's risk of upset impacts it is expected that the proposed project's incremental contribution to cumulative risk of upset impacts would not be considered significant for oil spills or gas releases, but significant for LNG truck transport. In addition, the offshore development projects are expected to generate a cumulative impact as a result of NGL/~~LNG~~LPG transport. The potential offshore oil and gas development projects located within State waters are located a substantial distance away from the proposed project, thus, no overlap in cumulative impacts to public safety would be anticipated to occur, and the proposed project's incremental contribution to theses impacts would not be expected to be cumulatively significant. Potential onshore development projects would contribute to an already significant cumulative impact by increasing the traffic on roadways that are used by the trucks that transport NGL/~~LNG~~LPGs from the Lompoc Oil and Gas Plant (LOGP) facility. The route principally affected would be Harris Grade Road and the areas within Lompoc where NGL/~~LNG~~LPGs are transported. With additional vehicles on the roadways used for NGL/~~LNG~~LPG transportation, the consequences of a NGL/LNG truck accident would increase in severity for this already significant impact. Santa Barbara County Safety Element Supplement Policies 2A, 3A, and 3B, and Planned Development Policy 3(c) would preclude the siting and construction of future residential developments within the hazard footprints of the proposed project's existing onshore pipelines; therefore, with full implementation of this policy, the number of additional ~~would consequentially put more~~ people placed at risk due to ~~in harms way in the event of~~ a pipeline ~~accident~~failure (rupture or leak) would be minimized. ~~However~~Given the nominal frequency value for emulsion or gas pipeline failure, and with implementation of the policies listed above and the mitigation measures identified in this Environmental Impact Report to reduce potential risk of upset impacts, the proposed project's incremental contribution to cumulative impacts associated with pipeline failure hazards would not be expected to be significant.
TERRESTRIAL AND FRESHWATER BIOLOGY
Incrementally, the proposed project would not significantly contribute to cumulative impacts related to terrestrial and freshwater biology; impacts associated with the proposed project could be mitigated to a level of less than significant. However, the combined impacts from the other potential off- and onshore development projects would be significant due to: an increased oil spill potential; the removal of vegetation due to construction; the introduction of non-native vegetation; and, increased disturbances to wildlife from additional lights, traffic, and noise.
ONSHORE WATER RESOURCES
Impacts to onshore water resources from the potential onshore development projects would not be expected to be cumulatively significant. However, the potential offshore oil and gas development projects could result in significant cumulative impacts to onshore water resources due to an increased potential for oil spills into surface water bodies. The proposed project's incremental contribution to these oil spill-related cumulative impacts into surface water bodies would also be expected to be significant.
MARINE BIOLOGICAL RESOURCES
Potential onshore development projects would not cumulatively impact marine biological resources. Potential offshore oil and gas development projects would not be expected to result in cumulatively significant impacts related to: marine traffic collisions with marine mammals and fish; noise; drilling muds discharges; or, produced water discharges. Similarly, the proposed project would not be expected to significantly contribute to these types of cumulative impacts. However, cumulative impacts associated with the effects of an offshore or coastal oil spill(s) on marine biological resources, including the proposed project's incremental contribution to them, would be expected to be significant.

Table ES3.d
Cumulative Impacts of the Proposed Project

OCEANOGRAPHY AND MARINE WATER QUALITY
Although there would be no impacts to marine water quality from the potential onshore development projects, the potential offshore oil and gas development projects, and their associated underwater pipelines, could result in cumulatively significant impacts to marine water quality and sediments due to an increased potential for oil spills. The proposed project's incremental contribution to oil spill-related cumulative impacts on oceanography and marine water quality could also be significant.
COMMERCIAL AND RECREATIONAL FISHING/KELP HARVESTING
There would be no cumulatively significant impacts to commercial and recreational fishing and kelp harvesting due to the potential onshore development projects. The potential offshore projects would not be expected to result in cumulatively significant impacts related to kelp beds and harvesting, drilling muds discharges, marine vessel traffic damage to fishing gear, or shell mounds, nor would the proposed project's incremental contribution to these types of cumulative impacts be expected to be significant. However, due to an increased potential for oil spills, cumulative impacts on commercial and recreational fishing and kelp harvesting due to the potential offshore oil and gas development projects, including the proposed project's incremental contribution to these impacts, could be significant.
TRAFFIC
The marine traffic associated with construction and operation of the potential offshore oil and gas development projects would not be expected to be cumulatively significant. Construction-related impacts from the potential onshore development projects, if they occur at the same time as the proposed project, could be cumulatively significant due to use of the same local roadways, such as Harris Grade Road. However, with full implementation of recommended mitigation measures, the proposed project's incremental contribution to these cumulative impacts would not be expected to be significant.
CULTURAL RESOURCES
Overall, cumulative impacts to cultural resources due to construction and routine operation of the potential on- and offshore development projects could be significant but fully mitigable, and the proposed project's incremental contribution to these impacts, with implementation of applicable mitigation measures that have been recommended, would not be expected to be significant. However, potential impacts from oil spill cleanup activities could be adverse and significant. The likelihood of oil spills and their subsequent cleanup activities would be increased if the potential offshore oil and gas development projects were developed. Cumulative oil spill cleanup impacts on cultural resources, including the proposed project's incremental contribution to them, could be significant.
AESTHETICS/VISUAL RESOURCES
If implemented, the potential offshore oil and gas development projects, including the proposed project, would be expected to result in cumulatively significant visual impacts due to either: (1) the construction and operation of new offshore facilities (platforms); or, (2) the extended lifetime of existing facilities. These facilities would be visible from the Coastal Zone. The potential onshore development projects within the proposed project area would result in an irreversible loss of open space and additionally change the visual character of affected local areas from semi-rural to urban. Therefore, their cumulative impacts to existing visual resources would be expected to be significant and the proposed project's incremental contribution to these impacts would also be significant due to the prolonged lifetime of the LOGP.
RECREATION/LAND USE
The potential onshore development projects would not be expected to result in significant cumulative impacts to recreation and land use, and the proposed project would not be expected to significantly contribute to these types of cumulative impacts. However, the potential offshore oil and gas development projects, and their associated underwater pipelines, could result in cumulatively significant impacts to coastal recreational areas due to an increased potential for oil spills, and the proposed project's incremental contribution to these cumulative recreational impacts would be considered cumulatively significant as well.
AGRICULTURAL RESOURCES

Table ES3.d
Cumulative Impacts of the Proposed Project

The onshore development projects located in the Santa Maria-Orcutt area could result in a cumulatively significant impact to agricultural resources due to the permanent loss of agriculturally productive lands. If all of the potential offshore oil and gas development projects were to occur, it is likely that a new onshore processing facility and associated connecting pipelines would be needed in northern Santa Barbara County (the Casmalia area). Introducing new onshore facilities, and extending the lifespan of existing onshore facilities, would increase the potential for disturbing agricultural production during both construction and operation; cumulative impacts could be significant. However, the proposed project's contribution to these impacts, while adverse, would not be considered significant with implementation of recommended mitigation measures.
GEOLOGICAL RESOURCES
Cumulative impacts to geological resources from the potential on- and offshore development projects would be localized and not expected to be significant. The combined impacts associated with erosion and sedimentation due to construction and operation of new onshore facilities related to the potential offshore oil and gas development projects could be mitigated to a level of less than significant. Therefore, cumulative geologic impacts, and the proposed project's incremental contribution to them, would not be expected to be significant.
AIR QUALITY
Air quality impacts from construction of the potential offshore oil and gas development projects could be adverse. However, these impacts could be mitigated to a level of less than significant by the provisions for emission reduction offsets as required by the Santa Barbara County Air Pollution Control District's (SBCAPCD's) regulations. Operational impacts associated with the potential offshore oil and gas development projects could also be mitigated to a level of less than significant with application of the emission reduction offsets required by the SBCAPCD's regulations. Therefore, cumulative construction and operational emissions, including the proposed project's incremental contribution to them, would not be considered significant. The potential onshore development projects are likely to result in significant air quality impacts. However these potential projects were conceptually accounted for in the 2004 Clean Air Plan; therefore, their associated air quality emissions would be expected to be consistent with the air quality planning document that is currently used to bring the region into attainment with ambient air quality standards. Cumulative impacts, including the proposed project's incremental contribution to them, would not be expected to be significant. Both onshore and offshore development projects would contribute to greenhouse gas emissions at varying levels. Significance of these impacts is not assigned.
NOISE
Cumulative noise impacts from the potential offshore oil and gas development projects would not be significant since their construction and operation would not occur within areas that are in close proximity to sensitive receptors, other than an increase in helicopter fly overs. However, if FAA flight paths and heights are utilized, no significant cumulative impact, including the proposed project's incremental contribution, is expected. Construction of some of the onshore development projects may be close to sensitive receptors and, therefore, could have cumulatively significant impacts. However, with implementation of recommended mitigation measures for noise, the proposed project's incremental contribution to cumulative noise impacts would not be expected to be significant.
FIRE PROTECTION AND EMERGENCY RESPONSE
The potential offshore oil and gas development projects would be required to develop, regularly update, and implement (as needed) emergency response and fire protection plans. These plans would be reviewed and approved by local fire departments. Additionally, existing facilities associated with offshore oil and gas development contribute funds to local fire protection and emergency response services, and any new facilities would be required to do so as well. Therefore, cumulative impacts, including the proposed project's incremental contribution to them, would be not significant. The residential and other onshore cumulative projects located in the Lompoc and Santa Maria-Orcutt areas would be adequately protected due to existing fire and emergency response services in the region, and the planned expansion of Fire Station No. 51; therefore, their cumulative fire protection and emergency response services impacts, and the proposed project's incremental contribution to them, would not be expected to be significant.

Table ES3.d
Cumulative Impacts of the Proposed Project

ENERGY RESOURCES
Potential offshore oil and gas development projects would be expected to utilize efficient technologies for drilling and production, and some of them may use existing facilities. Use of existing facilities would substantially reduce the overall energy consumption per barrel of oil produced by avoiding construction-related energy use and taking advantage of underutilized transportation and processing capacity. Therefore, the cumulative impact on energy resources, including the incremental contribution of the proposed project, would not be considered significant. With the exception of the Lompoc Wind Energy Project, which would generate up to 80 to 120 megawatts of commercially available power, the potential onshore development projects would be expected to require more energy. However, this potential development is not expected to affect available power supply or distribution in the area. Therefore, the cumulative energy resources impacts associated with these onshore development projects, including the proposed project's incremental contribution to them, would not be considered significant.

Table ES.4a
CLASS I Impacts of the VAFB Onshore Alternative
Impacts that may not be Fully Mitigated to Less than Significant Levels

(Impacts that must be addressed in a "statement of overriding consideration" if the project is approved in accordance with Sections 15091 and 15093 of the State CEQA Guidelines.)

Table ES.4a: Class I Impacts of the VAFB Onshore Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
RISK OF UPSET/HAZARDOUS MATERIALS (Section 5.1)				
Risk.4	*Operation*	The alternative project could generate additional risks to public safety by exposing the public to produced gas releases from the new drilling/production/processing facilities, additional length of sour gas pipeline and new metering/pigging facilities at the PXP pipeline tie-in station that could leak gas.	See Mitigation Measures Risk-1 and Risk-2. Risk-4 The applicant shall conduct a facility siting study using an accepted industry standard (e.g., API Recommended Practice 752: Management of Hazards Associated With Location of Process Plant Buildings) to select the best location of gas treating equipment so as to minimize the impact of sour gas releases at Space Launch Complex 5. Risk-5 The applicant shall coordinate with the Air Force in the development of an emergency protocol that is satisfactory to SBC, and addresses how access for safety will be allowed during launch periods for critical events such as explosions, fires, and vapor cloud incidents at the production facility Risk-6 The applicant shall install hydrogen sulfide and flammable gas sensors in-plant and at the fence line to detect the presents of gas leaks. Before unsafe levels are reached, an emergency plan shall be activated to close Coast Road, Delphy Road and Surf Road to all vehicle and pedestrian traffic and to stop any rail traffic. Risk-7 Excess flow valves shall be installed on the gas pipeline at the VAFB production site location and automatic shutoff valves and/or check valves shall be installed on the emulsion pipeline at intermittent locations to minimize the amount of gas or crude oil/emulsion that could be released in the event of a pipeline leak or rupture.	Significant (If Class II, insignificant)
TERRESTRIAL AND FRESHWATER BIOLOGY (Section 5.2)				
TB.9	*Construction*	Drilling noise, construction, and accidental release of boring materials ("frac-outs") during construction activities related to boring could impact one or more sensitive wildlife species.	Mitigation Measure TB-4, scheduling the work during the dry season, would reduce run off and potentially enhance the early detection of a "frac-out" in the Santa Ynez River. Implementation of Mitigation Measures TB-3, TB-5, TB-6 and TB-7 would reduce impacts to vegetation and wildlife habitat, and should be implemented along with the following measures: TB-15 If construction activities are scheduled to occur during the breeding season for the sensitive bird species (March 1 through September 30), pre-construction surveys shall be carried out by a qualified biologist to determine if nests of any of these species are present within 100 meters from the construction locations. If nests are found, construction activities shall be postponed until after the end of the breeding seasons of these bird species, on October 1. Results of surveys and recommended actions shall be submitted to SBC for review and approval prior to construction. TB-16 Prior to commencement of boring, a detailed site-specific Frac-Out Contingency Plan shall be developed that would include, but is not limited to the following, site	Significant

Table ES.4a: Class I Impacts of the VAFB Onshore Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
			analysis to determine optimum depth to prevent "frac-outs", use of fluorescent dye in drilling fluids, seasonal restrictions on work to be conducted, mapped locations of sensitive resources, measures to reduce the project footprint. The plan shall also contain methods to identify, report, and respond to "frac-outs," including notification procedures, response equipment staging, and site-specific clean-up procedures. TB-17 All boring activities shall be monitored to ensure all precautionary measures are taken to prevent release of drilling fluids into aquatic and terrestrial habitats. Prior to construction, bore crews and monitors shall receive specific training in operational methods to reduce the incidence of frac-outs, and in frac-out response and reporting procedures. Documentation that training has been completed shall be submitted to SBC and CCC for review and approval prior to construction.	
TB.10	*Construction*	~~Replacement of the existing pipeline from landfall to the LOGP has the potential to remove or damage up to 88.6~~Construction of the drilling site and installation of the pipelines, tie-in station, substations, and power lines have the potential to remove or damage up to 76.65 acres of native vegetation and wildlife habitat including sensitive plant species.	Mitigation Measures TB-1 and TB-3 (avoiding sensitive plant species and wildlife) would be less feasible due to the large area required for onshore drilling and production operations, and the linear nature of the pipeline corridor. These measures should be implemented when feasible. Mitigation Measure TB-2 would also apply. Revegetating the area impacted during pipeline installation (Mitigation Measures TB-6 and TB-7) with native species, including any sensitive plant species would reduce impacts. The amount of required restoration would be greater and the revegetated species assemblages would be adjusted to more accurately represent the disturbed habitat along Surf and Coast Roads.	Significant
TRAFFIC (Section 5.9)				
T.~~4~~3	~~*Drilling*~~ *Operations*	~~Increased offshore drilling activity would increase offshore traffic.~~An oil spill could result in the disruption of onshore transportation infrastructure.	T-4 Consultation with VAFB shall be conducted to develop a Construction Traffic Management Plan that minimizes conflicts to Base operations during alternative construction and operation. In addition, the Plan shall address traffic related to potential oil spill clean-up operations. The VAFB-approved plan shall be provided to SBC prior to land use clearance for review and approval.	Significant
CULTURAL RESOURCES (Section 5.12)				
CR.5	*Construction*	Disturbance or destruction of cultural sites that may contain significant or potentially significant cultural materials due to the construction of new drilling/production/ processing facilities, pipelines, power lines, tie-in station, and electrical substations..	CR-6 Prior to the approval of a Final Development Plan for the onshore drilling alternative, a comprehensive cultural resources mitigation plan shall be submitted to the County of Santa Barbara and the Vandenberg Air Force Base Cultural Resources Program Manager for review and approval. The plan shall include at minimum the following elements: 1. A complete inventory of previously known sites, their characteristics, and potential significance that may exist within 200 feet of potential ground disturbance. 2. Results of a Phase I archaeological survey covering all previously unsurveyed areas within 200 feet of identified construction footprints and corridors. 3. Procedures for monitoring during construction, the evaluation of newly discovered cultural or paleontological materials, and mitigation through avoidance, in situ preservation, research, or data recovery, as warranted before construction is allowed to continue. These procedures shall incorporate Native American representation.	Significant (If Class II, insignificant)
AESTHETICS/VISUAL RESOURCES (Section 5.13)				
Visual.5	*Operations*	New oil and gas facilities due to their tall	Mitigation Measures Visual-2 and Visual-4 would apply.	Significant

Table ES.4a: Class I Impacts of the VAFB Onshore Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
~~nighttime~~		structures and glare from lighting could impact visual resources in the area.		(If Class II, insignificant)

Table ES.4b
CLASS II Impacts of the VAFB Onshore Alternative
Impacts that can be Mitigated to less than Significant Levels

(Impacts that must be addressed in a "statement of overriding consideration" if the project is approved in accordance with Sections 15091 and 15093 of the State CEQA Guidelines.)

Table ES.4b: Class II Impacts of the VAFB Onshore Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
~~RISK OF UPSET/HAZARDOUS MATERIALS (Section 5.1)~~				
~~Risk.4~~	~~*Operations*~~	~~The alternative project could generate additional risks to public safety by exposing the public to produced gas releases from the new drilling/production/processing facilities and additional length of sour gas pipeline that could leak gas.~~	~~See Mitigation Measures Risk-1 and Risk-2.~~ ~~Risk-4 The applicant shall conduct a facility siting study using an accepted industry standard (e.g., API Recommended Practice 752: Management of Hazards Associated With Location of Process Plant Buildings) to select the best location of gas treating equipment so as to minimize the impact of sour gas releases at Space Launch Complex 5.~~ ~~Risk-5 The applicant shall coordinate with the Air Force in the development of an emergency protocol that is satisfactory to SBC, and addresses how access for safety will be allowed during launch periods for critical events such as explosions, fires, and vapor cloud incidents at the production facility~~ ~~Risk-6 The applicant shall install hydrogen sulfide and flammable gas sensors in-plant and at the fence line to detect the presents of gas leaks. Before unsafe levels are reached, an emergency plan shall be activated to close Coast Road, Delphy Road and Surf Road to all vehicle and pedestrian traffic.~~ ~~Risk-7 Excess flow valves shall be installed on the gas pipeline at the VAFB production site location and automatic shutoff valves and/or check valves shall be installed on the emulsion pipeline at intermittent locations to minimize the amount of gas or crude oil/emulsion that could be released in the event of a pipeline leak or rupture.~~	~~Insignificant~~
TERRESTRIAL AND FRESHWATER BIOLOGICAL RESOURCES (Section 5.2)				
TB.12	*Construction*	Pipeline and power line construction has the potential to result in disturbance to and loss of wetland and aquatic biota.	Measures identified in Section 5.3, Geologic Resources, and Section 5.4, Onshore Water Resources, would reduce impacts on aquatic biological resources. These measures include OWR-1, and GR-1. Mitigation Measures TB-6, minimize disturbance to native habitats, and TB-7, preparation and implementation of an approved HRRMP shall be also implemented. TB-18 Erosion and sediment control measures, which shall include the use of silt fencing, dust control, and other appropriate measures, shall be implemented at drainages; along portions of the right-of-way that intersect slopes greater than a 2-to-1 incline; and within 200 feet of downslope water bodies. Appropriate erosion and sediment control measures shall be installed and maintained until revegetation of the disturbed area is considered successful. (The use of straw bales and silt fences as erosion control protection shall not be considered to be appropriate in areas grazed by cattle unless the cattle are	Insignificant

Table ES.4b: Class II Impacts of the VAFB Onshore Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
			excluded from the area.). Applicant shall submit erosion and sediment control plans and specifications to SBC for approval prior to land use clearance. TB-19 Drainages shall be restored to original contours after construction activities in order to preserve downstream biological resources and minimize sedimentation. Plans for drainage recontouring shall be included in the restoration and revegetation plan ~~HRRMP~~ (TB-7) and submitted to SBC/CCC for review and approval prior to land use clearance. TB-20 All ground disturbance activities shall occur, if feasible, during the dry season (generally April 1 through November 1). TB-21 Applicant-funded SBC/CCC-qualified biological monitors shall be on-site during construc-tion activities to ensure avoidance of individual animals and minimization of habitat destruction. TB-22 A construction spill response plan shall be prepared prior to the onset of construction to ensure a prompt and effective response to any accidental spills or leaks of diesel, gasoline, oil or other contaminating materials. Examples of measures would include the following: All equipment will be inspected for fuel, lubricant, and hydraulic fluid leaks prior to and during the work. Any leaks will be repaired immediately. Drip pans will be used to capture leaked fluids until the repair is completed. Fueling of stationary equipment will be by fuel truck and no equipment shall be fueled or maintained within 100 feet of drainages. Fueling or maintenance will occur over a drip pan or in a lined fueling area. Plan to be submitted to SBC for review and approval prior to land use clearance.	
TB.13	*Construction*	~~Replacement of the pipeline~~Installation of the drilling site, pipelines, tie-in station, substations, and power lines ~~has~~ have the potential to remove or damage federally or state-listed plant species, including Gaviota tarplant.	Where impacts are unavoidable, the following mitigation measures shall be implemented: Mitigation Measures TB-8, to map locations of sensitive plant species, TB-9, to develop a program to salvage, propagate, and re-establish plant species that could not be avoided during project activities, and to re-establish and monitor state and federally listed plant species. Implementation of Mitigation Measures TB-6 and TB-7 would minimize disturbed areas to the maximum extent feasible.	Insignificant
TB.14	*Construction*	~~Pipeline replacement in the riparian woodland, wetlands, and upland habitats in Oak Canyon and Santa Lucia Canyon~~Pipeline and power line construction in the riparian woodland, wetlands, and upland habitats near the Santa Ynez River, Bear Creek, and several smaller drainages could adversely impact California red-legged frogs as well as several California species of concern (southwestern pond turtles, Cooper's hawk, yellow warbler, yellow-breasted chat).	TB-23 Preconstruction surveys shall be conducted by SBC/CCC-approved biologists with suitable experience to determine the presence of California red-legged frogs and other sensitive species no more than 30-days prior to construction. If surveys indicate that California red-legged frogs would likely be present in the work areas in or near stream crossings or riparian vegetation, construction activities shall be postponed and federal and state agencies shall be contacted to coordinate suitable protection measures (such as relocations, through authorization for incidental take, or avoidance) for implemen-tation by the applicant. If southwestern pond turtles, two-striped garter snakes or other sensitive species are encountered in work areas they shall be relocated or otherwise protected from harm by means acceptable to CDFG. Preconstruction survey documentation shall be submitted to SBC/CCC for review and approval prior to the commencement of construction.	Insignificant

Table ES.4b: Class II Impacts of the VAFB Onshore Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
			TB-24 Before any construction activities begin on the project, the biological monitor(s) shall conduct an employee training session for all construction crews and others present during construction. At a minimum, the training shall include a discussion of the biology, identification, and habitat needs of California red-legged frogs and the importance of their habitat, their status under the California Endangered Species and Federal Endangered Species Acts, and measures taken for the protection of these species and their habitat as part of the project. Upon completion of the orientation, employees shall sign a form stating that they attended the program and understand and will implement all protection measures for the species. Documentation of training shall be submitted to SBC/CCC for approval prior to construction. TB-25 Construction shall be scheduled to avoid the rainy season (after first soaking rains through April) when California red-legged frogs would be most likely to be moving between different bodies of water. Construction shall be completed between April 1 and November 1. If necessary, the project proponent shall seek approval from the Corps and the USFWS to work outside of this time period. TB-26 An applicant-funded, qualified SBC/CCC-approved California red-legged frog biologist shall be present throughout the construction phase to monitor for the species and to implement additional mitigation for the species. The approved biologist shall have the authority to halt any action that might result in impacts that exceed the levels anticipated during review of the action by the Corps and the USFWS. Documentation shall be included as part of SBC's Environmental Quality Assurance Program (EQAP). TB-27 The pipeline trench shall be provided with escape ramps constructed of earth fill to prevent entrapment of sensitive species or other animals during the construction phase of the project. The ramps shall be located at no greater than 1,000-foot intervals and be constructed at less than 45 degrees inclination. Include plans and specifications as part of TB-6 plan submitted by applicant to SBC/CCC for review and approval prior to land use clearance. TB-28 All trenches, open pipes and culverts, or similar structures at the construction site open for one or more overnight periods shall be thoroughly inspected for trapped animals by an SBC/CCC-qualified, applicant-funded biologist before the pipe is subsequently buried, capped, or otherwise used or moved in any way. Pipes in, or adjacent to, trenches left overnight shall be capped by the applicant and/or their contractors. If an animal is discovered inside a pipe during construction, that section of pipe shall not be moved, or if necessary, moved only once, to remove it from the path of construction until the animal has voluntarily escaped. Include plans and specifications as part of TB-6 plan submitted by applicant to SBC/CCC for review and approval prior to land use clearance. TB-29 Applicant shall ensure that all trash that may attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris shall be removed from work areas. Include plans and specifications as part of TB-6 plan submitted by applicant to SBC/CCC for review and	

Table ES.4b: Class II Impacts of the VAFB Onshore Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
			approval prior to land use clearance. TB-30 If dewatering is necessary, intakes shall be completely screened with wire mesh (not larger than five millimeters mesh size) to prevent California red-legged frogs from entering the pump system. Water shall be released or pumped downstream at an appropriate rate to maintain downstream flows during construction. No water containing any sediment shall be allowed to flow back into any flowing water. Upon completion of construction, any barriers to flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate. Include plans and specifications as part of TB-6 plan submitted by applicant to SBC/CCC for review and approval prior to land use clearance. TB-31 A SBC-approved biologist shall permanently remove from within suitable habitat in the disturbance corridor any individuals of exotic species, such as bullfrogs, crayfish, and non-native fishes, to the maximum extent possible. Include plans and specifications as part of TB-6 plan submitted by applicant to SBC/CCC for review and approval prior to land use clearance. TB-32 Surveys in suitable habitat shall be conducted on a regular basis (twice a week at night) during the construction phase to ensure that California red-legged frogs are not present in the work areas. Include plans and specifications as part of TB-6 plan submitted by applicant to SBC/CCC for review and approval prior to land use clearance. TB-33 If construction work is scheduled to occur during the period April 1 to August 1, a qualified avian biologist shall survey riparian habitat within 100 feet of the right-of-way. If surveys reveal Cooper's hawks, yellow warblers, or yellow-breasted chats are nesting within 100 feet of the right-of-way, construction activities in those areas shall be postponed until after the conclusion of the nesting period, April 1 to August 1. Include plans and specifications as part of TB-6 plan submitted by applicant to SBC/CCC for review and approval prior to land use clearance. TB-34 Drainage and wetland crossings shall be revegetated with an appropriate assemblage of native riparian and wetland species suitable for the area. A species list and restoration and monitoring plan shall be included with the project proposal for approval by SBC/CCC. This plan must include, but not be limited to, location of restoration, species to be used, restoration techniques, timing of restoration, identifiable success criteria for completion, and remedial actions if the success criteria are not achieved. Include plans and specifications as part of TB-6 plan submitted by applicant to SBC/CCC for review and approval prior to land use clearance.	

Table ES.4b: Class II Impacts of the VAFB Onshore Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
TB.15	*Construction*	~~Replacement of the pipeline in the drainages in Oak Canyon and Santa Lucia Canyon~~Pipeline and power line construction in riparian areas and drainages could cause downstream impacts to listed aquatic species (California red-legged frog) and species of concern (southwestern pond turtle). ~~could cause downstream impacts to tidewater gobies and southern steelhead~~	Implementation of Mitigation Measures identified previously, including TB-4, scheduling the work during the dry season; TB-5, controlling erosion; TB-6, minimize disturbance to native habitats; TB-7, preparation and implementation of an approved HRRMP; and, TB-22, equipment spill control measures, would reduce downstream impacts to aquatic species.	Insignificant
GEOLOGICAL RESOURCES (Section 5.3)				
GR.7	*Operation*	Liquefaction could jeopardize the integrity of the VAFB Onshore Alternative pipelines at the Santa Ynez River valley and Bear Creek crossings.	GR-5 Reduce Liquefaction Hazard. Final geotechnical investigations shall be conducted in the areas underlain by alluvium and dune sand at the Santa Ynez River and Bear Creek crossings. The results and recommendations of the geotechnical investigations shall be incorporated into the final pipeline design. If moderate to high liquefaction potential is confirmed by the geotechnical analyses, then design measures shall be implemented at the corresponding locations. Appropriate design is dependent on site-specific conditions and could include deep burial of the pipeline below liquefiable layers, densification of the ground above the pipeline to mitigate uplift, and selection of thick-walled, ductile steel pipe. The applicant shall submit the final geotechnical studies and design recommendations to SBC for review and approval prior to land use clearance.	Insignificant
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.1	*Construction*	Project- related construction could cause erosion or siltation resulting in substantial degradation of surface water quality (Class II).	Mitigation Measure OWR-1 would apply. OWR-7 The applicant shall schedule construction activities during the dry season, unless otherwise approved by SBC, CCC, CDFG, and USFWS. Construction time restrictions shall be included in the contractor bid solicitation packages and depicted on construction plans which will be provided to SBC prior to construction.	Insignificant
OWR.2	*Increased Throughput Extension of Life*	A rupture or leak from the emulsion, produced water or dry oil pipelines could substantially degrade surface and groundwater quality.	Mitigation Measures OWR-3 and OWR-5, as well as the following mitigation measures would apply. OWR-8 Install catchment basins to prevent spills from entering the Santa Ynez River. Basin volumes shall be designed in accordance with Mitigation Measure OWR-5. Catchment basin design and construction plans shall be submitted to SBC for review and approval prior to land use clearance. OWR-9 Implement an oil-spill response and containment plan, including catchment basins as necessary, for the drilling and production facility. The plan shall be submitted to SBC/CCC for review and approval prior to land use clearance.	Insignificant

Table ES.4b: Class II Impacts of the VAFB Onshore Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
OWR.7	*Construction*	Potential "frac-out" of boring muds could cause siltation and degrade surface water quality.	Mitigation Measures TB-16 and TB-17 would minimize impacts associated with a frac-out. OWR-10 The applicant shall monitor boring operations, immediately cleaning spilled drilling muds, restricting construction activities to avoid potential conflicts with special status species, and use of best management practices to prevent or minimize soil erosion and effects of siltation on surface waters.	Insignificant
OWR.~~8~~9	*Operations*	Scour from large flood events could uncover, expose, and place the pipeline at risk for rupture at Santa Ynez River and Bear Creek crossings.	OWR-11 The pipelines shall be placed below the 100-year depth of scour at all river crossings. The river cross section topography shall not be altered in a manner that would result in increased levels of scour or erosion. Pipeline construction plans for the Santa Ynez River and Bear Creek crossings shall be submitted to SBC for review and approval prior to land use clearance.	Insignificant
OWR.~~9~~10	*Construction*	Disturbance of sites contaminated with hazardous substances could result in contamination of surface water and groundwater.	OWR-12 The applicant shall work with the U.S. Air Force, the RWQCB Central Region, and the Department of Toxic Substances Control to identify Federal Installation Restoration Program (IRP) sites, Areas of Concern and Areas of Interest within the construction area, and characterize the nature and extent of hazardous substances that may be present at each. In conjunction with the USAF, the RWQCB Central Region, and the Department of Toxic Substances Control, the applicant shall develop a plan of action to avoid and/or minimize any contamination of groundwater or surface water that may result from construction in these areas. Permits/approvals from these respective agencies shall be provided to SBC prior to construction.	Insignificant
TRAFFIC (Section 5.9)				
T.1	*Construction*	Onshore construction associated with the project would temporarily add to local road traffic.	Mitigation Measure T-1 would apply. T-4 Consultation with VAFB shall be conducted to develop a Construction Traffic Management Plan that minimizes conflicts to Base operations during alternative construction and operation. In addition, the Plan shall address traffic related to potential oil spill clean-up operations. The VAFB-approved plan shall be provided to SBC prior to land use clearance for review and approval.	Insignificant

Table ES.4b: Class II Impacts of the VAFB Onshore Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
FIRE PROTECTION AND EMERGENCY RESPONSE (Section 5.11)				
Fire.5	*Construction*	~~Pipeline~~ Pipeline and production/processing facilities construction could create short-term impacts to fire protection and emergency response.	Fire-3 All construction equipment shall be equipped with the appropriate spark arrestors and functioning mufflers. ~~PXP~~The applicant shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance. Fire-4 A fire watch with appropriate fire fighting equipment (i.e., hydrants, water truck, etc.) shall be available at the project site at all times when welding or grinding activities are taking place. Further, welding or grinding shall not occur when sustained winds exceed 15-20 mph, as determined by SBC Fire Department, unless an SBC Fire Department approved wind shield is on site. ~~PXP~~The applicant shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance. Fire-5 All rubber-tired construction vehicles shall be equipped with appropriate fire fighting equipment, such as shovels and axes or pulaskis, to aid in the prevention or containment of fires. ~~PXP~~The applicant shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance.	Insignificant
AESTHETICS/VISUAL RESOURCES (Section 5.13)				
Visual.6	*Construction*	Visual impacts due to new pipeline installation construction activities.	Visual-5 Revegetation Plan shall describe revegetation efforts, including a schedule for achieving revegetation milestones. The plan shall be submitted to SBC for review and approval prior to land use clearance. A bond equivalent to the cost of installation and maintenance shall be provided. Initial pipeline right-of-way revegetation shall be completed within 90 days of the commencement of pipeline operations.	Insignificant
AGRICULTURAL RESOURCES (Section 5.15)				
AG.5	*Construction*	Directional drilling locations could reduce farmland areas.	Mitigation Measures AG-2 through AG-3 would apply. AG-4 The applicant shall prepare and submit for review and approval, a grazing land preservation plan that describes activities, including soil replacement, soil enrichment, and replanting to take place after pipeline replacement activities. The plan shall be submitted to SBC for review and approval prior to land use clearance.	Insignificant
AG.6	*Construction*	Potential loss of agricultural productivity during pipeline and facility construction.	Mitigation Measures AG-2 through AG-4 would apply.	Insignificant

Table ES.4c
CLASS III Impacts of the VAFB Onshore Alternative
Impacts that are Adverse but Insignificant

(In accordance with State and local policy, impacts are to be mitigated to the maximum extent feasible.)

Table ES.4c: Class III Impacts of the VAFB Onshore Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
TERRESTRIAL AND FRESHWATER BIOLOGICAL RESOURCES (Section 5.2)				
TB.11	*Construction*	~~Replacement of the existing pipeline from landfall to the LOGP has~~Construction of the drilling site and installation of the pipelines, tie-in station, substations, and power lines have the potential to cause temporary habitat loss for mobile wildlife species and to cause mortality to individual animals.	Mitigation Measures TB-3, remove sensitive species out of the harms way, TB-6, minimize disturbance to native habitats, and TB-7, preparation and implementation of an approved Habitat Revegetation, Restoration, and Monitoring Plan.	Insignificant
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.6~~8~~	*Operations*	The VAFB Onshore Alternative would contribute or lead to ~~the possible~~ groundwater basin overdraft~~of the Lompoc groundwater basin~~.	No mitigation measures have been identified.	Insignificant
COMMERCIAL AND RECREATIONAL FISHING/KELP HARVESTING (Section 5.6)				
CRF/KH.1	*Increased Throughput Extension of Life*	Oil spills may potentially impact commercial and recreational kelp harvests~~in the proposed project area~~.	Mitigation Measure MB-1 would apply. CRF/KH-3 An Oil Spill Response Plan shall detail methods to keep oil spilled into creeks and drainages from reaching the ocean and ways to protect kelp beds and important nearshore fishing areas along the southern VAFB coast should spilled oil enter the ocean. The Plan shall be submitted to SBC for review and approval prior to land use clearance.	Insignificant
AIR QUALITY (Section 5.8)				
Air.1	*Construction*	Construction activities would generate air emissions.	Mitigation Measure Air-1 would apply. Air-3 PXP shall implement the following SBC NOx reduction emissions measures: - Engines and emission systems shall be maintained, - High pressure fuel injectors shall be installed, and - Reformulated diesel fuel shall be used. The documentation supporting the implementation of the NOx reduction measures shall be submitted to the SBC P&D and the SBCAPCD prior to land use clearance. No operations shall occur until the applicable project Permits to Operate are modified. Air-4 PXP shall provide emission mitigations for the construction activities consistent with SBCAPCD Rules and Regulations. The documentation supporting the available emission mitigations for construction shall be submitted to the SBCAPCD and SBC P&D prior to	Insignificant

Table ES.4c: Class III Impacts of the VAFB Onshore Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
			land use clearance. No operations shall occur until the applicable project Permits to Operate are modified.	
TRAFFIC (Section 5.9)				
T.2	*Increased Throughput Extension of Life*	Increased production at LOGP would increase facility truck traffic on local roads.	Mitigation Measures T-2 and T-4 would apply.	Insignificant
CULTURAL RESOURCES (Section 5.12)				
CR.6	*Construction and Operation*	Aesthetic impacts on VAFB cultural sites and landscapes.	No mitigation measures have been identified for this impact.	Insignificant
AESTHETICS/VISUAL RESOURCES (Section 5.13)				
Visual.2	*Operations*	Visual impacts due to installation of new equipment at LOGP.		
~~Visual.5 nighttime~~	~~*Operations*~~	~~New oil and gas facilities due to their tall structures and glare from lighting could impact visual resources in the area.~~	~~Mitigation Measures Visual-2 and Visual-4 would apply.~~	~~Insignificant~~
RECREATION/LAND USE (Section 5.14)				
Rec.2	*Construction*	Pipeline and power line construction could interfere with or restrict recreational activities along the pipeline/power line route(s).	No mitigation measures have been identified.	Insignificant

Table ES.5a
CLASS I Impacts of the Casmalia East Processing Location
Impacts that may not be Fully Mitigated to Less than Significant Levels

(Impacts that must be addressed in a "statement of overriding consideration" if the project is approved in accordance with Sections 15091 and 15093 of the State CEQA Guidelines.)

Table ES.5a: Class I Impacts of the Casmalia Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
TERRESTRIAL AND FRESHWATER BIOLOGICAL RESOURCES (Section 5.2)				
TB.10	*Construction*	~~Replacement of the existing pipeline from landfall to the LOGP~~ Construction of the processing facility and installation of the pipelines has the potential to remove or damage up to ~~88.6~~142 acres of native vegetation and wildlife habitat including sensitive plant species.	Mitigation Measures TB-4 through TB-7 would be required.	Significant
AESTHETICS/VISUAL RESOURCES (Section 5.9)				
Visual.5 nighttime	*Operations*	New oil and gas facilities due to their tall structures and glare from lighting could impact visual resources in the area.	Mitigation Measures Visual-2 and Visual-4 would apply.	Significant

Table ES.5b
CLASS II Impacts of the Casmalia East Processing Location
Impacts that can be Mitigated to Less than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Section 15091 State CEQA Guidelines.)

Table ES.5b: Class II Impacts of the Casmalia Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
HAZARDOUS MATERIAL/RISK OF UPSET (Section 5.1)				
Risk.4	*Operations*	The alternative project could generate additional risks to public safety by exposing the public to produced gas releases from the new ~~drilling/production/~~processing facility and additional length of sour gas pipeline that could leak gas.	Mitigation Measures Risk-1 and Risk-2 would apply. Risk-8 The applicant shall route the LOGP-Casmalia pipeline such that they are ~~it is~~ not closer than 2,500 feet from the southern Orcutt. The route shall turn westward from Highway 1/135 near the Harris Canyon Creek area in order to avoid impacts to the southern Orcutt. The pipeline route shall be located on plans submitted to SBC P&D for review and approval prior to land use clearance. Timing shall be as part of land use permit conditions. Risk-9 Excess flow valves shall be installed on the gas pipeline at the LOGP location and automatic shutoff valves and/or check valves shall be installed on the emulsion pipeline at appropriate locations to minimize the amount of gas or crude oil/emulsion that could be released in the event of a pipeline leak or rupture. Plans shall include proposed valve locations and be submitted to SBC for review and approval prior to land use clearance.	Insignificant
TERRESTRIAL AND FRESHWATER BIOLOGY (Section 5.2)				
TB.12	*Construction*	Pipeline and power line construction has the potential to result in disturbance to and loss of wetland and aquatic biota.	Mitigation Measures OWR-1, GR-1, TB-18 through TB-22 would serve to reduce impacts to aquatic biota and reduce sedimentation issues.	Insignificant
TB.13	*Construction*	~~Replacement of the pipeline has~~ Installation of the drilling site, pipelines, tie-in station, substations, and power lines have the potential to remove or damage federally or state-listed plant species, including Gaviota tarplant.	Mitigation Measures TB-8 and TB-9 would reduce impacts.	Insignificant
TB.14	*Construction*	Pipeline construction ~~replacement~~ in ~~the~~ riparian woodland, wetlands, and upland habitats ~~in Oak Canyon and Santa Lucia Canyon~~could adversely impact California red-legged frogs as well as several California species of concern (southwestern pond turtles, Cooper's hawk, yellow warbler, yellow-breasted chat).	Implementation of Mitigation Measures TB-23 through TB-34 would reduce impacts.	Insignificant

Table ES.5b: Class II Impacts of the Casmalia Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
GEOLOGICAL RESOURCES (Section 5.3)				
GR.2	*Construction*	Ground-disturbing construction activities could result in geologic disturbances such as slope failure, gullying, erosion, and sedimentation.	Mitigation Measure GR-1 would apply. GR-6 Ensure that all pipeline and facility construction areas have adequate review by geotechnical engineers and geologists for expansive/collapsible soils and for potential areas of slope instability prior to construction. The geotechnical report shall be submitted to SBC for review and approval prior to land use clearance.	Insignificant
FIRE PROTECTION (Section 5.11)				
Fire.5	*Construction*	Pipeline construction could create short-term impacts to fire protection and emergency response.	Fire-3 All construction equipment shall be equipped with the appropriate spark arrestors and functioning mufflers. ~~PXP~~ The applicant shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance. Fire-4 A fire watch with appropriate fire fighting equipment (i.e., hydrants, water truck, etc.) shall be available at the project site at all times when welding or grinding activities are taking place. Further, welding or grinding shall not occur when sustained winds exceed 15-20 mph, as determined by SBC Fire Department, unless an SBC Fire Department approved wind shield is on site. ~~PXP~~ The applicant shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance. Fire-5 All rubber-tired construction vehicles shall be equipped with appropriate fire fighting equipment, such as shovels and axes or pulaskis, to aid in the prevention or containment of fires. ~~PXP~~ The applicant shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance.	Insignificant
Fire.7	*Operations Extension of Life*	Operation of the new oil and gas facility at Casmalia East site could create long-term impacts to fire protection and emergency response.	Mitigation Measure Fire-6 would apply. Fire-7 The new facility shall be designed in accordance with all applicable fire protection and emergency response standards. The new facility should be designed with all early fire detection and prevention of fire spread as the basis of the fire safety design. The facility should have adequate supply of water and oil fire fighting foam as per the National Fire Protection ~~Agency~~ Association (NFPA) requirements (i.e., Standards 11, 15, 22, 24, 25). The facility layout should provide sufficient access for emergency response vehicles and provide adequate equipment spacing as per the American Petroleum Institute (API) and Industrial Risk Insurers (IRI) guidelines (IRI IM 2.5.2). The new facility should have fire detection monitors positioned in the locations most likely to be affected by fire. All appropriate equipment such as crude oil storage tanks should have sufficient secondary containment. Grading under liquefied petroleum gas (LPG) storage vessels should be sloped to allow any spilled flammable liquids to flow outward from the vessel and into an impoundment area. The applicant shall submit all appropriate documentation for the new facility to the SSRRC for review and approval prior to land use clearance Fire-8 Fire protection, oil spill, and emergency response plans of the new facility	Insignificant

Table ES.5b: Class II Impacts of the Casmalia Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
			shall be developed or adjusted using the similar LOGP plans and coordinated with the SBC Fire Department. These plans shall address the fire prevention measures at the facility, the fire suppression systems, the specific hazards at the facility, and fire and emergency response training and planning. The Fire Protection, Oil Spill Response, and Emergency Response Plans shall be submitted to the SBC Fire Department for review and approval prior to land use clearance. Fire-9 The facility operators/owners shall provide funding to the SBC Fire Department to provide adequate staffing and equipment for the Santa Maria Fire Station to address the emergency response requirements of the Casmalia oil and gas processing facility. The facility operators/owners shall enter into an agreement with the SBC to provide the reasonable share of funds for fire protection and emergency response. The operators/owners shall provide documentation of the monetary deposits into the appropriate funds prior to land use clearance.	
Fire.8	*Operations*	Operation of the sour gas pipeline to the new plant at Casmalia East site could create long-term impacts to fire protection and emergency response.	Mitigation Measure Fire-9 would apply. Fire-10 The sour gas pipeline shall be equipped with a leak detection system that is capable of detecting leaks as small as ¼ inch. The pipeline shall be equipped with remotely operated block valves to limit the volume of material release in the event of a leak or rupture. The applicant shall submit documentation for the pipeline controls design to the SBC SSRRC for review and approval prior to land use clearance. Fire-11 The pipeline shall be constructed following all applicable standards for sour gas pipeline service. The applicant shall submit all pipeline documentation (e.g. route, materials of construction, operation procedures) to the SBC SSRRC for review and approval prior to land use clearance. Mitigation Measure Risk-3 requires that the route of the LOGP-Casmalia pipeline to be not closer than 2,500 feet from southern Orcutt.	Insignificant
CULTURAL RESOURCES (Section 5.12)				
CR.5	*Construction*	Disturbance or destruction of cultural sites that may contain significant or potentially significant cultural materials due to the construction of new drilling/production/ processing and pipeline facilities.	Mitigation Measure CR-6 would apply. CR-7 A Phase I archaeological surface survey shall be conducted along the new pipeline right-of-way and at the location of the new processing site prior to land use clearance to identify any cultural resources that may be affected during construction. If a cultural resource is encountered during the survey, it shall be documented by a County-qualified archaeologist and its potential significance evaluated in terms of applicable criteria prior to any construction activities. Resources considered significant shall be avoided or subject to a Phase 3 data recovery program (with Native American monitoring, if applicable), consistent with Santa Barbara County Cultural Resource Guidelines.	Insignificant
AGRICULTURAL RESOURCES (Section 5.15)				
AG.6	*Construction*	Potential loss of agricultural productivity during pipeline and facility construction.	Mitigation Measures AG-2 through AG-3 would apply. AG-4 PXP shall prepare and submit for review and approval, a grazing land	Insignificant

Table ES.5b: Class II Impacts of the Casmalia Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
			preservation plan that describes activities, including soil replacement, soil enrichment, and replanting to take place after pipeline replacement activities. The plan shall be submitted to SBC for review and approval prior to land use clearance.	
AESTHETICS/VISUAL RESOURCES (Section 5.13)				
Visual.6	*Construction*	Visual impacts due to new pipeline installation construction activities.	Visual-5 Revegetation Plans shall be prepared (or existing PXP Revegetation Plans updated) to include new revegetation efforts, including a schedule for achieving revegetation milestones. The updated plans shall be submitted to SBC for review and approval prior to land use clearance. A bond equivalent to the cost of installation and maintenance shall be provided. Initial pipeline right-of-way revegetation shall be completed within 90 days of the commencement of pipeline operations.	Insignificant

Table ES.5c
CLASS III Impacts of the Casmalia East Processing Location
Impacts that are Adverse but Insignificant
(In accordance with State and local policy, impacts are to be mitigated to the maximum extent feasible.)

Table ES.5c: Class III Impacts of the Casmalia Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
TERRESTRIAL AND FRESHWATER BIOLOGICAL RESOURCES (Section 5.2)				
TB.11	*Construction*	~~Replacement of the existing pipeline from landfall to the LOGP~~Pipeline construction has the potential to cause temporary habitat loss for mobile wildlife species and to cause mortality to individual animals.	Mitigation Measures TB-3 through TB-7 would be applied to mitigate the impact to the maximum extent feasible.	Insignificant
MARINE BIOLOGY (Section 5.5)				
MB.8	*Construction*	The burial of the pipeline would disturb soft-bottom habitats	No mitigation measure has been identified.	Insignificant
AIR QUALITY (Section 5.8)				
Air.1	*Construction*	Construction activities would generate air emissions.	Mitigation Measure Air-1 would apply. Air-3 PXP shall implement the following SBC NOx reduction emissions measures: - Engines and emission systems shall be maintained, - High pressure fuel injectors shall be installed, and - Reformulated diesel fuel shall be used. The documentation supporting the implementation of the NOx reduction measures shall be submitted to the SBC P&D and the SBCAPCD prior to land use clearance. No operations shall occur until the applicable project Permits to Operate are modified. Air-4 PXP shall provide emission mitigations for the construction activities consistent with SBCAPCD Rules and Regulations. The documentation supporting the available emission mitigations for construction shall be submitted to the SBCAPCD and SBC P&D prior to land use clearance. No operations shall occur until the applicable project Permits to Operate are modified.	Insignificant
FIRE PROTECTION (Section 5.11)				
Fire.6	*Construction*	Construction of Casmalia site facilities and dismantling of the LOGP could create short-term impacts to fire protection and emergency response.	Fire-6 For the new facilities, PXP shall follow all appropriate fire protection and safety measures outlined in the Point Pedernales Project Final Development Plan (FDP), Systems Safety and Reliability, Part P. PXP shall submit the construction procedures to the SBC Systems Safety Reliability Review Committee (SSRRC) for review and approval prior to land use clearance.	Insignificant

Table ES.6a
CLASS II Impacts of the Replacement of Oil Emulsion Pipeline from Platform Irene to LOGP
Impacts that can be Mitigated to Less than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Section 15091 State CEQA Guidelines.)

Table ES.6a: Class II Impacts of the Emulsion Pipeline Replacement Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
TERRESTRIAL AND FRESHWATER BIOLOGY (Section 5.2)				
TB.10	*Construction*	Replacement of the existing pipeline from landfall to the LOGP has the potential to remove or damage up to 88.6 acres of native vegetation and wildlife habitat including sensitive plant species.	The following mitigation measures shall be implemented: Mitigation Measures TB-4, scheduling the work during the dry season, TB-5, controlling erosion, TB-6 and TB-7, which address, in part, the restoration of native plant species would also reduce loss of native vegetation and wildlife habitat in affected project area.	Insignificant
TB.12	*Construction*	Replacement of the existing pipeline has the potential to result in disturbance to and loss of wetland and aquatic biota during pipeline replacement.	Mitigation Measures OWR-1, GR-1, TB-18 through TB-22 would serve to reduce impacts to aquatic biota and reduce sedimentation issues	Insignificant
TB.13	*Construction*	Replacement of the pipeline has the potential to remove or damage federally or state-listed plant species, including Gaviota tarplant.	Revegetating the area impacted during pipeline installation (Mitigation Measures TB-6 and TB-7) with native species, including any sensitive plant species and coast buckwheat would reduce impacts. Additionally, Mitigation Measures TB-8 and TB-9 would reduce impacts.	Insignificant
TB.14	*Construction*	Pipeline replacement in the riparian woodland, wetlands, and upland habitats in Oak Canyon and Santa Lucia Canyon could adversely impact California red-legged frogs as well as several California species of concern (southwestern pond turtles, Cooper's hawk, yellow warbler, yellow-breasted chat).	Implementation of Mitigation Measures TB-23 through TB-34 would reduce impacts.	Insignificant
TB.15	*Construction*	Replacement of the pipeline in the drainages in Oak Canyon and Santa Lucia Canyon could cause downstream impacts to tidewater gobies and southern steelhead.	Implementation of Mitigation Measures identified previously including TB-4, scheduling the work during the dry season; TB-5, controlling erosion; TB-6, minimize disturbance to native habitats; TB-7, preparation and implementation of an approved Habitat, Revegetation, Restoration and Monitoring Plan; and TB-22, equipment spill control measures; would reduce downstream impacts to listed aquatic species.	Insignificant
TB.16	*Construction*	Replacement of the pipeline in the coastal beach and foredune habitat, where the pipeline array makes landfall, would result in potential impacts to nesting western snowy plovers and California least terns.	Mitigation Measure TB-10, to schedule construction activities within the beach and foredune habitat at Wall Beach to avoid the nesting season for snowy plovers and California least terns.	Insignificant

Table ES.6a: Class II Impacts of the Emulsion Pipeline Replacement Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
TB.17	*Construction*	Replacement of the pipeline in the Eucalyptus tree habitat, between catchment basins 8 and 9, could result in potential impacts to a monarch butterfly autumnal aggregation site.	TB-35 Avoid scheduling construction activities between Catchment Basins #8 and #9 when aggregations of monarch butterflies are present, typically during the fall and winter months. Do not remove or trim trees within or surrounding the aggregation site if it would significantly alter temperature or humidity within the aggregation site, due to altered air flow patterns. Include schedule for this area in construction plan (TB-6) and submit to SBC for review and approval prior to land use clearance.	Insignificant
GEOLOGICAL RESOURCES (Section 5.3)				
GR.2	*Construction*	Ground-disturbing construction activities could result in geologic disturbances such as slope failure, gullying, erosion, and sedimentation.	Mitigation Measure GR-1 would apply. GR-7 Geotechnical analyses shall be completed in existing erosion-prone areas to determine proper pipeline burial depth.	Insignificant
GR.5~~8~~	*Construction*	Pipeline installation offshore could result in increased resuspension of bottom sediment material, increased bottom sediment drift, and decreased stability of sediments within the offshore pipeline right-of-way.	GR-8 Pipeline surveys shall be conducted to confirm the absence of unsupported spans after installation of the offshore pipeline and at periodic intervals during the life of the facility. Initial surveys shall be conducted annually, but may be reduced in frequency at the discretion of the MMS, CSLC, and SBC.	Insignificant
FIRE PROTECTION AND EMERGENCY REPONSE (Section 5.11)				
Fire.5	*Construction*	Pipeline ~~construction~~ replacement could create short-term impacts to fire protection and emergency response.	Fire-3 All construction equipment shall be equipped with the appropriate spark arrestors and functioning mufflers. PXP shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance. Fire-4 A fire watch with appropriate fire fighting equipment (i.e., hydrants, water truck, etc.) shall be available at the project site at all times when welding or grinding activities are taking place. Further, welding or grinding shall not occur when sustained winds exceed 15-20 mph, as determined by SBC Fire Department, unless an SBC Fire Department approved wind shield is on site. PXP shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance. Fire-5 All rubber-tired construction vehicles shall be equipped with appropriate fire fighting equipment, such as shovels and axes or pulaskis, to aid in the prevention or containment of fires. PXP shall submit the pipeline construction procedures to the SBC Fire Department for review and approval prior to land use clearance.	Insignificant
CULTURAL RESOURCES (Section 5.12)				
CR.5	*Construction*	Disturbance or destruction of cultural sites that may contain significant or potentially significant cultural materials due to pipeline replacement~~the construction of new drilling/production/ processing facilities.~~	Mitigation Measure CR-6 would apply	Insignificant

Table ES.6a: Class II Impacts of the Emulsion Pipeline Replacement Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
CR.8	*Construction*	Offshore oil emulsion pipeline replacement would result in seafloor disturbance and potential impacts on cultural resources.	CR-9 The original offshore construction corridor shall be mapped and labeled on appropriate offshore Project maps. All seafloor disturbances from construction activities associated with the new pipeline shall be confined within the original pipeline construction corridor to avoid impacts on potentially significant cultural resources. Applicant shall submit plans that demonstrate avoidance of known cultural sites prior to issuance of coastal development permit or land use clearance for grading.	Insignificant
CR.9	*Construction*	Onshore oil emulsion pipeline removal and replacement would result in ground disturbance and potential impacts on cultural resources.	Mitigation Measures CR-1 and CR-2 would apply. CR-10 The normal 100-foot wide right-of-way shall be reduced to a 40-foot wide right-of-way when within 200 feet of a recorded archaeological site unless the resource has been previously determined to have no potential for significance because it is re-deposited, an isolated occurrence, modern, or otherwise lacks data potential. PXP shall submit plans that demonstrate avoidance of known cultural sites prior to issuance of coastal development permit or land use clearance for grading. CR-11 Develop a Cultural Resources Monitoring Plan to prepare for archaeological and Native American monitoring activities during construction. This plan shall be submitted to P&D prior to issuance of coastal development permit or land use clearance for grading. PXP shall arrange for archaeological monitoring as per the construction monitoring plans.	Insignificant
AESTHETICS/VISUAL RESOURCES (Section 5.13)				
Visual.6	*Construction*	Visual impacts due to ~~new~~ pipeline ~~installation~~ replacement construction activities.	Visual-5 Revegetation Plans shall be prepared (or existing PXP Revegetation Plans updated) to include new revegetation efforts, including a schedule for achieving revegetation milestones. The updated plans shall be submitted to SBC and VAFB for review and approval prior to land use clearance. A bond equivalent to the cost of installation and maintenance shall be provided. Initial pipeline right-of-way revegetation shall be completed within 90 days of the commencement of pipeline operations.	Insignificant
AGRICULTURAL RESOURCES (Section 5.15)				
AG.6	*Construction*	Potential loss of agricultural productivity during pipeline replacement ~~and facility construction~~.	Mitigation Measures AG-2 through AG-4 and GR-1 would apply. AG-5 Pipeline sedimentation basins and traps shall be inspected, cleaned, and if necessary replaced. Silt fences shall be inspected monthly during dry periods and immediately after each rainfall. Sediment must be removed when more than 1/3 filled, until vegetation is reestablished in the area of the disturbed soil. Straw bales shall be inspected weekly and after each rain. Sediment shall be removed when it reaches a depth of 6 inches, until vegetation is reestablished.	Insignificant

Table ES.6b
CLASS III Impacts of the Replacement of Oil Emulsion Pipeline from Platform Irene to LOGP
Impacts that are Adverse but Insignificant
(In accordance with State and local policy, impacts are to be mitigated to the maximum extent feasible.)

Table ES.6b: Class III Impacts of the Emulsion Pipeline Replacement Alternative

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
TERRESTRIAL AND FRESHWATER BIOLOGICAL RESOURCES (Section 5.2)				
TB.11	*Construction*	Replacement of the existing pipeline from landfall to the LOGP has the potential to cause temporary habitat loss for mobile wildlife species and to cause mortality to individual animals.	Mitigation Measures TB-3 through TB-7 would mitigate Impact TB.11 to the maximum extent feasible.	Insignificant
MARINE BIOLOGICAL RESOURCES (Section 5.5)				
MB.7	*Construction*	The burial of the pipeline would disturb soft-bottom habitats.	No mitigation measure has been identified.	Insignificant
OCEANOGRAPHY AND MARINE WATER QUALITY (Section 5.6)				
MWQ.5	*Construction*	Marine water-quality impacts would result from seafloor sediments resuspended during the installation of a new offshore pipeline.	Mitigation Measures MWQ-1 and MB-1 would apply.	Insignificant
AIR QUALITY (Section 5.8)				
Air-1	*Construction*	Construction activities would generate air emissions.	See Mitigation Measure Air-1. Air-3 PXP shall implement the following SBC NOx reduction emissions measures: - Engines and emission systems shall be maintained, - High pressure fuel injectors shall be installed, and - Reformulated diesel fuel shall be used. The documentation supporting the implementation of the NOx reduction measures shall be submitted to the SBC P&D and the SBCAPCD prior to land use clearance. No operations shall occur until the applicable project Permits to Operate are modified. Air-4 PXP shall provide emission mitigations for the construction activities consistent with SBCAPCD Rules and Regulations. The documentation supporting the available emission mitigations for construction shall be submitted to the SBCAPCD and SBC P&D prior to land use clearance. No operations shall occur until the applicable project Permits to Operate are modified.	Insignificant

Table ES.6b: Class III Impacts of the Emulsion Pipeline Replacement Alternative				
Impact #	**Project Phase**	Description of Impact	**Mitigation Measure**	**Residual Impact**
NOISE (Section 5.10)				
N.4	*Construction*	~~Construction~~ Pipeline replacement activities along the pipeline route would temporarily increase ambient noise levels near Surf Beach and Ocean Beach Park, at residences along the north edge of Vandenberg Village and at Cabrillo High School, and at the residential complex at the Lompoc Federal Penitentiary.	Mitigation Measure N-2, limiting operating hours of construction, would apply.	Insignificant
RECREATION/LAND USE (Section 5.14)				
Rec.2	*Construction*	Pipeline ~~construction~~ replacement could interfere with or restrict recreational activities along the pipeline route.	No mitigation measures have been identified.	Insignificant

Table ES.7a
CLASS I Impacts of the Alternative Power Line Routes to Valve Site #2
Impacts that may not be Fully Mitigated to Less than Significant Levels

(Impacts that must be addressed in a "statement of overriding consideration" if the project is approved in accordance with Sections 15091 and 15093 of the State CEQA Guidelines.)

Table ES.7a: Class I Impacts of the Alternative Power Line Routes

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
TERRESTRIAL AND FRESHWATER BIOLOGY (Section 5.2)				
TB.9 Option 2b	*Construction*	Drilling noise, construction, and accidental release of boring materials ("frac-outs") during construction activities related to boring could impact one or more sensitive wildlife species.	Mitigation Measures TB-1, TB-2, TB-5, TB-6, TB-7, and TB-15 through TB-17 would apply to minimize disturbance in the riparian area and to avoid construction during the breeding seasons of sensitive avian species. Additionally, the bore would be drilled below the scour depth of the river. The mitigation measures would reduce the impacts to listed wildlife in the power line corridor. The mitigation measures would reduce the possibility of frac-outs, although the possibility of impact to listed species downstream of the site cannot be eliminated.	Significant

Table ES.7b
CLASS II Impacts of the Alternative Power Line Routes to Valve Site #2
Impacts that can be Mitigated to Less than Significant Levels

(Impacts that must be addressed in Findings that the mitigation measures would reduce the level of impact to insignificant in accordance with Section 15091 State CEQA Guidelines.)

Table ES.7b: Class II Impacts of the Alternative Power Line Routes

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.7 Option 2b	*Construction*	Potential "frac-out" of boring muds could cause siltation and degrade surface water quality.	Mitigation Measure OWR-9 would apply.	Insignificant
CULTURAL RESOURCES (Section 5.12)				
CR.8 Under-ground Along Terra Road	*Construction*	Trenching along Terra Road would result in ground disturbance and potential impacts on cultural resources.	Mitigation Measures CR-1, CR-2, CR-3, CR-4 and CR-5 would apply. CR-8 Avoid impacts on known cultural resources by rerouting the trench so that no ground disturbance occurs within 200 feet from established site boundaries of CA-SBA-913, -1917, -689, and -2126. PXP shall submit plans that demonstrate avoidance of known cultural sites prior to issuance of coastal development permit or land use clearance for grading.	Insignificant
AGRICULTURAL RESOURCES (Section 5.15)				
AG.5	*Construction*	Directional drilling locations could reduce farmland areas.	Mitigation Measures AG-2 through AG-3 would apply. AG-4 PXP shall prepare and submit for review and approval, a grazing land preservation plan that describes activities, including soil replacement, soil enrichment, and replanting to take place after pipeline replacement activities. The plan shall be submitted to SBC for review and approval prior to land use clearance.	Insignificant

Table ES.7c
CLASS III Impacts of the Alternative Power Line Routes to Valve Site #2
Impacts that are Adverse but Insignificant

(In accordance with State and local policy, impacts are to be mitigated to the maximum extent feasible.)

Table ES.7c: Class III Impacts of the Alternative Power Line Routes

Impact #	Project Phase	Description of Impact	Mitigation Measure	Residual Impact
TERRESTRIAL AND FRESHWATER BIOLOGICAL RESOURCES (Section 5.2)				
TB.1	*Construction*	Installation of power poles would result in disturbance or loss of less than one acre of native vegetation and wildlife habitat and possible injury to wildlife. Impact TB.1 would change under this alternative depending on the proposed alternative route (see Table ES.10).	Mitigation Measures TB-1 through TB-3 would apply, depending on the proposed alternative route.	Insignificant
TB.2	*Construction*	Installation of power poles have the potential to increase erosion and sedimentation in aquatic habitats. Impact TB.2 would change under this alternative depending on the proposed alternative route (see Table ES.10).	Mitigation Measures TB-1 through TB-3 would apply, depending on the proposed alternative route.	Insignificant
ONSHORE WATER RESOURCES (Section 5.4)				
OWR.7	*Construction*	Potential "frac-out" of boring muds could cause siltation and degrade surface water quality. Option 2b only.	Mitigation Measure OWR.9 would apply.	Insignificant
AIR QUALITY (Section 5.8)				
Air.1	*Construction*	Construction activities would generate air emissions.	Mitigation Measure Air-1 would apply.	Insignificant
TRAFFIC (Section 5.9)				
T.1	*Construction*	Onshore construction associated with the project would temporarily add to local road traffic.	Mitigation Measure T-1 would apply.	Insignificant
NOISE (Section 5.10)				
N.2	*Construction*	Construction noise would temporarily increase ambient daytime noise levels.	Mitigation Measure N-2 would apply.	Insignificant
FIRE PROTECTION AND EMERGENCY SERVICES (Section 5.11)				
Fire.2	*Operations*	Operation of the new power line to Valve Site #2 could result in impacts to fire protection and emergency response resources due to addition of an ignition source into a high fire hazard area.	Mitigation Measure Fire-2 would apply.	Insignificant
AGRICULTURAL RESOURCES (Section 5.15)				
AG.1	*Construction*	Addition of power poles and substation to Valve Site #2 could disturb farm operations.	No mitigation measures have been identified.	Insignificant

Table ES.8
CLASS III Impacts for the Alternative Drill Muds and Cuttings Disposal
Impacts that are Adverse but Insignificant
(In accordance with County policy, impacts are mitigated to the maximum extent feasible.)

Table ES.8: Class III Impacts for Alternative Muds and Cuttings Disposal				
Impact #	**Project Phase**	**Description of Impact**	**Mitigation Measures**	**Residual Impact**
MARINE BIOLOGICAL RESOURCES (Section 5.5)				
MB.9~~8~~	*Drilling*	Marine organisms would be impacted by accidental discharge of drilling muds and cuttings during transit to shore.	Mitigation Measures MWQ-3 and MWQ-4 would apply.	Insignificant
OCEANOGRAPHY AND MARINE WATER QUALITY (Section 5.6)				
MWQ.6 Inject	*Drilling*	Marine water-quality impacts could result from the marine release of interstitial waters contaminated by drill-muds injection into a near surface formation.	No mitigation is required beyond those specified in current underground injection control regulations.	Insignificant
MWQ.7 Onshore Disposal	*Drilling*	Marine water quality would be impacted by accidental discharge of drill muds and cuttings during transit to shore.	MWQ-2 The applicant shall regularly inspect all Baker tanks, bins, and hoses used to transfer muds and cuttings to the transport vessels and immediately repair of damaged components or require these inspection and repair tests within their contractual agreements with the vessel operators. Inspection records shall be submitted to MMS on a regular basis. MWQ-3 The applicant shall collect and dispose onshore, all wastewater generated by cleaning the boats, transport containers, and mud-transfer equipment or require these inspection and repair tests within their contractual agreements with the vessel operators. The applicant shall keep all disposal records to be available for inspection.	Insignificant
RECREATION/LAND USE (Section 5.14)				
Rec.3	*Drilling*	Muds and cuttings spilled near the shore could disrupt recreational activities such as SCUBA diving.	Mitigation Measure MWQ-6 would apply. REC-1 During project construction and operation, the applicant shall require project vessels to travel in recommended marine traffic corridors.	Insignificant

TABLE ES.9
Comparison of Class I Impacts for the Proposed Project and Major Alternatives

Class I Impacts	Proposed Project	VAFB Onshore Alternative	Casmalia Alternative	Emulsion Pipeline Replacement Alternative
Risk.3: Increased risk to public due to NGL/LPG transport.[1]	Extension of life of LOGP would continue risk. *No Preference*	Same as proposed project. *No Preference*	*No Preference*, but from Casmalia site instead of LOGP.	Same as proposed project. *No Preference*
Risk.4: Increased risk to VAFB operations and personnel.	Impact would not occur under proposed project. **Preferred.**	Additional hazards within VAFB due to drilling/production facilities and pipelines.[4]	Same as proposed project.	Same as proposed project.
TB.6: Oil spill impact to upland, riparian, and aquatic habitats, and wildlife.[1]	Increased throughput increases oil spill risk and volumes above baseline conditions.	Higher risk than proposed project because of new pipeline through sensitive resources.	Higher risk than proposed project because of new pipeline through sensitive resources.	Throughput same as proposed project. **Slightly preferred** due to 10% decrease in spill probability, compared to proposed project.
TB.7: Oil spill impact to state-or federally-listed plant species.[1]	Increased throughput increases oil spill risk and volumes above baseline conditions.	Higher risk than proposed project because of new pipeline through sensitive resources.	Higher risk than proposed project because of new pipeline through sensitive resources.	Throughput same as proposed project. **Slightly preferred** due to 10% decrease in spill probability.
TB.8: Oil spill impact to state-or federally-listed wildlife species.[1]	Increased throughput increases oil spill risk and volumes above baseline conditions.	Higher risk than proposed project because of new pipeline through sensitive resources.	Higher risk than proposed project because of new pipeline through sensitive resources.	Throughput same as proposed project. **Slightly preferred** due to 10% decrease in spill probability.
TB.9: Directionally drilling impacts to Santa Ynez River.[2]	Impact would not occur under proposed project. [3] **Preferred**	Frac-out could cause Class I impacts to aquatic resources and water quality.	Same as proposed project.	Same as proposed project.
TB.10: New pipeline construction impacts.[2]	Construction would result in 0.43 acres of vegetation removal (Class II). **Preferred**	Construction would result in 61 acres of vegetation removal.	Construction would result in 152 acres of vegetation removal.	Construction would result in 88.6 acres of vegetation removal, but within previously disturbed right-of-way (Class II).
OWR.2: Oil spill impacts to surface and ground waters.[1]	Increased throughput increases oil spill risk and volumes above baseline conditions.	Higher risk than proposed project because of additional pipeline length.	Higher risk than proposed project because of additional pipeline length.	Throughput same as proposed project. **Slightly preferred** due to 10% decrease in spill probability.
MB.1: Oil spill impacts to marine organisms.[1]	Extension of life of platform and offshore pipeline would continue oil spill risk to marine organisms an additional 20 years.	No extension of life. Risk to marine organisms reduced since alternative facilities are inland. **Preferred**.	Same as proposed project.	Throughput same as proposed project; however 10% decrease in spill probability.
MWQ.1: Oil spill impacts to marine water quality.[1]	Extension of life of platform and offshore pipeline would continue oil spill risk to marine water quality an additional 20 years.	No extension of life. Risk to marine water quality reduced since alternative facilities are inland.	Same as proposed project.	Throughput same as proposed project; however 10% decrease in spill probability.

Class I Impacts	Proposed Project	VAFB Onshore Alternative	Casmalia Alternative	Emulsion Pipeline Replacement Alternative
		Preferred.		
CRF/KH.2: Oil spill impacts to fisheries.[1]	Extension of life of platform and offshore pipeline would continue oil spill risk to fisheries an additional 20 years.	No extension of life. Risk to fisheries reduced since alternative facilities are inland. **Preferred**.	Same as proposed project.	Throughput same as proposed project; however 10% decrease in spill probability.
T.4: Oil spill impacts to marine transportation corridors.[1]	Spill could temporarily close Coast Guard recommended marine traffic corridors. *No preference.*	Spill could close mission critical VAFB transportation corridors. *No preference.*	Same as proposed project. *No preference.*	Throughput same as proposed project; however 10% decrease in spill probability. *No preference*.
CR.3: Oil spill clean up impacts to cultural resources.[1]	Increased throughput increases oil spill risk and volumes above baseline conditions.	Higher risk than proposed project because of additional pipeline length and proximity to NRHP sites.	Higher risk than proposed project because of additional pipeline length through sensitive resources.	Throughput same as proposed project. **Slightly preferred** due to 10% decrease in spill risk compared to proposed project.
CR.5: New pipeline construction impacts to cultural resources.[2]	Impact would not occur under proposed project. **Preferred.**	44 significant or potentially significant cultural sites could be destroyed as part of construction.[4]	4 recorded sites located within 200 ft of pipeline corridor; 7 miles of corridor have not been surveyed.	29 recorded sites within ½ mile of previously disturbed pipeline corridor.
Visual.1: Long term presence of Platform Irene & Surf substation.[1]	Extension of life would continue platform and substation presence an additional 20 years.	No extension of life; platform removed in 10 years. Substation to remain an additional 20 years. **Preferred.**	Same as proposed project.	Same as proposed project.
Visual 4: Long term presence of LOGP nighttime glare.[1]	Extension of life would continue LOGP nighttime glare an additional 20 years. *No preference.*	Same as proposed project. *No preference.*	More severe than proposed project because of new Casmalia facility.	Same as proposed project. *No preference*.
Visual 5: Presence of tall structures (180-200 foot drilling rig and 50 foot tall tank).	Impact would not occur under proposed project. **Preferred.**	Addition of tall structures within VAFB due to drilling/production facilities.[4]	Same as proposed project.	Same as proposed project.
Rec.1: Oil spill impacts to recreational resources.[1]	Extension of life would continue oil spill risk to coastal recreational resources an additional 20 years.	No extension of life. Risk to coastal recreational resources reduced since alternative facilities are inland. **Preferred**.	Same as proposed project.	Throughput same as proposed project; however 10% decrease in spill probability.

1. Operational impact.
2. Construction impact.
3. Proposed project preferred even if Option 2b is implemented for providing power to Valve Site #2.
4. Potential Class I, significant and unavoidable, or Class II, significant but mitigable, impact.

TABLE ES.10 COMPARISON OF IMPACTS FOR THE PROPOSED PROJECT WITH THE POWER LINE ROUTES TO VALVE SITE #2 ALTERNATIVES[6]

Impact #	Description of Impact	Option 2a	Option 2b	Underground along Terra Road	Comments
TB.9	Accidental release of boring materials ("frac-outs") during construction activities related to boring could impact one or more sensitive wildlife species **(Class I)**.	NA	+	NA	This impact would only occur as a result of boring the Santa Ynez River. This impact would not occur with the proposed project.
CR.2 and CR.6	Installation of power poles would result in ground disturbance and potential impacts on cultural resources **(Class II).**	Same	Same	+	The severity of the impact would be greater for undergrounding along Terra Road as a result of the increase in ground disturbance due to trenching.
Visual.2	Visual impacts due to the power lines to Valve Site #2 **(Class II).**	Same	Same	-	The severity of the impact would be less with the Terra Road undergrounding alternative since a portion of the route would not have power poles. However, the impact would still be Class II since some power poles would still be needed.
TB.1	Installation of power poles would result in disturbance or loss of less than one acre of native vegetation and wildlife habitat and possible injury to wildlife (Class III).	Same	Same	+	The severity of the impact would be greater for undergrounding along Terra Road as a result of the increase in ground disturbance due to trenching.
TB.2	Installation of power poles have the potential to increase erosion and sedimentation in aquatic habitats **(Class III).**	Same	Same	+	The severity of the impact would be greater for undergrounding along Terra Road as a result of the increase in ground disturbance due to trenching.
Air.1	Construction activities would generate air emissions **(Class III).**	Same	+	+	The severity of the impact would be greater for undergrounding along Terra Road as a result of the increase in ground disturbance due to trenching. The severity would be greater for Option 2b due to the increased equipment needed to bore the Santa Ynez River.
T.1	Onshore construction associated with the project would temporarily add to local road traffic **(Class III)**.	Same	+	Same	The severity would be greater for Option 2b due to the increase equipment needed to bore the Santa Ynez River.
N.2	Construction noise would temporarily increase ambient daytime noise levels **(Class III**).	Same	+	Same	The severity would be greater for Option 2b due to the increase equipment need to bore the Santa Ynez River, and the fact that the boring machine has a higher noise level.
AG.1	Addition of power poles to Valve Site #2 could disturb farm operations **(Class III).**	Same	+	Same	The work areas needed for boring the Santa Ynez River would both be located on agricultural lands. This would preclude the use of the land during the boring operations.

[6] NA = Impact does not apply to this alternative.
+ = Severity of the impact is greater than the proposed project.
- = Severity of the impact is less than the proposed project.

TABLE ES.10 COMPARISON OF IMPACTS FOR THE PROPOSED PROJECT WITH THE POWER LINE ROUTES TO VALVE SITE #2 ALTERNATIVES[6]

Impact #	Description of Impact	Option 2a	Option 2b	Underground along Terra Road	Comments
OWR.7	Potential "frac-out" of boring muds could cause siltation and degrade surface water quality (**Class III**).	NA	+	NA	This impact would only occur as a result of boring the Santa Ynez River. This impact would not occur with the proposed project.
Fire.2	Operation of the new power line to Valve Site #2 could result in impacts to fire protection and emergency response resources due to addition of an ignition source into a high fire hazard area **(Class III**).	Same	Same	-	The severity of the impact would be less for the Terra Road undergrounding alternative since less of the powerline would be aboveground. However, it would still be considered a Class III impact since portions of the power line would still be aboveground.

TABLE ES.11 COMPARISON OF IMPACTS FOR THE PROPOSED TRANQUILLON RIDGE PROJECT WITH THE MUDS AND CUTTINGS DISPOSAL ALTERNATIVES[7]

Impact #	Description of Impact	Injection	Transportation to Shore	Comments
MB.2	The discharge of drilling muds and cuttings from Platform Irene may potentially impact marine organisms in the project area **(Class III).**	NA	-	The injection alternative would eliminate this impact. The transportation to shore alternative would reduce the severity of the impact as compared to the proposed project. However, it would not be eliminated since there is still the possibility of accidentally spilling the muds and cutting into the ocean during transport to shore.
MWQ.2 and MWQ.7	Reduced marine water and sediment quality would result from increased oceanic discharge of drilling fluids **(Class III).**	NA	-	The injection alternative would eliminate this impact. The transportation to shore alternative would reduce the severity of the impact as compared to the proposed project. However, it would not be eliminated since there is still the possibility of accidentally spilling the muds and cutting into the ocean during transport to shore.
CRF/ KH.3	The discharge of drilling muds and drill cuttings from Platform Irene may potentially impact kelp communities in the project area (**Class III**).	NA	-	The injection alternative would eliminate this impact. The transportation to shore alternative would reduce the severity of the impact as compared to the proposed project. However, it would not be eliminated since there is still the possibility of accidentally spilling the muds and cutting into the ocean during transport to shore.
CRF/ KH.5	The deposition of shells, or shell mounds, could prevent commercial trawling activities beneath Platform Irene **(Class III).**	-	-	The severity of the impact would be reduced, but not eliminated since shells would still deposit on the sea floor from the platform. The contribution of the cuttings to the shell mounds would be eliminated for both alternatives.
Rec.3	Muds and cuttings spilled near the shore could disrupt recreational activities such as SCUBA diving **(Class III).**	NA	+	This impact only applies to the transportation to shore alternative. This impact could occur in the unlikely event that muds and cuttings are spilled into the ocean during transport to shore. This impact would not occur for the proposed project.
T.2	Transportation of drilling muds and cuttings would increase truck traffic on local roads **(Class III).**	NA	+	This impact only applies to the transportation to shore alternative. This impact would not occur for the proposed project.

[7] NA = Impact does not apply to this alternative.
+ = Severity of the impact is greater than the proposed project.
- = Severity of the impact is less than the proposed project.

ATTACHMENT D

POLICY CONSISTENCY ANALYSIS

ATTACHMENT D: POLICY CONSISTENCY ANALYSIS

This attachment contains the policy consistency analysis for the PXP Tranquillon Ridge project. Applicable Coastal Act policies and policies from the Santa Barbara County Local Coastal Plan and Comprehensive Plan are addressed in this analysis. Similar policies are grouped and discussed together.

The table below lists the policies reviewed and the conclusion regarding the Tranquillon Ridge project's consistency with each. The detailed consistency analyses follow the table.

POLICY CONSISTENCY ANALYSIS SUMMARY TABLE	
POLICY	**CONCLUSION**
Coastal Act Sections	
30230 – Marine Resources	Consistent
30231 – Biological Productivity	Consistent
30232 – Oil Spills	**Not Consistent**[8]
30240 – Environmentally Sensitive Habitats	Consistent
30244 – Archaeological Resources	Consistent
30250 – Development Location	Consistent
30251 – Visual Resources	Consistent
30253 – Development Requirements	Consistent
30260 – Industrial Development Location or Expansion	Consistent
30262 – Oil and Gas Development	Consistent
SBC Coastal Plan Policies	
2-6 – Adequate Public Services	Consistent
2-11 – Development Near Environmentally Sensitive Habitats	Consistent
3-8 – Geohazard Review	Consistent
3-9 – Fault Crossings (Pipelines)	Consistent
3-10 – Fault Setback	Consistent
3-12 – Flood Hazards	Consistent
3-13 – Minimize Cut and Fill	Consistent
3-14 – Site Development	Consistent
3-19 – Water Quality	Consistent
4-2 – Landscape Plan	Consistent
4-3 – Structure Compatibility	Consistent
4-7 – Underground Utilities	Consistent
6-3 – Environmental Review	Consistent
6-4 – Site Restoration	Consistent
6-6F – Planning Commission Review for Abandonment	Consistent
6-8 – Oil Transportation by Pipeline	Consistent
6-9 – Emergency Response Plan	Consistent
6-14 – Pipeline Corridor Surveys	Consistent
6-14A – Common Carrier Pipeline Use	Consistent
6-15 – Herbicide Ban (Pipeline Construction)	Consistent
6-18 – Pipelines / Shut-off Valves	Consistent
6-19 – Minimize Spill Impacts	Consistent
9-4 – Critical Bird Habitats	Consistent
10-2 – Avoid Archaeological Impacts	Consistent
10-3 – Mitigate Archaeological Impacts	Consistent
10-5 – Native American Consultation	Consistent
SBC Comprehensive Plan Policies	
LUDP 4 – Adequate Public Services	Consistent

[8] This inconsistency is subject to the override provisions of Coastal Act Section 30260.

POLICY CONSISTENCY ANALYSIS SUMMARY TABLE	
POLICY	**CONCLUSION**
LUDP 10 – Common Carrier Pipeline Use	Consistent
LUDP 11 – Gas Plant Siting Study	Consistent
LUDP 12 – Oil Transportation by Pipeline	Consistent
LUDP 13 – Decommissioning and Site Restoration	Consistent
Hillside 1 – Minimize Cut and Fill	Consistent
Hillside 2 – Site Development	Consistent
Hillside 4 – Sediment Basin/Runoff Control	Consistent
Hillside 5 – Soil Stabilization	Consistent
Hillside 6 – Runoff Control	Consistent
Hillside 7 – Water Quality	Consistent
Streams 1 – Minimize Impacts	Consistent
Historical 2 – Avoid Archaeological Impacts	Consistent
Historical 3 – Mitigate Archaeological Impacts	Consistent
Historical 5 – Native American Consultation	Consistent
Visual 1 – Landscape Plan	Consistent
Visual 2 – Structure Compatibility	Consistent
Visual 5 – Underground Utilities	Consistent
Lompoc Area Goals - Land Use	Consistent
Lompoc Area Goals – Environment	Consistent
Noise Element, 1 – Maximum Noise Level	Consistent
Noise Element, 9 – Noise Limits	Consistent
Circulation Element, IV.B – Roadway Standards	Consistent
Energy Element, 4.1 – Construction Recycling	Consistent
Energy Element, 5.3 – Cogeneration Systems	Consistent
Energy Element, 5.7 – Alternative Energy Mitigation	Consistent
Agricultural Element, Goal I, Policy I.A – Compatibility	Consistent
Agricultural Element, Goal II, Policy II.D – Conversion Discouraged	Consistent
Hazardous Waste Element, 2-2 – Hazardous Waste Generation	Consistent
Hazardous Waste Element 2-3 – Hazardous Waste Facility	Consistent
Hazardous Waste Element 8-1 – Emergency Response Plan	Consistent
Safety Element, Hazardous Facility 1-A – Risk Estimates	Consistent
Safety Element, Gas Pipeline Safety 1-A – Risk Estimates	Consistent
Safety Element, Hazardous Facility 2-B – Unacceptable Risk	Consistent
Safety Element, Gas Pipeline Safety 2-B – Unacceptable Risk	Consistent
Safety Element, Hazardous Facility Safety 3-A - Siting	Consistent
Safety Element, Gas Pipeline Safety 4-B – Safe Operations	Consistent
Safety Element, Gas Pipeline Safety 4-C – Reduced Hazard Zones	Consistent
Safety Element, Gas Pipeline Safety 5-C – Burial Depth	Consistent
Safety Element, Gas Pipeline Safety 5-D – Marking Pipeline Presence	Consistent
Conservation Element, Mineral Resources – Avoid Significant Impacts	Consistent
Conservation Element, Ecological Systems – Use and Protection	Consistent
Other Plans and Policies	
2007 Clean Air Plan	Consistent
AB 32 (California Global Warming Solutions Act of 2006)	Consistent

COASTAL ACT AND COASTAL PLAN POLICIES

The following policies are applicable to portions of the Tranquillon Ridge project within the coastal zone. This includes Valve Sites #1 and #2 and the Point Pedernales pipelines/facilities west of Valve Site #2.

Coastal Act Section 30230 – Marine Resources

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Coastal Act Section 30231 – Biological Productivity

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Operational aspects of the Tranquillon Ridge project at Platform Irene that could affect marine resources include (1) discharges of drill muds and cuttings, treated produced water, and miscellaneous other discharges; (2) impingement and entrainment of marine organisms due to sea water uptake; (3) noise; (4) increased vessel traffic; and, (5) artificial lighting. The EIR found that the discharges would result in adverse but not significant effects to marine biological resources (EIR Section 5.5.4) and significant but mitigable effects to marine water quality (EIR Section 5.6.4). Discharges from the platform are regulated by the US EPA and must be in compliance with the limits for certain constituents of the discharge that are set in the National Pollutant Discharge Elimination System (NPDES) permit applicable to Platform Irene. The volume of drill muds and cuttings and produced water discharges would increase for the Tranquillon Ridge project and miscellaneous discharges are expected to remain about the same as for current Point Pedernales operations. PXP will continue to adhere to the requirements of the NPDES permit, including treatment and monitoring of its discharges, for the Tranquillon Ridge project.

Impingement of marine organisms may occur due to sea water intake at the platform. The Tranquillon Ridge project will not increase the use of sea water at the platform and this was determined to be an existing adverse but not significant impact (EIR Section 5.5.4). Vessel traffic associated with Tranquillon Ridge operations will increase over current levels and could interfere with marine organisms. Noise from drilling operations will be similar to current levels

when the drill rig is operating and lighting will remain at the same level for the Tranquillon Ridge project. These potential impacts from vessels, noise and lighting are considered to be adverse but not significant.

Artificial lighting at the platform also could affect seabirds, as discussed in the Final EIR. However, the lighting on the platform will not change from existing conditions and the Tranquillon Ridge project would not increase or extend these potential impacts beyond the Point Pedernales project lifetime.

Based on the foregoing, the Tranquillon Ridge project is **consistent** with Coastal Act Sections 30230 and 30231.

Coastal Act Section 30232 – Oil Spills

Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

SBC Coastal Plan Policy 6-18

For pipeline segments passing through important coastal resource areas, including recreation, habitat, and archaeological areas, the segment, in the case of a break, shall be isolated by automatic shutoff valves.

SBC Coastal Plan Policy 6-19

Unavoidable routing through recreation, habitat, or archaeological areas, or other areas of significant coastal resource value, shall be done in a manner that minimizes the impacts of a spill, should it occur, by considering spill volumes, durations, and trajectory. Appropriate measures for cleanup or structures such as catch basins to contain a spill shall be included as part of an oil spill contingency plan.

The Tranquillon Ridge project would result in increased volumes of oil and gas transported through the existing pipelines within the coastal zone. This increased throughput would increase the risk and consequence of a potential oil spill over current levels. If a rupture or leak of the pipelines were to occur, increased significant degradation could occur to coastal resources, including:

- marine biota (including sea otters, whales, marine birds, sea turtles, amphibians, fish and other marine organisms, abalone, and plants);
- surface and ground water resources;
- environmentally sensitive habitat areas such as rocky intertidal and sandy beach habitat, estuaries, and wetlands;
- commercial fishing;
- recreation and access; and
- cultural resources.

PXP is required to maintain spill prevention measures, both onshore and offshore, throughout the life of the project and to keep its Oil Spill Response Plan (OSRP) up-to-date for all project facilities. The OSRP serves as the spill response plan required by the Minerals Management Service, the Department of Transportation, the California Department of Fish & Game-Office of Spill Prevention and Response, the Environmental Protection Agency and Santa Barbara County, with specific sections for each agency as appropriate. The OSRP describes the project facilities, response team organization, management and responsibilities, spill notification procedures, specific spill response actions for minor and major spills, including spill containment, recovery, and clean-up actions, potentially affected natural resources, and communications. The OSRP describes the following system features and procedures:

- Abnormal Operating Procedures – Specific instructions to be followed during operations other than those for which the facility is designed (e.g., upset conditions).
- Pipeline Control Systems – Regulation and monitoring of pressure, level, temperature, flow rates, and pump speed.
- Emergency shut-down – Automatic system shutdown if process variables exceed predetermined values or if manually activated.
- External and Internal Corrosion Protection – The existing pipelines are protected externally by an extruded polyethylene-type coating; magnesium or zinc anodes provide cathodic protection; chemical corrosion prohibitor program; and, corrosion coupons measure internal corrosion rates.
- Isolation Valves – portions of the pipeline can be isolated in the event of a spill.
- Facility Inspections – Routine inspections of facilities and pollution response equipment on the platform and at the LOGP.
- Health and Safety Meetings – Operations personnel attend health and safety meetings at least monthly.
- Leak Detection – Pipeline flow rate and pressure are monitored by a triply redundant computer-based system which is in turn monitored by LOGP personnel.
- Preventative Maintenance – Safety features are routinely tested and maintained.
- Lockout/Tagout Procedures – Written procedures to be followed in case of a facility shutdown, when closing valves, testing new equipment, or inspecting tanks.
- Operator Training – Initial and refresher courses on safety procedures and emergency response.
- Overpressure Safety Devices – Relief valves are installed at the pig receivers to protect pipelines and measurement facilities from damage due to overpressure.
- Visual Right-of-Way Inspections – The pipeline right-of-way is visually inspected once per week, weather permitting, for abnormal conditions or visible leaks or sheen.

Spill prevention measures are required to be enhanced for the Tranquillon Ridge project through adopted revisions to FDP Condition P-2, PXP's SBC-approved Safety Inspection, Maintenance, and Quality Assurance Program (see discussion in EIR Section 5.1.1.4.2, *Emulsion Pipeline Smart Pigging Results* and Table 9.3.2, *Point Pedernales Facility Inspections / Consultations* in EIR Section 9.3). The existing leak detection systems for the PXP pipelines are required to be updated to provide maximum leak detection capabilities (FDP Condition P-16).

Twelve catchment basins have been installed at strategic onshore locations (predominately in the vicinity of the Santa Ynez River) to contain the oil in the event of a spill and the OSRP is in place to direct response to, cleanup of, and restoration of spill-affected areas. Seven remotely operated valves are in place along the emulsion pipeline to isolate the pipeline segments in the event of a leak or rupture. The OSRP is required to be updated specifically for the Tranquillon Ridge project and at least annually, as currently required for the Point Pedernales project (FDP

Condition P-13). To provide further protection against crude oil spills, the EIR identified the need for a containment berm for the future modifications at Valve Site #2 (FDP Condition H-0) to provide additional containment capability in the event of an oil spill. PXP is required to implement these mitigation measures which would fulfill the oil spill protection requirements of these policies. Based on the foregoing, the Tranquillon Ridge project is **consistent** with SBC Coastal Plan Policy 6-18 and 6-19 and the first portion of Coastal Act Section 30232.

Although the applicant is required to implement feasible containment, cleanup, and restoration measures as described in the EIR and in existing permits for the Point Pedernales project, current spill containment measures are not 100 percent effective at containing and cleaning up oil spills. In ocean waters, these measures are about 20 percent effective under good conditions and less effective in inclement weather or under other adverse conditions. Thus, the Tranquillon Ridge project is **not consistent** with the second portion of Coastal Act Section 30232. However, Coastal Act Section 30260 encourages expansion of coastal-dependent industrial facilities within existing sites and provides for permitting such facilities where they are not consistent with other sections of the Coastal Act, if three conditions are met. As noted in the discussion under Coastal Act Section 30260, the Tranquillon Ridge project would meet these three conditions.

Coastal Act Section 30240 – Environmentally Sensitive Habitats

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

SBC Coastal Plan Policy 2-11

All development, including agriculture, adjacent to areas designated on the land use plan or resource maps as environmentally sensitive habitat areas, shall be regulated to avoid adverse impacts on habitat resources. Regulatory measures include, but are not limited to, setbacks, buffer zones, grading controls, noise restrictions, maintenance of natural vegetation, and control of runoff.

SBC Coastal Plan Policy 3-19

Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

SBC Coastal Plan Policy 6-3

All oil and gas development in areas designated as environmentally sensitive habitats in the land use plan shall be subject to environmental review.

SBC Coastal Plan Policy 9-4

All permitted industrial and recreational uses shall be regulated both during construction and operation to protect critical bird habitats during breeding and nesting seasons. Controls may include restriction of access, noise abatement, and restriction of hours of operations of public or private facilities.

The Santa Ynez River estuary is designated as environmentally sensitive habitat. The existing Point Pedernales pipelines and associated facilities, which would be used for the Tranquillon Ridge project, were originally sited to minimize impacts to the river. Catchment basins were required and are installed along the pipeline route in the vicinity of the river to contain and collect oil in the event of a leak or rupture. The Tranquillon Ridge project would result in an increased throughput in the existing oil emulsion, gas, and produced water pipelines. Installation of pumps at Valve Site #2 would increase the risk of a spill occurring over current conditions, due to leaks from valves and other fittings during project operations. If a rupture or leak of the pipelines were to occur, significant degradation to marine and coastal waters could occur. The potential volume of a spill would also increase due to the increased volume of oil in the emulsion pipeline from the Tranquillon Ridge project. To further minimize spill-related impacts, the EIR identifies the need for installation of a berm at Valve Site #2 and revision of PXP's Oil Spill Response Plan to address protection and restoration of sensitive resources. With incorporation of these measures, the Tranquillon Ridge project is **consistent** with Coastal Act Section 30240.

Some components of the Tranquillon Ridge project are located near designated environmentally sensitive habitats (ESHs). These components were reviewed in the original Point Pedernales Environmental Impact Report (EIR) and in the 2006 EIR for the proposed Tranquillon Ridge project. Several mitigation measures intended to avoid or reduce impacts to these sensitive habitats were required to be implemented for the Point Pedernales project (for example, FDP Conditions F-5, *Creek and River Crossings*, H-1, *Restoration, Erosion Control and Revegetation Plan*, H-3, *Herbicide and Pesticide Ban*, H-9, *Restoration, Revegetation and Implementation Section of Oil Spill Response Plan*, and H-24, *Construction Within ESHs*). Construction-related discharges are expected to be minimal and controlled through the implementation of erosion and sediment control measures as specified in the EIR and the Point Pedernales FDP. Potential discharges during pipeline repair and maintenance would also be minimized through implementation of erosion and sediment control measures identified in the EIR and required for the Tranquillon Ridge project. Construction activities at Valve Site #2 are not expected to adversely affect critical bird habitats (e.g., American Peregrine Falcon, Western Snowy Plover, California Least Tern, or California Brown Pelican) due to the distance (over 1,000 feet) between these habitats and Valve Site #2. The Tranquillon Ridge project would be subject to the requirements of the existing Marine Biology Impact Reduction Plan (FDP Condition G-2) which restricts helicopter overflights of sensitive bird habitats on Vandenberg Air Force Base. It is within the Coastal Commission's perview to require additional oil spill prevention, clean up and restoration measures specifically for sensitive habitats would further reduce potential impacts to critical bird habitats.

With incorporation of these measures, the Tranquillon Ridge project is **consistent** with Coastal Act Section 30240 and SBC Coastal Plan Policies 2-11, 3-19, 6-3, and 9-4.

Coastal Act Section 30244 – Archaeological Resources

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

SBC Coastal Plan Policy 10-2

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.

SBC Coastal Plan Policy 10-3

When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.

SBC Coastal Plan Policy 10-5

Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

There are 29 recorded archaeological sites located along the existing Point Pedernales pipeline corridor, several of which are located within the Coastal Zone. No recorded sites are known to occur within areas that would be disturbed by new construction at Valve Site #2 and surveys conducted in this area did not reveal the presence of any archaeological or cultural resources. In conjunction with current FDP Conditions I-2 through I-8, Mitigation Measures CR-2, CR-3, and CR-4 identified in the EIR would protect previously unknown cultural deposits in the vicinity of new construction. These measures have been adopted as conditions of approval for the Tranquillon Ridge project.

Known cultural sites could be affected during future new construction, pipeline repair and maintenance activities, and by spill-related clean up activities. To minimize disturbance to these known resources, EIR Mitigation Measure CR-1 (FDP Condition I-2.f) requires monitoring within 200 feet of any known site during pipeline maintenance and appropriate data recovery if resources are encountered. In the event of a spill of either produced water or oil, containment and clean up activities could significantly affect cultural resources. EIR Mitigation Measure CR-5 (FDP Condition I-9) requires updating the Oil Spill Response Plan to specify procedures for minimizing these potential impacts; however, avoidance or data recovery may not be feasible, depending on the extent and magnitude of the spill. FDP Condition I-4 and EIR Mitigation Measure CR-1 require Native American monitoring of ground-disturbing activities in previously undisturbed areas, or within 200 feet of a recorded, significant archaeological site, respectively.

Implementation of existing FDP requirements and mitigation measures from the EIR render the Tranquillon Ridge project **consistent** with Coastal Act Section 30244 and SBC Coastal Plan Policies 10-2, 10-3, and 10-5.

Coastal Act Section 30250 – Development Location

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

(b) Where feasible, new hazardous industrial development shall be located away from existing developed areas.

(c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.

The Tranquillon Ridge project would use the existing Point Pedernales infrastructure, with the possible addition of pumps at Valve Site #2. New construction for these pumps would be adjacent to the existing development within previously disturbed areas. Therefore, the Tranquillon Ridge project is **consistent** with Coastal Act Section 30250.

SBC Coastal Plan Policy 2-6

Prior to issuance of a development permit, the County shall make the finding, based on information provided by the environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan. Where an affordable housing project is proposed pursuant to the Affordable Housing Overlay regulations, special needs housing or other affordable housing projects which include at least 50% of the total number of units for affordable housing of 30% of the total number of units affordable at the very low income level are to be served by entities that require can-and-will serve letters, such projects shall be presumed to be consistent with the water and sewer service requirements of this policy if the project has, or is conditioned to obtain all necessary can-and-will serve letters at the time of final map recordation, or if no map, prior to issuance of land use permits.

The portion of the existing Point Pedernales facilities within the coastal zone does not generate a demand for water, wastewater disposal, or solid waste disposal. The facilities are accessed via Terra Road on Vandenberg Air Force Base. This existing road provides adequate access to the pipeline corridor in this area. Emergency response and fire protection services are provided by the applicant and by County Fire Station No. 51 (first responder) and Lompoc City Fire Station No. 1. An Emergency Response Plan (ERP) is in place for the existing Point Pedernales project

and is required to be updated to address any new equipment and operating conditions associated with the Tranquillon Ridge project. Public services are available and adequate to serve the proposed project, thus the project is **consistent** with SBC Coastal Plan Policy 2-6.

Coastal Act Section 30251 – Visual Resources

The scenic and visual qualities of coastal areas shall be considered and protected a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

SBC Coastal Plan Policy 4-2

All commercial, industrial, planned development, and greenhouse projects shall be required to submit a landscaping plan to the County for approval.

SBC Coastal Plan Policy 4-3

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.

SBC Coastal Plan Policy 4-7

Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where the cost of undergrounding would be so high as to deny service.

For the Tranquillon Ridge project, the Surf Substation and Platform Irene are existing elements of the landscape in the coastal zone. The presence of these project facilities in the coastal zone where they are visible to the public is considered to be a significant and unavoidable impact of the Point Pedernales project. This impact will continue to occur during operation of the Tranquillon Ridge project. However, because the operating life of the Tranquillon Ridge project will coincide with the remaining operating life of the Point Pedernales project, this significant impact will not be extended by the Tranquillon Ridge project. PXP will continue to implement mitigation measures such as painting and screening of its facilities and to contribute to the Coastal Resource Enhancement Fund to partially compensate for these significant effects until the facilities are decommissioned and the sites restored.

The modifications to Valve Site #2 would be adjacent to and compatible with existing development on the site. Mitigation Measure Visual-2 requires all new equipment to be painted

in colors that are compatible with the surrounding area. The Surf substation, which was constructed as part of the original Point Pedernales project, is visible from Ocean Avenue (Highway 246). Efforts to screen the substation from public views with landscaping have not been fully effective to date and the presence of the substation would continue to be a significant visual impact until it is removed. The significant visual impacts of the substation would continue with the Tranquillon Ridge project until the facilities are removed and the sites restored. Mitigation Measure Visual-1 requires implementation of a visual mitigation plan specifically for the substation and this measure has been adopted in revised FDP Condition L-8. Although PXP is required to continue to pursue landscape screening efforts at the substation, these efforts are not expected to reduce the visual impact to less than significant; however, some improvements may be achieved.

EIR Mitigation Measure Visual-3 requires the use of existing poles for the power line to Valve Site #2, if feasible. Implementation of this measure will reduce the visual impacts of the new power line; it is included in revised FDP Condition H-19.

The Tranquillon Ridge project is **consistent** with Coastal Act Section 30251 and SBC Coastal Plan Policies 4-2, 4-3, and 4-7 with implementation of the EIR visual impact mitigation measures which have been adopted as conditions of project approval.

Coastal Act Section 30253 – Development

New development shall:

(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard
(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.
(3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.
(4) Minimize energy consumption and vehicle miles traveled.
(5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational users.

The existing Point Pedernales facilities are located within a designated high-fire hazard area and traverse areas with high geologic hazards. Potential impacts associated with these hazards were identified in the 1985 Point Pedernales project EIR and the Tranquillon Ridge project EIR and mitigated through the existing Point Pedernales FDP conditions; these requirements would continue to be implemented for the Tranquillon Ridge project. Construction at Valve Site #2 would be within the existing high fire hazard area and has been reviewed for potential geologic hazards. Because the Tranquillon Ridge project involves minimal new development and would use the existing Point Pedernales facilities, introduction of new facilities to hazard areas also would be minimal.

If required by SBC APCD rules, PXP would need to obtain an "Authority to Construct" and a "Permit to Operate" to allow for new emissions from the Tranquillon Ridge project facilities. Energy consumption during both construction and operations of the Tranquillon Ridge project is identified as an adverse but not significant impact (See EIR Section 5.16.4). Revised FDP Condition Q-4 requires PXP to conduct an energy efficiency audit of the LOGP to identify opportunities to conserve energy at the plant. As conditioned, the Tranquillon Ridge project is **consistent** with Coastal Act Section 30253.

SBC Coastal Plan Policy 3-8

Applications for grading and building permits, and applications for subdivision shall be reviewed for adjacency to, threats from, and impacts on geologic hazards arising from seismic events, tsunami runup, landslides, beach erosion, or other geologic hazards such as expansive soils and subsidence areas. In areas of known geologic hazards, a geologic report shall be required. Mitigation measures shall be required where necessary.

Geologic hazards associated with the Point Pedernales pipelines were reviewed in the 1985 EIR prepared for that project and mitigation measures were adopted as conditions of approval. The Point Pedernales Final Development Plan (FDP) Conditions D-1 through D-5 require site-specific investigation, design and mitigation of potential geologic hazards that could affect the pipelines. The Tranquillon Ridge EIR (Section 5.3) discusses geologic hazards and mitigation measures (GR-1 – Erosion control; GR-2 – Subsidence monitoring at LOGP; GR-3 – Drainage scour monitoring; GR-4 – Tsunami safety plan) that have been adopted as additional conditions of approval for the proposed project. Based on the foregoing, the Tranquillon Ridge project is **consistent** with SBC Coastal Plan Policy 3-8.

SBC Coastal Plan Policy 3-9

Water, gas, sewer, electrical, or crude oil transmission and distribution lines which cross fault lines, shall be subject to additional safety standards, including emergency shutoff where applicable.

The existing pipeline route does not cross any known active faults but does cross several potentially active faults. The Point Pedernales approval required the installation and use of a leak detection system on the emulsion line that allows the operator to monitor the flow and, if necessary, isolate pipeline segments in the event of an upset condition. This will limit the volume of a potential oil spill. The sour gas pipeline is equipped with alarms and shutdowns that are initiated if the pipeline pressure deviates from prescribed points. Four onshore valve stations provide for segment isolation in the event of a leak or release and hydrogen sulfide detectors are located at several points along the onshore portion of the pipeline. Since PXP acquired the Point Pedernales facilities, they have upgraded the emulsion pipeline leak detection system (see EIR Section 2.0, Project Description) and Mitigation Measures Risk-1 and Risk-2 have been adopted to require an additional upgrade to the leak detection system for the emulsion pipeline (FDP Condition P-16) and specific operating parameters for the sour gas pipeline (FDP Condition P-15). Therefore, the Tranquillon Ridge project, as approved, is **consistent** with SBC Coastal Plan Policy 3-9.

SBC Coastal Plan Policy 3-10

Major structures, i.e., residential, commercial, and industrial, shall be sited a minimum of 50 feet from a potentially active, historically active, or active fault. Greater setbacks may be required if local geologic conditions warrant.

The existing pipelines cross several potentially active faults. Pursuant to FDP Condition D-1, detailed geologic investigations were conducted for specific geologic hazards along the pipeline route and relevant geotechnical information was incorporated into the final engineering design of the pipeline and other facility construction. FDP Condition D-3 also required that the pipeline trenches be inspected during construction to identify and mitigate for any site-specific geologic hazards not previously accounted for in the pipeline design. FDP Condition D-4 required installation of isolation valves to limit the volume of an oil spill in the vicinity of active fault crossings in the event of a pipeline break. The sour gas pipeline is also monitored and subject to emergency shutdown during an upset condition. The Tranquillon Ridge project, as approved, is **consistent** with SBC Coastal Plan Policy 3-10.

SBC Coastal Plan Policy 3-12

Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control work, i.e., dams, stream channelizations, etc.

Future pipeline repair and maintenance activities could occur in stream channel crossings and within the floodplain of the Santa Ynez River where the pipelines are susceptible to scour. The pipelines were originally installed consistent with County Flood Control District and Building and Safety Division requirements for burial depth to avoid exposure of the pipelines due to scour, as was required by FDP Condition D-1 (*Geologic Investigation, Design and Mitigation Program*). Continued implementation of FDP Conditions D-1 and D-2 (*Geologic Hazards Monitoring Program*) and implementation of EIR Mitigation Measure GR-1 (FDP Condition H-9, *Restoration and Revegetation Section of OSRP*) will ensure the project does not contribute to flood hazards due to exposure of the pipelines by scouring and makes the Tranquillon Ridge project **consistent** with SBC Coastal Plan Policy 3-12.

SBC Coastal Plan Policy 3-13

Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.

SBC Coastal Plan Policy 3-14

All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soils, geologic, flood, erosion, or other hazards shall remain in open space.

Only a minor amount of grading would be required to construct the modifications at Valve Site #2 and, except for the new power poles, would occur in previously disturbed areas. Grading for Power pole installation will not require excessive amounts of grading and will occur in relatively level areas. No trees would be removed for the power lines. Total vegetation removal would be minimal and all disturbed sites would be restored once construction is completed.

Pipeline repair and maintenance activities could result in additional vegetation removal and ground disturbance. EIR Mitigation Measure Visual-3 requires use of existing poles, if feasible. If not feasible, implementation of erosion control measures, protective fencing, and restoration of the disturbed areas is required. This mitigation measure is adopted in revised FDP Condition H-19 and, in addition to the other existing Point Pedernales FDP conditions, will reduce potential visual impacts to a less than significant level. Therefore, the Tranquillon Ridge project is **consistent** with SBC Coastal Plan Policies 3-13 and 3-14.

Coastal Act Section 30260 – Industrial Development Location or Expansion

Coastal dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if (1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would adversely affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.

Platform Irene is considered a coastal-dependent facility as it "requires a site on, or adjacent to, the sea to be able to function at all" (Coastal Act Section 30101). The pipelines connecting Platform Irene and the LOGP traverse lands both within and outside of the Coastal Zone. The LOGP is zoned M-CR, Coastal-Related Industry, and is contained within the boundaries of the onshore Lompoc Oil Field, inland of the Coastal Zone. Coastal-related development refers to uses that are "dependent on a coastal-dependent development or use" (Coastal Act Section 30101.3). This Coastal Act policy is not applicable to the LOGP due to the facility's location outside of the Coastal Zone. The LOGP is not designated as Coastal-Dependent, nor is it a Consolidated Oil and Gas Processing Facility, but it does serve offshore oil and gas development and is the only existing facility in northern Santa Barbara County that is approved for this purpose. These facilities have operated since 1987 (Platform Irene, pipelines, oil processing at the LOGP site) and 1997 (gas processing at the LOGP). All of these facilities would be used to implement the Tranquillon Ridge project. New project components associated with the Tranquillon Ridge project are limited to the potential addition of booster pumps at Valve Site #2, which is in the Coastal Zone, and installation of additional power lines and poles and possibly a new substation to provide power for the new pumps. The substation would be located outside of the Coastal Zone. Physical components of the Tranquillon Ridge project are existing and the expansion at Valve Site #2 would occur within the valve site, with the exception of portions of the new power line and potential substation. Therefore, the Tranquillon Ridge project is **consistent** with the first part of Section 30260.

Coastal Act Section 30232 requires that effective spill containment and clean-up facilities and procedures be provided. Because currently available oil spill containment and clean-up equipment and efforts, including those for the proposed project, are not capable of containing and cleaning up 100 percent of a spill, a finding of consistency with Section 30232 cannot be made. However, Section 30260 provides that industrial development may be approved even when it is not consistent with other sections of the Coastal Act, if certain findings can be made:

(1) Alternative locations are infeasible or more environmentally damaging. The Tranquillon Ridge project would use existing facilities almost entirely and only minor new construction would occur. There are no other existing facilities in the vicinity that could accommodate the project. Therefore, locating the project at any other site would include construction of a new platform or onshore drilling and production site, and/or a new gas processing plant, and new pipelines. The Tranquillon Ridge EIR assessed the relative impacts of constructing a new oil and gas drilling and production site and using the existing LOGP for processing, and of constructing a new onshore oil and gas processing plant in the Casmalia Oil Field and new pipelines from the LOGP site to this plant. For the Casmalia East alternative, the EIR concluded that this would not reduce significant impacts of the proposed project and would result in additional environmental damage, primarily from construction. For the onshore production site, significant impacts from an oil spill originating offshore would be eliminated, but some impacts to marine biota and water quality would still be likely in the event an onshore spill reached the ocean. Other significant impacts would be likely to occur for an onshore production site from both construction and operation. The EIR did not draw a conclusion as to whether the onshore alternative or the Tranquillon Ridge project would be environmentally preferable overall because significant impacts would occur in both similar and different issue areas when compared to the Tranquillon Ridge project. However, the onshore drilling site alternative would clearly involve more construction-related impacts, some of them significant and potentially unavoidable, than the Tranquillon Ridge project. Therefore, the Planning Commission finds that potentially feasible alternative locations for the facilities necessary to develop the Tranquillon Ridge Field reserves would not be less environmentally damaging than the Tranquillon Ridge project, primarily due the type and amount of new construction that would be needed.

(2) To do otherwise would adversely affect the public welfare. The Tranquillon Ridge project will develop the oil and gas resources using existing facilities, thus avoiding construction-related impacts. Other options for developing the resources, such as a new onshore drilling and production site, a new platform in State waters, a relocated processing site, or new pipelines offshore, would likely result in greater environmental impacts than the Tranquillon Ridge project. Under the No Project Alternative, the resource could still be developed in the future. If this development occurred after Platform Irene is decommissioned, new construction potentially would result in significant impacts. Operational impacts would be similar to those for the Tranquillon Ridge project, several of them significant and unavoidable. We acknowledge that a significant impact associated with the Tranquillon Ridge project related to marine oil spills would be reduced if the resource were to be developed from an onshore site. However, other Class I impacts would still occur and

construction-related impacts would be greater. In addition, as approved, the Tranquillon Ridge project will operate for up to 14 years. If new facilities were built to develop the Tranquillon Ridge resources, they would likely operate for at least twice as long, thus extending the significant impacts well into the future. Use of existing facilities is encouraged by both County and Coastal Act policies. In this case, use of the existing Point Pedernales facilities is clearly consistent with these policies. Because the resources can be adequately developed using the existing facilities and the project includes a specific operational end date, to do otherwise could adversely affect the public welfare.

(3) Adverse environmental effects are mitigated to the maximum extent feasible. The County has adopted mitigation measures from the Tranquillon Ridge EIR as conditions of approval for the Tranquillon Ridge project. These conditions are presented in Attachment C to the April 21, 2008 Planning Commission staff report and include any modifications made by the Planning Commission in its approval of PXP's revised Final Development Plan (FDP). PXP has committed to implementing the revised FDP as approved by the County.

The following table lists each mitigation measure from the Tranquillon Ridge EIR and the corresponding FDP condition number that was adopted by the County and incorporated into PXP's FDP in approving the Tranquillon Ridge project. Mitigation measures and permit conditions that are not applicable to Coastal Zone facilities are identified as such in the table (shaded entries). In addition to the conditions identified in the table, the following is a partial list of existing FDP conditions that are also applicable to project components in the Coastal Zone:

M-1 – Joint Oil/Fisheries Committee
M-2 – Notice to Fishermen
M-4 – Post-Construction Survey of Ocean Bottom
M-5 – Fisheries Training Program
M-7 – Contribution to Fisheries Enhancement Fund
M-9 – Mooring of Support Vessels
N-1 – Contribution to Coastal Resource Enhancement Fund

Although several impacts will remain significant after application of the adopted mitigation measures and existing permit conditions, the Planning Commission finds that implementation of these revised and existing FDP conditions will mitigate the significant impacts of the Tranquillon Ridge project to the maximum extent feasible.

Based on the foregoing discussion, the three findings needed for consistency with the second part of Section 30260 can be made. Thus, the Tranquillon Ridge project is **consistent** with Section 30260.

Tranquillon Ridge EIR Mitigation Measures and FDP Conditions		
Mitigation Measure	**Description** *(Shaded entries indicate Inland (non-Coastal Zone) only)*	**FDP Condition**
Risk-1	Upgrade leak detection system	P-16
Risk-2	Gas pipeline operating parameters: 600 psig & ≤ 8000 ppm H_2S	P-15

Tranquillon Ridge EIR Mitigation Measures and FDP Conditions		
Mitigation Measure	**Description** *(Shaded entries indicate Inland (non-Coastal Zone) only)*	**FDP Condition**
Risk-3	NGL/LPG trucking	P-23
TB-1	Pre-construction power line corridor plant survey	H-19
TB-2	13th St. Bridge feasibility; pole design for raptors; agency consultations	H-19
TB-3	Immediate pre-construction survey & wildlife relocation	H-19
TB-4	Ground disturbance during dry season (April 1-November 1)	H-1(c)
TB-5	Site-specific erosion control measures for new disturbances along ROW	H-1(c)
TB-6	Update RECRP - plans for work area restriction and delineation	H-1(l)
TB-7	Update RECRP - multiple site-specific measures	H-1
TB-8	Botanist site survey for listed plant species	H-1(l)
TB-9	Site-specific vegetation salvage and restoration plan	H-1(l)
TB-10	Update RECRP - avoid breeding season at beach & foredune habitats	H-24
TB-11	Update OSRP - increased spill volumes & site-specific containment	H-9, P-13
TB-12	Update OSRP - site-specific habitat protection & restoration procedures	H-9, P-13
TB-13	Update OSRP - low-impact clean-up procedures, best available practices	H-9, P-13
TB-14	Update OSRP - spill response training & drills; wildlife rehabilitation center	H-9, P-13
GR-1	Update OSRP - BMPs for drainages	H-9
GR-2	Subsidence monitoring and grouting program at LOGP	D-2
GR-3	Creek & drainage inspection & maintenance program for scour along ROW	D-2
GR-4	Tsunami assessment & safety plan	D-1
OWR-1	Erosion control BMPs for construction	F-1
OWR-2	Berm at Valve Site #2	H-0
OWR-3	Update OSRP - leak detection, training, containment accessibility	P-13
OWR-4	Catch basin calculations, inspection & maintenance	H-0
OWR-5	Protect pipeline from 100-yr flood scour and erosion	D-2, F-5
OWR-6	Restore stream beds excavated for pipeline repair or spill clean-up	P-13(4)
MB-1a	Update OSRP for blowouts, containment effectiveness, otter impacts, training	P-13
MB-1b	Coastline conditions	G-4
MB-1c	Marine mammal and sea bird impact mitigation fund	*
MB-2	Muds disposal	G-2(A)
MB-3	Produced water disposal	G-3
MB-4	Marine mammal observers on support vessels	G-2(B)
MWQ-1	Offshore pipeline inspections, update SIMQAP	P-2
CRF/KH-1	JO/FLO guidelines for gear damage disputes	M-3
CRF/KH-2	Shell mound assessment at abandonment	R-3
Air-1	Dust control measures	E-11
Air-2	Emission reductions	E-10
T-1	Non-rush hour delivery times	O-10
T-2	LPG/NGL truck traffic time restrictions	P-23
T-3	Supply boats use USCG marine traffic corridors	M-8
N-1	1000-ft flight height minimum, Oso Flaco Lake restriction	K-1
N-2	Construction 7am-4pm, M-F; post signs; forward complaints to P&D	K-3
Fire-1	Update FPP, ERP, OSRP for Tranquillon Ridge modifications	P-3, P-10, P-13
Fire-2	Include power line in updated Fire Protection Plan	P-10
CR-1	Grading plan within 200 feet of recorded archaeological sites	I-2(f)
CR-2	Protocols for unexpected discovery of archaeological resources	I-2(f)
CR-3	Phase I survey in unsurveyed pipeline route segments	I-1
CR-4	Phase I survey for power line route	I-1
CR-5	Update OSRP - spill containment measures	I-9
Visual-1	Visual mitigation plan for Surf substation	L-8
Visual-2	Equipment painting	L-4
Visual-3	13th St. Bridge feasibility for power line	H-19
Visual-4	Lighting Plan	L-2
Energy-1	LOGP Energy Efficiency Audit	Q-4

* Within the perview of the California Coastal Commission.

Coastal Act Section 30262 – Oil and Gas Development

a) Oil and gas development shall be permitted in accordance with Section 30260, if the following conditions are met:

(1) The development is performed safely and consistent with the geologic conditions of the well site.

(2) New or expanded facilities related to that development are consolidated, to the maximum extent feasible and legally permissible, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts.

(3) Environmentally safe and feasible subsea completions are used when drilling platforms or islands would substantially degrade coastal visual qualities unless use of those structures will result in substantially less environmental risks.

(4) Platforms or islands will not be sited where a substantial hazard to vessel traffic might result from the facility or related operations, determined in consultation with the United States Coast Guard and the Army Corps of Engineers.

(5) The development will not cause or contribute to subsidence hazards unless it is determined that adequate measures will be undertaken to prevent damage from such subsidence.

(6) With respect to new facilities, all oilfield brines are reinjected into oil-producing zones unless the Division of Oil and Gas of the Department of Conservation determines to do so would adversely affect production of the reservoirs and unless injection into other subsurface zones will reduce environmental risks. Exceptions to reinjections will be granted consistent with the Ocean Waters Discharge Plan of the State Water Resources Control Board and where adequate provision is made for the elimination of petroleum odors and water quality problems.

(7)(A) All oil produced offshore California shall be transported by pipeline only. The pipelines used to transport this oil shall utilize the best achievable technology to ensure maximum protection of public health and safety and of the integrity and productivity of terrestrial and marine ecosystems.

(B) Once oil produced offshore California is onshore, it shall be transported to processing and refining facilities by pipeline.

(C) The following guidelines shall be used when applying subparagraphs (A) and (B):

(i) "Best achievable technology" means the technology that provides the greatest degree of protection taking into consideration both of the following:

(I) Processes that are being developed, or could feasibly be developed, anywhere in the world, given overall reasonable expenditures on research and development.

(II) Processes that are currently in use anywhere in the world. This clause is not intended to create any conflicting or duplicative regulation of pipelines, including those governing the transportation of oil produced from onshore reserves.

(ii) "Oil" refers to crude oil before it is refined into products, including gasoline, bunker fuel, lubricants, and asphalt. Crude oil that is upgraded in quality

through residue reduction or other means shall be transported as provided in subparagraphs (A) and (B).

(iii) Subparagraphs (A) and (B) shall apply only to new or expanded oil extraction operations. "New extraction operations" means production of offshore oil from leases that did not exist or had never produced oil, as of January 1, 2003, or from platforms, drilling islands, subsea completions, or onshore drilling sites, that did not exist as of January 1, 2003. "Expanded oil extraction" means an increase in the number of well heads, on or after January 1, 2003.

(iv) For new or expanded oil extraction operations subject to clause (iii), if the crude oil is so highly viscous that pipelining is determined to be an infeasible mode of transportation, or where there is no feasible access to a pipeline, shipment of crude oil may be permitted over land by other modes of transportation, including trains or trucks, which meet all applicable rules and regulations, excluding any waterborne mode of transport.

(8) If a state of emergency is declared by the Governor for an emergency that disrupts the transportation of oil by pipeline, oil may be transported by a waterborne vessel, if authorized by permit, in the same manner as required by emergency permits that are issued pursuant to Section 30624.

(9) In addition to all other measures that will maximize the protection of marine habitat and environmental quality, when an offshore well is abandoned, the best achievable technology shall be used.

b) Where appropriate, monitoring programs to record land surface and near-shore ocean floor movements shall be initiated in locations of new large-scale fluid extraction on land or near shore before operations begin and shall continue until surface conditions have stabilized. Costs of monitoring and mitigation programs shall be borne by liquid and gas extraction operators.

c) Nothing in this section shall affect the activities of any state agency that is responsible for regulating the extraction, production, or transport of oil and gas.

The original (1984) proposal to install Platform Irene was subject to detailed geotechnical assessment and the approved project incorporated design standards addressing seismic and other geotechnical concerns, as required by the Federal Minerals Management Service (MMS) and the Coastal Commission through its consistency review process. In the Tranquillon Ridge case, the wells would be drilled into State waters from a platform in Federal waters. Thus, both MMS and California State Lands Commission well drilling requirements are applicable to the project and the proposal will undergo Coastal Commission review, as well.

All major project facilities exist and are in operation today. New facilities that will be constructed for the project are minimal and would be located within or adjacent to existing project-related facilities, with the exception of potential new power lines and electrical substation. Therefore, the Tranquillon Ridge facilities will be consolidated to the extent feasible. Although significant visual impacts will continue due to the presence of Platform Irene, subsea well completions have not been required for the Tranquillon Ridge project. Use of subsea well completions likely would extend the drilling times and would include the presence of a

temporary drill rig, nearer to shore than Platform Irene, which would also continue to operate until it is abandoned. Use of the existing fixed platform will result in less environmental risks and similar visual impacts compared to subsea completions for the Tranquillon Ridge wells.

Platform Irene is known to vessel operators and does not constitute a hazard to navigation in the area. Subsidence due to oil extraction related to the Point Pedernales project has not occurred offshore on a significant scale and would not be expected to pose a significant hazard to the structural integrity of the platform. (Subsidence at the LOGP, which is inland of the coastal zone, is related to soil conditions at the plant site and has been successfully addressed through various measures, including an extensive grouting program (see FDP Condition D-2) at the facility.)

Final Development Plan Condition G-3 (*Produced Water Quality*) requires that PXP's produced water discharges comply with the requirements of the National Pollutant Discharge and Elimination System (NPDES) permit that applies to Platform Irene (General NPDES Permit CAG280000). The EIR identified significant but mitigable impacts to marine water quality (Impact MWQ.3) and adverse, but less than significant impacts to marine organisms (Impact MB.3) from this discharge. The EIR also notes that the produced water discharge plume is expected to become well-diluted and dispersed within about 10 meters of the platform, which will serve to reduce the potential for fish to bioaccumulate the chemical constituents of the produced water. EIR Mitigation Measure MB-3 recommends maintaining the produced water discharge shunt depth at 180 feet below the water surface to achieve the necessary dilution of the discharge. Approval of the Tranquillon Ridge project includes a requirement that PXP discharge produced water and drill muds and cuttings in accordance with the requirements of the NPDES permit. The EPA currently is in the process of determining an appropriate limit for sulfides in water discharges. Once the requirement has been set, PXP will determine what configuration of discharge piping will be needed to maintain compliance with all discharge requirements. This may include a multi-port diffuser which would discharge at multiple depths and would be expected to achieve at least the same amount of dilution as the 180-foot depth discharge point. For this reason, FDP Condition G-3 does not specify the 180-foot depth, but does require that the NPDES limits be met.

Drill muds and cuttings may also be discharged at the platform and could result in adverse but not significant impacts to marine organisms in the area (Impact MB.2). The EIR recommends that PXP assess the feasibility of injecting the drill muds and cuttings into an offshore reservoir from Platform Irene and, if feasible, to do so. This is within the perview of the California Coastal Commission. If it is not feasible to inject the muds and cuttings, PXP would still need to comply with the NPDES permit for any muds and cuttings discharges.

PXP currently transports its Point Pedernales crude oil via pipeline to the ConocoPhillips pipeline system in Santa Barbara County. ConocoPhillips then transports the crude oil via its Line 300 pipeline system to the Santa Maria Refinery in San Luis Obispo County and then north via pipeline to Bay Area refineries for final refining. PXP has stated that the oil and gas developed from the Tranquillon Ridge project would be transported using this existing pipeline network. Both the PXP and ConocoPhillips facilities are subject to County-approved Final

Development Plans which specify (Condition Q-5, *Transportation of Processed Oil*) that all oil processed at the Lompoc Oil and Gas Plant is to be transported from that facility in accordance with the County's Local Coastal Plan Policy 6-8, which requires pipeline transport of processed oil to refinery centers. Therefore, both the producer, PXP, and the transporter, ConocoPhillips, are currently required to transport oil processed at the LOGP, including Tranquillon Ridge oil, to refineries by pipeline. PXP is required to inspect its pipelines at least annually, to report the results of the annual inspections to the County, and to take corrective measures where necessary and as approved by the County, Coastal Commission, State Lands Commission, and Minerals Management Service (as applicable). Final Development Condition P-2 (*Safety, Inspection, Maintenance and Quality Assurance Program*) has been revised to specifically apply to both the Point Pedernales and the Tranquillon Ridge projects and requires that PXP maintain the integrity of its pipelines throughout their working life. Two other related and important requirements adopted for approval of the Tranquillon Ridge project are: (1) a requirement to install an upgraded leak detection system on the oil pipeline (Condition P-16, *Pipeline Leak Detection*); and, (2) implementation of PXP's approved *"Procedure for Unintended Shutdown of Platform Irene and the 20-inch Oil Emulsion Pipeline"* prior to restarting the pipeline if an unexplained shutdown occurs (Condition P-2).

Platform Irene and its associated wells will be decommissioned in accordance with Federal and State requirements. A new FDP Condition, R-2 (*Demolition and Reclamation Permit*), has been adopted to specify that PXP is required to obtain a Demolition and Reclamation Permit from the County at the appropriate time and prior to decommissioning its Point Pedernales/Tranquillon Ridge facilities. This permitting process includes environmental review to ensure the facilities within the County's jurisdiction are decommissioned properly and the sites restored appropriately, and that these post-abandonment activities occur in a timely manner.

It is not anticipated that any of the requirements or activities associated with the Tranquillon Ridge project would conflict with, or otherwise affect, the actions of any State agency having regulatory authority over the extraction, production or transport of oil and gas. Relevant State (and Federal) agencies participated in the environmental review process for the Tranquillon Ridge project and are expected to fully exercise their regulatory duties during their respective permitting processes, subsequent to the County's approval of the project. Any future conflicts that may arise are expected to be resolved through these subsequent permitting processes and related permit compliance procedures.

Based on the foregoing, the Planning Commission finds that the required conditions of Coastal Act Section 30262 are met for the Tranquillon Ridge project and the project is therefore **consistent** with Section 30260 of the Coastal Act.

SBC Coastal Plan Policy 6-4

Upon completion of production, the area affected by the drilling, processing, or other related petroleum activity, shall be appropriately contoured, reseeded, and landscaped to conform with the surrounding topography and vegetation.

SBC Coastal Plan Policy 6-6F

Review of Oil and Gas Facility Permits. (Added 12/14/87, B/S Resol #87-616)
The Planning Commission shall review permits that are approved after August 12, 1985 for new or modified oil and gas facilities when throughput, averaged (arithmetic mean) over any twelve (12) consecutive months, does not exceed 3 percent of the facility's maximum permitted operating capacity. The review shall be conducted in a duly-noticed public hearing to determine if facility abandonment or facility modifications are appropriate.

Appropriate abandonment-related permit conditions have been adopted for the Tranquillon Ridge project. These include FDP Condition R-1, which requires County review of the Final Development Plan permit and a public hearing when oil or gas throughput is reduced to 3% or less of permitted capacity to determine if abandonment is appropriate; Condition R-2, which requires PXP to apply for and obtain a Demolition and Reclamation Permit from the County when certain conditions exist as described in Article II, Coastal Zoning Ordinance Section 35-107.3 (*Requirement to File an Application*); Condition R-3, which requires equipment removal and site restoration upon abandonment and Condition R-4, which requires financial assurance for demolition and restoration. Environmental review will be conducted for the Demolition and Reclamation Permit application and appropriate mitigation measures will be adopted as conditions of approval for the permit. With these requirements in place, the Tranquillon Ridge project is **consistent** with Coastal Plan Policies 6-4 and 6-6F.

SBC Coastal Plan Policy 6-8

If an onshore pipeline for transporting crude oil to refineries is determined to be technically and economically feasible, proposals for expansion, modification, or construction of new coastal dependent oil and gas processing facilities shall be conditioned to require transportation of oil through the pipeline when constructed, unless such condition would not be feasible for a particular shipper. (Revised 6/18/84, B/S Resol #84-284).

a) Pipeline transportation of crude oil to a refining center served by a pipeline is presumed to be technically and economically feasible and the required method of transportation to that center. (Revised 6/18/84, B/S Resol #84-284).

b) Pipeline transportation of crude oil is presumed feasible for a particular shipper if a pipeline is in operation to the refining center of the shipper's choice. (Revised 6/18/84, B/S Resol #84-284).

c) Crude oil processing facilities shall be conditioned to require that each shipper's oil leaving those facilities be transported by pipeline when a pipeline is in operation to the refining center of the shipper's choice. (Revised 6/18/84, B/S Resol #84-284).

d) Until pipelines become available, and for refining centers not served by pipeline, other modes of oil transportation are allowed consistent with County policies. Rail is not preferred for large volume shipments of oil. (Revised 6/18/84, B/S Resol #84-284).

e) For refining centers served by pipeline, other modes of transportation up to the limits of permitted capacity for those modes, and with assurances that the shipper or transportation facility operator can and will mitigate the environmental impacts caused by the alternate transportation mode, are allowed only under the following circumstances:

1) Pipeline unavailability or inadequate capacity; or

2) A refinery upset lasting no longer than two (2) months and only where the alternate refining center is not served by pipeline; or

3) An emergency which may include a national state of emergency. (Revised 6/18/84, B/S Resol #84-284).

Oil produced from the Point Pedernales project is currently transported to and from the Lompoc Oil and Gas Plant via existing pipeline systems to the Santa Maria Refinery located in San Luis Obispo County. ConocoPhillips takes possession of the oil at a custody transfer point adjacent to the LOGP and ships it to the Santa Maria Refinery and then to refinery locations in the Bay Area by pipeline. PXP has stated that the Tranquillon Ridge oil will be transported using the existing pipeline infrastructure, but since PXP does not own the oil after it is transferred to ConocoPhillips, it cannot guarantee pipeline transport of Tranquillon Ridge oil to refinery destinations. However, both PXP and ConocoPhillips operate in Santa Barbara County under existing Development Plan permits which require, pursuant to FDP Condition Q-5 of both permits, that all oil processed at the LOGP be transported from that facility in accordance with this Coastal Plan Policy (6-8). In addition, the California Coastal Commission must find the Tranquillon Ridge project consistent with Coastal Act Policy 30262 (see discussion above) which requires pipeline transport of crude oil that is produced offshore to processing and refining facilities, once that oil is onshore. Therefore, since both PXP and ConocoPhillips are required to transport oil processed at the LOGP to refinery destinations by pipeline, the Tranquillon Ridge project is **consistent** with SBC Coastal Plan Policy 6-8.

SBC Coastal Plan Policy 6-9

Applicants for oil and gas processing facilities shall prepare and keep updated emergency response plans to deal with the potential consequences of hydrocarbon leaks or fires. These emergency response plans shall be approved by the County's Emergency Services Coordinator and Fire Department.

PXP currently maintains an Emergency Response Plan, as required by FDP Condition P-3, specific to the LOGP, the onshore portions of the pipeline system between Platform Irene and the LOGP, and the sales gas transfer line. This Plan provides action checklists for specific facilities for PXP personnel to follow in the event of an emergency (including hydrocarbon leaks or fires), notification lists, facility site plans, a response organizational structure, training requirements, description of the Community Alert Network (CAN) to notify nearby residents in the event of an incident that has the potential to affect them, and incident reporting forms. Certain revisions to this Plan have been required to update the Plan and incorporate the Tranquillon Ridge project. This Plan will continue

in effect throughout the life of the project and both the County's Office of Emergency Services and the Fire Department, along with the Planning and Development Department, review and approve all revisions and updates to the Emergency Response Plan. Therefore, the Tranquillon Ridge project, as approved, is **consistent** with Coastal Policy 6-9.

SBC Coastal Plan Policy 6-14

Except for pipelines exempted from coastal development permits under Section 30610(c) and (e) of the Coastal Act as defined by the State Coastal Commission's Interpretive Guidelines, a survey shall be conducted along the route of any pipeline in the coastal zone to determine what, if any, coastal resources may be impacted by construction and operation of a pipeline. The costs of this survey shall be borne by the applicant. (This survey may be conducted as a part of environmental review if an EIR is required for a particular project.) The survey shall be conducted by a consultant selected jointly by the applicant, the County and the Department of Fish and Game. If it is determined that the area to be disturbed will not revegetate naturally or sufficiently quickly to avoid other damage, as from erosion, the applicant shall submit a revegetation plan. The plan shall also include provisions for restoration of any habitats which will be disturbed by construction or operation procedures.

For projects where a revegetation plan and/or habitat restoration plan has been deemed necessary, one year after completion of construction, the area crossed by the pipeline shall be resurveyed to assess the effectiveness of the revegetation and restoration plan. This survey shall continue on an annual basis to monitor progress in returning the site to pre-construction conditions or until the County feels no additional progress is possible.

The County may require the posting of a performance bond by the applicant to ensure compliance with these provisions.

Potential resources that will be affected by continued operation of the existing pipeline system are identified in the Environmental Impact Report prepared for the proposal (06EIR-00005; SCH #2006021055). Potential impacts to terrestrial biological and freshwater resources are discussed in Section 5.2 of the EIR, along with several mitigation measures which have been adopted as conditions of project approval. Revegetation efforts along the pipeline corridor since the pipelines were installed in 1986 have not been completely successful to-date, though restoration efforts and success have improved in recent years. Approval of the Tranquillon Ridge project includes revisions to PXP's Restoration, Erosion Control, and Revegetation Plan (RECRP; FDP Condition H-1) to enhance restoration of areas disturbed by project-related activities. The RECRP sets certain performance criteria for revegetation efforts. Monitoring on at least an annual basis is required until PXP achieves the performance standards. FDP Condition H-1 requires that these criteria be updated for the Tranquillon Ridge project to incorporate the mitigation measures identified in the EIR.

It is expected that PXP's increased attention over the last few years to landscaping and revegetating areas disturbed by construction, including pipeline maintenance activities, will continue until performance criteria are met. The County monitors PXP's compliance with the RECRP requirements and assesses whether performance criteria are met with the assistance of the

Environmental Quality Assurance Program (EQAP) monitor, who is under contract to the County. The EQAP monitor will continue to evaluate PXP's compliance with the RECRP during operation of the Tranquillon Ridge project. FDP Condition H-23 requires PXP to post a revegetation bond to ensure that PXP's revegetation plan is completed to the County's specifications. PXP currently has two revegetation bonds posted with the County, one for oak trees in the amount of $250,000 and one for black-flowered figwort in the amount of $35,000. These bonds are subject to release once performance criteria have been met. Financial assurance for site restoration after facility decommissioning is addressed in FDP Condition R-4 which requires that PXP post a financial assurance for site restoration prior to introducing Tranquillon Ridge oil and gas into the pipeline system between Platform Irene and the LOGP.

Based on the foregoing, the Tranquillon Ridge project, as conditionally approved, is **consistent** with Coastal Plan Policy 6-14.

SBC Coastal Plan Policy 6-14A

Impacts of new pipelines outside of industry facilities shall be minimized by requiring the use of available or planned common carrier or multiple-user pipelines to the maximum extent feasible. New pipeline construction shall be permitted only if the Planning Commission determines that the use of available common carrier or multiple-user pipelines is not feasible or is not the environmentally preferred alternative. New pipelines that are permitted shall be constructed, operated, and maintained as common carrier or multiple-user pipelines unless the Planning Commission determines that it is not feasible. New multiple-user pipelines shall provide equitable access to all shippers with physical compatible stock on a nondiscriminatory basis. To determine physical compatibility of stocks, the Planning Commission shall consider available information on the physical and chemical characteristics of the stacks, including but not limited to API gravity, sulfur and water content, viscosity, and pour point. (Added 7/28/86, B/S Resol 86-380; Revised 12/22/86, B/S Resol #86-656).

All new pipelines shall be restricted to approved corridors that have undergone comprehensive environmental review unless the Planning Commission determines that such corridors are not available, safe, technically feasible, or the environmentally preferred route. The required environmental review for proposed pipelines shall include analysis to determine what cumulative impacts might result in adding pipelines to that corridor in the future. (Added 7/28/86, B/S Resol 86-380).

The design of new common carrier and multiple-user pipelines shall take into account the reasonable, foreseeable needs of other potential shippers. If other pipeline projects-are expected to be permitted in the same corridor, the proposed project shall be required to coordinate concurrent or "shadow" construction with the other projects where practical. (Added 7/28/86, B/S Resol 86-3801).

Permits for new pipeline construction shall require engineering of pipe placement and burial to minimize incremental widening of the corridor during subsequent pipeline projects, unless

the proposed route is determined to be unacceptable for additional pipelines. (Added 7/28/86, B/S Resol 86-380).

No new pipelines are proposed or required for the Tranquillon Ridge project. All pipelines associated with the Tranquillon Ridge project are existing and currently operational. The existing pipeline corridors were reviewed in the original EIR/EIS prepared for the Point Pedernales project and the pipelines were installed in accordance with the County's conditional approval of that project. The pipelines are common carrier pipelines and will continue to operate as such throughout the life of the Tranquillon Ridge project. Therefore, the Tranquillon Ridge project is **consistent** with Coastal Plan Policy 6-14A.

SBC Coastal Plan Policy 6-15

Herbicides shall not be used during pipeline construction and sidecasting of soil may be restricted, when deemed necessary, by removal of excess soil to an approved dumping site after the excavation has been backfilled and compacted.

Herbicides are not permitted to be used along the pipeline corridor and disposition of topsoil excavated for construction/maintenance is subject to restrictions identified in the EIR and incorporated in the FDP as conditions of approval for the Tranquillon Ridge project. FDP Condition H-1 requires that PXP identify procedures for topsoil salvage, stockpiling and replacement and prohibits placing soils in biologically sensitive areas. Therefore, the Tranquillon Ridge project is **consistent** with Coastal Plan Policy 6-15.

SANTA BARBARA COUNTY COMPREHENSIVE PLAN POLICIES

Land Use Element

Land Use Development Policies (LUDP)

LUDP 4: Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private resources shall be grounds for denial of the project or reduction in the density otherwise indicated on the land use plan. *(References to affordable housing omitted.)*

The 1999 Point Pedernales Condition Effectiveness Study noted that the Mission Hills Community Services District (MHCSD) supplies water only for domestic purposes to the LOGP. Water for facility needs is supplied by a private well. The MHCSD confirmed in 1999 that the project uses only a minor portion of the original projected peak demand of 19 acre-feet per year. Sewage disposal is also provided by the MHCSD. The LOGP is served by existing roads and the pipeline route is accessed by various combinations of public and private roadways. These public services will not be affected by the Tranquillon Ridge project. Fire protection services are

provided onsite and by County Fire Station 51 and police protection is provided by the Lompoc County Sheriff's station. FDP Condition P-8 requires PXP to contribute to a funding mechanism to provide adequate staffing levels at County Fire Station #51. Since 1986, PXP has made the required payments as requested by the Fire Department, pursuant to the existing agreement. County Fire Department and PXP recently developed an updated agreement with PXP to continue its funding of staffing levels at Fire Station 51.

With PXP's continued funding to ensure adequate fire protection services are available, the Planning Commission finds that adequate public and private services and resources (i.e., water, sewer, roads, etc.) are available to serve the Tranquillon Ridge project. The Tranquillon Ridge project is therefore **consistent** with LUDP 4.

LUDP 10: **Impacts of oil, gas and produced water pipelines outside of industry facilities shall be minimized by requiring the use of available or planned common carrier and multiple user pipelines to the maximum extent feasible.** *(References to new pipelines omitted.)*

The Tranquillon Ridge project will use existing oil, gas, and produced water pipelines entirely, **consistent** with LUDP 10.

LUDP 11: For the purpose of ensuring safe, orderly, and planned development of oil and gas resources, the Board of Supervisors designates the northwestern and midwestern portion of the County as the North County Consolidation Planning Area, or NCCPA (as defined under the section "Other Definitions" in this element) and subjects oil and gas development in this planning area to the flowing policies:

> **a. Due to estimated oil and gas reserves located offshore, the County has prepared a study entitled *Siting Gas Processing Facilities: Screening & Siting Criteria.* That study is incorporated herein by reference to guide a comprehensive analysis of alternative sites should the county receive an application for a Development Plan to construct or expand a facility in the NCCPA for treating or processing either onshore or offshore gas production. The criteria are designed to optimize public safety, environmental protection, and the benefits of consolidation.**

The Tranquillon Ridge project will increase the amount of gas processed at the LOGP, and this gas will come from a new source, the Tranquillon Ridge field in State waters. This qualifies the Tranquillon Ridge project as an expansion of a gas processing facility pursuant to the County's Comprehensive Plan. The 1993 Supplemental Environmental Impact Report for the gas processing plant at the LOGP site evaluated that site and several alternative sites using the *Siting Study* criteria. In that analysis, the LOGP site was determined to be the environmentally superior location for processing gas associated with the Point Pedernales project. The Tranquillon Ridge EIR analysis of an alternative gas processing site in northern Santa Barbara County also concluded that use of the existing gas processing facilities, as proposed by PXP and conditionally approved by the Planning Commission, would be environmentally preferable to

constructing and operating a new gas processing plant in the County. Thus, the Planning Commission finds that alternative gas processing sites have been properly considered for the Tranquillon Ridge project using the *Siting Study* criteria and that the Tranquillon Ridge project, as conditionally approved, is **consistent** with LUDP 11.

LUDP 12: Proposals for expansion, modification, or construction of new oil as gas processing facilities, oil storage facilities, or pipeline terminals, which receive oil from offshore fields exclusively or from both offshore and onshore fields, shall be conditioned to require transportation of oil by pipeline to processing facilities and final refining destination, except as provided by this policy.

"Final Refining Destination" shall mean a refinery in California where final refining of the subject oil into products is accomplished. Exceptions: Oil shall be considered to reach its final refining destination if (a) the oil has been transported out of the State of California, and does not re-enter before final refining; or (b) the oil has been transferred to truck or train after leaving the County by pipeline and does not re-enter the County by truck or train, and is not transferred to a marine terminal vessel for further shipment to a port in California prior to final refining.

Crude oil received onshore from offshore production facilities may be transported by highway or rail if the Director determines that the oil is so highly viscous that pipeline transport is infeasible, taking into account available options such as modifications to existing pipelines, blending of NGLs, etc.

Any shipment of oil by highway or rail under this policy shall be limited to that fraction of the oil that cannot feasibly be transported by pipeline and shall not exceed the limits of permitted capacity for these transportation modes. The shipper or carrier shall mitigate to the maximum extent feasible any environmental impacts caused by use of the alternate transportation mode.

Temporary transport of oil by waterborne vessel may be authorized under an emergency permit if the Governor of the State of California declares a state of emergency pursuant to Public Resources Code Sec. 30262 (a)(8) for an emergency that disrupts the pipeline transportation of oil produced offshore Santa Barbara county. In such a case, the oil transported by alternate mode shall be limited to that fraction which cannot feasibly be transported by pipeline. Transport by the alternate mode shall cease immediately when it becomes technically feasible to resume pipeline transport.

Oil produced from the Point Pedernales project is currently transported to and from the Lompoc Oil and Gas Plant via existing pipeline systems to the Santa Maria Refinery located in San Luis Obispo County. ConocoPhillips takes possession of the oil at a custody transfer point adjacent to the LOGP and ships it to the Santa Maria Refinery and then to refinery locations in the Bay Area by pipeline. PXP has stated that the Tranquillon Ridge oil will be transported using the existing pipeline infrastructure, but since PXP does not own the oil after it is transferred to ConocoPhillips, it cannot guarantee pipeline transport of Tranquillon Ridge oil to refinery destinations. However, both PXP

and ConocoPhillips operate in Santa Barbara County under existing Development Plan permits which require, pursuant to FDP Condition Q-5 of both permits, that all oil processed at the LOGP be transported from that facility in accordance with this policy. Therefore, since both PXP and ConocoPhillips are required to transport oil processed at the LOGP to refinery destinations by pipeline, the Tranquillon Ridge project is **consistent** with LUDP 12.

LUDP 13: Oil and gas facilities shall be dismantled and removed, their host sites cleaned of contamination and reclaimed to natural conditions, or conditions to accommodate reasonably foreseeable development, in an orderly and timely manner that avoids long-term impacts to the health, safety, and welfare of the public and environment.

Final Development Plan Conditions R-1 through R-4 require PXP to decommission and restore the project facility sites (LOGP, pipeline corridor, substations) when oil production and processing ceases. Condition R-2 (*Demolition and Reclamation Permit*) requires PXP to apply for and obtain a Demolition and Reclamation Permit from the County prior to decommissioning the project facilities. This process provides for County review of decommissioning procedures, evaluation of site contamination and remediation, and for adopting specific conditions of approval for the demolition and reclamation permit. PXP is required to restore the various project facility sites to the County's satisfaction through both FDP Condition R-3 (*Site Restoration*) and the demolition permit process of Condition R-2. FDP Condition R-4 (*Abandonment Financial Assurance*) requires PXP to post a financial assurance for decommissioning and site restoration prior to introducing hydrocarbons produced from the Tranquillon Ridge project into the pipeline system between Platform Irene and the LOGP. This will ensure that the project sites are properly restored once they are no longer in use by PXP for oil and gas production and processing. The Tranquillon Ridge project, as conditionally approved, is **consistent** with LUDP 13.

Hillside and Watershed Protection Policies

1. **Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.**

No grading is needed to return the two heater treaters to service at the LOGP and very little grading will be necessary to install the pumps at Valve Site #2, if they are needed in the future. Some grading at each pole site will be necessary to install the power line and substation associated with the Valve Site #2 modifications. A limited amount of grading may be necessary for pipeline maintenance, testing, or segment replacement during Tranquillon Ridge operations. However, any cut and fill associated with the project will not be excessive. The Tranquillon Ridge project is **consistent** with this policy.

2. **All development shall be designed to fit the site topography, soils, geology, hydrology, and other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site**

which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

New facilities for the Tranquillon Ridge project are minimal and would be located primarily within previously developed areas (LOGP and Valve Site #2), with the possible exception of a new substation and power line to Valve Site #2. The new substation would occupy about 1,600 square feet and would be located within an existing agricultural field. Natural features, landforms, and native vegetation would not be significantly affected by power line and substation construction and hazardous areas would be avoided. Therefore, the Tranquillon Ridge project is **consistent** with this policy.

5. **Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.**

Grading for the Tranquillon Ridge project will be minimal and PXP's current revegetation requirements will continue to apply during the life of the project. These requirements include implementation of a detailed Restoration, Erosion Control, and Revegetation Plan (Condition H-1) and site-specific erosion control measures for any ground-disturbing activity along the pipeline right-of-way. Measures that may be applied at specific locations during project operations include dust control, slope stabilization, temporary reseeding and permanent revegetation, and erosion control devices, if warranted. Slopes along the pipeline corridor are inspected annually for erosion and remedial measures are required if needed. The Tranquillon Ridge project is thus **consistent** with this policy.

6. **Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.**

Surface water in the vicinity if the LOGP is directed toward a permanent retention basin located at the southern portion of the plant site. Water in the retention basin is tested for contamination prior to being released into a natural swale to the south. PXP is required to maintain this retention basin throughout the life of the Tranquillon Ridge project. Therefore, the project is **consistent** with this policy.

4. **Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping site.**

7. Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

Streams and Creeks Policies

1. All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.

Several Final Development Plan conditions required sediment control and protection of onshore water resources during both construction and operation phases of the Point Pedernales project. These measures have been implemented for the Point Pedernales project and will continue to be implemented over the life of the Tranquillon Ridge project. They include:

D-5 and H-1: Installation of erosion and sedimentation control features at construction sites in order to control runoff from ground disturbance.
F-4: Dams or ditch plugs be placed in the pipeline trench in certain areas to protect groundwater.
F-5: Scour-prevention measures for the pipeline within stream beds.
H-0: Catch basins along the pipeline right-of-way to contain oil spills.
H-1: Site-specific erosion control planning and implementation for ground-disturbing maintenance and repair activities.
H-3: Bans use of herbicides and pesticides in or near riparian areas.
H-21: Prohibits fueling within 0.25 miles of flowing streams.

With continued implementation of these permit conditions, the Tranquillon Ridge project is **consistent** with Hillside and Watershed Protection Policies 4 and 7 and Streams and Creeks Policy 1.

Historical and Archaeological Sites Policies

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.

3. When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.

5. Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

Final Development Plan Conditions I-1 through I-9 address protection of cultural resources during all phases of the project. Condition I-1 required a Phase II cultural resource assessment

of the entire pipeline route before the Final Development Plan was originally approved. This condition has been revised for the Tranquillon Ridge project to require a Phase I survey for any ground disturbance in areas not previously surveyed, such as along the route for the power line to Valve Site #2. Conditions I-1, I-8, and the Cultural Resource Mitigation Plan (CRMP) required by Condition I-2 all specifically require avoidance of known sites wherever feasible. The CRMP describes the surveying, avoidance, and mitigation of cultural sites and is applicable to any project-related activity that could affect archaeological or cultural resources during the life of the project. Condition I-2 has been revised to require that the CRMP be updated to incorporate the Tranquillon Ridge project. PXP is also required under State law to follow the guidelines of the State Office of Historic Preservation and the Native American Heritage Commission in developing and implementing mitigation measures. Condition I-4 specifically requires Native American and archaeologist monitoring during ground-disturbing activities in previously undisturbed areas. Based on the foregoing, the Tranquillon Ridge project, as conditionally approved, is **consistent** with Historical and Archaeological Sites Policies 2, 3, and 5.

Visual Resources Policies

1. All commercial, industrial, and planned developments, shall be required to submit a landscaping plan to the County for approval.

Final Development Plan Conditions H-5 and L-8 require PXP to update its landscaping and screening plans for the LOGP and the Surf Substation through implementation of a visual impact mitigation plan. Landscaping at the Surf Substation has not successfully screened the facility from views as originally intended. Some plantings (cypress trees) have done well, but most of the screening vegetation has not grown well, or has grown very slowly, due in part to the ocean-air environment. The site is also susceptible to spot erosion due to a drainage culvert not under PXP's control near the site that directs flow toward the substation. The Surf substation screening was reviewed in the 2000 Condition Effectiveness Review for the Point Pedernales project and one conclusion was that the landscaping efforts should be increased and periodically re-evaluated during the life of the project. PXP has taken steps in recent years to improve the screening at the site and a renewed effort is warranted at this time. Therefore, the Planning Commission has adopted revised permit conditions (H-5 and L-8) that require development and implementation of additional screening measures for the substation. However, even with a renewed landscaping effort, it is unlikely the substation will be fully screened from view during the life of the project and the presence of this facility in the coastal zone will continue to be a Class I visual impact. PXP will continue to contribute to the Coastal Resource Enhancement Fund during the life of the Tranquillon Ridge project in part to compensate for this significant and unavoidable impact. With these measures in place, the Tranquillon Ridge project is **consistent** with Visual Resources Policy 1.

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.

The Tranquillon Ridge project would use existing facilities at the LOGP. The only new structures are the power line and substation for the Valve Site #2 modifications if additional pumping capacity is needed on the emulsion pipeline. The LOGP and the pipeline corridor outside of Vandenberg Air Force Base are in a designated rural area. Although oil field operations have existed in the area for decades, the noise, lighting (especially at night), and appearance of industrial equipment and facilities are not entirely compatible with the character of the surrounding natural area. In addition, several pieces of the existing equipment at the LOGP are between 50 and 60 feet high, exceeding the 45-foot height limit of the MC-R zone district. This height limit exceedance was originally permitted with a modification to the zone district limitation based on the technical requirements of the facility. Since that time, the zoning ordinance has been revised to provide for exceptions to the height limit for certain structures and equipment where compliance with the limit would render the facilities technically infeasible (LUDC Section 35.30.090.E.2). The structures at the LOGP would be allowed under this exception.

Previous landscaping and revegetation efforts have not completely screened equipment at the LOGP from all public viewing points, as noted in EIR Section 5.13.1.2, though landscaping has somewhat reduced exposure of the facilities to the public and will continue to do so in the future. Approval of the Tranquillon Ridge project includes adoption of revised FDP Condition L-8 to require visual impact mitigation plans for the LOGP and the Surf Substation to improve screening of those facilities. PXP is also required to provide a painting plan for the LOGP (FDP Condition L-4) to improve the facility's compatibility with the surrounding area and to develop an updated lighting plan (FDP Condition L-2) to identify feasible opportunities to reduce lighting at the LOGP. The Tranquillon Ridge project will not introduce new features that would intrude into the skyline as seen from public viewing places. Therefore, use of the existing LOGP to process Tranquillon Ridge oil and gas is compatible with the character of the surrounding natural area and **consistent** with this policy.

5. Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.

The Tranquillon Ridge project will predominantly use existing structures. If additional pumping capacity is required to be installed at Valve Site #2, a new power line would also be installed from a substation to the valve site to provide the additional electrical power for the new pumps. The Planning Commission considered, but declined to adopt, an alternative to place a portion of this new power line along Terra Road within Vandenberg AFB underground. This alternative would reduce visual impacts associated with placement of a new power line and poles where few currently exist, but other impacts would occur. The Tranquillon Ridge EIR found that undergrounding the line along Terra Road would be slightly environmentally superior to using above-ground poles and that this undergrounding alternative also would result in significant but mitigable impacts to cultural resources. Adverse but not significant impacts to biological

resources and air quality also would occur with this alternative. PXP is required to use existing poles where feasible for new power lines and to place the new power line on the 13th Street Bridge or use existing Air Force poles for crossing the Santa Ynez River, if feasible based on discussions with VAFB (FDP Condition H-19, *Power Lines and Poles*).

The Tranquillon Ridge project is **consistent** with this policy because it does not include new development within the meaning of this policy, the new power line would be located in a part of Vandenberg AFB not open to the general public, and it would not be highly visible from public viewing places.

Lompoc Area Goals – Land Use

The unique character of the area should be protected and enhanced with particular emphasis on protection of agricultural lands, grazing lands, and natural amenities.

Residential, commercial and industrial growth should be confined to urban areas.

Industrial development should be light intensity.

The LOGP is appropriately sited within the M-CR (Coastal-Related Industry) zone district. This facility is operated as a consolidated site for oil and gas processing, which favors its use for expanded or new oil and gas production. In addition, it is not appropriate to locate an oil and gas processing plant near urban areas due to safety concerns. The Tranquillon Ridge project is **consistent** with these three Lompoc Area *Land Use* goals.

Changes in natural or re-established topography, vegetation, biological communities should be minimized in an attempt to avoid the destruction of natural habitats.

The Tranquillon Ridge project includes requirements to restore affected biological resources and habitats. As conditioned, the project is **consistent** with this *Land Use* goal.

Lompoc Area Goals – Environment

Growth and employment must be consistent with the preservation and enhancement of resources and environmental quality.

The Tranquillon Ridge project would not result in population or employment growth in the County. Several permit conditions have been adopted to ensure the preservation and enhancement of natural resources and environmental quality. Therefore, the Tranquillon Ridge project, as conditionally approved, is **consistent** with this goal.

Pollution of streams, sloughs, drainage channels, underground water basins, estuaries, the ocean, and areas adjacent to such waters should be minimized.

Several conditions of approval adopted for the Tranquillon Ridge project will help ensure that water resources are protected. These conditions include requirements for runoff and erosion control, spill prevention and clean-up, and proper waste disposal which will minimize the potential for pollution of streams or other water bodies in the County. The Tranquillon Ridge project is **consistent** with this *Environment* goal.

The groundwater resources should be protected against prolonged overdrafting.

The Tranquillon Ridge project includes operation of the LOGP which uses water from the Lompoc groundwater basin. This basin is not currently in overdraft and the project's annual usage is comparable to that of a small office building. The project will not contribute significantly to prolonged overdrafting of the groundwater basin and is **consistent** with this *Environment* goal.

The County should plan for and encourage the maximum conservation of water.

Condition F-6 requires PXP to install water-conserving devices throughout the LOGP. The LOGP uses non-potable water for daily plant operations and fire water. Potable water is used only to meet the needs of plant personnel. The Tranquillon Ridge project is **consistent** with this *Environment* goal.

The County should plan for and encourage the maximum conservation of energy.

Condition Q-4 of the Tranquillon Ridge Final Development Plan requires that cost-effective energy conservation techniques be incorporated into project design. PXP is also required to conduct a facility-wide energy audit to identify potential energy-saving modifications and to implement those modifications to ensure maximum conservation of energy. Thus, the project is **consistent** with this *Environment* goal.

Good air quality should be maintained as one of our greatest assets.

Implementation of the Final Development Plan air quality conditions (E Conditions) will help minimize potential air quality impacts of the project. As approved, the project is **consistent** with this *Environment* goal.

Excessive noise should be eliminated through the development of noise pollution standards.

NOISE ELEMENT

1. **In the planning of land use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.**

9. Noise level limits, applicable to new noise sources should be incorporated into all commercial and industrial zoning districts and into conditional use permits.

Noise impacts associated with the Tranquillon Ridge project will be less than significant. Nuisance noise from the project will be mitigated to the maximum extent feasible through implementation of Noise Conditions K-1 through K-5. Noise standards and allowable levels are also addressed in these conditions, which identify maximum noise levels (K-2), construction noise restrictions (K-3), minimization of noise and vibration from equipment (K-4) and nighttime restrictions on noise-generating activities (K-5). PXP is also required to update its Noise Monitoring and Control Plan (K-1) for the Tranquillon Ridge project. The project is **consistent** with the *Environment - Noise* goal and Noise Element Policies 1 and 9.

CIRCULATION ELEMENT

IV.B. Roadway Standards: The policy capacities provided in this Element shall be used as guidelines for evaluating consistency with this section of this Element. A project's consistency with this section shall be determined as follows:

a. A project that would contribute ADTs to a roadway where the Estimated Future Volume does not exceed the policy capacity would be considered consistent with this section of this Element.

The Tranquillon Ridge project would increase truck traffic on Harris Grade Road for hauling gas liquids from the LOGP. These trips would increase from about 3 per week to about five per week, still well below the permitted maximum of 2.3 trips per day (FDP Condition P-23). This increase in local road traffic will not change the level-of-service on any local roadways. The Tranquillon Ridge project is **consistent** with this policy.

ENERGY ELEMENT

Policy 4.1: Construction – Encourage recycling and reuse of construction waste to reduce energy consumption associated with extracting and manufacturing virgin materials.

The Tranquillon Ridge project will use existing infrastructure with only minor construction at Valve Site #2 to accommodate additional pumping capacity if necessary in the future. By avoiding energy use to fabricate and install new production facilities, construction waste generated by the project would be minimal. Therefore, the Tranquillon Ridge project is **consistent** with Energy Policy 4.1.

Policy 5.3: The County shall encourage installation and use of cogenerating systems where they are cost-effective and appropriate.

The Tranquillon Ridge project does not currently include installation and use of a cogeneration power system. Several other County oil and gas development projects (e.g., Santa Ynez Unit and the Point Arguello projects) operate cogeneration facilities and rely on the electricity produced by these facilities. At the time the Point Pedernales project was approved by Santa Barbara County, the SBC APCD was strongly in favor of reducing new air emissions by using utility grid power for the Point Pedernales facilities. The original project applicant (Union Oil) constructed the electrical substation at Surf Beach and installed a subsea power cable power cable to extend power to Platform Irene. The project facilities have operated with grid power and emergency back-up generators since startup in 1987. PXP's facilities will still be fully dependant on the grid for electricity during operation of the Tranquillon Ridge project.

FDP Condition Q-4 (*Energy Conservation*) has been revised to require that PXP conduct an Energy Efficiency Audit to identify feasible energy-conserving measures that could be implemented at the LOGP. This audit is to include a cost-benefit analysis of installing cogeneration capabilities at the LOGP. If this is found to be feasible, PXP would be required to implement this measure. With this energy audit requirement, the Tranquillon Ridge project is **consistent** with Energy Policy 5.3.

Policy 5.7: Alternative Energy Mitigation – During the regulatory review of a proposed project, when appropriate, use mobile alternative energy projects as mitigation for impacts to air quality.

The Tranquillon Ridge project would result in Class II impacts to air quality, primarily from drilling, processing, and boat emissions. PXP is required to mitigate these impacts by first controlling emissions (FDP Conditions E-5, E-6, and E-11) and then providing the necessary emission reduction credits (FDP Condition E-10). PXP has also agreed to reduce the greenhouse gas emissions of the project through feasible reduction measures and offset funding. Mobile alternative energy projects are not appropriate or necessary to further mitigate air quality impacts of the Tranquillon Ridge project. The Tranquillon Ridge project is **consistent** with this policy.

AGRICULTURAL ELEMENT

GOAL I: Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts), expansion and intensification shall be supported.

> **Policy I.A: The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.**

GOAL II. Agricultural lands shall be protected from adverse urban influence.

> **Policy II.D: Conversion of highly productive agricultural lands, whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.**

The only new construction for the project would occur primarily within Vandenberg AFB, but could include a new electrical substation on land currently in agricultural use. The EIR (Section 5.15.4) estimated the footprint of the substation to be about 1,600 square feet (0.04 acre). Because of the relatively small size of the substation, this is not considered a significant impact to agricultural resources. When the Tranquillon Ridge project ceases operation and undergoes decommissioning, the substation facilities would be removed. If the landowner so desires, the site could then be returned to agricultural uses. The integrity of existing agricultural operations will not be affected by substation construction and operation and highly productive agricultural lands will be retained in the area. Therefore, the Tranquillon Ridge project is **consistent** with Agricultural Element Policies I.A and II.D.

HAZARDOUS WASTE ELEMENT

Policy 2-2: All businesses that generate hazardous wastes including home occupations, but excluding normal household activities, shall provide the County with information regarding the type, amount and management of all hazardous wastes generated. Such information shall be required as part of EHD hazardous waste generator permit program and shall be updated annually.

Policy 2-3: All hazardous waste treatment, storage, and disposal facilities in the County shall provide the County with information regarding their operations and treatment, storage, and disposal capacity. Such information shall be updated annually.

Condition P-5 of the Final Development Plan requires that PXP provide a Hazardous Material and Waste Management Plan for approval by the County Fire Department and the Planning and Development Department. Elements of the required plan include identification of the locations and methods for storing hazardous materials and wastes and a monitoring system for detecting releases of hazardous material and wastes, among other requirements. Condition P-5 requires that this Plan be updated prior to start-up of any modifications or additions to the facilities approved under the original FDP. This plan will be updated to address production and processing of oil and gas from the Tranquillon Ridge project; this update will occur prior to issuance of the zoning clearance for the Tranquillon Ridge project. The Tranquillon Ridge project, as approved, is **consistent** with Hazardous Waste Element Policies 2-2 and 2-3.

Policy 8-1: Any land use permit for a hazardous waste generator or a hazardous waste facility shall require submittal of an emergency response plan prior to operations, if such a plan is required under Chapter 6.95 (Section 25500 et seq.) of the California Health and Safety Code.

Final Development Plan Condition P-3 requires PXP to submit an updated Emergency Response Plan to the County Office of Emergency Services, the Fire Department, and the Planning and Development Department for review and approval prior to approval of the zoning clearance for the Tranquillon Ridge project. Therefore, the project is **consistent** with Hazardous Waste Element Policy 8-1.

SAFETY ELEMENT SUPPLEMENT (TO SEISMIC SAFETY AND SAFETY ELEMENT)

Policy HAZARDOUS FACILITY SAFETY 1-A, *Risk Estimates*: The County shall employ accurate estimates of risk associated with hazardous facilities to inform discretionary land-use decisions where substantial, preliminary evidence indicates involuntary public exposure to significant risk may result from the land-use decision.

Policy GAS PIPELINE SAFETY 1-A, *Risk Estimates*: To the extent practical, the County shall maintain accurate estimates of societal risk associated with gas pipelines to inform land-use decision-making of potential risk where substantial evidence indicates public exposure to significant risk may result.

The Tranquillon Ridge EIR (Section 5.1) assessed the risks associated with the project and identified one significant and unavoidable risk to the public as a result of project operations (gas liquids trucking). This analysis is based on a risk assessment prepared by a well-qualified risk assessment firm (ioMosaic) that accurately identified the level of potential project-related risks to the public, including risks associated with operation of the LOGP and the existing gas pipeline for the project. Final Development Plan Condition P-2 requires implementation of a Safety, Inspection, Maintenance and Quality Assurance Program for the PXP facilities, which includes annual safety audits of the LOGP. Condition P-23 requires that PXP first minimize the need for trucking gas liquids offsite by blending the gas liquids with the crude oil in the outgoing pipeline to the extent technically feasible, and then conduct trucking operations pursuant to Board of Supervisors Resolution 93-480 and specific requirements of a County-approved Transportation Risk Management and Prevention Program (TRMPP). The Tranquillon Ridge project is **consistent** with Hazardous Facility Safety Policy 1-A and Gas Pipeline Safety Policy 1-A.

POLICIES HAZARDOUS FACILITY SAFETY 2-B and GAS PIPELINE SAFETY 2-B, *UNACCEPTABLE RISK INVOLVING MODIFICATIONS TO EXISTING DEVELOPMENT*: Proposed modifications to existing development that require a discretionary land-use permit and meet any of the following three criteria shall represent an unacceptably high level of risk and constitute a *prima facie* standard for denial.

(1) Modifications that increase risk and the resulting mitigated risk registers in the red zone of the County's risk thresholds, unless the proposed modification is required to comply with law, the modification does not increase significant risk to highly sensitive land uses, and no other feasible alternatives are achievable.
(2) Modifications that increase risk and the resulting mitigated risk registers in the red zone of the County's risk thresholds, unless the proposed modification is made to an urban dependent land use and highly sensitive land uses are not exposed to significant risk as a result of the modification.
(3) Modifications that increase risk and the resulting mitigated risk registers in the amber zone of the County's risk thresholds if exposure of a highly sensitive land use would occur as a result of project approval.

The Tranquillon Ridge project will not introduce increased hydrogen sulfide levels or increased pipeline operating pressures for the sour gas pipeline between Platform Irene and the LOGP. The risks to public from the gas pipeline carrying Tranquillon Ridge gas are the same as the current operations. These risks fall into the green zone of the County's thresholds. The risks associated with LOGP operations (not including gas liquids transportation) will remain at current levels with implementation of the Tranquillon Ridge project and will still fall within in the green zone of the County's thresholds.

Based on the foregoing, the County finds the Tranquillon Ridge project is **consistent** with Hazardous Facility Safety Policy 2-B and Gas Pipeline Safety Policy 2-B.

POLICY HAZARDOUS FACILITY SAFETY 3-A, *SITING*: New hazardous facilities shall be sited to prevent unacceptable risk to offsite population as defined in this chapter. New hazardous facilities should also be sited to avoid significant offsite risk to populated areas, as defined in this chapter. Siting considerations undertaken to optimize public safety shall also examine routes used for transporting acutely hazardous materials to or from a new hazardous facility.

The existing LOGP will be used to process Tranquillon Ridge oil and gas production and is not a new hazardous facility. However, it should be noted that this oil and gas plant is located in a semi-rural area, away from heavily populated areas. The fatality and injury zones associated with plant operations do not encroach upon any inhabited areas (see EIR Figure 5.1-2b, *Injury and Fatality Hazard Zones for PXP Facilities - East*) and do not pose an unacceptable risk to offsite populations. The risks associated with transporting the gas liquids via truck have been mitigated to the extent feasible, but do remain significant and unavoidable, as discussed under Safety Policy 1-A, above. Routes to and from the LOGP for gas liquid trucks have been examined and are specified in FDP Condition P-23. The Tranquillon Ridge project is **consistent** with this policy.

POLICY GAS PIPELINE SAFETY 4-B, *SAFE OPERATIONS*: 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.

POLICY GAS PIPELINE SAFETY 4-C, *REDUCED HAZARD ZONES*: For pipelines associated with new production of natural gas, the County shall require feasible methods for reducing the hazard along the pipeline corridor that are commensurate with the level of risk.

Final Development Plan Conditions P-1 and P-2 require continuous safety review of the PXP facilities during project operations, including annual safety audits of the LOGP and inspection of the pipelines. Final Development Plan Condition P-15 has been revised to require restrictions on the pressure and hydrogen sulfide levels for the gas pipeline to ensure its continued safe

operation and to ensure that any future changes to these parameters will not expand the existing hazard footprint associated with this pipeline. Condition P-16 requires upgraded leak detection systems for both the emulsion and gas pipelines. Based on the foregoing, the Tranquillon Ridge project is **consistent** with Gas Pipeline Safety Policies 4-B and 4-C.

POLICY GAS PIPELINE SAFETY 5-C, *BURIAL DEPTH*: 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.

Final Development Plan Conditions D-1, D-2, D-4, and F-5 require that the emulsion and gas pipelines be buried at an appropriate depth to avoid exposure of the pipelines due to scour or other geologic hazards along the pipeline route. PXP's Geologic Hazards Monitoring Program required by Condition D-2 includes annual inspection for scour or other potentially hazardous conditions for the pipelines along their entire onshore length. PXP will continue to implement this monitoring program and remediated eroded sites or occurrences of scour as they are identified through this annual inspection effort. The Tranquillon Ridge project is **consistent** with Gas Pipeline Safety Policy 5-C.

POLICY GAS PIPELINE SAFETY 5-D, *MARKING PIPELINE PRESENCE*: 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 about buried pipelines where feasible.

The existing project-related pipelines are appropriately marked. PXP will maintain this marking for the life of the Tranquillon Ridge project. The project is thus **consistent** with Gas Pipeline Safety Policy 5-D.

CONSERVATION ELEMENT

Ecological Systems

The Conservation Element contains descriptions of the ecological systems in the County and recommendations for their use and protection. The components associated with the proposed project are located adjacent to, and traverse a number of, sensitive habitats, including, but not limited to, the riparian and wetland areas associated with the Santa Ynez River, areas containing Burton Mesa chaparral, coastal dune scrub, oak savannah and woodlands, and vernal pools.

The power line alignment to Valve Site #2 would require siting of the support poles near the Santa Ynez River and spanning the river. Impacts to sensitive biological resources in and along the river would be reduced by mounting the power line on the 13th Street Bridge or using existing poles (or both), if feasible (Mitigation Measure TB-2). If this measure is not feasible, impacts to terrestrial biological resources could be reduced by locating the pole footings outside of sensitive

riparian and wetland areas, timing the construction to avoid breeding seasons for sensitive bird species, and by placing the power line at a height above the river that would minimize bird collisions.

The existing Final Development Plan conditions (for example, H-1, H-10, H-19, and H-26) require restoration of any biological resources affected by project-related activities throughout the project's lifetime. These conditions would continue to apply to any new construction as well as future pipeline repair and maintenance activities associated with the Tranquillon Ridge project. In addition, to further reduce impacts during pipeline repair and maintenance, the EIR identifies the need for an update to the existing Restoration, Erosion Control, and Revegetation Plan (RECRP; FDP Condition H-1) to include specific measures to avoid and minimize impacts during any construction activity, including pipeline maintenance and repair efforts (Mitigation Measure TB-6).

Containment and cleanup activities in response to an on- or offshore oil spill could significantly impact biological resource along the pipeline route. To reduce this impact, the EIR requires updating the Oil Spill Response Plan (OSRP; FDP Condition P-13) to incorporate additional specific measures for minimizing impacts and restoring affected resources (Mitigation Measures TB-11 through TB-14). The implementation of existing FDP conditions and additional measures from the EIR render the Tranquillon Ridge project **consistent** with the Ecological System policies in the Conservation Element.

OTHER PLANS AND POLICIES

2007 Clean Air Plan

The purpose of the 2007 Clean Air Plan is to continue to improve the County's air quality and to facilitate the transition from the Federal 1-hour ozone standard to the new 8-hour ozone standard and to serve as the County's "road map" toward attaining the State 8-hour ozone standard and maintaining attainment of the State 1-hour standard. The County is in attainment for the Federal 8-hour ozone standard.

Under SBC APCD rules, PXP may need to obtain an "Authority to Construct" and a "Permit to Operate" to account for new emissions associated with the Tranquillon Ridge project. According the EIR analysis, increased emissions associated with the Tranquillon Ridge project would be mitigated through application of emission reduction credits (ERCs) originally required for approval of the Point Pedernales project (FDP Conditions E-6 and E-10). Adoption of FDP Condition E-10 to ensure that total emissions do not exceed the available emission credits renders the Tranquillon Ridge project **consistent** with the Clean Air Plan.

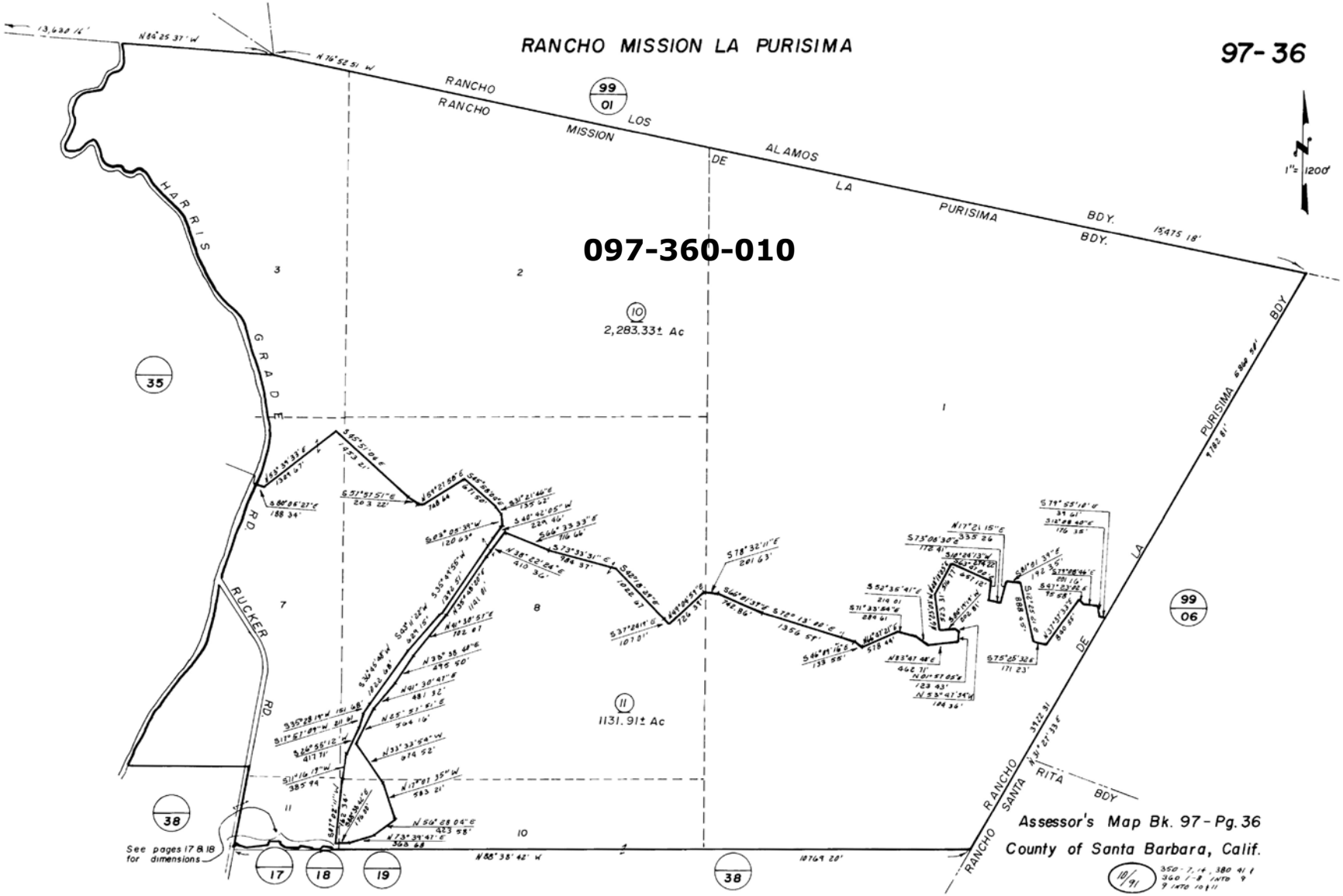
AB 32 (California Global Warming Solutions Act of 2006)

AB 32 was signed into California law in September 2006 and is codified in the Health and Safety Code Division 25.5, Section 38500 et seq. AB 32 requires that the California Air Resources

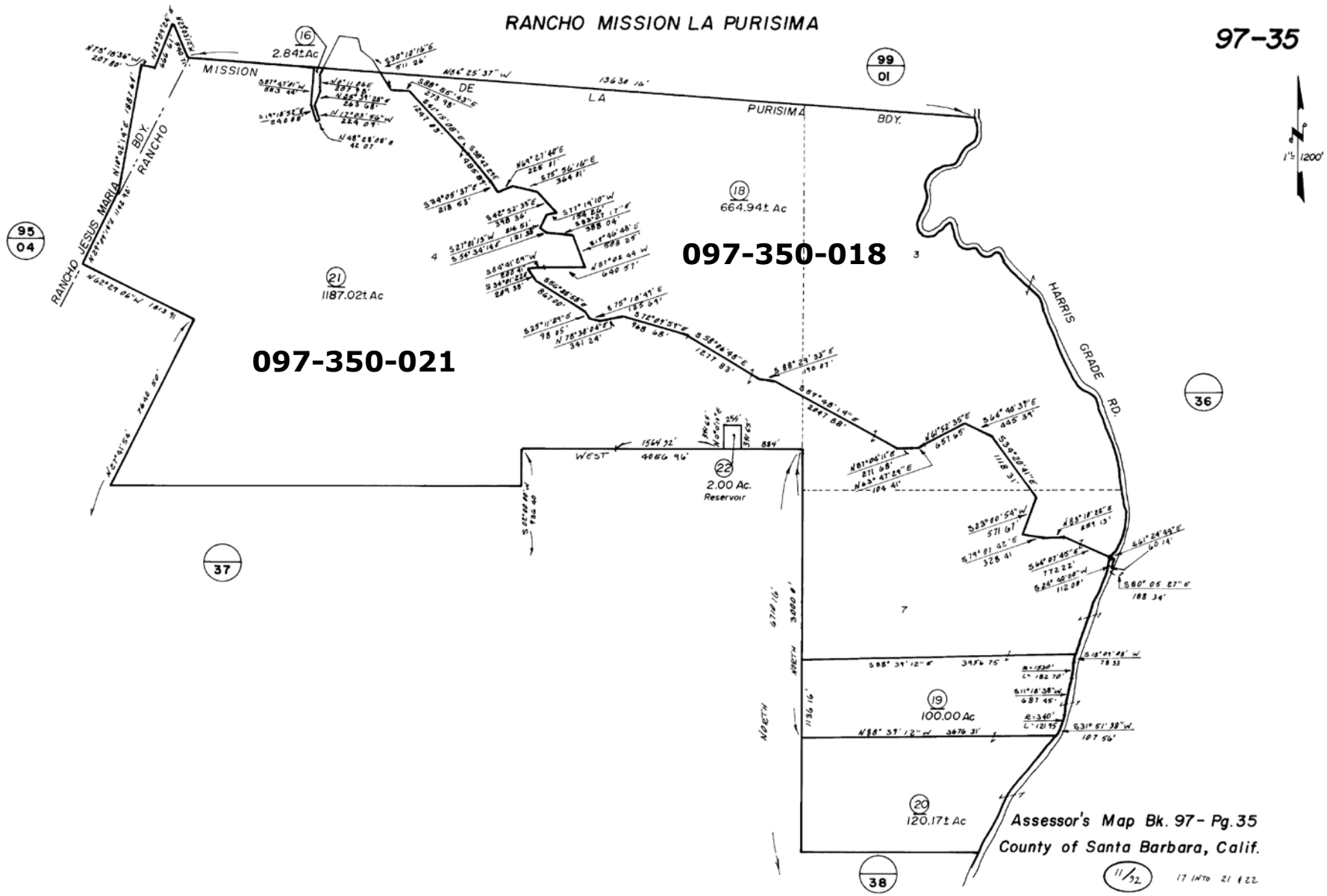
Board (CARB) develop regulations intended to reduce emissions of greenhouse gases (GHGs) within the State. AB 32 does not set regulations for greenhouse gas emissions but does provide a framework for developing such regulations and timing for their adoption. The Tranquillon Ridge project would contribute approximately 14,925 tons per year of CO_2-equivalent greenhouse gas emissions. Within the context of other large industrial facilities in the State, such as oil refineries, and vehicular emissions of greenhouse gases, this amount appears to be relatively small. Thresholds have not been developed for determining, under CEQA, whether a project's emissions would be significant and the Tranquillon Ridge EIR does not designate the Tranquillon Ridge GHG emissions as either significant or less than significant. The EIR does note that implementation of energy-saving measures identified through an energy efficiency audit of the Lompoc Oil and Gas Plant and a commitment to undertake certain other measures could achieve consistency with AB 32. The energy efficiency audit is required by FDP Condition Q-4.

ATTACHMENT E

ASSESSOR PARCEL MAPS



APN 097-360-010 (LOGP)



APNs 097-350-018 and 097-350-021 (Pipelines)

Public Comment Letters to Planning Commission
for April 21, 2008 Hearing

Community Environmental Council

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PROGRAM AREAS

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Regional Energy Blueprint

Sustainable Transportation

Watershed Resource Center

April 18, 2008

Santa Barbara County Planning Commission
123 East Anapamu Street
Santa Barbara, CA 93101

RE: Tranquillon Ridge oil project

Dear Honorable Planning Commissioners ,

The Community Environmental Council is a non-profit environmental organization founded in 1970 in the wake of the infamous oil spill off the coast of Santa Barbara. Since 2005, our mission has been exclusively focused on energy, climate change and transportation policy. Our flagship campaign is to wean the tri-counties region (which includes Santa Barbara County, San Luis Obispo County and Ventura County) off fossil fuels by 2033 or sooner (more information is available at www.fossilfreeby33.org).

We are writing today to express our support for the provisions of the recently announced agreement with PXP, Inc., to end all of its oil extraction activities in Santa Barbara County by 2022. We understand that this agreement will result in a cessation of oil extraction from platforms Hidalgo, Harvest and Hermosa, and associated refinery infrastructure on the Gaviota Coast, by 2017; and a cessation of oil extraction from Platform Irene by 2022. We also understand that this agreement will require PXP to ensure its operations are "carbon neutral" through 2022 and to provide in addition $1.5 million to the Santa Barbara Air Pollution Control District for a fund to provide local offsets.

We are fully supportive of the provisions of the agreement and strongly urge the Commission to support the modified Tranquillon Ridge project.

Thank you for your consideration.

Sincerely,

Dave Davis
Executive Director

26 W. Anapamu Street, 2nd Floor • Santa Barbara, CA • 93101-3108
805.963.0583 tel • 805.962.9080 fax • www.CECSB.org • www.FossilFreeBy33.org

PXP

Steven P. Rusch, P.E.
Vice President Environmental, Health,
Safety & Governmental Affairs
Direct: 323.298.2223 Fax: 323.296.9375

April 17, 2008

Mr. Doug Anthony
Deputy Director
Santa Barbara County
Planning & Development, Energy Division
123 East Anapamu Street
Santa Barbara, CA 93101

Re: PXP Request for Greenhouse Gas Emissions Provisions to be Incorporated into Tranquillon Ridge Oil and Gas Development Project

Dear Mr. Anthony,

Per our previous communications, PXP hereby officially requests that the following provisions be incorporated into the above captioned project.

PXP shall arrange for a facility-wide GHG emissions audit of Platform Irene and the LOGP, to be completed within six months following initial production of the Tranquillon Ridge Project. The audit shall be conducted by an independent consultant, in order to identify measures that would help improve energy efficiency, reduce energy consumption and otherwise reduce GHG emissions. Such measures may include, but are not limited to, consideration of the following: reductions in the heater treater emissions, reductions in vehicle and vessel emissions, extension of fugitive hydrocarbon inspection and maintenance programs to components that are in methane and ethane service, and assessment of CO_2 capture and liquefaction. The independent consultant shall quantify the reduction in emissions that can be achieved by such measures, and the cost of such measures. PXP shall implement any of those measures that can be implemented at a cost not to exceed $20 per ton on a one-time basis, i.e. not to exceed a total cost to PXP of $298,507. Such measures shall be initiated within six months following the completion of the audit and properly maintained thereafter.

On or before March 1 following PXP's implementation of the measures described above, and on or before each March 1 thereafter until the Tranquillon Ridge end date, PXP shall calculate the actual amount, if any, of net emissions that remain after implementation of measures identified as feasible in the audit. PXP shall report the annual net GHG

emissions to the Santa Barbara County Air Pollution Control District (SBCAPCD) as part of PXP's annual reporting requirements. SBCAPCD shall verify the emissions accounting and make any necessary corrections. PXP will then offset these residual emissions each year at a rate of $10 per ton (in 2008 dollars) for the life of the project. The annual funds will be offered to an entity such as the Climate Trust or California Wildfire ReLeaf for GHG mitigation projects.

PXP may apply for offset and/or credit status for reductions in emissions of any and all contaminants achieved through the projects and activities funded pursuant to this condition to the extent allowed under AB 32 (the California "Global Warming Solutions Act of 2006") or any applicable local district, state or federal statute or regulation. PXP's obligations under this condition do not change the character of any such emission reductions that otherwise qualify as "surplus" within the meaning of the Rules and Regulations of the Santa Barbara County APCD.

If you have any questions or comments, please call me at (323) 298-2223.

Sincerely,

David Rose, for

Steve Rusch
Vice President, EH&S and Government Affairs

ExxonMobil Exploration Company
Post Office Box 4778
Houston, Texas 77210-4778
281 654 7016 Telephone
281 654 5155 Facsimile

Ray G. Charles
Area Geoscience & Exploration Manager
U. S. & Mexico

April 17, 2008

ExxonMobil
Exploration

Santa Barbara County Planning Commission
123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Comments on PXP Tranquillon Ridge Project Final EIR & Staff Report

Planning Commissioners:

Exxon Mobil Corporation (ExxonMobil) and Sunset Exploration Inc. (Sunset) are submitting our comments regarding the Tranquillon Ridge Final Environmental Impact Report (SCH # 2006021055, County EIR #06EIR-00000-00005) published in April 2008 and the associated Santa Barbara County Planning Commission Staff Report published April 15, 2008.

As you are likely aware, ExxonMobil/Sunset have submitted a detailed Vahevala project application to Santa Barbara County and California State Lands Commission proposing an onshore-based development of the same State Tidelands oil and gas resources targeted by the offshore-based Tranquillon Ridge project. The proposed Vahevala onshore drilling and production site is located on Vandenberg Air Force Base. The Vahevala application was deemed complete for the purpose of CEQA processing by California State Lands Commission, and Santa Barbara County has deemed it complete with respect to technical details required to support CEQA review and permit processing. However, County staff have deferred a formal completeness determination until the Air Force commits to proceeding with the required NEPA review. ExxonMobil/Sunset have been working closely with the Air Force on this next step.

Our evaluation of the April 2008 Tranquillon Ridge Final EIR and associated Staff Report indicates that, as was the case with the Draft EIR, the described VAFB Onshore Alternative does not accurately represent the actual onshore alternative, the ExxonMobil/Sunset Vahevala project. The VAFB Onshore Alternative, as described in the Final EIR, lacks several optimizations that are incorporated in the proposed Vahevala project. These reduce potential environmental impacts; Key examples include:

(1) The non-optimized pipeline routing and construction/design methods assumed in the VAFB Onshore Alternative results in overestimated pipeline construction and potential spill impacts as compared to the proposed Vahevala pipeline design and routing which incorporate input from Vandenberg Air Force staff for minimizing potential environmental impacts (e.g., Vahevala pipeline route avoids the Santa Ynez River mouth area)

(2) Visual impacts are overestimated as visual elements are remote from public viewing locations, including an optimized location for the electrical substation

(3) Safety risks are likely overestimated as the proposed Vahevala facilities and operating procedures are designed to minimize potential risks and offsite consequences (e.g., Vahevala project design incorporates state-of-art pipeline monitoring and automated shut-down systems)

ExxonMobil/Sunset believe that to properly compare the environmental impacts of the offshore-based PXP Tranquillon Ridge project with the onshore-based Vahevala project, the CEQA(EIR) and NEPA(EIS) environmental evaluations of Vahevala must be completed first, including key project aspects such as a detailed comparison of impacts related to a marine oil spill vs. an onshore spill (as referenced in Staff Report section 6.1.1.5, page 36). This comparison will give the decision makers a significantly improved basis for selecting the best project for the County and State. This position is actually stated in Finding 1.6 (page A-12) of the Staff Report, "The EIR did not reach a conclusion as to how this conceptual (VAFB Onshore) alternative compares overall to the Tranquillon Ridge project because the projects cannot be examined to the same level of detail". We believe it is premature and contradictory to then conclude in the same Finding that "the reduced-life Tranquillon Ridge project will result in fewer significant and unavoidable impacts than a new long-term onshore drilling and production project and is preferred to the VAFB Onshore Alternative".

Another key element that ExxonMobil/Sunset believes deserves further consideration by Santa Barbara County prior to any decision on the proposed Tranquillon Ridge project is the estimated volumes of recoverable oil and associated levels of benefit to the County and State. Per the production forecasts in the April 2008 Tranquillon Ridge Final EIR, the PXP 15 year limited production scenario will recover ~135 million barrels of oil. By comparison, the proposed ExxonMobil/Sunset Vahevala project could develop up to 250 million barrels of oil. This close to two-fold difference in potential produced oil volumes would have a significant impact on total project tax revenues to Santa Barbara County (which are based on annual estimates of the value of the oil and gas field) as well as royalties to the State (and potentially the County if royalty sharing is reinstated). In addition, we agree with the Findings (Staff Report section 1.8, page A-16) regarding the benefits of developing interim sources of domestically produced oil and gas in California at this time. These benefits are logically more fully realized with a full development of the potential resources as opposed to a shortened development that leaves much of the Tranquillon Ridge resources un-recovered.

Given the aspects described above, ExxonMobil/Sunset suggest that it is in the best interest of the County to deny without prejudice the Tranquillon Ridge permit at this time. Following completion of the full environmental evaluation of the Vahevala project, the Tranquillon Ridge permit decision could then be reconsidered and compared to the Vahevala permit application basis.

Thank you for your consideration of these facts.

Should you have questions or require additional information, please do not hesitate to call Mr. Edward S. Feragen of ExxonMobil Exploration Company, a Division of Exxon Mobil Corporation, at (281) 654-7099.

Sincerely,

Ray G. Charles
Area Geoscience & Exploration Manager
U.S. & Mexico
ExxonMobil Exploration Company

environmental
DEFENSE CENTER

April 17, 2008

Santa Barbara County Planning Commission
123 East Anapamu Street
Santa Barbara, CA 93101

Re: Tranquillon Ridge Oil and Gas Project

Dear Honorable Commissioners:

This letter is submitted by the Environmental Defense Center (EDC) on behalf of our clients, Get Oil Out! (GOO!) and Citizens Planning Association of Santa Barbara County (CPA). Get Oil Out! is a non-profit corporation whose mission is to protect the natural environment and beauty of the Santa Barbara Channel from the adverse effects of oil development. Citizens Planning Association is a non-profit corporation formed in 1960 dedicated to defending the County's natural resources and upholding the County's planning policies and objectives. The Environmental Defense Center was founded in 1977 to protect and enhance the local environment through education, advocacy, and legal action, and works primarily within Santa Barbara, Ventura and San Luis Obispo counties.

GOO! and CPA support the proposed Tranquillon Ridge Oil and Gas Project (Project), as modified by an agreement executed by the project applicant, PXP, and the environmental groups on April 9, 2008. This agreement significantly reduces the potential impacts of the project by imposing an end date that coincides with the projected life of existing operations from the Pt. Pedernales Project. In addition, the agreement provides significant benefits to the public, by guaranteeing an end date to other oil and gas development in the County, providing funding to reduce greenhouse gas emissions, and requiring the conveyance of approximately 3,900 acres of land for public benefit.

Based on this precedent-setting agreement, EDC and our clients recommend that the Planning Commission take the following actions:

- Certify the Final Environmental Impact Report (EIR) for the Project;

906 Garden Street Santa Barbara, CA 93101 Phone (805) 963-1622 FAX (805) 962-3152
www.edcnet.org

- Approve the revised Final Development Plan (FDP), subject to the conditions included as Attachment B to the Staff Report and supplemented by the April 17, 2008 request from PXP (pertaining to greenhouse gas reductions and offsets).

Background

In March 2005, PXP applied to the County of Santa Barbara for a revised Development Plan to allow for development of the Tranquillon Ridge field, located in state waters offshore from Vandenberg Air Force Base. PXP plans to use an existing platform, Platform Irene, which is currently used to produce oil and gas from the adjacent Pt. Pedernales field, in federal waters. Like the oil produced from Pt. Pedernales, oil produced from Tranquillon Ridge would be sent to shore by pipeline and processed at the Lompoc Oil and Gas Plant (LOGP). No new construction would occur.

In addition to a revised Development Plan from the County, PXP must acquire a new lease (or leases) from the State Lands Commission. The lease(s) would be issued under an exception to the California Coastal Sanctuary Act, which allows a new lease if oil or gas from state-owned tide and submerged lands "are being drained by means of producing wells upon adjacent federal lands and the lease is in the best interests of the state." (Pub. Res. Code §6244.) In this case, PXP is draining oil and gas from state tide and submerged lands from wells drilled on Platform Irene. GOO! and CPA believe that they have negotiated an agreement that is in the best interests of the state, not only because it provides specific environmental benefits, but also because it sets a new precedent for mitigation of the impact of industrial development in the County and the state.

The Agreement

The attached exhibit provides a disclosure of the terms of the agreement reached by GOO!, CPA and PXP. A summary of the agreement follows.

End Dates

A previous proposal to develop the Tranquillon Ridge Field, by Nuevo Energy Company, was opposed by local environmental groups (including those that are party to the PXP agreement) and denied by the County of Santa Barbara in 2002. When PXP made a similar proposal, the environmental groups again raised objections, based on the fact that the drilling operations would extend the life of the existing facilities. PXP responded by agreeing to include a termination date for the Tranquillon Ridge Project. This commitment goes well beyond any legal requirements, which allow oil companies to continue operations so long as they are producing commercially viable quantities of oil and gas.

In addition, PXP offered to commit to end dates for the company's other operations in the County. These operations include the Pt. Pedernales Project (located

offshore from Vandenberg Air Force Base), the Pt. Arguello Project (including three platforms offshore from Pt. Conception, and the Gaviota processing site), and the Lompoc Onshore Oil Project (consisting of numerous onshore oil and gas wells in the vicinity of the Lompoc Oil and Gas Plant (LOGP)).

Pursuant to the agreement, the Pt. Arguello Project will shut down within nine years following approval of the Tranquillon Ridge leases (most likely 2017). The Tranquillon Ridge, Pt. Pedernales, and Lompoc Onshore Oil Projects will all shut down by December 31, 2022. ***Without this agreement, none of these projects would be required to shut down, and could continue indefinitely.***

Greenhouse Gas Emission Reductions

The agreement requires PXP to reduce or offset all of the greenhouse gas emissions from the project. This commitment is discussed in the Final EIR for the Tranquillon Ridge Project. Specifically, the EIR notes that:

> PXP has committed to preparing a greenhouse gas audit of its project facilities and to implementing feasible measures at those facilities to reduce GHG emissions up to a total cost of $20 per ton of GHG emissions attributable to Tranquillon Ridge project operations for one year (14,925.35 tons CO2 = $298,507). PXP will measure, and the SBCAPCD will verify, residual GHG emissions that would occur after implementation of the measures identified in the greenhouse gas audit. PXP will then offset these residual emissions each year at a rate of $10 per ton (in 2008 dollars) for the life of the project. The annual funds will be offered to an entity such as the Climate Trust or California Wildfire ReLeaf for GHG mitigation projects.

(Final EIR, 5.8-21, 22.) It is our understanding that PXP has requested that the GHG reduction and offset commitments from our agreement be incorporated as a condition in the FDP. We support this request and urge the Planning Commission to take such action.

In addition, to ensure a local benefit, PXP has committed to donate an additional $1,500,000 to reduce greenhouse gas emissions in Santa Barbara County. This fund will be administered by the Santa Barbara County Air Pollution Control District as part of a transit bus technology program and may be used to fund the purchase of hybrid buses in Santa Maria, Lompoc, and on the south coast.

Land Conveyances

The agreement with the environmental groups also includes a commitment by PXP to convey thousands of acres in the Lompoc Valley and on the Gaviota coast for public benefit. Under this agreement, PXP will convey approximately 3,700 acres in the

Lompoc area next to the Burton Mesa Ecological Reserve. This land includes the site of the LOGP, as well as 800 acres on which PXP proposes to construct the Purisima Hills residential project; accordingly, the agreement requires PXP to withdraw its applications for this project. These lands will be permanently dedicated for purposes of open space preservation, management and restoration of natural resources, as well as passive recreation, education and research. It is the desire of the environmental groups and PXP that these lands be added to the Burton Mesa Ecological Reserve.

In addition, PXP will convey approximately 140 acres on the Gaviota coast, known as the Smith and Sunburst parcels. These parcels, which are located to the east and west of the Gaviota processing site, include approximately 30 acres that are already required to be transferred to the California Department of Fish and Game as a tarplant reserve, and will be conveyed to the public. PXP will also take steps to convey the 56-acre Gaviota processing site after nine years, following abandonment of the facilities.

An initial conveyance of up to 1,200 acres will occur in less than two years. The remainder of the land will be conveyed following abandonment of the oil production facilities.

Recommended Action

GOO! and CPA recommend that the Planning Commission certify the Final EIR. GOO! and CPA also support approval of the Tranquillon Ridge Oil and Gas Project, as modified by their agreement with PXP. These modifications include the greenhouse gas emissions reduction and offset commitments described in the Final EIR, as well as the end date discussed in the Staff Report and included as part of Condition A-6.

Due to the significant impacts of the Project, the County must approve a Statement of Overriding Considerations that describes the benefits that outweigh such residual impacts.[1] As noted in the Staff Report, a Statement of Overriding Considerations must be supported by substantial evidence in the record.[2] The Staff Report cites certain benefits of the Project as part of the Findings of Approval.

We agree that the Project provides benefits significant enough to outweigh the Project's impacts. In addition to those cited in the Staff Report, we would like to inform the Commission of the other benefits secured in our agreement with PXP. As noted in the attached description of the agreement, additional benefits of the Project include: (a) shut down of the Pt. Pedernales Project (including Platform Irene, off and on shore pipelines, and the LOGP), the Pt. Arguello Project (including Platforms Hidalgo, Hermosa and Harvest, off and on shore pipelines and the Gaviota processing site), and the Lompoc Onshore Oil Field; and (b) conveyance of almost 4,000 acres of land for permanent protection and public benefit.

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[1] CEQA Guidelines §15093(a).
[2] CEQA Guidelines §15093(b); *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222-1224 [13 Cal.Rptr.2d 182].

Conclusion

Never before have EDC, GOO! and CPA supported an oil and gas development project. The reason these groups are willing to support this Project, as modified, is because the County will actually be better off with the Project than without it. Without the Project, oil development from four offshore platforms and numerous onshore wells would continue indefinitely, threatening our coast and region with the risk of oil spills, pollution, and other adverse impacts. With the Project as modified, oil development from these facilities will stop on a date certain, enforceable by the environmental groups and the County. Facilities will be removed, land will be cleaned up, and the public will have the benefit of approximately 3,900 acres in perpetuity. In addition, the agreement between the environmental groups and PXP will result in a historic requirement for an oil company to mitigate or offset all of its direct greenhouse gas emissions and contribute towards further emission reductions in the County.

This Project will use existing facilities and will not require any new infrastructure or construction. As modified, it will not extend the life of the existing operations of these facilities. This fact, along with the benefits described above, lead the environmental groups to support the modified Tranquillon Ridge Project.

Thank you for your consideration.

Sincerely,

Linda Krop,
Chief Counsel

Atts: Tranquillon Ridge Oil & Gas Project and Land Conservation Agreement terms

cc: Get Oil Out!
Citizens Planning Association
California State Lands Commission
California Coastal Commission

TRANQUILLON RIDGE OIL & GAS PROJECT AND LAND CONSERVATION AGREEMENT

On April 9, 2008, Get Oil Out! (GOO!) and Citizens Planning Association of Santa Barbara (CPA), represented by the Environmental Defense Center (EDC), executed an agreement with Plains Exploration and Production Company (PXP) regarding PXP's proposed Tranquillon Ridge Oil & Gas Project. The Tranquillon Ridge project would involve development of oil and gas reserves in portions of the Tranquillon Ridge Field located within state lands, offshore Lompoc, California. The field would be produced from Platform Irene, and the oil and gas would be processed at the Lompoc Oil and Gas Plant. These facilities are currently used by PXP to produce oil and gas as part of the Pt. Pedernales Project.

The agreement provides the following:

End Dates

The Tranquillon Ridge Project will end by a date certain, in order to ensure that the project does not extend the life of the existing facilities currently used to produce oil and gas from the Pt. Pedernales project. Imposing this end date will reduce or avoid the project's impacts on the environment. In addition, as part of this agreement, end dates will be imposed for the Pt. Pedernales Project, Pt. Arguello Project, and Lompoc Oil Field Project.

- The Tranquillon Ridge Project will end no later than December 31, 2022.
- The Pt. Pedernales Project (including Platform Irene and the Lompoc Oil and Gas Plant) will end no later than December 31, 2022.
- The Lompoc Onshore Oil Field production will end no later than December 31, 2022.
- The Pt. Arguello Project (including Platforms Hidalgo, Harvest and Hermosa, and the Gaviota processing site) will shut down no later than nine years following approval of the Tranquillon Ridge Project (most likely in 2017).
- All end dates require abandonment and remediation in compliance with applicable governmental requirements.

Greenhouse Gas Emission Reductions

As part of the agreement, PXP will reduce (mitigate) and offset all of the direct greenhouse gas (GHG) emissions from the project. In addition, PXP will donate funds to provide for additional reductions in GHG emissions within Santa Barbara County.

- All direct greenhouse gas emissions from the Tranquillon Ridge Project will be mitigated or offset. PXP will incorporate feasible measures identified during an independent energy efficiency and greenhouse gas emissions audit. Any such identified measures will reduce, or mitigate, project emissions. PXP will also pay $10/ton/year (adjusted for inflation) to offset any remaining emissions. Actual emissions will be reported by PXP and verified by the Santa Barbara County Air Pollution Control District (SBCAPCD) on an annual basis.

- PXP will donate an additional $1,500,000 to reduce greenhouse gas emissions in Santa Barbara County. This funding will be administered by SBCAPCD as part of a transit bus technology program.

Land Conveyances

PXP will convey approximately 3,900 acres that will be permanently dedicated to the public for purposes of open space preservation, management and restoration of natural resources, as well as passive recreation, education and research.

- PXP will convey approximately 3,700 acres of land adjacent to the Burton Mesa Ecological Reserve in the Lompoc Valley. This land includes the sites of the Lompoc Oil and Gas Plant, Lompoc Onshore Oil Field, and proposed Purisima Hills residential development project, and will be conveyed, through The Trust for Public Land, for the benefit of the public. The environmental parties and PXP have stated their intention that the land be conveyed to the State for addition to the Burton Mesa Ecological Reserve and managed by the California Department of Fish and Game. Approximately 1,000 acres will be donated when PXP begins developing the Tranquillon Ridge Field, and the remainder will be conveyed after the Tranquillon Ridge end date.

- PXP will convey up to 200 acres on the Gaviota Coast, for the benefit of the public. Approximately 140 acres, known as the Smith and Sunburst parcels, will be conveyed when PXP begins developing the Tranquillon Ridge Field. The parties anticipate that the remainder will be protected after the Pt. Arguello end date. (Note: a portion of the Smith parcel is already slated to be conveyed to the California Department of Fish and Game for a Tar Plant Reserve.)