

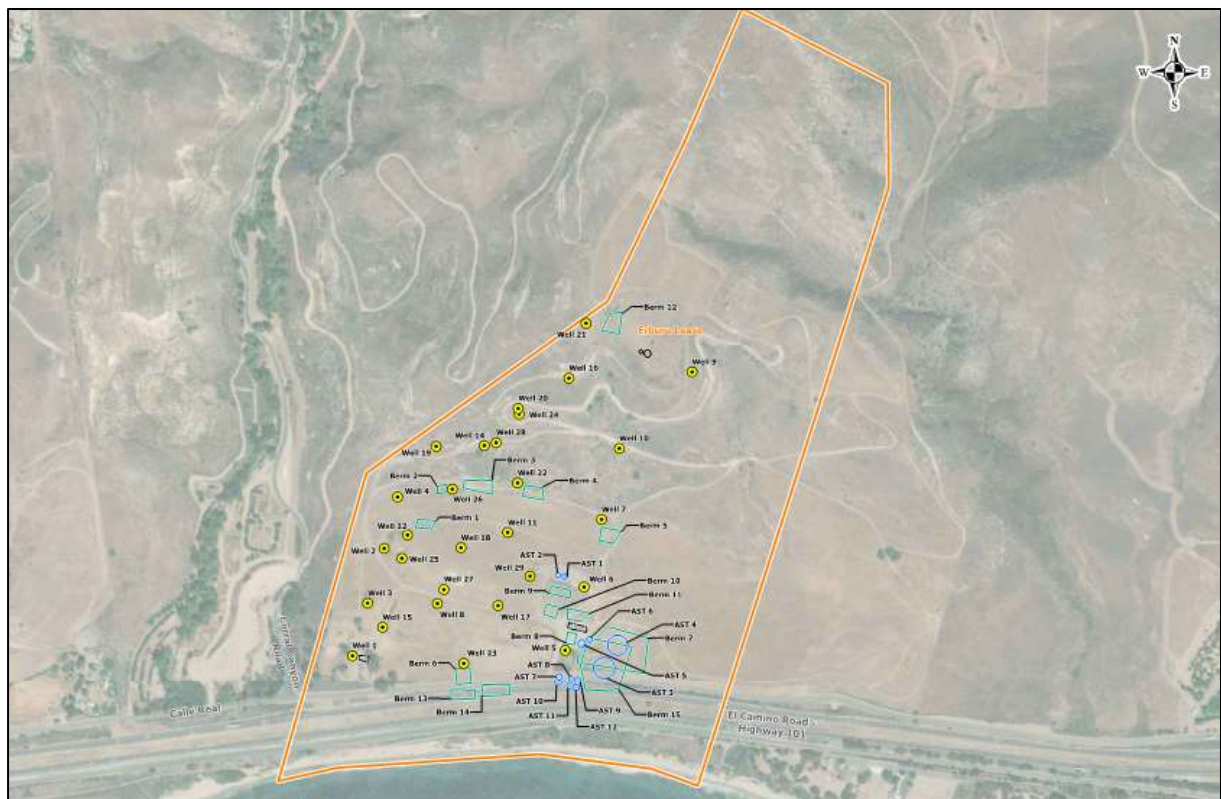


Draft Mitigated Negative Declaration

Erburu Lease Remediation Project

21CDP-00000-00039

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1.0 REQUEST/PROJECT DESCRIPTION

The project is for a Coastal Development Permit to implement the actions described in the Supplemental Assessment / Remedial Action Work Plan dated October 30, 2020, including soil sampling to supplement existing site investigation data, removal of oil field infrastructure and confirmation soil sampling, and targeted soil removal in areas where soil concentrations exceed San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs). The investigated areas include 28 former well pads, six historical aboveground storage tank footprints, and 12 formerly bermed areas. Of the 46 former operational areas investigated, only eight areas (Well Pads 3, 8, 11, 15, 16, 18, and 24; Bermed Area 5) had petroleum impacts in soil with concentrations above applicable ESLs and will require excavation/remediation. The excavations will range in depths from approximately 5 feet to 30 below existing grade.

Soil samples will be collected at the excavation limits to confirm removal of total petroleum hydrocarbons (TPH)-containing soil. The excavations will be backfilled with clean earth material and the site surface will be restored to pre-existing conditions. The total limits of disturbance, including the staging area, is approximately 26 acres. Raw cut is approximately 16,000 cubic yards and raw fill is approximately 16,000 cubic yards. The project will result in approximately 4,500 cubic yards of impacted soil to be removed and replaced.

2.0 PROJECT LOCATION

The project site is located at the Erburu Lease in the Capitan Oil Field and is associated with Assessor Parcel Number (APN) 081-230-018 in Santa Barbara County, California within the Third Supervisorial District. The Erburu Lease is located in the Capitan Oil Field, east of Las Flores Canyon. The work areas, where work activities will occur within the Site, are primarily in the southwestern portion of the Project Parcel and include existing oil field and agricultural roads, well pads, and adjacent upland habitat. The Site includes a southern facing slope with native shrub cover including California sagebrush (*Artemisia californica*), purple sage (*Salvia leucophylla*) scrub; giant wild rye (*Elymus condensatus*) grassland; non-native grasslands; and Menzies' goldenbush (*Isocoma menziesii*) scrub. The extent of the project site is shown in Figure 1. The project site is within the United States Geological Survey (USGS) Goleta, California 7.5-minute topographic quadrangle (USGS 2015).

| 2.1 Site Information | |
|--------------------------------|---|
| Comprehensive Plan Designation | Rural, Agriculture II, minimum parcel size of 320 acres (AG-II-320) |
| Zoning District, Ordinance | Article II Coastal Zoning Ordinance, Gaviota Coast Community Plan, Critical Viewshed Corridor, Coastal Appealable Zone AG-II-320 |
| Site Size | 314 acres |
| Present Use & Development | Grazing; abandoned oil wells and associated appurtenances |
| Surrounding Uses/Zoning | North: Industrial/AG-II South: Highway 101 East: Grazing, REC West: Exxon Las Flores Canyon Oil & Gas Separation Facility; AG-II |
| Access | Calle Real |
| Public Services | Water Supply: Private Well Sewage: Not Applicable Fire: Santa Barbara County Fire District |

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SETTING

The Eruburu Lease is located approximately 12 miles northwest of the City of Goleta, California. The Site currently consists of abandoned oil wells and associated appurtenances; including concrete associated with well pads, concrete well cellars, above and below ground piping, and miscellaneous oil field debris. The Eruburu Lease is located in the Capitan Oil Field, east of Las Flores Canyon. The Site was used for crude oil production from approximately 1929 to 1995. Twenty-eight oil wells were located on the Site, and California Division of Oil, Gas, and Geothermal Resources (DOGGR) Final Well Abandonment letters were identified for all 28 of the known wells associated with the Site.

The site is currently used for cattle and horse grazing. There is a single residence in the southwest portion of the Site along Calle Real and the southern end of the parcel includes an old barn, located on gentle slopes which gradually increase to steep slopes towards the northern end of the parcel. The site is mostly covered by scrub and annual grasslands. The site elevation ranges from approximately 70 feet above mean sea level (amsl) on the southern edge adjacent to US 101 to 700 feet amsl along the northern edge of the lease into the foothills of the Santa Ynez Mountains. The parcels adjacent to the Site are designated agricultural use (AG-II-320), coastal-related industrial use (M-CR), and recreation (REC) and are currently used for cattle grazing, oil production, open space and a recreational vehicle (RV) park and campground. El Capitan State Beach is located to the southeast. There are also existing oil production facilities and oil field roads (ExxonMobil Las Flores Canyon) to the western and northern property boundaries.

According to the California Geologic Survey's Geologic Map of California, the Site is underlain by Miocene marine sandstone, shale, siltstone, conglomerate, and breccia and is moderately to well consolidated. Based on the interpretation of historic well logs available from the California Department of Water Resources (DWR) database, the base of groundwater was detected at 150 feet below ground surface (bgs) on the lower plain in the south of the lease and at 168 feet bgs in the foothills in the north of the lease.

Immediately to the north and east of the Site there is an unnamed tributary to the Pacific Ocean. The Site has no connectivity to any named blue-line streams. The hydrology within the Survey Area is limited to upland erosional drainage features, which are ephemeral and only support surface water flows during and immediately following storm events. Deposits of sandy material just downslope of these drainage features likely occurs and may result in temporary ponding within the depression areas following storm events. These drainage features are likely dry year-round except during and immediately following storm flows. The Site has experienced drought conditions in the last decade and is currently in an abnormally dry condition.

3.2 ENVIRONMENTAL BASELINE

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

4.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

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

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

Significant but Mitigable: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to an Insignificant Impact.

Insignificant Impact: An impact is considered adverse but does not trigger a significance threshold.

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

Beneficial Impact: There is a beneficial effect on the environment resulting from the project.

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

4.1 AESTHETICS/VISUAL RESOURCES

| Will the proposal result in: | Potent. Signif. and Unavoid. | Significant but Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|---|------------------------------|---------------------------|-----------|-------------------------------|----------------------------------|
| a. The obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view? | | | | X | |
| b. Change to the visual character of an area? | | | | X | |
| c. Glare or night lighting which may affect adjoining areas? | | | | X | |
| d. Visually incompatible structures? | | | | X | |

Setting: The surrounding land use is primarily rural open space. Highway 101 runs along the southern property line, El Capitan State Beach is located to the east, and the Exxon mobil Las Flores Canyon Treating Plant is located to the west of the property. The subject parcel includes a single family residence in the southwest corner of the lot and an old barn in the center.



FIGURE 1. VIEW OF THE SITE ALONG CALLE REAL LOOKING NORTH.

County Environmental Thresholds: The County’s Visual Aesthetics Impact Guidelines (Santa Barbara County Thresholds Manual 2020) classify coastal and mountainous areas, the urban fringe, and travel corridors as “especially important” visual resources. A project may have the potential to create a significantly adverse aesthetic impact if (among other potential effects) it would impact important visual resources, obstruct public views, remove significant amounts of vegetation, substantially alter the natural character of the landscape, or involve extensive grading visible from public areas. The Guidelines address public views rather than private views.

Impact Discussion:

(a – d). The site is located within a Critical Viewshed Corridor for Highway 101. The project will not result in any permanent structures or long term changes to the aesthetics of the project site. Remediation activities will occur over a period of two months and will be followed by restoration activities. The proposed standard equipment includes an excavator, slide hammer equipment, and soil sampling equipment such as field assay tests. The initial vegetation removal and periodic heavy equipment activity during the construction period may result in short-term degradation of the visual quality (associated with exposed soil, stockpiles, construction materials) of views from Highway 101. The post-construction visual contrast should diminish quickly as the affected areas would be revegetated with the local native vegetation.

The proposed project does not include the installation of any lighting fixtures or use of shiny or reflective materials. Construction activities would be limited to daytime hours (see Noise-02 Construction Hours in section 4.11) and the Project does not adversely alter the character of the landscape or topography. The project would not affect neighboring areas with glare or night lighting.

No project components, including land alterations or lighting, would be visible from any public viewing place, such as roads, highways, railroads, public and other open spaces, trails, beaches or other recreation areas. The project would not affect neighboring areas with glare or night lighting. The project will have *no impacts* to aesthetics.

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

4.2 AGRICULTURAL RESOURCES

| Will the proposal result in: | Poten. Signif. and Unavoid. | Significant but Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|---|-----------------------------|---------------------------|-----------|-------------------------------|----------------------------------|
| a. Convert prime agricultural land to non-agricultural use, impair agricultural land productivity (whether prime or non-prime) or conflict with agricultural preserve programs? | | | | X | |
| b. An effect upon any unique or other farmland of State or Local Importance? | | | | X | |

Setting: Agricultural lands play a critical economic and environmental role in Santa Barbara County. Agriculture continues to be Santa Barbara County’s major producing industry with a gross production value of over \$1.6 billion (Santa Barbara County Agricultural Production Report, 2019). In addition to the creation of food, jobs, and economic value, farmland provides valuable open space and maintains the County’s rural character. The existing 314-acre parcel currently supports grazing activities

Impact Discussion:

(a, b). Impact to Agricultural Land. The property currently contains old oil infrastructure including abandoned oil wells and associated appurtenances such as, concrete associated with well pads, concrete well cellars, above and below ground piping, and miscellaneous oil field debris. The site is also used for grazing activities and a single-family residence in the southwestern corner of the property. Due to the previous oil production activities, the site has never been used for agricultural activities besides grazing, and therefore does not render the site an important agricultural resource. The proposed remediation would not substantially interfere with the operator’s ability to conduct grazing activities since the individual work areas are small in size and the activities are temporary in nature. The project would have *no impact* on any neighboring agricultural operations.

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

4.3a AIR QUALITY

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| a. The violation of any ambient air quality standard, a substantial contribution to an existing or projected air quality violation, or exposure of sensitive receptors to substantial pollutant concentrations (emissions from direct, indirect, mobile and stationary sources)? | | X | | | |
| b. The creation of objectionable smoke, ash or odors? | | | X | | |
| c. Extensive dust generation? | | X | | | |

Setting: The project site is located within the South Central Coast air basin, a federal and state nonattainment area for ozone (O₃) and a state non-attainment area for particulate matter (PM₁₀). Reactive organic compounds (ROC) and nitrogen oxides (NO_x), which are precursors to ozone, are considered to be non-attainment pollutants. The major sources of ozone precursor emissions in the County are motor vehicles, the petroleum industry and solvent use. Sources of PM₁₀ include grading, road dust and vehicle exhaust

County Environmental Threshold: Chapter 5 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (as revised in January 2021) addresses the subject of air quality. Although no quantitative threshold has been established for short-term, construction related PM₁₀, NO_x or ROC, PM₁₀ impacts are discussed when projects involve ground disturbance. Standard dust control measures are required under the County of Santa Barbara's Grading Ordinance for most projects.

Long-term/operational emissions thresholds have been established to address mobile emissions (i.e., motor vehicle emissions) and stationary source emissions (i.e., stationary boilers, engines, and chemical or industrial processing operations that release pollutants). Long-term air quality impacts occur during project operation and include emissions from any equipment or process used in the project.

Impact Discussion:

(a – c). Potential Air Quality Impacts. The scope of the project includes testing of soil to determine soil quality in order to supplement existing site investigation data, removal of oil field infrastructure, targeted soil removal in areas where soil concentrations exceed target levels, and restoration of

excavated areas. The proposed standard equipment includes an excavator, slide hammer equipment, and soil sampling equipment such as field assay tests. There is a farm house located on the southwest portion of the property. The farm house is within 140 feet from grading activities associated with Well 15 and within 50 feet of underground pipeline removal (approximately 3 to 4 feet below ground surface).

Short-term emissions of ozone precursors (NO_x and ROC) during project construction would result primarily from the use of earthmoving equipment. Based on existing investigation data, project-related grading to remediate the site of contaminated soil would require approximately 16,000 cubic yards of raw cut and 16,000 cubic yards of raw fill, and removing approximately 4,500 cubic yards of contaminated soil. Additional impacted soils above ESLs would be removed as encountered during supplemental investigation, infrastructure removal, and remedial excavation activities. Backfill would be comprised of clean soils from excavations as well as imported clean fill. Contaminated soil would be stockpiled onsite then sent offsite for disposal at the Santa Maria Regional Landfill approximately 75 miles north.

Since the County does not have established short-term construction-related emissions, project-related construction emissions of NO_x and ROC would be less than significant on a project-specific and cumulative basis. However, due to the non-attainment status of the air basin for ozone, contractors would be required to adhere to diesel particulate and NO_x emission reduction measures as required by County APCD, and outlined in Attachment 3, to reduce construction-related emissions of ozone precursors to the extent feasible. Compliance with these measures is routinely required for all new development in the County. The implementation of these standard conditions is routinely required for all new development in the County.

No post remedial activities or permanent structures are proposed at the site and therefore the project would not generate traffic (Section 4.13, Transportation/Circulation) aside from those trips associated with the temporary construction activities. The project would not result in substantial direct or indirect emissions from stationary sources or result in industrial or other operations that would have the potential to result in emissions of smoke, ash, or objectionable odors. Therefore, the project would not be a substantial long-term source of emissions and would result in less than significant project-specific air emission impacts.

Project-related grading activities would have the potential to cause short-term fugitive dust that could have the potential to impact nearby residential uses. Project related grading would also contribute to regional emissions of PM₁₀ and PM_{2.5}. Dust emissions resulting from project-related construction would be reduced to the extent feasible through the implementation of County Grading Ordinance and the Air Pollution Control District requirements, which require the implementation of standard dust control measures. In addition, County APCD reviewed the Supplemental Investigation and Remedial Action Work plan and recommended additional standard dust mitigation measures, included as Attachment 3. Therefore, short-term dust emissions from project related grading would be less than significant. The project would not be a substantial long-term source of dust emissions, and the project's potential dust emissions would not be cumulatively considerable.

With implementation of standard County Air Quality conditions specified in Air-01 and the APCD condition letter, the project's air emissions would not be substantial. Therefore, the project will have a *less than significant impact with mitigation* on air emission.

Cumulative Impacts: The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the significance criteria for air

quality. Therefore, the project’s contribution to regionally significant air pollutant emissions is not cumulatively considerable, and its cumulative effect is insignificant.

Mitigation and Residual Impact. The following mitigation measures would reduce the project’s air quality impacts to a less than significant level:

Air-01 Dust Control. The Owner/Applicant shall comply with the following dust control components at all times when work activities are being conducted including weekends and holidays:

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

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

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

TIMING: The dust monitor shall be designated prior to grading permit. The dust control components apply from the beginning of any grading or construction throughout all development activities until Final Building Inspection Clearance is issued. **MONITORING:** P&D processing planner shall ensure measures are on plans. P&D grading and building inspectors shall spot check; Grading and Building shall ensure compliance onsite. APCD inspectors shall respond to nuisance complaints.

Implementation of standard conditions placed on the grading plan as implemented through Chapter 14 (Grading Ordinance) of the County Code, along with standard APCD conditions listed in Attachment 3 would reduce potential short-term air quality impacts to a less than significant level. The project would not result in significant project-specific long-term air quality impacts. No further mitigation measures are required.

4.3b AIR QUALITY - GREENHOUSE GAS EMISSIONS

| Greenhouse Gas Emissions - Will the project: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|

| | | | | | |
|--|--|--|---|---|--|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | X | | |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | | X | |

Setting. Greenhouse gases include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆), and nitrogen trifluoride (NF₃). The largest source of greenhouse gas emissions from human activities in the United States is from fossil fuel combustion for electricity, heat, and transportation. Specifically, the *Inventory of U.S. Greenhouse Gasses and Sinks* (U.S. Environmental Protection Agency, 2013) states that the primary sources of greenhouse gas emissions in 2013 included electricity production (31%), transportation (27%), industry (21%), commercial and residential (12%), and agriculture (9%). This release of gases creates a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as “the greenhouse effect,” there is strong evidence to support that human activities have accelerated the generation of greenhouse gases beyond natural levels. The overabundance of greenhouse gases in the atmosphere has led to a warming of the earth and has the potential to severely impact the earth’s climate system. For instance, Santa Barbara County is projected to experience an increase in the number of wildfires, land vulnerable to 100-year flood events, and temperature increases, even under a low-emissions scenario (California Energy Commission, 2015).

Climate change results from greenhouse gas emissions “...generated globally over many decades by a vast number of different sources” rather than from greenhouse gas emissions generated by any one project (County of Santa Barbara Planning and Development, 2008). As defined in CEQA Guidelines Section 15355 and discussed in Section 15130, “...a cumulative impact consists of an impact which is created as a result of the combination of the [proposed] project...evaluated...together with other projects causing related impacts.” Therefore, by definition, climate change under CEQA is a cumulative impact.

Environmental Threshold. Per CEQA Guidelines Section 15064.4, County staff should consider the following factors, among others, when determining the significance of impacts from GHG emissions on the environment: (1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The CEQA Guidelines also clarify that the County has the discretion to select a model or methodology that it considers most appropriate for estimating GHG emissions, but that it must “support its selection of a model or methodology with substantial evidence” and “explain the limitations of the particular model or methodology selected for use.”

In July 2020, the Board affirmed its target to reduce GHG emissions in unincorporated County areas by 50 percent below 2007 levels by 2030. This target is in line with the State’s goal of reducing statewide emissions by 40 percent below 1990 levels by 2030.

The County developed the interim thresholds based on the County’s 2030 GHG target, which are in line with the State’s GHG emission reduction goals. The County developed the interim project-level threshold by determining the portion of the County’s 2030 GHG target emissions level that may be attributed to new development.

The Board adopted a numeric Screening Threshold of 300 MTCO₂e/year for non-industrial stationary source projects and plans. The recommended Screening Threshold results in approximately 15 percent of all applicable future projects, and 87 percent of all applicable future land use emissions, being subject to

the Significance Threshold. Approximately 85 percent of future projects will fall below the Screening Threshold and, therefore, will not require further analysis.

Impact Discussion:

- a.) Generate GHG Emissions. The limited nature and duration of construction activities would not generate considerable greenhouse gas emissions. Santa Barbara County APCD has reviewed the project and while they included conditional requirements to ensure impacts related to air quality are reduced, they did not require any conditions targeted at GHG emissions. Once constructed, the project would require vehicular trips that would generate emissions GHG emissions from direct, indirect, and mobile sources associated with the site would not substantially increase. Therefore, the project would not exceed the Sacramento AQMD threshold of 1,100 MTCO₂e/year, and the impact would be *less than significant*.
- b.) Conflict with an applicable regulations. The project will *not conflict* with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Cumulative Impacts: The proposed project’s total GHG emissions would be less than the applicable threshold. Therefore, the project’s incremental contribution to a cumulative effect is not cumulatively considerable and the project’s greenhouse gas emissions will not have a significant impact on the environment.

Mitigation and Residual Impact: Since the proposed project would not have a significant impact on the environment, no additional mitigation is necessary. Therefore, residual impacts would be less than significant.

4.4 BIOLOGICAL RESOURCES

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| Flora | | | | | |
| a. A loss or disturbance to a unique, rare or threatened plant community? | | | | X | |
| b. A reduction in the numbers or restriction in the range of any unique, rare or threatened species of plants? | | X | | | |
| c. A reduction in the extent, diversity, or quality of native vegetation (including brush removal for fire prevention and flood control improvements)? | | X | | | |
| d. An impact on non-native vegetation whether naturalized or horticultural if of habitat value? | | X | | | |
| e. The loss of healthy native specimen trees? | | | | X | |
| f. Introduction of herbicides, pesticides, animal life, human habitation, non-native plants or other factors that would change or hamper the existing habitat? | | | | X | |
| Fauna | | | | | |
| g. A reduction in the numbers, a restriction in the range, or an impact to the critical habitat of any | | X | | | |

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|---|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| unique, rare, threatened or endangered species of animals? | | | | | |
| h. A reduction in the diversity or numbers of animals onsite (including mammals, birds, reptiles, amphibians, fish or invertebrates)? | | X | | | |
| i. A deterioration of existing fish or wildlife habitat (for foraging, breeding, roosting, nesting, etc.)? | | X | | | |
| j. Introduction of barriers to movement of any resident or migratory fish or wildlife species? | | | X | | |
| k. Introduction of any factors (light, fencing, noise, human presence and/or domestic animals) which could hinder the normal activities of wildlife? | | X | | | |

Existing Plant and Animal Communities/Conditions:

Background and Methods:

Santa Barbara County has a wide diversity of habitat types, including chaparral, oak woodlands, wetlands and beach dunes. These are complex ecosystems and many factors are involved in assessing the value of the resources and the significance of project impacts. For this project, a site visit was conducted on March 30, 2021 and a Biological Resources Assessment (“BRA”) was prepared by Langan Engineering and Environmental Services, Inc. in February 2021 and Revised in May 2021. The following analysis is based on this information.

The BRA’s “Survey Area” was defined as the southern portion of the El Capitan Oil Field, encompassing 158 acres, 26 acres of which contain remnants of former oil field infrastructure. This includes 28 abandoned petroleum production wells and 16 areas of hydrocarbon-impacted soil. The desktop review and field survey have identified several habitats that occur in the region protected by Federal, State, or local agencies. In addition, a total of five (5) field surveys were conducted between November of 2019 and June of 2020 to capture the range of conditions suitable for detecting plant and wildlife species.

Prior to field efforts, a) the United States Geological Survey (USGS) Tajiguas, CA 7.5-minute quadrangle map (USGS 2015); b) the CDFW California Natural Diversity Database (CNDDDB) (CDFW 2020); c) the USDA-NRCS Web Soil Mapper (USDA 2020); d) the National Hydrography Dataset (NHD) (USGS 2020); e) the National Wetlands Inventory (NWI) (USFWS 2020); and f) a high quality aerial photograph of the Survey Area and its surroundings were reviewed to determine the locations of potential hydrologic features. The USGS 7.5-minute quadrangle map and the NWI indicated the presence of two potential hydrological features (unnamed drainages) within the Site. A larger drainage is within the northern portion of the Project Parcel but is not within the Site.

Flora:

Plant species in the region that are classified as Endangered or Threatened under the Federal ESA or the California ESA; or considered rare under the California Native Plant Protection Act; or considered rare by resource agencies, professional organizations, and/or the scientific community are identified in the Biological Resource Assessment (Langan, May 2021). These include any species found within the Tajiguas USGS quadrangle or any directly adjacent USGS quadrangle. A spring rare plant survey was completed in April and May 2020 within all work areas of the Site. Additionally, another summer rare plant survey was completed on June 19, 2020 and focused on identification of Gaviota tarplant. This survey effort was completed during the flowering period for all potential rare plant species requiring flower material for identification.

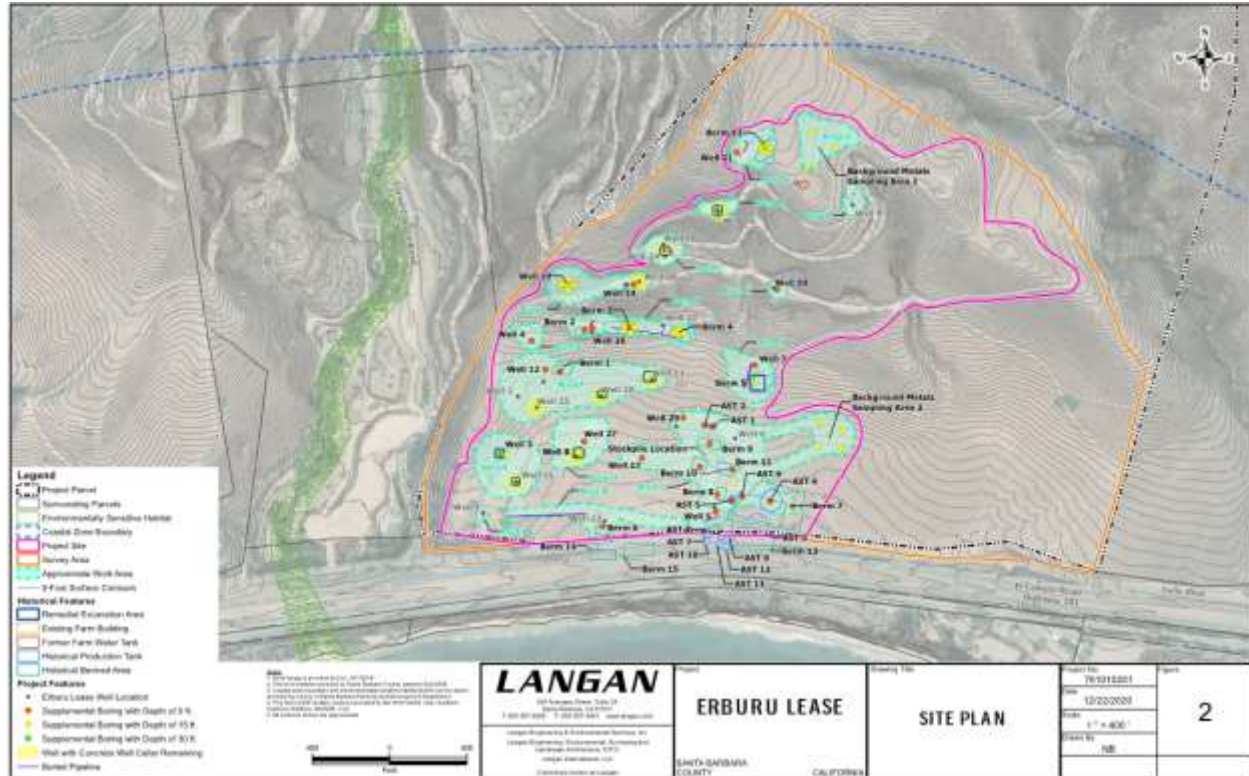


FIGURE 2. SITE PLAN SHOWING APPROXIMATE WORK AREAS.

Vegetative Communities

The 314 acre site consists primarily of annual grassland, California sagebrush (*Artemisia californica*), purple sage (*Salvia leucophylla*) scrub; giant wild rye (*Elymus condensatus*) grassland; non-native grasslands; and Menzies' goldenbush (*Isocoma menziesii*) scrub.). Eight Vegetative Communities were identified during the field surveys, which are identified below.

California Sagebrush - Purple Sage Scrub. California sagebrush – purple sage scrub is present along the western boundary of the Survey Area and persists along access roads commonly used for the grazing of cattle and horses. They are dominated by California sagebrush, purple sage, and giant wild rye. Approximately 14.41 acres of California sagebrush – purple sage scrub was observed within the Survey Area.

Eucalyptus Grove. A small eucalyptus grove approximately 1.20 acres in size is present at the southwestern limit of the Survey Area (Figure 2). This habitat includes blue gum (*Eucalyptus globulus*) trees within developed areas around a residence and horse corrals. The understory is generally bare ground, paved road, or dominated by annual grasses.

Giant Wild Rye Grassland. Giant wild rye grassland is an environmentally sensitive habitat along the Gaviota Coast. 14.5 acres of this species was observed on the upper slopes within the central portion of the Survey Area. The giant wild rye grasslands are dominated by giant wild rye, yellow sweet clover (*Melilotus indicus*), riggut brome (*Bromus diandrus*), and California sagebrush. The Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*) – CNPS Rare Plant Rank 1.B2 was found in two locations within this vegetation type but was located outside of the Work Area P near Well 9.

Menzies's Goldenbush Scrub. Approximately 10.52 acres of Menzies's goldenbush scrub was observed within the central and northern portion of the Survey Area, in a heavily grazed portions of the site and as a result, was highly impacted by grazing. Menzies's goldenbush scrub is common within the Survey Area.

Perennial rye grass fields. Perennial rye grass (*Lolium perenne*) fields was observed in the southern and northern portion of the Survey Area. The perennial rye grass in the northern portion of the Survey Area is dense with limited species diversity. Perennial rye grass fields within the Survey Area covers approximately 15.07 acres.

Poison Hemlock Patches. Poison hemlock (*Conium maculatum*) patches were observed in two separate locations on the eastern side of the Survey Area. The amount of poison hemlock patches within the Survey Area is 0.87 acres, with none occurring within the work areas.

Upland mustard fields. Upland mustard fields were observed throughout the Survey Area and within upland terraces. The upland mustard fields are common on the southern facing slopes and likely included more California sagebrush – purple sage scrub and giant wild rye grasslands prior to disturbance. The amount of upland mustard fields within the Survey Area is 22.00 acres.

Wild oats and annual brome grasslands. Wild oats and annual grasslands stands were observed throughout the Survey Area in upland and low-lying areas. These areas are commonly used for the grazing of cattle and horses. The amount of wild oats and annual brome grasslands within the Survey Area is 64.88 acres.

Developed area. The Site has a number of historic oil field roads, agricultural roads, access areas, and well pads. Most of them have been maintained for access and are clear of vegetation but well pads and roads on the upper elevations of the Site have been allowed to return to native habitat. Vegetation within these areas include non-native grasses and mustards. The amount of developed areas within the Survey Area was estimated at 15.03 acres with 6.20 acres within thirteen work areas.

Sensitive Habitat

Critical Habitat for multiple species occur within the project region and include California red-legged frog (CRLF) (*Rana draytonii*), Gaviota tarplant, tidewater goby (*Eucyclogobius newberryi*), and western snowy plover (*Charadrius alexandrinus nivosus*). Although no critical habitat occur within the Survey Area, the nearest Critical Habitat is located 1.2 miles west of the Site along Refugio Road. Gaviota tarplant Critical Habitat occurs approximately 7.2 miles west of the Site at Cañada Del Molino. Tidewater goby Critical Habitat occurs approximately 5.6 miles west of the Site at Arroyo Hondo. Western snowy plover Critical Habitat occurs approximately 8.5 miles southeast of the Site at Santa Barbara Shores. Southern California steelhead habitat is approximately 5.6 miles west of the Site.

In addition, southern coast live oak riparian forest, southern cottonwood willow riparian forest, southern willow scrub, needlegrass grasslands, and southern vernal pools were not observed within the Site, but do occur within the Project region. Riparian habitat/Environmentally Sensitive Habitat (ESH) is located 500 feet west of the site within the corridor along Cañada Del Corral. Giant wild rye grassland is an environmentally sensitive native grassland within the Gaviota Coast Plan and was identified within Work Areas K, L, and P.

The Site has no connectivity to any named blue-line streams. The hydrology within the Survey Area is limited to upland erosional drainage features, which are ephemeral and only support surface water flows during and immediately following storm events. No hydrophytic vegetation or evidence of hydrology was observed.

Special Status Plant Species

The California Natural Diversity Database (CNDDDB) indicates that the 4 special status plants have the potential to occur in the area; Santa Barbara honeysuckle, white-veined monardella, black-flowered figwort, and Sonoran maiden fern. However, during appropriately timed field surveys, only Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*) was found near Well Pad 9. Gaviota tarplant was not observed at the site. The closest known occurrence is located 7.2 miles west of the site.

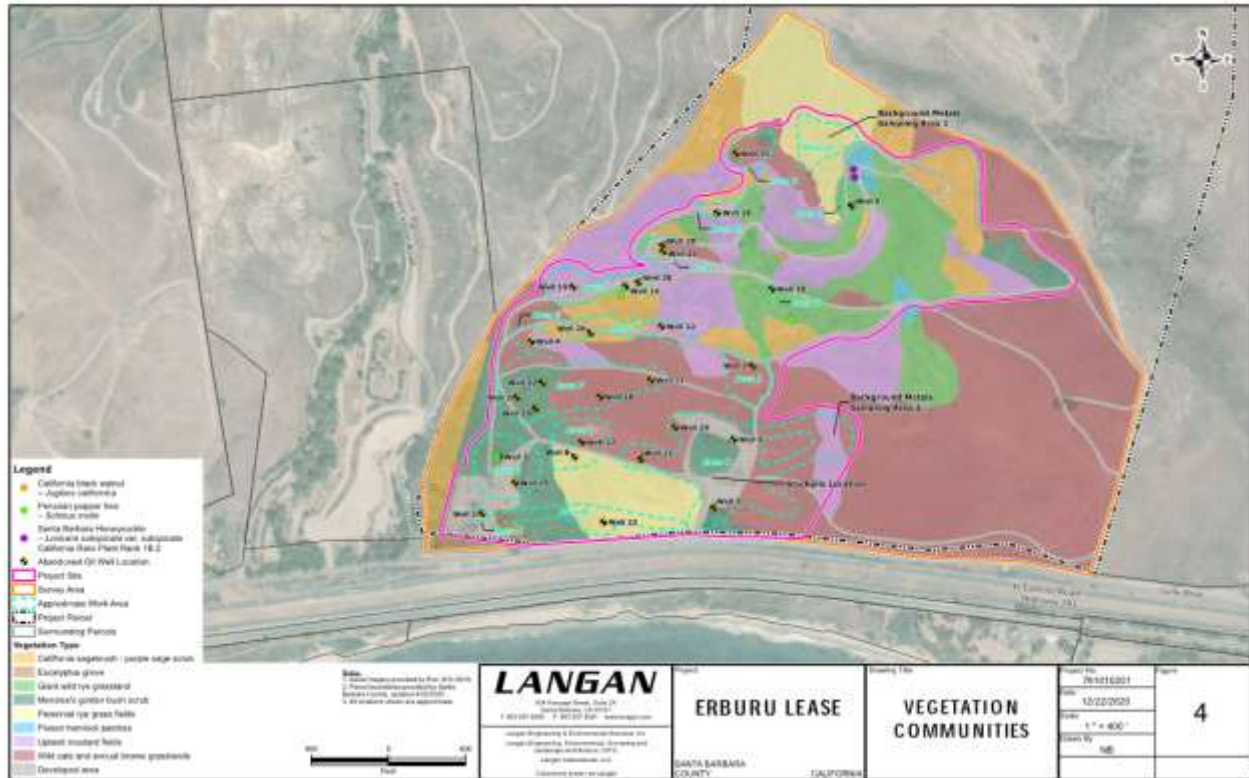


FIGURE 3. SITE PLAN SHOWING ONSITE VEGETATIVE COMMUNITIES.

Fauna:

Of the 33 Special-status wildlife species that have known occurrences within the region, only 8 had a moderate potential to occur within the project area because their habitat was present including the Crotch's Bumble bee, monarch butterfly, San Diego desert woodrat, Cooper's hawk, Prairie falcon, White-tailed kite, Blainville's horned lizard, and the California legless lizard. Only one wildlife species of special concern, white-tailed kite (*Elanus leucurus*), was observed during the field surveys.

Insects.

Crotch Bumble Bee. Although this species was not observed during site investigations, suitable habitat exists onsite for the Crotch's Bumble Bee, therefore there is a moderate potential for this species to occur at the Site, both overwintering and foraging.

Monarch butterflies. Monarch butterflies are known to occur within eucalyptus groves and potential roosting habitat is present within the Site. Small aggregations of monarch butterflies (less than 100 individuals) have been observed within Las Flores Canyon in the winter of 2019 and are known to occur within eucalyptus groves. Two small eucalyptus groves at the Site provide potential habitat for monarch butterflies. However, roosting at the groves has not been recorded and monarch butterflies were not observed during site investigations.

Mammals.

American badger. American badger (*Taxidea taxus*) uses grasslands, forests and shrub habitats with friable soil and is known to occur within Project region. The open areas and coastal scrub within the ESH property to the west are suitable habitat for the species, however, none were observed during the field surveys.

Bats. Pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii*) have been documented within the Project region. Suitable roosting habitat for these bat species include crevices in rocky outcrops, caves, mines, hollow trees, cliff faces and buildings. Maternal colonies for most bats occur

between April and August. Potential habitat occurs for several native bat species, including special-status bats, throughout the Project region. Bats were not observed during field surveys; however, no specific bat surveys were completed. The pallid bat and Townsend's big-eared bat have the potential to occur throughout the Project region in areas containing suitable habitat.

San Diego desert woodrat. The San Diego desert woodrat (*Neotoma lepida intermedia*) has been documented within the Tajiguas and Gaviota quadrangle, west of Tajiguas, in rocky outcroppings and coastal sage scrub habitats. The San Diego desert woodrat is moderately likely to occur within the Site, but none were found during site investigations. Focused trapping surveys were not conducted to determine the presence of the species.

Birds.

The Site may provide suitable breeding habitat for Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) and other scrub and grassland nesting species. However, it does not have suitable breeding habitat for many of the special-status species that occur regionally. Nevertheless, there is suitable foraging habitat for many of the special-status bird species in proximity to the Site. Bald eagle (*Haliaeetus leucocephalus*), Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), burrowing owl (*Athene cunicularia*), California brown pelican (*Pelecanus occidentalis californicus*), California horned lark (*Eremophila alpestris actia*), California least tern (*Sternula antillarum browni*), Cooper's hawk (*Accipiter cooperii*), ferruginous hawk (*Buteo regalis*), great blue heron (*Ardea herodias*), golden eagle (*Aquila chrysaetos*), least Bell's vireo (*Vireo bellii pusillus*), prairie falcon (*Falco mexicanus*), purple martin (*Progne subis*), Southern California rufous-crowned sparrow, southwestern willow flycatcher (*Empidonax traillii extimus*), western snowy plover, and white-tailed kite (*Elanus leucurus*) may all occur onsite as overhead transient visitors or utilize vegetation to forage throughout the Site. No special status bird species were observed during site investigations, however protocol surveys were not performed. Nesting bird surveys will be completed prior to construction activities. If active nests are observed a nest protection plan will be developed including appropriate protective buffers.

Amphibians

California red-legged frog (*Rana draytonii*). The California red-legged frog ("CRLF") is a federally listed threatened species and a California SSC. The CRLF is generally found along marshes, streams, ponds, and other permanent sources of water where dense scrubby vegetation such as willows, cattails, and bulrushes dominate. Breeding sites occur along watercourses with pools that remain long enough for breeding and the development of larvae. Breeding time depends on winter rains but is usually between late November and late April. Intermittent streams must retain surface water in pools year-round for frog survival. The nearest CRLF Critical Habitat is located 1.2 miles west of the Site along Refugio Road and have been well-documented at the adjoining property immediately to the west of the Site within Cañada Del Corral. No CRLF were observed on site during the investigations.

Coast range newt (*Taricha torosa*). The Coast range newt is listed as a SSC by the CDFW. The newt occurs in wet forests, oak forests, chaparral and rolling grasslands. It is terrestrial during the summer months and found under woody debris, in animal burrows or rock crevices. It becomes aquatic during their breeding season, which begins in December to January with the first heavy rains, through May. It is endemic to California, ranging from the western coastline of Mendocino County to San Diego County. The closest known occurrence of coast range newt is approximately 2.9 miles from the Site (CDFW 2020). No Coast range newts were observed on site during the investigations.

Foothill yellow-legged frog (*Rana boylei*). The Foothill yellow-legged frog is listed as a SSC by the CDFW. The Site does not provide breeding habitat. The closest known occurrence is approximately 1.5 miles from the Site. Their occurrence was last confirmed in 1974 (CDFW 2020) and multiple efforts to confirm current status have been unsuccessful.

Fish

Southern Steelhead. No freshwater perennial streams or connectivity are located within the Site allowing Southern Steelhead to occur. Tidewater goby also requires water bodies where there is a mix of fresh and saltwater or freshwater tributaries. Designated critical habitat does not include the Site as the nearest documented location is 4.4 miles to the west at Arroyo Quemada.

Thresholds:

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

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

Native Grasslands: In general, project created impacts to native grasslands may be considered significant if they involve removal of or severe disturbance to a patch or a combined patch area of native grasses that is greater than one-quarter (1/4) acre in size. The grassland must contain at least 10 percent relative cover of native grassland species (based on a sample unit). Impacts to patch areas less than one-quarter acre in size that are clearly isolated and not part of a significant native grassland or an integral component of a larger ecosystem are usually considered insignificant.

Individual Native Trees: Project created impacts may be considered significant due to the loss of 10% or more of the trees of biological value on a project site.

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

Impact Discussion:

(a). Disturbance to threatened plant community. No USFWS/NMFS Critical Habitat or Environmentally Sensitive Habitat (ESH) area was identified within the Site. All sensitive habitats identified from literature review were greater than 1 mile away from the property boundaries. The approximate acreages of impact of each vegetative community within the work areas are presented in Table 1 below. No hydrophytic vegetation or evidence of hydrology was observed during the field surveys. Two drainages identified as upland erosional features likely only convey water during and immediately after rain events, however, no work areas are located within the two upland drainage features. An area of Environmentally Sensitive Habitat is over 500 feet from the Site and no immediate, direct impacts, or disruptions of this habitat are expected from Project activities, no impacts to this resource are anticipated. Due to the lack of Sensitive or Threatened plant communities onsite, disturbance impacts are *no impact*.

(b). Reduce threatened plant species. Plant species in the region that are classified as Endangered or Threatened under the Federal ESA or the California ESA; or considered rare under the California Native Plant Protection Act; or considered rare by resource agencies, professional organizations, and/or the scientific community are identified in Table 5 of the BRA, included as Attachment 4. Of the 21 special status plant species identified as existing within the region, only the Santa Barbara Honeysuckle was identified in the rare plant surveys completed in 2020. Four individuals of Santa

Barbara honeysuckle were observed outside of the Work Area P on the east facing slope near Well 9 where infrastructure removal will occur. Although the individuals were present outside of disturbance areas, avoidance measures (Bio-1 through Bio-7) would ensure the impacts to Santa Barbara honeysuckle will be less than significant. No additional special-status perennial shrub species were observed during the surveys by the Langan biologists. Therefore impacts to threatened plant species would be *less than significant with mitigation*.

(c, d). Reduce quality of native vegetation. Work areas have been identified to provide access, staging, and material removal at each work location. The proposed project would result in the temporary disturbance of 3.7 acres including approximately 16,000 CY of cut and approximately 16,000 CY of fill material, and removing approximately 4,500 cubic yards of contaminated soil. Grubbing of vegetation will occur in excavation locations, for temporary stockpile of soil and infrastructure materials, and areas requiring grading. Where possible, vegetation would be mowed to ground level or driven over to reduce impacts required for access. This would remove natural vegetation made up of both native and non-native plant communities. Native vegetation may be impacted by an accumulation of fugitive dust, increased erosion, and sedimentation during proposed project activities. For the plants that inhabit these areas, ground disturbance could lead to injury and mortality of individuals. Approximately 0.95 acres of California sagebrush – purple sage scrub, 0.06 acres of the Eucalyptus grove, 0.45 acres of Giant wild rye grassland, 4.84 acres of Menzies’s goldenbush scrub, 3.18 acres of Poison hemlock patches, 2.19 acres of Upland mustard fields, and 8.57 acres of Wild oats and annual grasslands would be temporarily impacted as a result of the project. Table 1 below identifies the onsite vegetative communities’ occurrence and temporary disturbance within each work area. A habitat restoration plan has been prepared to mitigate any temporary loss of vegetative cover (Bio-1). Bonding will be required to ensure the success of the restoration plan.

Table 1. Vegetation Communities within Approximate Work Areas and Survey Areas.

| Location | California sagebrush – purple sage scrub (Acres) | Eucalyptus Grove (Acres) | Giant Wild Rye Grassland (Acres) | Menzies’s goldenbush scrub (Acres) | Perennial rye grass fields (Acres) | Poison Hemlock Patches (Acres) | Upland Mustard Fields (Acres) | Wild oats and annual brome grasslands (Acres) | Developed Areas (Acres) |
|---|--|--------------------------|----------------------------------|------------------------------------|------------------------------------|--------------------------------|-------------------------------|---|-------------------------|
| Work Area A (0.11 acres) | - | - | - | - | - | - | - | - | 0.11 |
| Work Area B (1.67 acres) | - | 0.06 | - | 0.45 | 1.16 | - | - | - | - |
| Work Area C (7.93 acres) | - | - | - | 1.27 | 0.24 | - | 0.59 | 3.25 | 2.56 |
| Work Area D (1.64 acres) | - | - | - | 0.28 | 0.53 | - | - | 0.70 | 0.12 |
| Work Area E (2.17 acres) | - | - | - | 1.24 | - | - | - | - | 0.92 |
| Work Area F (4.55 acres) | - | - | - | 1.50 | - | - | 0.07 | 2.46 | 0.62 |
| Work Area G (0.44 acres) | 0.03 | - | - | - | - | - | 0.11 | 0.23 | 0.07 |
| Work Area H (1.64 acres) | 0.77 | - | - | - | - | - | 0.39 | 0.13 | 0.34 |
| Work Area I (1.31 acres) | - | - | - | - | - | - | 0.04 | 1.04 | 0.23 |
| Work Area J (1.29 acres) | 0.03 | - | - | - | - | - | 0.76 | - | 0.58 |
| Work Area K (0.13 acres) | - | - | 0.13 | - | - | - | - | - | - |
| Work Area L (0.62 acres) | 0.02 | - | 0.02 | - | - | - | 0.06 | 0.15 | 0.38 |
| Work Area M (0.40 acres) | 0.05 | - | - | - | - | - | 0.10 | - | 0.25 |
| Work Area N (0.81 acres) | 0.05 | - | - | 0.10 | - | - | 0.08 | 0.59 | - |
| Work Area O (1.29 acres) | - | - | - | - | 1.25 | - | - | 0.02 | 0.02 |
| Work Area P (0.27 acres) | - | - | 0.30 | - | - | - | - | - | 0.07 |
| Work Area Total (25.86 acres) | 0.95 | 0.06 | 0.45 | 4.84 | 3.18 | - | 2.19 | 8.57 | 6.21 |
| Survey Area Total (158.46 acres) | 14.41 | 1.20 | 14.50 | 10.52 | 15.07 | 0.87 | 22.00 | 64.88 | 15.03 |

When project activities are complete, the site would return to its natural contours and excavated areas would be restored with native vegetation communities. This is outlined in the Habitat Restoration Plan (Langan, May 2021) (BIO-1). Impacts would be further reduced by recommended mitigation measures

BIO-2 through BIO-7. With this, impacts to native and non-native vegetation are expected to be *less than significant with mitigation*.

- (e). **Loss of healthy native specimen trees.** Areas within the Project footprint were mapped and all trees within the Survey Area that were not previously mapped and were at least 6 inches in diameter at breast height were mapped. A small eucalyptus grove approximately 1.20 acres in size is present at the southwestern limit of the Survey Area. California black walnut and Peruvian pepper trees were also identified within the project site. However, the project locations do not have any specimen trees that would be disturbed. Therefore *no impacts* are expected.
- (f). **Introduction of factors that would change the existing habitat.** The project does not propose introducing permanent structures. Once oil infrastructure, contaminated soil, and construction equipment is removed, the site will return to pre-construction conditions. Therefore *no impact* is expected.
- (g, h, i, k). **Reduce critical habitat of and diversity of threatened animal species.** Of the 33 Special-status wildlife species that have known occurrences within the region, only 8 had a moderate potential to occur within the project area because their habitat was partially present during field surveys. These species include the Crotch's Bumble bee, monarch butterfly, San Diego desert woodrat, Cooper's hawk, Prairie falcon, White-tailed kite, Blainville's horned lizard, and the California legless lizard. Only one wildlife species of special concern, white-tailed kite (*Elanus leucurus*), was observed during the field surveys.

Approximately 0.06 acres of the estimated Work Area B is within the Eucalyptus grove. This has the potential to act as roosting habitat for Monarch butterflies. Roosting at the groves has not been recorded and monarch butterflies were not observed during site investigations. The Gaviota Coastal Plan's Dev Std NS-6 prevents construction or grading within 200 feet of known or historic butterfly roosts. The nearest recorded site of monarch butterflies was observed within Las Flores Canyon, over 200 feet to the west.

Direct impacts to all species may include mortality from vehicle or equipment strikes as foraging birds move through the work area, and physical impacts to active nests, or suitable nesting habitat on site. Accidental fuel spills during construction could lead to contamination of soils adjacent to the work area, and habitat degradation. Noise, vibrations, and dust from construction activities can cause birds to flush out of cover and become exposed to predators or vehicle strikes. Adults may not return to nests, predators may feed on eggs or chicks in unprotected nests, or vibrations could cause eggs to fall out of nests. Noise, dust, and vibrations may also cause avian species to leave regular foraging areas, however suitable foraging and nesting habitat is available adjacent to the project area. Project impacts to nesting birds will be temporary during working hours. Nesting bird surveys will be completed prior to construction activities. If active nests are observed a nest protection plan will be developed including appropriate protective buffers. Bio-8 requires nesting bird surveys to take place if ground disturbance or vegetation removal occurs during nesting bird season (February 15 to September 15).

Due to the presence of suitable habitat and documented occurrences in the Project region, the San Diego desert woodrat is moderately likely to occur in within the Site. Focused trapping surveys were not conducted to determine the presence of the species. If any nests are discovered, an appropriate buffer would be established to protect each nest from disturbance. If avoidance is not possible, the nests will be knocked-down following approval from CDFW and prior to initial ground disturbance and vegetation removal activities to provide adequate time for the woodrats to vacate the Project area into adjacent habitat.

The nearest California Red-Legged Frog Critical Habitat is located 1.2 miles west of the Site along Refugio Road and have been well-documented at the adjoining property immediately to the west of

the Site within Cañada Del Corral. The Site does not provide breeding habitat for three Special Status amphibians identified within the Survey Area: CRLF, Coast range newt (*Taricha torosa*), Foothill yellow-legged frog (*Rana boylii*). Therefore, protocol surveys were not performed. Although expected occurrence is low, the Site could be utilized as a movement corridor during winter months since the two drainages identified within the upland area likely only convey water during and immediately after rain events. Therefore, Bio-5, Bio-7, Bio-9 and Bio-10 would be required to ensure the project would have a less than significant impact on amphibians.

The Site includes multiple sandy ephemeral erosional drainages features with low cover. The adjacent upland habitat is a mixture of predominately coastal scrub, grassland, and mustard fields, suitable for Blainville's horned lizard (*Phrynosoma blainvillii*) and California legless lizard (*Anniella pulchra*). However, there is only one occurrence documented of Blainville's horned lizard within the Tajiguas quad (CDFW 2020), observed last in 1978 approximately 3.9 miles to the north of the Site. The California legless lizard has been observed within the Project region, approximately 2.3 miles to the east (CDFW 2020) and has a moderate potential to occur at the Site.

No freshwater perennial streams or connectivity are located within the Site allowing Southern Steelhead to occur. Tidewater goby also requires water bodies where there is a mix of fresh and saltwater or freshwater tributaries. Designated critical habitat does not include the Site as the nearest documented location is 4.4 miles to the west at Arroyo Quemada, therefore the species is not expected to occur.

Impacts to all wildlife onsite can be lowered to a *less than significant level with the incorporation of mitigation measures* with mitigation measures Bio-5 through Bio-10.

- (j). Prevent movement of any resident or migratory fish or wildlife species.** Construction of the proposed project would be temporary and would not interfere substantially with the movement of any native resident or migratory wildlife species. The net removal of abandoned oil facilities and contaminated soil throughout the project area only improves the ability for wildlife species to move freely among areas of suitable habitat. Therefore, impacts to wildlife movement by the proposed project would be *less than significant*.

Cumulative Impacts: Since the Project would not significantly impact biological resources on-site with implementation of the mitigation measures described below, it would not have a cumulatively considerable effect on the County's biological resources.

Mitigation and Residual Impact: The following mitigation measures would reduce the project's biological resource impacts to an insignificant level:

Bio-1 Habitat Restoration Plan. All areas of vegetation removal within the limits of disturbance (LOD) shall be restored. Approximately 3.2 acres within the LODs will be restored in accordance with the Habitat Restoration Plan (Langan 2021), as approved by P&D. The seed mix and ratios presented within Table 7 are designed to mitigate temporary impacts from removal of native vegetation and include the following components:

- Utilize a Coastal Sage Scrub Seed Mix for upland mustard fields, poison hemlock patches, and California sagebrush – purple sage brush vegetation communities (as defined in Figure 2);
- Utilize a Giant Wild Rye Grassland Seed Mix for giant wild rye vegetation communities; and
- Utilize a seed mix Native Grassland for perennial rye grass, wild oats, and Menzie's goldenbush vegetation communities.

Plan Requirements: The above measure shall be noted on all grading and construction plans.

Timing: Hydroseeding activities shall be timed during the start of the rainy season (around November) following completion of remedial activities to take advantage of natural rainfall for encouraging seed germination.

Monitoring: A pre-construction survey of each LOD will provide species observed and cover estimates. The Owner/Applicant shall demonstrate to P&D compliance monitoring staff that all required components of the habitat restoration activities are in place as required prior to Final Inspection Clearance. The P&D compliance monitoring staff signature is required to release the installation security upon satisfactory installation of all items in approved plans and maintenance security upon successful implementation of this plan. Owner/Applicant shall include a closure report, and conduct annual vegetation monitoring accompanied with annual reports until native coverage is at least 70 percent of pre-project conditions. P&D compliance monitoring staff signature is required to release the installation security upon satisfactory installation of all items in approved plans and maintenance security upon successful implementation of this plan.

Bio-2 Equipment Storage. The Owner/Applicant shall designate one or more work equipment fueling and storage areas on an existing oil field pad to contain spills, facilitate cleanup, and proper disposal and prevent contamination from discharging to the storm drains, streets, drainage ditches, creeks, or wetlands. The areas shall be no larger than 50 by 50 feet unless otherwise approved by P&D and shall be located at least 100 feet from any storm drain, waterbody or sensitive biological resources.

Plan Requirements: The Owner/Applicant shall designate the P&D approved location on a site plan.

Timing: The Owner/Applicant shall install the area prior to commencement of work activities.

Monitoring: P&D compliance monitoring staff shall ensure compliance prior to and throughout work activities.

Bio-3 Equipment Washout. The Owner/Applicant shall designate one or more washout areas for the equipment or similar activities to prevent wash water from discharging to the storm drains, streets, drainage ditches, creeks, or wetlands. Note that polluted water and materials shall be contained in these areas and removed from the site daily. The areas shall be located at least 100 feet from any storm drain, waterbody or sensitive biological resources.

Plan Requirements: The Owner/Applicant shall designate the P&D approved location on a site plan.

Timing: The Owner/Applicant shall install the area prior to commencement of work activities.

Monitoring: P&D compliance monitoring staff shall ensure compliance prior to and throughout work activities.

Bio-4 Erosion Control Measures. Erosion and sediment controls (e.g. silt fencing, wattles, mulching, and hydroseeding) will be installed properly and maintained in good working condition. Other Best Management Practices will be implemented as necessary and as required by project permits.

PLAN REQUIREMENTS: The BMPs shall be described and detailed on the site, grading and drainage plans, and depicted graphically. The location and type of BMP shall be shown on the site grading plans.

TIMING: The plans and maintenance program shall be submitted to P&D for approval prior to Coastal Development Permit issuance.

MONITORING: P&D compliance monitoring staff shall site inspect for installation prior to Final Building Inspection Clearance. The landowner shall make annual maintenance records available for review by P&D upon request.

Bio-5 Sensitive Species Training. Before any ground disturbing work (including vegetation clearing and grading) occurs in the construction footprint, a qualified biologist shall conduct a mandatory biological

resources awareness training for all construction personnel about special-status species wildlife and plant species and provide an overview of avoidance and minimization measures for the project. The training shall include the natural history, representative photographs, and legal status of each federally listed species. Proof of personnel attendance shall be kept on file. If new construction personnel are added to the project, the contractor shall ensure that the new personnel receive the mandatory training before starting work. The subsequent training of personnel can include videotape of the initial training and/or the use of written materials rather than in-person training by a biologist.

PLAN REQUIREMENTS: This condition shall be noted on any plans. A sign in sheet of construction workers who attended the training shall be provided to P&D Compliance staff.

TIMING: The training shall occur before any ground disturbing work (including vegetation clearing and grading) occurs in the construction footprint.

MONITORING: The Owner/Applicant shall demonstrate to P&D compliance monitoring staff. P&D processing planner shall ensure measures are on plans.

Bio-6 Delineation of Project Disturbance Limits. Prior to construction the jobsite will be clearly delineated under the guidance of a P&D approved biologist. Delineation of the Site will clearly identify areas where equipment and other activities are not permitted.

Bio-7 Pre-activity Clearance Surveys. Pre-activity surveys shall be conducted by a P&D approved biologist prior to initial grading, excavation, and vegetation removal. The pre-activity survey shall be completed no more than 14 days prior to commencement of work. The pre-activity survey shall include observation of all active work areas (i.e., areas where work is ongoing) for all special-status wildlife species with potential to occur. If discovered, the appropriate regulatory agencies shall be notified. The area shall be avoided to the greatest extent feasible. If avoidance is not possible then a translocation plan shall be established and approved by regulatory agencies prior to implementation. Rare plant populations shall be clearly marked using wooden stakes and flagging or other measure recommended by the P&D approved biologist. The Santa Barbara honeysuckle populations shall be avoided to the greatest extent feasible. If avoidance is not feasible or plants are inadvertently damaged, a salvage and relocation plan shall be developed in (consultation with resource agencies). This impact acreage shall be used to determine the size of mitigation sites to be established for the project. Mitigation area shall be at least at a 5:1 ratio to the disturbed area, or at a higher ratio determined by the resource management agencies (e.g., CDFW or CCC).

PLAN REQUIREMENTS AND TIMING: This condition shall be printed on project plans submitted for Coastal Development Permit Issuance and installed prior to Grading Permit issuance.

MONITORING: The Owner/Applicant shall demonstrate to P&D compliance monitoring staff that all required components of the approved plan(s) are in place as required prior to Final Inspection Clearance.

Bio-8 Nesting Bird Surveys. To avoid disturbance of nesting birds, including raptorial species, protected by the Federal Migratory Bird Treaty Act (MBTA) and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code (CFGC), the removal of vegetation, ground disturbance, exterior construction activities, and demolition shall occur outside of the bird nesting season (February 1 through August 31) whenever feasible. If these activities must occur during the bird nesting season, then a pre-construction nesting bird survey shall be performed by a County-qualified biologist. Pre-construction surveys for nesting birds shall occur within the area to be disturbed and shall extend outward from the disturbance area by 500 feet. The distance surveyed from the disturbance may be reduced if property boundaries render a 500-foot survey radius infeasible, or if existing disturbance levels within the 500-foot radius (such as from a major street or highway) are such that project-related activities would not disturb nesting birds in those outlying areas. If any occupied or active bird nests are found, a buffer shall be established and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other

means to mark the boundary. The buffer shall be 300 feet for non-raptors and 500 feet for raptors, unless otherwise determined by the qualified biologist and approved by P&D. Buffer reductions shall be based on the known natural history traits of the bird species, nest location, nest height, existing pre-construction level of disturbance in the vicinity of the nest, and proposed construction activities. All construction personnel shall be notified as to the location of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities or vegetation removal shall occur within this buffer until the County-qualified biologist has confirmed that nesting is completed, the young have fledged and are no longer dependent on the nest, or the nest fails, and there is no evidence of a second nesting attempt; thereby determining the nest unoccupied or inactive. If birds protected under MBTA or CFGC are found to be nesting in construction equipment, that equipment shall not be used until the young have fledged and are no longer dependent on the nest, and there is no evidence of a second nesting attempt.

PLAN REQUIREMENTS AND TIMING: If construction must begin within the nesting season, then the pre-construction nesting bird survey shall be conducted no more than one week (7 days) prior to commencement of vegetation removal, grading, or other ground disturbing activities. Active nests shall be monitored by the biologist at a minimum of once per week until it has been determined that the nest is no longer being used by either the young or adults, and there is no evidence of a second nesting attempt. Bird survey results and buffer recommendations shall be submitted to County Planning and Development for review and approval prior to commencement of grading or construction activities. The qualified biologist shall prepare weekly monitoring reports, which shall document nest locations, nest status, actions taken to avoid impacts, and any necessary corrective actions taken. Active nest locations shall be marked on an aerial map and provided to the construction crew on a weekly basis after each survey is conducted. Active nests shall not be removed without written authorization from USFWS and CDFW.

MONITORING: P&D shall be given the name and contact information for the biologist prior to initiation of the pre-construction survey. Permit Compliance and P&D staff shall review the survey report(s) for compliance with this condition prior to the commencement of ground-disturbing activities and perform site inspections throughout the construction period to verify compliance in the field.

Bio-9 Pre-activity Survey for California-red legged frog. The CRLF may use the adjacent streams in close proximity to the Site as a migration corridor during winter months (December through March). Prior to the onset of any project-related activities during winter months, a biological monitor qualified to survey CRLF shall inspect the active work area and areas adjacent to the work area each morning for CRLF.

TIMING: The biological monitor shall be designated prior to issuance of grading permits. The biological components apply from the beginning of any grading or construction throughout all development activities until Final Building Inspection Clearance is issued.

MONITORING: P&D processing planner shall ensure measures are on plans. P&D Compliance inspectors shall spot check; and shall ensure compliance onsite.

Bio-10 Exclusion Fencing and Protection for California-red legged frog. At the discretion of the P&D approved biological monitor, exclusion fencing shall be installed around the active work area(s) and Staging Area during the winter months. After installation of the fence barrier, a biological monitor shall inspect the active work area(s) daily prior to the commencement of activities. If the biological monitor determines that sensitive species are not within the work area(s), equipment or materials may be moved onto the work site under the observation of the biological monitor. In the event CRLF are found within the work area or areas adjacent to the work area, work shall immediately stop and the USFWS will be notified and consulted as to how to proceed.

With the incorporation of these measures, residual impacts would be insignificant.

4.5 CULTURAL RESOURCES

| Will the proposal: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| a. Cause a substantial adverse change in the significance of any object, building, structure, area, place, record, or manuscript that qualifies as a historical resource as defined in CEQA Section 15064.5? | | | | X | |
| b. Cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource pursuant to CEQA Section 15064.5? | | X | | | |
| c. Disturb any human remains, including those located outside of formal cemeteries? | | X | | | |
| <p>d. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p> <p>2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p> | | X | | | |

County Environmental Thresholds: Chapter 8 of the Santa Barbara County Environmental Thresholds and Guidelines Manual contains guidelines for the identification, significance evaluation, and mitigation of impacts to cultural resources, including archaeological, historic, and tribal cultural resources. In accordance with the requirements of CEQA, these guidelines specify that if a resource cannot be avoided, it must be evaluated for importance under specific CEQA criteria. CEQA Section 15064.5(a)(3)A-D contains the criteria for evaluating the importance of archaeological and historic resources. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the

significance criteria for listing in the California Register of Historical Resources: (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (B) Is associated with the lives of persons important in our past; (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (D) Has yielded, or may be likely to yield, information important in prehistory or history. The resource also must possess integrity of at least some of the following: location, design, setting, materials, workmanship, feeling, and association. For archaeological resources, the criterion usually applied is (D).

CEQA calls cultural resources that meet these criteria "historical resources". Specifically, a "historical resource" is a cultural resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources, or included in or eligible for inclusion in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1. As such, any cultural resource that is evaluated as significant under CEQA criteria, whether it is an archaeological resource of historic or prehistoric age, a historic built environment resource, or a tribal cultural resource, is termed a "historical resource".

CEQA Guidelines Section 15064.5(b) states that "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." As defined in CEQA Guidelines Section 15064.5(b), substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project: (1) demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; (2) demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources; or (3) demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

For the built environment, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995), is generally considered as mitigated to an insignificant impact level on the historical resource.

Existing Setting: For at least the past 10,000 years, the area that is now Santa Barbara County has been inhabited by Chumash Indians and their ancestors. Based on the Extended Phase 1 Archaeological Investigation Report prepared for the project, cultural resources are located in the vicinity of the proposed project.

Based on a records search conducted at the CCIC on December 4, 2020, one (1) cultural resource, a prehistoric archaeological site (CA-SBA-85) and one (1) historic site has been identified within the project vicinity. Additionally, fifty-four (54) cultural resources have been previously recorded within the 1-mile radius of the proposed Project site, including eighteen (18) prehistoric sites, twenty-six (26) prehistoric isolates, six (6) historic sites, one (1) historic isolate, and three (3) multicomponent sites comprised of both prehistoric and historic resources. The proposed Project site was also examined for potential remnants of the Anza Trail, which in total is a 1,210-mile historic trail that approximates the route of the Anza Expedition of 1775-1776 from Sonora, Mexico, to San Francisco, California. No physical evidence of the Anza Trail was observed within the proposed Project site. Evidence of disturbance and/or alteration of the landscape includes agricultural and industrial activities, mound of deposited soils resulting from grading and residential main and accessory structures.

The parcel is almost entirely undeveloped with remnants of the oil pads, roads and structures still existing. A pedestrian survey and an Extended Phase I was conducted on March 23, 2021 by Dudek staff archaeologists under the monitoring and direction of Senior Archaeologist Heather McDaniel McDevitt, MA, RPA (Dudek, Phase 1 and Extended Phase 1, August 2021). The survey was limited to the proposed "Project Site" with focused attention on the "Approximate Work Areas". Fourteen (14) testing locations were excavated as backhoe trenches, six (6) locations did not show any prehistoric cultural material, and eight (8) testing locations had prehistoric cultural material found, but only within disturbed soils. All cultural material was found within visibly disturbed soils or were immediately adjacent to a disturbed location as evidenced by an excavated oil pad, well or graded road. Bedrock features, such as cupules were observed within close proximity of the backhoe trenches but have been clearly moved to their current location. A series of medium-sized boulders, upon which cupules appear to have been ground, but were clearly not in their original location based on their placement atop redeposited soils and their alignment along a modern dirt road. No artifacts were collected during the survey. CA-SBA-85 is located near two of the approximate work areas. The Extended Phase 1 study concludes that the proposed AWAs have generally been subjected to extensive and significant ground disturbances since at least 1928. These disturbances include road grading, construction of structures and installation of subsurface oil wells, pipelines and cellars as well as utilities.

On August 3, 2021, a formal notice of application completeness for the proposed project was sent to Julie Tumamait-Stenslie, Chair, Barbareno/Ventureno Band of Mission Indians and Kenneth Kahn, Tribal Chairman of the Santa Ynez Band of Chumash Indians. The notice provided notification of the opportunity for consultation under AB 52, and included a description of the proposed project and a summary of the Extended Phase 1 study methods and results. The Santa Ynez Band of Chumash Indians responded on August 9, 2021, requesting consultation for the project. On October 4th, the County met with a representative of the Santa Ynez Band of Chumash Indians, the representative requested involvement in the development of the Cultural Resource Inadvertent Discovery Plan (Special CulRes-01). No further comments were received from either party.

Impact Discussion:

- (a). Historic Resource. The Anza Trail is considered commemorative of the de Anza Expedition as an important historic event and as a multi-use trail, it serves two key goals: recreation, and historic interpretation. No remnants of the Anza Trail (CA-SBA-3804/H) were observed either during the pedestrian survey or subsurface testing. Previous disturbance to the proposed Project site and surrounding area impacting the sense of place and feeling existent contemporaneous with the use of the Trail include the construction of roads, Highway 101, and the Southern Pacific railroad, as well as various agricultural, industrial and light residential development. Although a segment of the historic trail is located within the proposed Project site, there is no potential for adverse effects to the character defining features of the trail since the Project proposes to restore and remediate the land within the proposed Project boundary. There is no adverse effect to historical resources beyond what has occurred historically, therefore there would be *no project impacts*.
- (b). Archaeological Resources. Based on these test pits, the boundary of CA-SBA-85 extends into the proposed Project site located within the southwestern portion of Approximate Work Area (AWA) A, which contains Well 1, and AWA E, which contains wells 3 and 15. Eight testing locations had prehistoric cultural material found, the variability of material and artifact types is consistent with the archaeological site record with a significant percentage of artifacts being chert chipped stone debitage and marine shell fragments. However, all cultural material was found within visibly disturbed soils or were immediately adjacent to a disturbed location as evidenced by an excavated oil pad, well or graded road. The proposed AWAs have generally been subjected to extensive and significant ground

disturbances since at least 1928. These disturbances include road grading, construction of structures and installation of subsurface oil wells, pipelines and cellars as well as utilities.

There is limited potential for intact cultural deposits to be encountered as a result of proposed ground disturbances within the boundary of site CA-SBA-85 as well as isolated human remains and diagnostic artifacts important to the Native American community to be present within disturbed soils in and adjacent to the CA-SBA-85 boundary. According to CEQA Guidelines Section 15064.5(c)(4), "If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment." With respect to this proposed Project's intended ground disturbances, there is no evidence that intact cultural deposits would be impacted. However, measures such as a construction monitoring and treatment plan, preconstruction training, , retainment of a qualified archaeologist to provide fulltime, spot and on-call archaeological monitoring and an inadvertent discovery clause are recommended to ensure that any potential for impacts to known and unknown cultural resources are addressed consistent with CEQA and the County of Santa Barbara cultural resource guidelines. Therefore, impacts would be *less than significant with mitigation*.

- (c, d). Human Remains & Tribal Cultural Resources.** No evidence of human remains has been encountered on the project site and in the areas of proposed disturbance. However, given the overall cultural sensitivity of the area, as demonstrated by the presence of CA-SBA-85 and the number of recorded sites in proximity to the project site, there is the potential that unknown cultural resources could be encountered during grading and ground disturbance. Impacts are considered potentially significant but mitigable with pre-construction training of the construction personnel (CulRes-02), monitoring of earth disturbances by a qualified archaeologist and Native American observer (CulRes-07), and requiring that work be stopped in the event that cultural materials are uncovered during grading (CulRes-09). Therefore, impacts would be *less than significant with mitigation*.

Cumulative Impacts: Since the project would not significantly impact cultural resources, it would not have a cumulatively considerable effect on the County's cultural resources with implementation of the mitigation measures described below.

Mitigation and Residual Impact: The following mitigation measures would reduce the project's cultural resource impacts to an insignificant level:

CulRes-02 Educational Training. Prior to ground disturbance, a qualified archaeologist shall conduct cultural resources training for construction personnel to educate them about the types of resources that might be encountered during construction excavation, and the laws and regulations protecting cultural resources and penalties for removal or damage of these resources. The training will also establish procedures for temporary halting and redirecting work to permit sampling, identification, and evaluation of possible cultural resources, as appropriate. The project archaeologist and Native American monitor shall be present and conduct this training. This training shall occur as part of the pre-construction meeting with P&D grading and compliance monitoring staff.

CulRes-07 Cultural Resource Monitor. The Owner/Applicant shall have all earth disturbances including scarification and placement of fill within the archaeological site area (CA-SBA-85) monitored by a P&D approved archaeologist and a Native American monitor in compliance with the provisions of the County Archaeological Guidelines.

TIMING: Prior to issuance of the Coastal Development Permit, the Owner/Applicant shall submit for P&D review and approval, a contract or Letter of Commitment between the Owner/Applicant and the archaeologist, consisting of a project description and scope of work, and once approved, shall execute the contract.

MONITORING: The Owner/Applicant shall provide P&D compliance monitoring staff with the name and contact information for the assigned onsite monitor(s) prior to grading permit issuance. P&D

compliance monitoring staff shall confirm monitoring by archaeologist and Native American consultant and shall spot check field work.

CulRes-09 Stop Work at Encounter. The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall immediately contact P&D staff, and retain a P&D approved archaeologist to evaluate the significance of the find in compliance with the provisions of the County Archaeological Guidelines. If the cultural resource is considered to be Native American in nature, a Native American representative will be retained by the applicant to consult with and be present during archaeological investigation activities that require ground disturbance. Appropriate investigations and mitigation measures resulting from the discovery shall be funded by the Owner/Applicant.

PLAN REQUIREMENTS: This condition shall be printed on all building and grading plans.

MONITORING: P&D permit processing planner shall check plans prior to issuance of Coastal Development Permit and P&D compliance monitoring staff shall spot check in the field throughout grading and construction.

Special CulRes-01 Cultural Resource Inadvertent Discovery Plan. Impacts to cultural resources should be minimized through implementation of pre- and post- construction tasks. Tasks pertaining to cultural resources include the development of a cultural resource inadvertent discovery plan (Plan). The purpose of the Plan is to outline a program of treatment and mitigation in the case of an inadvertent discovery of cultural resources during ground-disturbing phases (including but not limited to preconstruction site mobilization and testing, grubbing, removal of soils for remediation, construction ground disturbance, construction grading, trenching, and landscaping) and to provide for the proper identification, evaluation, treatment, and protection of any cultural resources throughout the duration of the Project. This Plan should define the process to be followed for the identification and management of cultural resources in the Project area during construction. Existence of and importance of adherence to this Plan should be stated on all Project site plans intended for use by those conducting the ground disturbing activities.

With the incorporation of these measures, residual impacts would be insignificant.

4.6 ENERGY

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|---|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| a. Substantial increase in demand, especially during peak periods, upon existing sources of energy? | | | | X | |
| b. Requirement for the development or extension of new sources of energy? | | | | X | |

Impact Discussion: The County has not identified significance thresholds for electrical and/or natural gas service impacts (Thresholds and Guidelines Manual). Private electrical and natural gas utility companies provide service to customers in Central and Southern California, including the unincorporated areas of Santa Barbara County. However, only mobile equipment would be used to execute the soil sampling, removal of infrastructure, and remediation of hydrocarbon-impacted soil, which would not result any increase in demand upon nearby energy sources. There are no structures proposed as part of this project, therefore no new energy sources would be required and there would be *no impact* to energy resources.

Cumulative Impacts: The project’s contribution to the regionally significant demand for energy is not considerable, and is therefore insignificant.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would be insignificant.

4.7 FIRE PROTECTION

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| a. Introduction of development into an existing high fire hazard area or exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | | X | |
| b. Project-caused high fire hazard? | | | | X | |
| c. Introduction of development into an area without adequate water pressure, fire hydrants or adequate access for fire fighting? | | | | X | |
| d. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | | | | X | |
| e. Introduction of development that will substantially impair an adopted emergency response plan, emergency evacuation plan, or fire prevention techniques such as controlled burns or backfiring in high fire hazard areas? | | | | X | |
| f. Development of structures beyond safe Fire Dept. response time? | | | | X | |

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

- The emergency response thresholds include Fire Department staff standards of one on-duty firefighter per 4000 persons (generally 1 engine company per 12,000 people, assuming three firefighters/station). The emergency response time standard is approximately 5-6 minutes.
- Water supply thresholds include a requirement for 750 gpm at 20 psi for urban single family dwellings in urban and rural developed neighborhoods, and 500 gpm at 20 psi for dwellings in rural areas (lots larger than five acres).
- The ability of the County’s engine companies to extinguish fires (based on maximum flow rates through hand held line) meets state and national standards assuming a 5,000 square foot structure. Therefore, in any portion of the Fire Department’s response area, all structures over 5,000 square feet are an unprotected risk (a significant impact) and therefore should have internal fire sprinklers.
- Access road standards include a minimum width (depending on number of units served and whether parking would be allowed on either side of the road), with some narrowing allowed for driveways. Cul-de-sac diameters, turning radii and road grade must meet minimum Fire Department standards based on project type.

- Two means of egress may be needed and access must not be impeded by fire, flood, or earthquake. A potentially significant impact could occur in the event any of these standards is not adequately met.

Impact Discussion:

(a - e). Predictions about the long-term effects of global climate change in California include increased incidence of wildfires and a longer fire season, due to drier conditions and warmer temperatures. Any increase in the number or severity of wildfires has the potential to impact resources to fight fires when they occur, particularly when the state experiences several wildfires simultaneously. Such circumstances place greater risk on development in high fire hazard areas. Short-term impacts may arise as a result of the introduction of mechanized equipment during removal work, however, the temporary usage would not hamper fire prevention techniques in the area. No new structures are proposed to be developed. Therefore, *no impacts* are expected.

Cumulative Impacts: Since the project would not create significant fire hazards, it would not have a cumulatively considerable effect on fire safety within the County.

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

4.8 GEOLOGIC PROCESSES

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|---|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mudslides, ground failure (including expansive, compressible, collapsible soils), or similar hazards? | | | | X | |
| b. Disruption, displacement, compaction or overcovering of the soil by cuts, fills or extensive grading? | | | X | | |
| c. Exposure to or production of permanent changes in topography, such as bluff retreat or sea level rise? | | | | X | |
| d. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | | | X | |
| e. Any increase in wind or water erosion of soils, either on or off the site? | | X | | | |
| f. Changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake? | | | X | | |
| g. The placement of septic disposal systems in impermeable soils with severe constraints to disposal of liquid effluent? | | | | X | |
| h. Extraction of mineral or ore? | | | | X | |
| i. Excessive grading on slopes of over 20%? | | X | | | |

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|---|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| j. Sand or gravel removal or loss of topsoil? | | | X | | |
| k. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas? | | | | X | |
| l. Excessive spoils, tailings or over-burden? | | | | X | |

Setting: The project site is located within the western portion of the Transverse Ranges geomorphic province of southern California. The Transverse Ranges province is oriented in a general east-west direction, which is transverse to the general north-northwest structural trend of the remainder of California Coastal mountain ranges. The western Transverse Ranges are composed of sedimentary, volcanic, and metamorphic rocks ranging in geologic age from the Jurassic to Holocene. North-south tectonic compression has resulted in regional east-west trending faults and folds within rocks of the western Transverse Ranges. The closest major fault system to the project area is the Santa Ynez fault zone laying approximately 5.6 miles north of the project site.

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

1. The project site or any part of the project is located on land having substantial geologic constraints, as determined by P&D or PWD. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. "Special Problems" areas designated by the Board of Supervisors have been established based on geologic constraints, flood hazards and other physical limitations to development.
2. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical.
3. The project proposes construction of a cut slope over 15 feet in height as measured from the lowest finished grade.
4. The project is located on slopes exceeding 20% grade.

Impact Discussion:

(a). Potential to Result in Geologic Hazards. The proposed project includes the removal of contaminated soil and abandoned infrastructure associated with old oil field activities. The project site is not located within a Fault Hazard Zone or underlain by any known fault. The closest active fault is the Santa Ynez fault zone laying approximately 5.6 miles north of the project site. There would not be any exposure to or production of unstable earth conditions such as landslides, earthquakes, soil creep, mudslides or ground failure resulting from the proposed project. The proposed project would involve returning the topography of the area to its existing conditions. Liquefaction potential in the area has been determined to be low, and no permanent structures would result from the project. No excessive spoils, tailings or overburden is proposed. The only exception to this is that soil would be excavated and would be stockpiled. *No impacts* are anticipated.

(b, f, j, l). Extensive Grading. The proposed project grading includes 16,000 CY of cut and 16,000 CY of fill. Excavated soil that is sampled and determined to be below ESLs as well as additional imported natural soil is proposed to be used for back filling the site. No excessive spoils, tailings or overburden is proposed. The only exception to this is that soil would be excavated and would be stockpiled onsite for

refilling the graded areas therefore there would be no loss of topsoil. Topography would be restored to match the existing, surrounding area. Impacts would be temporary and *less than significant*.

(c). Sea Level Rise. Predictions about the long-term effects of global climate change include rising sea levels due to the melting of glaciers and thermal expansion. Rising sea-levels caused by global climate change could increase the rate of coastal-bluff retreat due to scouring of the base of bluffs. Although the exact rate of potential sea level rise cannot be determined, the Intergovernmental Panel on Climate Change¹ predicts that sea levels could possibly rise between 50 and 90 centimeters (approximately 1.6-to-3 feet) by the year 2100. The site location is on the northern side of Highway 101 and does not propose the construction of permanent structures, therefore the project would appear to be adequately set back from coastal erosion within that planning horizon. *No impact* is expected.

(d, g, h, k, l). Other Unique Geologic Hazards. The area has been highly disturbed by historical oil activities and current Ag grading and grazing activities. The project would not cause destruction, covering or modification of any unique geologic, paleontological, or physical features. The project would not involve the placement of septic disposal systems. No permanent extraction of soil for mineral or ore materials is proposed. Any vibrations from construction work that would affect adjoining areas are likely to be short term, occur during daylight hours, and minimal in comparison to vibrations from the railroad adjacent to the site. *No impacts* are anticipated.

(e, i). Potential Erosion and Sedimentation Impacts. Grading operations that would occur on the project site would remove vegetative cover and disturb the ground surface, thereby increasing the potential for erosion and sedimentation impacts. The project site does not have substantial geological constraints. Although some areas that require sampling and/or excavation are located on slopes exceeding 20%, standard erosion and sediment control measures are sufficient to prevent impacts. The potential for the project to cause substantial erosion and sediment transport would be mitigated by the County's standard erosion and sediment control and drainage requirements included herein as mitigation measure Geo-02: Erosion and Sediment Control Plan. Impacts would be *less than significant with mitigation*.

Cumulative Impacts: Since the project would not result in significant geologic impacts after mitigation, and geologic impacts are typically localized in nature, it would not have a cumulatively considerable effect on geologic hazards within the County.

Mitigation and Residual Impact: The following mitigation measures would reduce the project's geologic impacts to an insignificant level:

Geo-02 Erosion and Sediment Control Plan. Where required by the latest edition of the California Green Code and/or Chapter 14 of the Santa Barbara County Code, a Storm Water Pollution Prevention Plan (SWPPP), Storm Water Management Plan (SWMP) and/or an Erosion and Sediment Control Plan (ESCP) shall be implemented as part of the project. Grading and erosion and sediment control plans shall be designed to minimize erosion during construction and shall be implemented for the duration of the grading period and until re-graded areas have been stabilized by structures, long-term erosion control measures or permanent landscaping. The Owner/Applicant shall submit the SWPPP, SWMP or ESCP) using Best Management Practices (BMP) designed to stabilize the site, protect natural watercourses/creeks, prevent erosion, convey storm water runoff to existing drainage systems keeping contaminants and sediments onsite. The SWPPP or ESCP shall be a part of the Grading Plan submittal and will be reviewed for its technical merits by P&D. Information on Erosion Control requirements can be found on the County web site re: Grading Ordinance Chapter 14 (<http://sbcountyplanning.org/building/grading.cfm>) refer to Erosion and Sediment Control Plan

¹ The Intergovernmental Panel on Climate Change is a scientific intergovernmental body set up by the World Meteorological Organization (WMO) and by the United Nations Environment Programme (UNEP).

Requirements; and in the California Green Code for SWPPP (projects < 1 acre) and/or SWMP requirements.

PLAN REQUIREMENTS: The grading and SWPPP, SWMP and/or ESCP shall be submitted for review and approved by P&D prior to approval of land use clearances. The plan shall be designed to address erosion, sediment and pollution control during all phases of development of the site until all disturbed areas are permanently stabilized.

TIMING: The SWPPP requirements shall be implemented prior to the commencement of grading and throughout the year. The ESCP/SWMP requirements shall be implemented between November 1st and April 15th of each year, except pollution control measures shall be implemented year round.

MONITORING: P&D staff shall perform site inspections throughout the construction phase.

With the incorporation of these measures, residual impacts would be insignificant.

4.9 HAZARDOUS MATERIALS/RISK OF UPSET

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

Setting: The Eruburu Lease is located approximately 12 miles northwest of the City of Goleta, California. The Site currently consists of abandoned oil wells and associated appurtenances; including concrete features associated with well pads, well cellars, above and below ground piping, and miscellaneous oil field debris. The site is located in the Capitan Oil Field, east of Las Flores Canyon and is currently used for cattle and horse grazing. The Site was used for crude oil production from approximately 1929 to 1995. Twenty-eight oil wells

were located on the Site, and California Division of Oil, Gas, and Geothermal Resources (DOGGR) Final Well Abandonment letters were verified for all 28 of the known wells associated with the Site.

In response to a December 2019 and January 2020 environmental investigation of the Site, SBCEHS requested investigation of shallow soils, background metal concentrations, and previously inaccessible areas. To satisfy the requests further investigation of features associated with infrastructure removal (i.e. well cellars and below ground piping), previously deferred features (i.e. Well 19 and Bermed Area 4), shallow soils associated with features where petroleum COPCs were not detected, and further delineation of features with petroleum detections above EHS' 100 mg/kg TPH investigation standard but below ESLs. In addition, sampling and analysis would be conducted to determine background threshold values for metals associated with Site features to further support that metal concentrations exceeding ESLs are attributed to background levels at the Site.

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

Impact Discussion:

(a, b, d - h). The project would involve a one-time removal of petroleum hydrocarbon (TPH) impacted soil and temporary transportation of removed onsite infrastructure including abandoned oil wells and associated appurtenances and miscellaneous oil field debris. If excavated material tests indicate the contamination is above ESLs, excavated material would be sent offsite for disposal the Santa Maria Regional Landfill via truck transportation. The stockpiled material would be covered with sheeting or a soil binder at the end of each workday and prior to precipitation events. No permanent development is proposed. The work sites involving heavy equipment are not readily accessible to the public. The project would remove potential hazardous materials from the site before project completion and therefore, impacts would be *less than significant* because the project would have a net benefit to the environment.

(c). Approximately 2,300 feet of shallow (approximately 3 to 4 feet bgs) buried pipe from approximately 30 locations would be removed during lease restoration activities. An excavator would be used to remove the impacted material, which would be staged on adjacent, lined staging areas for waste characterization and offsite disposal. The stockpiled material would be covered with sheeting or a soil binder at the end of each workday and prior to precipitation events. The amount of residual hydrocarbons within the soil and left over infrastructure is expected to be minimal, the proximity of the hydrocarbons to the sensitive habitats requires implementation of mitigation measure HazMat-01 Spill contingency Plan. With this, impacts from the release of hazardous substances is *less than significant with mitigation*.

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

Mitigation and Residual Impact: The following mitigation measures would reduce the project's effects regarding hazardous materials and/or risk of upset to an insignificant level:

HazMat-01 Spill Contingency. A Spill Contingency Plan (SCP) outlining measures to prevent the release of oil and/or other hazardous materials from the abandoned and removed pipeline segments including containment methods for emergency clean-up operations shall be developed for the project. All vehicles shall be staged only in appropriately marked and protected areas and at no time shall any cleaning and/or refueling of equipment be allowed upslope and/or within the vicinity of streambeds. If an accidental spill of a hazardous or toxic material occurs, the RWQCB, CDFG and the SBCFPD shall be notified.

Plan Requirements: Prevention measures shall include, but not be limited to the identification of appropriate fueling areas away from sensitive habitat areas such as streambeds and on-site storage of containment and spill response materials. The applicant shall designate staging areas, a minimum of 50 feet from wetlands/riparian habitat and stream channels, and these areas shall be depicted on project plans.

Timing: The SCP shall be developed prior to project implementation and staging areas shall be in place and maintained throughout project activities.

Monitoring: This plan shall be submitted to SBCPDD and SBCFPD prior to the initiation of ground-disturbing activities.

With the incorporation of these measures, residual impacts would be insignificant.

4.10 LAND USE

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|---|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| a. Structures and/or land use incompatible with existing land use? | | | | X | |
| b. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | | | | X | |
| c. The induction of substantial unplanned population growth or concentration of population? | | | | X | |
| d. The extension of sewer trunk lines or access roads with capacity to serve new development beyond this proposed project? | | | | X | |
| e. Loss of existing affordable dwellings through demolition, conversion or removal? | | | | X | |
| f. Displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | X | |
| g. Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere? | | | | X | |
| h. The loss of a substantial amount of open space? | | | | X | |
| i. An economic or social effect that would result in a physical change? (i.e. Closure of a freeway ramp results in isolation of an area, businesses located in the vicinity close, neighborhood degenerates, and buildings deteriorate. Or, if construction of new freeway divides an existing community, the construction would be the physical change, but the economic/social effect on the community would be the basis for determining that the physical change would be significant.) | | | | X | |
| j. Conflicts with adopted airport safety zones? | | | | X | |

Setting: The project site is located within the Gaviota Coast Plan. Access to the project site is taken from Calle Real, which runs parallel to Highway 101 and the Pacific Ocean. The land use category is designated AG-II, and is used for cattle grazing. Infrastructure at the Site currently consists of abandoned oil wells and associated appurtenances; including concrete associated with well pads, concrete well cellars, above and below ground piping, and miscellaneous oil field debris. The project was reviewed for consistency with policy and regulatory documents relating to the environment and appropriate land use.

Environmental Threshold: The Thresholds and Guidelines Manual contains no specific thresholds for land use. Generally, a potentially significant impact can occur if a project would result in substantial growth inducing effects or result in a physical change in conflict with County policies adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Discussion:

(a – j). The proposed project includes soil sampling to supplement existing site investigation data, removal of oil field infrastructure and confirmation soil sampling, and targeted soil removal in areas where soil concentrations exceed ESLs. Once excavation activities are complete, the site topography would be brought back to existing conditions and revegetation would occur. Therefore, the project would not cause a physical change that conflicts with adopted environmental policies or regulations. The project is not growth inducing, and does not result in the loss of affordable housing, loss of open space, or a significant displacement of people. The project does not involve the extension of a sewer trunk line, and does not conflict with any airport safety zones. The project is compatible with existing land uses and will have *no impact*.

Cumulative Impacts: The implementation of the project is not anticipated to result in any substantial change to the site’s conformance with environmentally protective policies and standards or have significant growth inducing effects. Thus, the project would not cause a cumulatively considerable effect on land use.

Mitigation and Residual Impact: With the incorporation of biological and geologic mitigation measures, residual impacts would be less than significant.

4.11 NOISE

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

Setting/Threshold: Noise is generally defined as unwanted or objectionable sound which is measured on a logarithmic scale and expressed in decibels (dB(A)). The duration of noise and the time period at which it occurs are important values in determining impacts on noise-sensitive land uses. The Community Noise Equivalent Level (CNEL) and Day-Night Average Level (L_{dn}) are noise indices which account for differences in

intrusiveness between day- and night-time uses. County noise thresholds are: 1) 65 dB(A) CNEL maximum for exterior exposure, 2) 45 dB(A) CNEL maximum for interior exposure of noise-sensitive uses, and 3) an increase in noise levels by 3 dB(A) – either individually or cumulatively when combined with other noise-generating sources when the existing (ambient) noise levels already exceed 65 dB(A) at outdoor living areas or 45dB(A) at interior living areas. Noise-sensitive land uses include: residential dwellings; transient lodging; hospitals and other long-term care facilities; public or private educational facilities; libraries, churches; and places of public assembly.

Noise from grading and construction activity proposed within 1,600 feet of sensitive receptors, including schools, residential development, commercial lodging facilities, hospitals or care facilities, would generally result in a potentially significant impact. According to EPA guidelines average construction noise is 95 dB(A) at a 50-foot distance from the source. A 6 dB drop occurs with a doubling of the distance from the source. Therefore, locations within 1,600 feet of the construction site would be affected by noise levels over 65 dB(A).

The subject property is located in a rural area along Highway 101, which is a major noise source in the project area. No other roadways, public facilities, airport approach and take-off zones or other land uses that are substantial noise sources are located in the project area. A single-family dwelling is located in the southwest corner of the subject parcel.

Impact Discussion:

- (a, c.)** The proposed project would be short-term in nature and consist of soil sampling to supplement existing site investigation data, removal of oil field infrastructure and confirmation soil sampling, and targeted soil removal in areas where soil concentrations exceed and would not result in: 1) the generation of any noise exceeding County thresholds; 2) substantially increase ambient noise levels in adjoining areas; or 3) exposure of noise sensitive uses on the proposed project site to off-site noise levels exceeding County thresholds. *No long-term noise-related impacts* would result.
- (b).** Excavation and soil stockpile would result in a temporary increase in noise levels at the project site due to the use of heavy equipment and haul trucks. It is estimated that Remediation activities would occur over a period of two months and would be followed by restoration activities. The existing residence in the southwest corner of the property is within 1,600 feet of the project site. Therefore, the project could cause short-term construction-related noise impacts to the residence. This potential short-term impact would be reduced to a *less than significant level with the implementation of Mitigation Measure Noise-02*, which limits the days and hours that construction (grading) operations may occur.

Cumulative Impacts: The implementation of the project is not anticipated to result in any substantial noise effects. Once excavation activities are complete, the site would continue to be used for grazing activities. Therefore, the project would not contribute in a cumulatively considerable manner to noise impacts.

Mitigation and Residual Impact: The following mitigation measures would reduce the project’s noise effects to an insignificant level:

Noise-02 Construction Hours. The Owner /Applicant, including all contractors and subcontractors shall limit construction activity, including equipment maintenance and site preparation, to the hours between 7:00 a.m. and 4:00 p.m. Monday through Friday. No construction shall occur on weekends or State holidays. Non-noise generating interior construction activities such as plumbing, electrical, drywall and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) are not subject to these restrictions. Any subsequent amendment to the Comprehensive General Plan, applicable Community or Specific Plan, or Zoning Code noise standard upon which these construction hours are based shall supersede the hours stated herein.

PLAN REQUIREMENTS: The Owner/Applicant shall provide and post a sign stating these restrictions at all construction site entries.

TIMING: Signs shall be posted prior to commencement of construction and maintained throughout construction.

MONITORING: The Owner/Applicant shall demonstrate that required signs are posted prior to grading/building permit issuance and pre-With the incorporation of these measures, residual impacts would be insignificant.

With the incorporation of these measures, residual impacts would be insignificant.

4.12 PUBLIC FACILITIES

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

Impact Discussion: Existing service levels would be sufficient to serve the proposed project. The soil and oil infrastructure to be removed would be transported and disposed of at the Santa Maria Regional Landfill. The proposed project would not generate solid waste in excess of County thresholds.

(a - e). The project would not cause the need for new or altered sewer system facilities as it is already in the service district, and the District has adequate capacity to serve the project. No additional drainages or water quality control facilities would be necessary to serve the project. Therefore, the project would have no impact to public facilities.

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

4.13 RECREATION

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

Setting/Threshold: The Thresholds and Guidelines Manual contains no threshold for park and recreation impacts. However, the Board of Supervisors has established a minimum standard ratio of 4.7 acres of recreation/open space per 1,000 people to meet the needs of a community. The Santa Barbara County Parks Department maintains more than 900 acres of parks and open spaces, as well as 84 miles of trails and coastal access easements.

The proposed project site is located west to El Capitan State Beach however no established recreational uses (including parks, biking, equestrian or hiking trails) are located on or adjacent to the proposed project site.

Impact Discussion:

(a - c). The proposed project site is private and not located on or near any established recreational uses, including biking, equestrian or hiking trails. There are no parks or public trails located on or near the project site. The proposed project would not result in any population increase and would have *no adverse impacts* on the quality or quantity of existing recreational opportunities, either in the project vicinity or County-wide.

Cumulative Impacts: The proposed project would not result in an increase in population in the project area and would not directly or indirectly impact any existing recreation facilities. Therefore the project contribution to cumulative recreation impacts would not be cumulatively considerable and its cumulative impacts would be less than significant.

Mitigation and Residual Impact: Since the proposed project would not have a significant impact on the Recreational opportunities, no additional mitigation is necessary. Residual impacts would be insignificant.

4.14 TRANSPORTATION

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities? | | | X | | |
| b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)? | | | | X | |

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | | | X | |
| d. Result in inadequate emergency access? | | | X | | |

Setting: The proposed project is located along Calle Real in Santa Barbara County. Calle Real is managed by the Santa Barbara County Transportation Division, which maintains 1,650 lane miles of roads in the unincorporated areas of Santa Barbara County. At the project site, the roadway parallels Highway 101 along a straight stretch of the coastline. Calle Real is open with two-way traffic.

SBCAG is responsible for all regional transportation planning within Santa Barbara County, including identifying and funding major infrastructure improvements, determining transit needs, creating and updating bicycle and pedestrian master plans, determining the feasibility of and planning of enhancements to the passenger rail system, and developing and implementing ongoing efforts to reduce traffic congestion throughout the region (SBCAG, 2020). SBCAG adopted the *Regional Transportation Plan and Sustainable Communities Strategy* in 2017, and this plan applies to the proposed Project. Other applicable plans include the Circulation Element of the *Santa Barbara County Comprehensive Plan* (2014) and the *Montecito Community Plan* (1993).

Thresholds: According to the County’s Environmental Thresholds and Guidelines Manual, a significant transportation impact would occur when:

a. Potential Conflict with a Program, Plan, Ordinance, or Policy. The SBCAG’s 2040 Regional Transportation Plan and Sustainable Communities Strategy (SBCAG, 013) and the County’s Comprehensive Plan, zoning ordinances, capital improvement programs, and other planning documents contain transportation and circulation programs, plans, ordinances, and policies. Threshold question “a” considers a project in relation to those programs, plans, ordinances, and policies that specifically address multimodal transportation, complete streets, transportation demand management (TDM), and other vehicle miles traveled (VMT)-related topics. The County and CEQA Guidelines Section 15064.3(a) no longer consider automobile delay or congestion an environmental impact. Therefore, threshold question “a” does not apply to provisions that address LOS or similar measures of vehicular capacity or traffic congestion.

A transportation impact occurs if a project conflicts with the overall purpose of an applicable transportation and circulation program, plan, ordinance, or policy, including impacts to existing transit systems and bicycle and pedestrian networks pursuant to Public Resources Code Section 21099(b)(1). In such cases, applicants must identify project modifications or mitigation measures that eliminate or reduce inconsistencies with applicable programs, plans, ordinances, and policies. For example, some community plans include provisions that encourage complete streets. As a result, an applicant for a multifamily apartment complex may need to reduce excess parking spaces, fund a transit stop, and/or add bike storage facilities to comply with a community plan’s goals and policies.

b. Potential Impact to VMT. The County expresses thresholds of significance in relation to existing, or baseline, county VMT. Specifically, the County compares the existing, or baseline, county VMT (i.e., pre-construction) to a project’s VMT. Projects with VMT below the applicable threshold would normally result in a less than significant VMT impact and, therefore, would not require further analyses or studies. Nonetheless, CEQA Guidelines Section 15064(b)(2) states, “Compliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the Project’s environmental effects may still be significant.” Projects with a VMT above the applicable threshold would

normally result in a significant VMT impact and, therefore, would require further analyses and studies, and, if necessary, project modifications or mitigation measures. CEQA Guidelines Section 15064.3 establish VMT as the most appropriate measure of transportation impacts under CEQA.

The County presumes that land use or transportation projects meeting any of the screening criteria would have less than significant VMT impacts and would not require further analysis. County thresholds identify Small Projects as a project that generates 110 or fewer average daily trips. The VMT thresholds of significance are for general use and should apply to most projects subject to environmental review. However, the thresholds may not be appropriate for unique projects. In such cases, CEQA Guidelines Section 15064.7(c) allows the County to use other thresholds "... on a case-by-case basis as provided in Section 15064(b)(2)." The OPR Technical Advisory recommended thresholds of significance for land use projects including Residential, Employment, Regional Retail, Mixed-Use Projects, and Other Land Use types.

Projects subject to Absolute Thresholds and Land Use Plans. Transportation projects and some land use projects are subject to an absolute threshold of significance (i.e., total roadway VMT or total VMT). Projects and plans that exceed the thresholds of significance require project modifications or mitigation measures to avoid or reduce VMT impacts to a less-than-significant level (i.e., below the applicable threshold of significance). As discussed above, the VMT Calculator contains and, therefore, can help applicants assess the effectiveness of possible mitigation measures.

Cumulative Impacts

CEQA requires lead agencies to consider a project's individual and cumulative impacts. Specifically, CEQA Guidelines Section 15064(h)(1) states, "the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. The County typically uses one of two methods to determine whether a project's VMT impact is cumulatively considerable. As explained below, one method is for projects subject to an efficiency-based threshold of significance. The other method is for projects subject to an absolute threshold of significance and land use plans.

c. Design Features and Hazards. Threshold "c" considers whether a project would increase roadway hazards. An increase could result from existing or proposed uses or geometric design features. In part, the analysis should review these and other relevant factors and identify results that conflict with the County's Engineering Design Standards or other applicable roadway standards.

d. Emergency Access. Threshold "d" considers any changes to emergency access resulting from a project. To identify potential impacts, the analysis must review any proposed roadway design changes and determine if they would potentially impede emergency access vehicles.

Impact Discussion:

(a). Potential Conflict with a Program, Plan, Ordinance, or Policy. The scope of the project includes removal of oil field infrastructure and confirmation soil sampling, targeted soil removal in areas where soil concentrations exceed threshold levels, and restoration of excavated areas with clean fill soil. No new structures or uses are proposed as a result of the project. No new operational vehicle miles would be introduced to the area besides during excavation activities. Construction equipment would access the site from Calle Real and remain onsite until soil disposal. The onsite residence uses a second private driveway which would not be impacted by the project. The project would be consistent with programs, plans, ordinances, and policies related to circulation. Therefore the project will have a *less than significant impact* to existing programs.

(b). Potential Impact to VMT. Approximately 205 truck trips are expected to be made for export soil and 205 truck trips for import soil. There would be an average of about 10 truck trips per day, with a peak of about 50 truck trips per day. The export material would be disposed of at the Santa Maria Regional Landfill, approximately 55 miles north.

The proposed project would not result in the construction of a permanent structure or use that would intensify the VMT of the area. Therefore, the project would cause a less than significant impact under CEQA and would not require further VMT analysis due to its nature and limited duration.

According to the Santa Barbara County Environmental Thresholds and Guidelines Manual, amended September 2020, the proposed Project is exempt from further VMT analysis based on Step 1, Project Screening. The project would be similar to existing conditions upon completion of excavation. The proposed project would not decrease future vehicle capacity or create long-term changes to traffic patterns or VMT. Roadway users would continue to be similar to those currently using Calle Real. No change in traffic patterns, VMT, or ADT would result from the proposed Project. The project will have no impact on VMTs.

(c). Design Features and Hazards. The proposed project is located on a parcel used for grazing and would not impact traffic flow of the surrounding roads. The project would not introduce any design features or incompatible uses that would result in new hazards in the Project Study Area or vicinity. The project would maintain sight distance, private property ingress/egress, and emergency access throughout project construction and operation. The Project does not propose a new geometric design which would increase hazardous conditions. The proposed project would have *no impact* in this regard, and no mitigation measures are required.

(d). Emergency Access. Emergency access to surrounding areas is currently available along Calle Real which is a two way road. During construction, the road would remain open and un-impacted by construction vehicles which would be stored onsite until project completion. The project would be in compliance with applicable regulations, and ensure that there would be no impacts related to traffic hazards, emergency access, and other transportation safety and access considerations. The project would not interfere with police and fire response times or school bus routes. Therefore, the proposed project impacts would be *less than significant*, and no mitigation is required.

Cumulative Impacts: The County’s Environmental Thresholds were developed, in part, to define the point at which a project’s contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the threshold of significance for transportation. Therefore, the project’s contribution to the regionally significant transportation impacts is not considerable, and is insignificant.

Mitigation and Residual Impact: No impacts are anticipated. Mitigation measures are not required.

4.15 WATER RESOURCES/FLOODING

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters? | | | X | | |
| b. Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff? | | | X | | |
| c. Change in the amount of surface water in any water body? | | | X | | |

| Will the proposal result in: | Poten. Signif. and Unavoid. | Signif. But Mitigable | Insignif. | No Impact / Beneficial Impact | Reviewed Under Previous Document |
|--|-----------------------------|-----------------------|-----------|-------------------------------|----------------------------------|
| d. Discharge, directly or through a storm drain system, into surface waters (including but not limited to wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc) or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution? | | | X | | |
| e. Alterations to the course or flow of flood water or need for private or public flood control projects? | | | X | | |
| f. Exposure of people or property to water related hazards such as flooding (placement of project in 100 year flood plain), accelerated runoff or tsunamis, sea level rise, or seawater intrusion? | | | | X | |
| g. Alteration of the direction or rate of flow of groundwater? | | | X | | |
| h. Change in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or recharge interference? | | | | X | |
| i. Overdraft or over-commitment of any groundwater basin? Or, a significant increase in the existing overdraft or over-commitment of any groundwater basin? | | | | X | |
| j. The substantial degradation of groundwater quality including saltwater intrusion? | | | | X | |
| k. Substantial reduction in the amount of water otherwise available for public water supplies? | | | | X | |
| l. Introduction of storm water pollutants (e.g., oil, grease, pesticides, nutrients, sediments, pathogens, etc.) into groundwater or surface water? | | | X | | |

Water Resources Thresholds: A project is determined to have a significant effect on water resources if it would exceed established threshold values which have been set for each overdrafted groundwater basin. These values were determined based on an estimation of a basin’s remaining life of available water storage. If the project’s net new consumptive water use [total consumptive demand adjusted for recharge less discontinued historic use] exceeds the threshold adopted for the basin, the project’s impacts on water resources are considered significant.

A project is also deemed to have a significant effect on water resources if a net increase in pumpage from a well would substantially affect production or quality from a nearby well.

Water Quality Thresholds: A significant water quality impact is presumed to occur if the project:

- Is located within an urbanized area of the county and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;

- Increases the amount of impervious surfaces on a site by 25% or more;
- Results in channelization or relocation of a natural drainage channel;
- Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks or wetlands;
- Is an industrial facility that falls under one or more of categories of industrial activity regulated under the NPDES Phase I industrial storm water regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);
- Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan or otherwise impairs the beneficial uses² of a receiving water body;
- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

Impact Discussion

(a-e, g). The project could create minor runoff and erosional issues as a result of temporary grading activities. Application of standard County grading, erosion, and drainage-control measures would ensure that no significant increase of erosion or storm water runoff would occur. Therefore, impacts would be *less than significant*.

(h-k). The project would not impact groundwater quality. No permanent structures would be constructed which would prevent water filtration. No streams, ponds, or reservoirs are in the vicinity which could be polluted or impacted by the project. The project would not require an onsite water source and no water would be pumped from the groundwater basin as a result of the project. Therefore, the project would have *no impact* on water supplies.

(f). The area proposed for excavation is situated at a minimum altitude of 70 feet above current sea level. Therefore, even if predicted rates of sea level rise are realized, the development area would remain well above sea level within that planning horizon and *no impacts* are anticipated.

(l). The project could adversely affect surface water quality by introducing excavation equipment which would be used to remove the impacted material, and stored on adjacent staging areas. The stockpiled material for each work area would be covered with sheeting or a soil binder at the end of each workday and prior to precipitation events. Minor amounts of materials from onsite vehicular use would not present a significant potential for release of waterborne pollutants and would be highly unlikely to create a public health hazard. Therefore, impacts are expected to be *less than significant*.

Cumulative Impacts: The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the threshold of significance for

² Beneficial uses for Santa Barbara County are identified by the Regional Water Quality Control Board in the Water Quality Control Plan for the Central Coastal Basin, or Basin Plan, and include (among others) recreation, agricultural supply, groundwater recharge, fresh water habitat, estuarine habitat, support for rare, threatened or endangered species, preservation of biological habitats of special significance.

water resources. Therefore, the project's contribution to the regionally significant issues of water supplies and water quality is not considerable, and is insignificant.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would be insignificant.

5.0 INFORMATION SOURCES

5.1 County Departments Consulted

EHS, Public Works, APCD

5.2 Comprehensive Plan

| | |
|---|--|
| <input checked="" type="checkbox"/> Seismic Safety/Safety Element | <input checked="" type="checkbox"/> Conservation Element |
| <input checked="" type="checkbox"/> Open Space Element | <input checked="" type="checkbox"/> Noise Element |
| <input checked="" type="checkbox"/> Coastal Plan and Maps | <input checked="" type="checkbox"/> Circulation Element |
| <input checked="" type="checkbox"/> ERME | |

5.3 Other Sources

| | |
|---|---|
| <input checked="" type="checkbox"/> Field work | <input checked="" type="checkbox"/> Ag Preserve maps |
| <input checked="" type="checkbox"/> Calculations | <input checked="" type="checkbox"/> Flood Control maps |
| <input checked="" type="checkbox"/> Project plans | <input checked="" type="checkbox"/> Other technical references (reports, survey, etc.) |
| <input type="checkbox"/> Traffic studies | <input checked="" type="checkbox"/> Planning files, maps, reports |
| <input checked="" type="checkbox"/> Records | <input checked="" type="checkbox"/> Zoning maps |
| <input checked="" type="checkbox"/> Grading plans | <input checked="" type="checkbox"/> Soils maps/reports |
| <input checked="" type="checkbox"/> Elevation, architectural renderings | <input checked="" type="checkbox"/> Plant maps |
| <input checked="" type="checkbox"/> Published geological map/reports | <input checked="" type="checkbox"/> Archaeological maps and reports |
| <input checked="" type="checkbox"/> Topographical maps | <input type="checkbox"/> Other |

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

The following is a summary of project-specific impacts:

Class I Impacts (Significant and Unavoidable): None identified.

Class II Impacts (Potentially Significant and Subject to Mitigation): Air Quality, Biological Resources, Cultural Resources, Geologic Processes, Hazardous Materials/Risk of Upset, and Noise.

Significant direct short- and long-term project specific impacts would be reduced to a less than significant level through the implementation of the mitigation measures listed in the sections above.

Class III Impacts (Less than Significant): Aesthetics, Land Use, Recreation, Transportation, and Water Resources.

The project would have no impacts on Agriculture, Energy, Fire Protection, and Public Facilities.

Cumulative Impacts: With the implementation of the mitigation measures discussed above in each section, the proposed project's contribution to cumulative environmental impacts would not be substantial or significant.

7.0 MANDATORY FINDINGS OF SIGNIFICANCE

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

- (1) Substantially Degrade the Quality of the Environment. The proposed project does not have the potential to substantially degrade the quality of the environment. As discussed in Section 4.4 (Biological Resources), implementation of the mitigation measures BIO-1 and BIO-4 through BIO-10 would ensure that the project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels or threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. The proposed project would not contribute significantly to greenhouse gas emissions or significantly increase energy consumption. As discussed in Section 4.5 (Cultural Resources), with the implementation of mitigation measures CulRes-02, CulRes-07, and CulRes-09, the project would not

eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be ***less than significant with mitigation*** identified.

- (2) Disadvantage Long-term Environmental Goals. The proposed project is designed to achieve the goal of removing contaminated soils and abandoned oil infrastructure from grazing areas along the Gaviota Coast. The proposed project does not have the potential to achieve short-term goals to the disadvantage of long-term environmental goals. Therefore, impacts would be ***less than significant***.
- (3) Cumulative Impacts. As discussed throughout this document, because the project does not propose a new or significantly different use than the existing use, it does have any impacts that are individually limited, but cumulatively considerable. Any contribution of the project to significant cumulative impacts would be adequately reduced by mitigation measures identified to address project-specific impacts. Therefore, impacts would be ***less than significant with mitigation*** described within each issue area.
- (4) Substantially Affect Human Beings. The proposed project would not create environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. Project effects would be very limited in duration. Construction equipment would generate short term noise impacts to the single residence on the site; however, this effect would be minimized with the implementation of mitigation measure NOISE-02. Therefore, impacts would be ***less than significant with mitigation***.
- (5) Disagreement over the Significance of an Effect. There is no disagreement supported by or predicated upon facts and/or expert opinion over the significance of an effect which would warrant investigation in an EIR. Therefore, impacts would be ***less than significant***.

8.0 PROJECT ALTERNATIVES

CEQA does not require an analysis of potential project alternatives because the proposed project would not result in potentially significant, adverse and unmitigated impacts.

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

The project is an improvement project necessary to restore the surrounding environment to natural conditions to the maximum extent feasible. The project would restore the site to reflect site conditions as they existed prior to oil activities, which would enhance existing habitat and ground water resources. Preliminary analysis indicates that it would be consistent with applicable subdivision, zoning and comprehensive plan requirements.

An analysis of the consistency of the proposed project with applicable policies of the Comprehensive Plan is provided below. The proposed project, with incorporated mitigation measures is expected to be consistent with all land use and development policies.

Coastal Land Use 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.

Coastal Land Use 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 soil, geologic, flood, erosion or other hazards shall remain in open space.

Coastal Land Use Plan Policy 3-15: For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.

Coastal Land Use Plan Policy 3-16: 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 throughout the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location

Coastal Land Use Plan Policy 3-17: 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 immediately with planting of native grasses and shrubs, appropriate nonnative plants, or with accepted landscaping practices.

Coastal Land Use Plan Policy 3-18: 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 on-site whenever possible to facilitate groundwater recharge.

Coastal Land Use 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.

Coastal Land Use Plan Policy 6-30: Oil and gas facilities shall be dismantled and removed, and 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.

Archaeological Site Poly 1: All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.

Archaeological Site Poly 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.

Archaeological Site Poly 5: Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

10.0 RECOMMENDATION BY P&D STAFF

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

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

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

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

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

Potentially significant unavoidable adverse impact areas:

With Public Hearing Without Public Hearing

PREVIOUS DOCUMENT:

PROJECT EVALUATOR: Katie Nall DATE: _____

11.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

I agree with staff conclusions. Preparation of the appropriate document may proceed.

I DO NOT agree with staff conclusions. The following actions will be taken:

I require consultation and further information prior to making my determination.

SIGNATURE: _____

INITIAL STUDY DATE: _____

SIGNATURE: _____

NEGATIVE DECLARATION DATE: _____

SIGNATURE: _____

REVISION DATE: _____

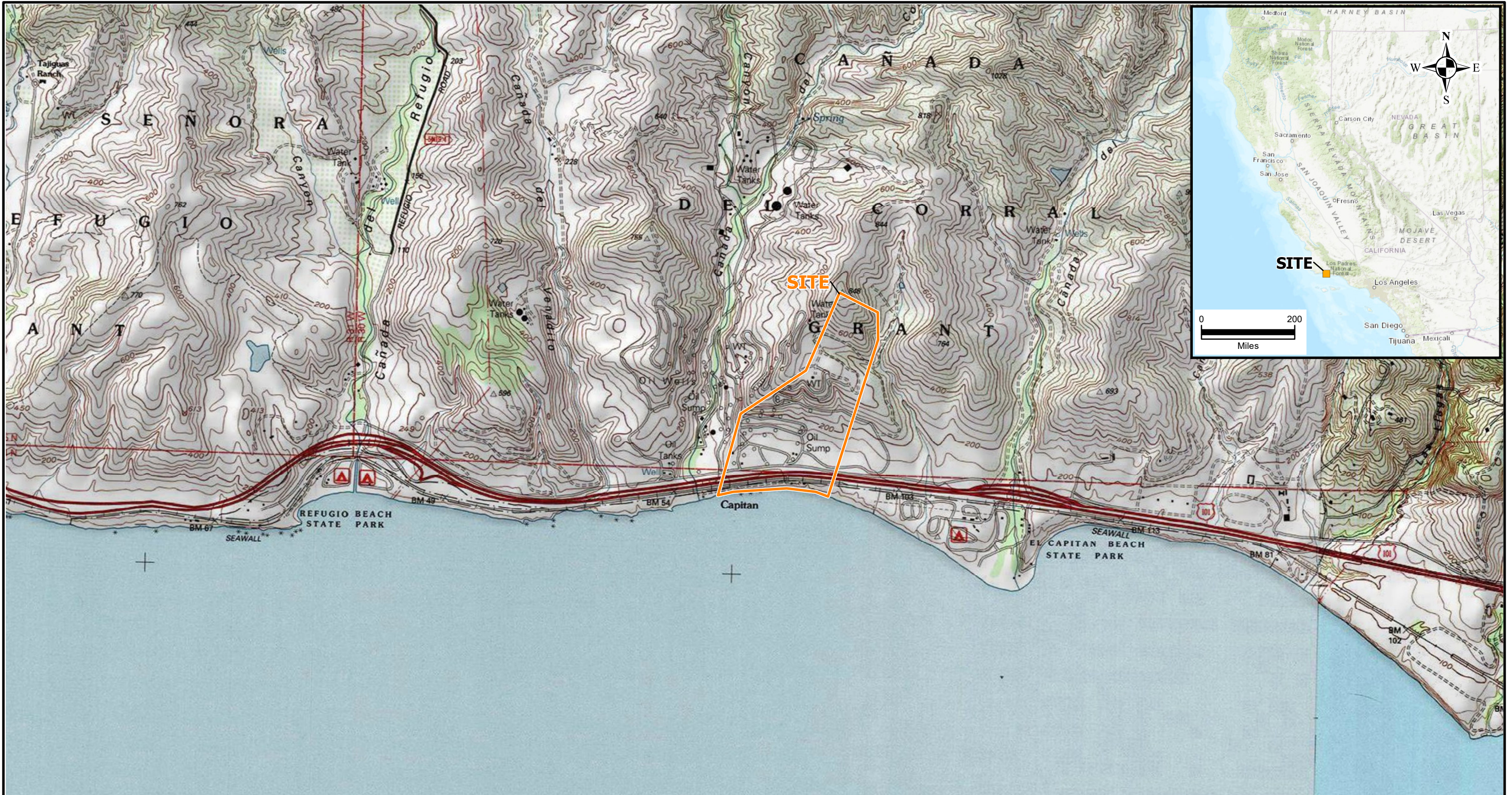
SIGNATURE: _____

FINAL NEGATIVE DECLARATION DATE: _____

12.0 ATTACHMENTS

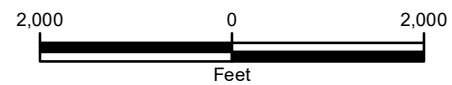
1. Vicinity Map
2. Site Plan
3. APCD condition letter dated May 5, 2021
4. Biological Resource Assessment Table 5 dated May 20, 2021

ATTACHMENT 1: VICINITY MAP



Legend

Erburu Lease



Notes:
 1. Topographic maps provided by Esri and the USGS.
 2. All locations shown are approximate.

LANGAN

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 T: 805.957.6000 F: 805.957.6001 www.langan.com

Langan Engineering & Environmental Services, Inc.
 Langan Engineering, Environmental, Surveying and
 Landscape Architecture, D.P.C.
 Langan International, LLC
 Collectively known as Langan

Project

**CAPITAN OIL FIELD
 ERBURU LEASE**

SANTA BARBARA COUNTY CALIFORNIA

Drawing Title

**SITE
 LOCATION MAP**

Project No.
781010201

Date
10/24/2019

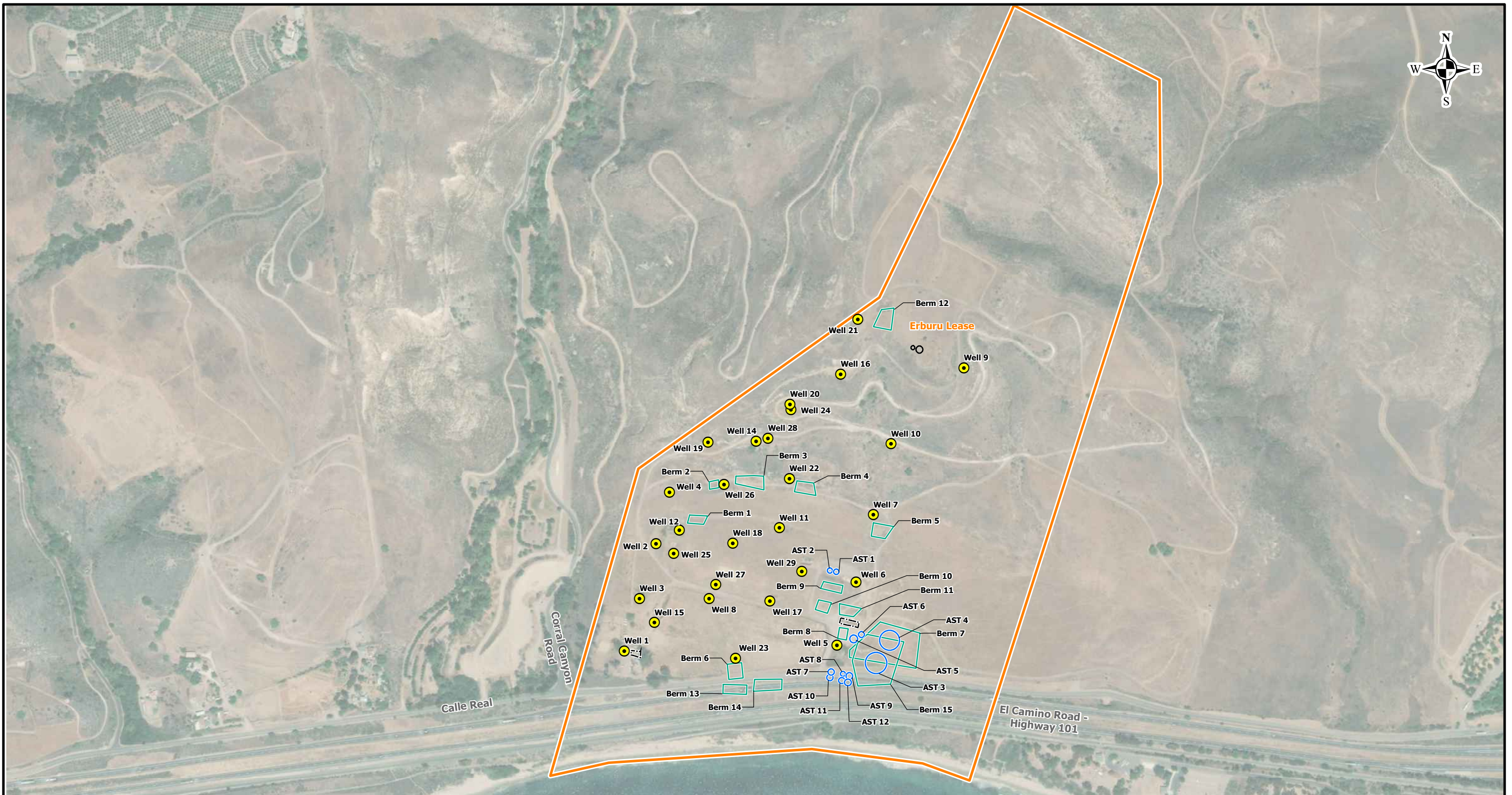
Scale
1" = 2,000'

Drawn By
BJS

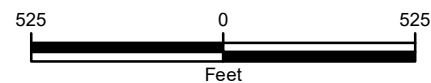
Figure

1

ATTACHMENT 2: SITE PLAN



- Legend**
- Abandoned Oil Well Location
 - Existing Farm Building
 - Former Farm Water Tanks
 - Historical Production Tanks
 - Historical Bermed Areas
 - Erburu Lease



Notes:
 1. Off-site Well locations and lease boundaries provided by DOGGR, 2019.
 2. All locations shown are approximate.

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Langan Engineering & Environmental Services, Inc.
 Langan Engineering, Environmental, Surveying and
 Landscape Architecture, D.P.C.
 Langan International, LLC
 Collectively known as Langan

Project
ERBURU LEASE
 SANTA BARBARA COUNTY CALIFORNIA

Drawing Title
SITE PLAN

| | |
|--------------------------|----------|
| Project No. 781010201 | 2 |
| Date 4/23/2020 | |
| Scale 1" = 525' | |
| Drawn By BJS | |

ATTACHMENT 3: APCD CONDITION LETTER

Nall, Katie

From: Carly V. Barham <BarhamC@sbcapcd.org>
Sent: Tuesday, May 11, 2021 4:09 PM
To: Nall, Katie
Cc: Emily Waddington; Desmond S. Ho
Subject: RE: 21CDP-00000-00039 Erburu Remediation Project
Attachments: Alternative Attachment A Dust and Odor Control Measures.pdf; Attachment B Diesel Particulate and NOx Emission Measures 2019.pdf

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hi Katie,

For the Erburu Remediation project (21CDP-00039), the District has the following comments based on the information provided to date.

1. If the project involves the excavation (“dig-and-haul”) of more than 1,000 cubic yards of contaminated soil, the project is required to obtain an **Authority to Construct (ATC)** and/or **Permit to Operate** permits from the District prior to grading/building permit issuance. Proof of receipt of the required District permits shall be submitted by the applicant to planning staff.
2. The applicant is required to complete and submit an **Asbestos Demolition/Renovation Notification or an EXEMPTION** from Notification for Renovation and Demolition (District Form ENF-28 or District Form ENF-28e), which can be downloaded at www.ourair.org/compliance-forms for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed exemption or notification should be presented, mailed, or emailed to the District with a minimum of 10 working days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. The applicant should visit www.ourair.org/asbestos to determine whether the project triggers asbestos notification requirements or whether the project qualifies for an exemption.
3. All portable diesel-fired construction engines rated at 50 brake horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or District permits prior to grading/building permit issuance. Construction engines with PERP certificates are exempt from the District permit, provided they will be on-site for less than 12 months. *If a District permit is required, proof of receipt of the District permits shall be submitted by the applicant to planning staff. The District permit process can take several months. To avoid delay, the applicant is encouraged to submit their Authority to Construct permit application to the District as soon as possible, see www.ourair.org/permit-applications to download the necessary permit application(s).*
4. Any petroleum storage tank degassing activities shall comply with District Rule 343, *Petroleum Storage Tank Degassing*. Please see www.ourair.org/tank-degassing for more information.
5. If odor generation becomes a concern during any pipeline removal/abandonment activities, the applicant should consider using a degassing unit to control odors. Some companies already have District permits with the District for such equipment. The applicant could consider utilizing an already permitted unit through a company, or could contact the District to obtain a permit or permit exemption for the use of a degassing unit.

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

7. To reduce the potential for violations of District Rule 345 (*Control of Fugitive Dust from Construction and Demolition Activities*), Rule 302 (*Visible Emissions*), and Rule 303 (*Nuisance*), standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities. The name and telephone number of an on-site contact person must be provided to the District prior to grading/building permit issuance.

8. The State of California considers particulate matter emitted by diesel engines carcinogenic. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of particulate matter (as well as of ozone precursors) from diesel equipment. Recommended measures should be implemented to the maximum extent feasible. Prior to grading/building permit issuance and/or map recordation, all requirements shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout all grading and construction periods. The contractor shall retain the Certificate of Compliance for CARB’s In-Use Regulation for Off-Road Diesel Vehicles onsite and have it available for inspection.

In addition, in terms of the evaluation of potential environmental impacts, we would encourage the County to consider the scope of earth-moving activities and equipment, hauling of soil and debris for offsite disposal, including magnitude of truck trips, and fugitive dust generation. The Shell Hercules Demo and Reclamation Plan Project and associated MND (16NGD-0001, 15DRP-0001) might be a good project to review for comparison.

Please let me know if you have any questions, and we would appreciate a copy of the CEQA document when it is processed.

Sincerely,
Carly



Carly Barham

Planning Division
Air Pollution Control District
Santa Barbara County

BarhamC@sbcapcd.org
805.961.8890
Available Tues, Thurs, Fri

ourair.org [@OurAirSBC](https://twitter.com/OurAirSBC)  

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ATTACHMENT A
RECOMMENDED DUST & ODOR CONTROL MEASURES

- Animal waste, composting and other operations must be conducted so that objectionable odors are not a public nuisance. APCD Rule 303, *Nuisance*, states that a source shall not discharge air contaminants or other material in violation of Section 41700 of the Health and Safety Code. To view the complete rule see www.ourair.org/wp-content/uploads/rule303.pdf.
- Water sprinklers should be installed around the perimeter of horse riding areas and access to running water provided at paddocks to minimize dust associated with the *operation* of the project.
- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Increased watering frequency shall be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The applicant shall designate a person or persons to monitor the dust and odor control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to final permit sign-off.

Plan Requirements: All requirements shall be shown on grading and building plans and/or as a separate information sheet listing the conditions of approval to be recorded with the map. **Timing:** Requirements shall be shown on plans prior to grading/building permit issuance and/or recorded with the map during map recordation. Conditions shall be adhered to throughout all grading and construction periods.

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



ATTACHMENT B DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

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

The following measures are required by state law:

- All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of diesel-powered mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation (Title 13, California Code of Regulations (CCR), §2449), the purpose of which is to reduce oxides of nitrogen (NO_x), diesel particulate matter (DPM), and other criteria pollutant emissions from in-use off-road diesel-fueled vehicles. Off-road heavy-duty trucks shall comply with the State Off-Road Regulation. For more information, see www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- Fleet owners of diesel-fueled heavy-duty trucks and buses are subject to CARB's On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation (Title 13, CCR, §2025), the purpose of which is to reduce DPM, NO_x and other criteria pollutants from in-use (on-road) diesel-fueled vehicles. For more information, see www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.
- All commercial off-road and on-road diesel vehicles are subject, respectively, to Title 13, CCR, §2449(d)(3) and §2485, limiting engine idling time. Off-road vehicles subject to the State Off-Road Regulation are limited to idling no more than five minutes. Idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes, unless the truck engine meets the optional low-NO_x idling emission standard, the truck is labeled with a clean-idle sticker, and it is not operating within 100 feet of a restricted area.

The following measures are recommended:

- Diesel equipment meeting the CARB Tier 3 or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible.
- On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible.
- Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel, should be used on-site where feasible.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.
- Construction truck trips should be scheduled during non-peak hours to reduce peak hour emissions whenever feasible.
- Proposed truck routes should minimize to the extent feasible impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows.

PLAN REQUIREMENTS AND TIMING: Prior to grading/building permit issuance and/or map recordation, all requirements shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout all grading and construction periods. The contractor shall retain the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles onsite and have it available for inspection.

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

ATTACHMENT 4: BIOLOGICAL RESOURCE ASSESSMENT TABLE 5

Table 5: Special-Status Plants

| Common Name | Scientific Name | Regulatory Status | Habitat Requirements | Site Suitability |
|--------------------------|---|---------------------------|--|---|
| Black-flowered figwort | <i>Scrophularia atrata</i> | CNPS Rank 1B.2 | Found in closed-cone coniferous woodlands, coastal dunes, coastal scrub, and riparian scrub. | Does not occur. Elements of habitat are found on site; however, this species was not observed during rare plant surveys completed in 2020. The nearest known population is within 5-miles from the Site. |
| Chaparral ragwort | <i>Senecio aphanactis</i> | CNPS Rank 2B.2 | Found in chaparral, cismontane woodland, and coastal scrub. | Does not occur. Elements of habitat are found on site; however, this species was not observed during rare plant surveys completed in 2020. The nearest known population is within 5-miles from the Site. |
| Contra Coasta goldfields | <i>Lasthenia conjugens</i> | CNPS Rank 1B.1 | Found in cismontane woodland, playas, valley and foothill grassland, and vernal pools. | Does not occur. Elements of habitat are found on site; however, this species was not observed during rare plant surveys completed in 2020. The nearest known population is greater than 5-miles from the Site. |
| Coulter's goldfields | <i>Lasthenia glabrata</i> ssp. <i>coulteri</i> | CNPS Rank 1B.1 | Found in marshes, vernal pools, playas, and in chaparral areas. | Does not occur. No suitable habitat in the Site or adjacent habitat. |
| Davidson's saltscale | <i>Atriplex serenana</i> var. <i> davidsonii</i> | CNPS Rank 1B.2 | Found in coastal sage scrub, wetlands and riparian areas. | Does not occur. Elements of habitat are found on site; however, this species was not observed during rare plant surveys completed in 2020. The nearest known population is greater than 5-miles from the Site. |
| Gaviota tarplant | <i>Deinandra increscens</i> ssp. <i>villosa</i> | FE, SE, CNPS Rank 1B.1 | Found in coastal scrub, valley and foothill grasslands, and coastal bluff scrub. | Does not occur. Elements of habitat are found on site; however, this species was not observed during rare plant surveys |

Table 5: Special-Status Plants

| Common Name | Scientific Name | Regulatory Status | Habitat Requirements | Site Suitability |
|-----------------------------|---|--------------------------|---|--|
| | | | | completed in 2020. The nearest known population is greater than 5-miles from the Site. |
| La Purisima manzanita | <i>Arctostaphylos purissima</i> | CNPS Rank 1B.1 | Found in chaparral and coastal scrub within sandy soils. | Does not occur. This perennial shrub was not observed during rare plant surveys completed in 2020. The nearest known population within 1-mile of the Site. |
| Late-flowered mariposa-lily | <i>Calochortus fimbriatus</i> | CNPS Rank 1B.3 | Found in chaparral coastal mountain ranges. | Does not occur. No suitable habitat in the Site or adjacent habitat. The nearest known population is within 5-miles of the Site. |
| Mesa horkelia | <i>Horkelia cuneata</i> var. <i>puberula</i> | CNPS Rank 1B.1 | Found in chaparral, cismontane woodland, and coastal scrub. | Does not occur. Coastal scrub habitat exists within the Site; however, this species was not observed during rare plant surveys completed in 2020. The nearest known population is within 5-miles of the Site. |
| Miles' milk-vetch | <i>Astragalus didymocarpus</i> var. <i>milesianus</i> | CNPS Rank 1B.2 | Found in coastal scrub with clay soils. | Does not occur. Coastal scrub habitat is found within the Project Site; however, this species was not observed during rare plant surveys completed in 2020. The nearest known population is within 5-miles of the Site. |
| Ojai fritillary | <i>Fritillaria ojaiensis</i> | CNPS Rank 1B.2 | Found in chaparral, yellow pine forest, and mixed evergreen forest. | Does not occur. No suitable habitat in the Site or adjacent habitat. The nearest known population is greater than 5-miles from the Site. |

Table 5: Special-Status Plants

| Common Name | Scientific Name | Regulatory Status | Habitat Requirements | Site Suitability |
|---------------------------|--|--------------------------|--|--|
| Pale-yellow layia | <i>Layia heterotricha</i> | CNPS Rank 1B.1 | Found in cismontane woodland, pinyon juniper woodland, valley and foothill grassland. | Does not occur. Foothill grassland in the Site; however, this species was not observed during rare plant surveys completed in 2020. The nearest known population is greater than 5-miles from the Site. |
| Rufugio manzanita | <i>Arctostaphylos refugioensis</i> | CNPS Rank 1B.2 | Found in chaparral. | Does not occur. This perennial shrub was not observed during rare plant surveys completed in 2020. The nearest known population is greater than 5-miles from the Site. |
| Santa Barbara honeysuckle | <i>Lonicera subspicata</i> var. <i>subspicata</i> | CNPS Rank 1B.2 | Found in chaparral, cismontane woodland with sandy soils. | Occurs on site. A small population of Santa Barbara honeysuckle was found on an east facing slope near well pad 9. There were four individuals observed. |
| Santa Lucia dwarf rush | <i>Juncus luciensis</i> | CNPS Rank 1B.2 | Found in chaparral, vernal pools, meadows, seeps, and lower montane coniferous forest. | Does not occur. No suitable habitat in the Site or adjacent habitat. The nearest known population is greater than 5-miles from the Site. |
| Santa Ynez false lupine | <i>Thermopsis macrophylla</i> | CNPS Rank 1B.3 | Found in chaparral and woodland areas. | Does not occur. No suitable habitat in the Site or adjacent habitat. The nearest known population is within 5-miles of the Site. |
| Seaside bird's-beak | <i>Cordylanthus rigidus</i> ssp. <i>littoralis</i> | SE, CNPS Rank 1B.1 | Found in coastal chaparral to mountainous areas. | Does not occur. No suitable habitat in the Site or adjacent habitat. The nearest known population is within 5-miles of the Site. |
| Southern tarplant | <i>Centromadia parryi</i> ssp. <i>australis</i> | CNPS Rank 1B.1 | Found valley and foothill grassland, marshes, and vernal pools. | Does not occur. Foothill grassland in the Site; however, this species was not |

Table 5: Special-Status Plants

| Common Name | Scientific Name | Regulatory Status | Habitat Requirements | Site Suitability |
|-------------------------|---|--------------------------|---|---|
| | | | | observed during rare plant surveys completed in 2020. The nearest known population is 5.6 miles from the Site. |
| Sonoran maiden fern | <i>Thelypteris puberula</i> <i>var. sonorensis</i> | CNPS Rank 2B.2 | Found in canyons, streambanks and seeps. | Does not occur. Elements of habitat are found on site; however, this species was not observed during rare plant surveys completed in 2020. The nearest known population is greater than 5-miles from the Site. |
| Umbrella larkspur | <i>Delphinium umbracolorum</i> | CNPS Rank 1B.3 | Found in cismontane woodland. | Does not occur. No suitable habitat in the Site or adjacent habitat. The nearest known population is greater than 5-miles from the Site. |
| White-vented monardella | <i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i> | CNPS Rank 1B.3 | Found in chaparral and cismontane woodland areas. | Does not occur. No suitable habitat in the Site or adjacent habitat. Documented occurrence within 1-mile of the Site was an anonymous observation with poor location accuracy (CDFW 2020). |

Codes:

FE – Federally Endangered (USFWS)

SE – State Endangered (CDFW)

CNPS Ranks:

Rank 1B – Plants rare, threatened, or endangered in California or elsewhere

Rank 2B – Plants rare, threatened, or endangered in California but more common elsewhere

.1 – Seriously threatened in California

.2 – Moderately threatened in California

.3 – Not very threatened in California