Draft
Environmental Impact Report

Decommissioning and Remediation of the Chevron Carpinteria Oil & Gas Processing Facility Project

Executive Summary

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Executive Summary

This Draft Environmental Impact Report (EIR) has been prepared to address the environmental impacts associated with the Decommissioning and Remediation of the Chevron Oil and Gas Processing Facility (Project). Chevron USA (Chevron, or "the Applicant") is currently planning to decommission and remediate the Carpinteria Oil and Gas Processing Facilities (Project Site). The proposed Project-related activities would also include the removal of nearshore/offshore pipelines out to three nautical miles (nmi) (state waters limit) (State Waters Offshore Pipelines). In support of this activity, an application for a Coastal Development Permit (CDP) is being filed with the City of Carpinteria (City).

The Project is subject to analysis pursuant to the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15367, the City of Carpinteria is the Lead Agency with principal responsibility for considering the Project for approval (14 California Code of Regulations [CCR] 15000 et seq.).

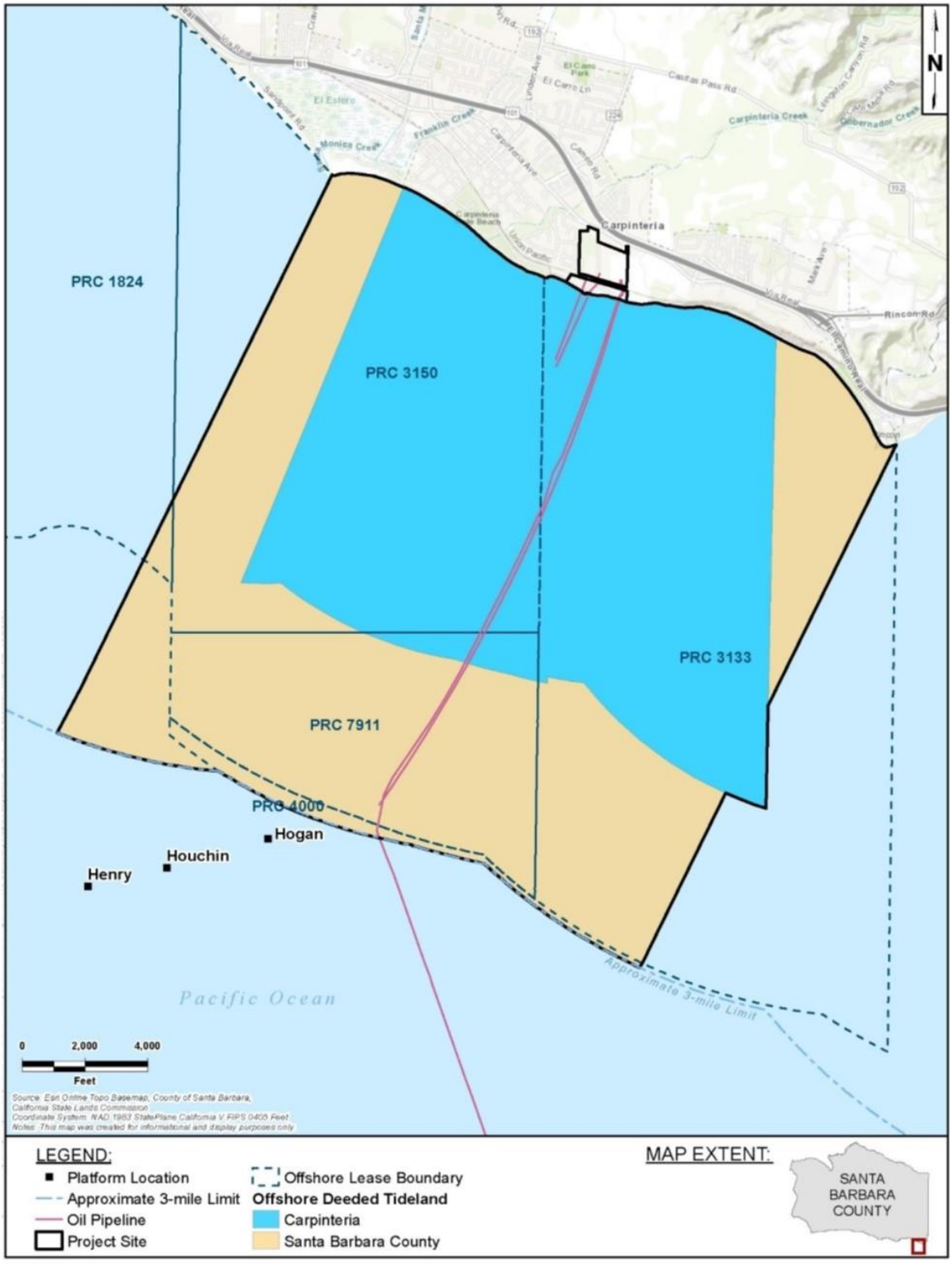
This Draft EIR is an informational document that is being used by the general public and governmental agencies to review and evaluate the Project. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Project. Specifically, the Draft EIR should be consulted for information about the environmental effects associated with the Project and potential mitigation measures to address or minimize those effects.

The remainder of the Executive Summary consists of the following sections:

- An introduction, which discusses the regulatory oversight in the preparation of the Draft EIR and public scoping process, and agency use of the Draft EIR;
- A brief description of the Project and the Project objectives;
- A discussion of the background environmental setting;
- A brief description of the alternatives evaluated in detail in the Draft EIR;
- A summary of key impacts of the Project, alternatives, and cumulative impacts; and
- A discussion of the Environmentally Superior Alternative.

Tables ES.4 through ES.6, located at the end of this Executive Summary, summarize the impacts and mitigation measures for the Project. The impacts and mitigation measures for the Project are discussed in detail in Sections 4.1 through 4.13 of this Draft EIR.

Figure ES-1 Project Site Location Map



Source: Applicant Project Description, 2021.

ES.1 Introduction

The City, as Lead Agency under CEQA, determined that an EIR would be required as part of the permitting process for the Project. The City's decision to prepare an EIR is documented in an Initial Study included in Appendix D of this EIR. The Initial Study, which consists of a checklist of possible effects on a range of environmental topics, found that the Project may have significant environmental impacts related to:

- Aesthetics;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Climate Change and Greenhouse Gas Emissions;
- Hazardous Materials and Risk of Upset;
- Hydrology and Water Resources;
- Land Use and Planning;
- Noise and Vibration;
- Transportation and Circulation; and
- Tribal Cultural Resources.

A detailed analysis associated with an EIR is needed to further assess potential effects. While these issue areas are the main topics of focus in this EIR, other issue areas are included in Section 4.13 which provides a discussion of issue areas that were found not to have the potential for significant impacts.

On August 1, 2022, the City, as the Lead Agency, issued a Notice of Preparation (NOP) to inform the general public and agencies that an EIR would be prepared for the Project and to solicit comments on environmental issues to be addressed in the document. The public scoping comment period was extended by 30 days and closed on September 30, 2022. Comments received in response to the NOP were used to further refine the scope of the analysis and the technical studies in this EIR. Written comments received in response to the NOP are provided in Appendix D with an indication of specific EIR sections where topics related to individual comments are addressed.

The City of Carpinteria is the Lead Agency per CEQA Guidelines Section 15051. In addition, a number of public agencies with discretionary authority over this Project have been identified as Responsible Agencies which may rely on this EIR, once certified, as part of the deliberative review in deciding whether to approve or disapprove a particular activity. Table 1.2 provides a listing of these Responsible Agencies and their applicability to the Project. The City, as the CEQA Lead Agency, will act first on the Project before any of the Responsible Agencies act on the Project. City decision-makers (Planning Commission and City Council) will use the EIR for decision-making regarding the Project. If the Project is approved by all required permitting agencies, the City would be responsible for reviewing and approving all pre-construction compliance plans and ensuring that the Project modifications and operations are conducted in accordance with the permit conditions.

The Draft EIR (paper copy form) will be available to the general public for review at these locations:

City of Carpinteria Community Development Department
City of Carpinteria Public Library

CD and paper copies of the Draft EIR may be obtained (free of charge) at the City of Carpinteria Community Development Department.

The Draft EIR is also available on the City of Carpinteria's website at:
https://carpinteriaca.gov/city-hall/community-development/oil-gas-information/oil-processing-facility-decommissioning/

ES.2 Project Description

The Project proposes to demolish and remove the Facility including, but not limited to the onshore portions of the Facility (Onshore Facility), and State Waters Offshore Pipelines and complete remediation of impacted soils and groundwater at the Facility. The Project's purpose is to demolish and remove surface and subsurface facilities and subsequent remediation of impacted soils and groundwater at the onshore Carpinteria Oil and Gas Processing Facility. Remediation is intended to achieve the most stringent clean up levels as determined by the Santa Barbara County Public Health Department, Environmental Health Services (SBCEHS), Regional Water Quality Control Board (RWQCB) and U.S. Environmental Protection Agency (U.S. EPA), while preserving existing site resources, including mature trees and bluffs, and while respecting site constraints including buffer zones adjacent to the railroad right-of-way. Tier 1 Environmental Screening Levels for residential uses (or equally protective contaminant-specific, agency-approved levels) provide the standard for on-site soil remediation, consistent with Chevron's clean up objectives. Although relevant agencies with jurisdiction will establish required clean up levels, by assuming the most stringent clean up level, soil excavation and truck trip estimates are higher. This assumption affects the reasonably foreseeable scope of environmental impacts because the most stringent clean up levels would require more intensive remediation activities (e.g., truck trips, site activities). The most stringent clean up levels would also result in greater flexibility for development on the site meeting the most rigorous standards (e.g., unrestricted land use).

ES.3 Objectives of the Project

Pursuant to Section 15124(b) of the CEQA Guidelines, the description of the Project is to contain "a clearly written statement of objectives" that would aid the Lead Agency in developing a reasonable range of alternatives to evaluate in the EIR and would aid decision makers in preparing findings and, if necessary, a statement of overriding considerations. The City is the CEQA Lead Agency responsible for preparing the EIR. The City decision-makers will consider the EIR for certification and the Project for approval.

The underlying purpose of the Project is to remediate the environmental impacts of the legacy oil and gas facilities on the Project site.[1] More specifically, the Project's purpose is to demolish and remove surface and subsurface facilities and subsequent remediation of any impacted soils connected to activities from the Onshore Facility to accommodate the site's potential future redevelopment. Any residually impacted soils at the Onshore Facility will be remediated to a unrestricted land use standard consistent with the approvals from the SBCEHS, RWQCB, and U.S. EPA to facilitate reuse of the property for land use

[1] 14 Cal Code Regs §15124(b); See *Golden Door Props., LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 546; *Bay Area Citizens v. Association of Bay Area Gov'ts* (2016) 248 Cal.App.4th 966, 1013.

acceptable under the City's current Draft General Plan/Local Coastal Plan (General Plan) Update (anticipated to be Planned Unit Development and Open Space/Recreation). The State Waters Offshore Pipelines will also be removed. The Project objectives as provided by the Applicant are summarized as follows:

- Idling and removal of existing surface and subsurface equipment, piping, pipeline segments and structures associated with the Facility including removal of concrete foundations, asphalt, oil spray, and road base within the Facility;
- Pig and flush pipelines in preparation for removal and removal of State Waters Offshore Pipelines out to the 3-nmi state waters limit;
- Excavation/remediation of any impacted soils within the Facility and restoration of the affected portions of the Project Site in accordance with the agency approved Remedial Action Plan;
- Complete removal of State Waters Offshore Pipelines; and
- Recycling/disposal of all materials removed from the Project Sites.

ES.4 Background and Historic Operations

The Project Site is located within an area that has been historically utilized for agricultural production and more recently for oil and gas development support activities. Historical agricultural production activities documented at the Project Site from the 1920s through 1959 included dry farming, row crop production, orchards (fruit trees and nuts), and commercial flower production (plant nursery).

Oil and gas processing equipment was initially constructed onsite in the 1950s to support production from the offshore Summerland field developed by the Standard, Humble, and Summerland State (SHSS) joint venture. Oil and gas first flowed through Project Site in 1959 after the commissioning of offshore Platform Hazel. The processed oil was metered and transferred to Tank 861, a 217,000-barrel (bbl) capacity above-ground storage tank (AST) with a floating top roof operated by Standard Oil's Pipeline Department (now Chevron Pipeline & Power). Produced gas that flowed to the Project Site from Platform Hazel and later other offshore platforms was processed onsite and then sold to Southern California Gas Company (SoCalGas) via the Sales Gas Area (pipes, valves, meters, and equipment), which was also constructed in the late 1950s.

Historically, processing levels at the Facility have been as high as 20,000 barrels per day of crude oil and 20 million standard cubic feet (MMSCF) per day of natural gas. The Facility consisted of offices, production pipelines from offshore platforms, a connected system of product separation, processing, and storage facilities. Processed natural gas from the Facility was fed into the SoCalGas network. Processed crude oil and natural gasoline were blended and shipped from the Facility by way of pipeline to Ventura, from where it was piped to refineries in the Los Angeles area.

Historically, refined products and crude oil were also transferred from the Facility via marine tanker. However, the marine terminal, formerly accessed by an offshore mooring, is no longer operational. From 1960 to 1989, the Facility received oil and gas from Platform Hazel as well as several other offshore platforms constructed in the Santa Barbara Channel, including Hilda, Hope, and Heidi (Carpinteria Field), and Gail and Grace (Santa Clara Field and Sockeye Field). Upgrades and additions to the Facility were completed to accommodate the varied quality of the additional oil and gas volume. Abandonment of the wells and decommissioning/removal of offshore Platforms Hazel, Hilda, Hope, and Heidi (4H Platforms) from the Santa Barbara Channel were completed in 1996.

The Applicant sold its Santa Barbara Channel assets to Venoco, Inc. in 1998. Platform Grace ceased operations in 1998 and Platform Gail in 2017. Chevron purchased the property as part of Venoco bankruptcy proceedings and is the Operator of record and Applicant for the decommissioning Project.

ES.5 Description of Alternatives

Alternatives to the Project were developed per CEQA Guidelines Section 15126.6. Section 5.0, Environmental Analysis and Comparison of Alternatives, provides a complete description of all alternatives considered, including an explanation for rejecting potential alternatives for further analysis. The following were the alternatives evaluated and carried forward to the Environmentally Superior Alternative Discussion.

ES.5.1 No Project Alternative

CEQA requires an evaluation of the No Project Alternative so that decision makers can compare the impacts of approving the Project with the impacts of not approving the Project. According to CEQA Guidelines §15126.6(3)(B), for a development project the No Project Alternative is the circumstances under which the Project does not proceed. If disapproval of the Project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed.

Under the No Project Alternative, the Project as proposed would not occur and the Applicant would not conduct the site demolition and remediation activities proposed by the Project. The CPF would remain at the site in a shut-down status and facilities would not be decommissioned. This would include onshore facilities, and offshore pipelines. It should be noted that remediation activities may still be required to proceed since the U.S. EPA and SBCEHS would likely continue to require that these facilities be cleaned up of contaminated materials and appropriately remediated. However, without the removal of above-ground equipment and tanks, it would be difficult to fully access all areas targeted for excavation and remediation.

ES.5.2 Full Removal of Facilities Alternative

The Project as proposed excludes a number of facilities that are not slated for decommissioning for a variety of reasons. Under this alternative all oil and gas facilities within the property and all related offshore facilities that can be addressed would be fully decommissioned. Those facilities would include the plugging and abandonment of the seven wells that exist within the Project Site; removal and remediation of naturally occurring petroleum hydrocarbons which include a number of seep areas within the Buffer Zone Area, MSRC Area, Main Plant Area, and Pier Parking Lot Area; and removal of former Platforms Hazel and Hilda pipeline bundle, which include two, 8-inch diameter and one, 6-inch diameter abandoned pipelines that come from offshore, across the beach near the western extent of the Project area and a 36-inch diameter corrugated metal vault located at the edge of the bluffs.

This alternative would potentially eliminate potential long term oil spill impacts related to oil well blowouts and would eliminate the impacts associated with ongoing oil seeps. In addition, removal of pipelines through the bluffs would prevent future erosion impacts and would address pipelines that were not previously removed and would not become a burden on the public for addressing future removal.

ES.5.3 Other Alternatives Examined

Other alternatives were examined and eliminated from detailed consideration, including:

- Removal of Offshore Facilities only Alternative;
- Removal of Onshore Facilities only Alternative; and
- Limitations on Trucking Destinations Alternative.

These are discussed in Section 5.3, Alternatives Description.

ES.6 Impacts of Project, Alternatives, and Cumulative Development

In the Impact Summary Tables (ES.1 through ES.6) in this Executive Summary and throughout this EIR, the impacts of the Project and alternatives have been classified using the categories Class I, II, III, and IV as described below:

Class I – Significant and Unavoidable: Significant unavoidable adverse impacts for which the decisionmaker must adopt a statement of Overriding Considerations: these are significant adverse impacts that cannot be effectively avoided or mitigated. No measures could be taken to avoid or reduce these adverse effects to insignificant or negligible levels. Even after application of feasible mitigation measures, the residual impact would be significant;

Class II – Less Than Significant with Mitigation: Significant environmental impacts that can be feasibly mitigated or avoided for which the decision maker must adopt Findings and recommended mitigation measures: these impacts are potentially similar in significance to those of Class I but can be reduced or avoided by the implementation of feasible mitigation measures. After application of feasible mitigation measures, the residual impact would not be significant;

Class III – Less than Significant: Adverse impacts found not to be significant for which the decision maker does not have to adopt Findings under CEQA: these impacts do not meet or exceed the identified thresholds for significance. Generally, no mitigation measures are required for such impacts; and

Class IV – Beneficial: Impacts beneficial to the environment.

The term “significance” is used in these tables and throughout this EIR to characterize the magnitude of the projected impact. For the purposes of this EIR, a significant impact is a substantial or potentially substantial change to resources in the local Project area or the area adjacent to the Project in comparison to the threshold of significance established for the issue area. Within each issue area an analysis of potential impacts compared to the appropriate significance criteria is presented.

The remainder of this section provides a brief discussion of the significant and unavoidable Class I impacts identified for the Project, the alternatives, and cumulative development. A detailed listing of the impacts associated with the Project can be found in the Impact Summary Tables at the end of this section. Sections 4.1 through 4.13 provide a comprehensive discussion of impacts of the Project and discussions of the impacts associated with the cumulative development. Section 5.0, Alternatives, provides an analysis of the impacts of each selected alternative, compares the impacts of each alternative relative to the Project, and identifies the Environmentally Superior Alternative.

ES.6.1 Impacts Associated with the Project

Table ES.1 summarizes the Project impacts and mitigation measures.

Table ES.1 Summary of Project Impacts and Mitigation Measures

Issue Area	Impact	Description	Class*	Mitigation Measures
Aesthetics	A.1	Scenic Vistas	III	-
	A.2	Scenic Resources	III	-
	A.3	Visual Character/Quality	III	-
	A.4	Night Lighting	II	A.4: Beach/Nearshore Night Lighting Minimization
Air Quality	AQ.1	Standards	III	-
	AQ.2	Odors	III	-
	AQ.3	Toxic Air Emissions	III	-
Biological Resources	Bio.1	Listed Species	II	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys Bio.1d: Fencing Bio.1e: Worker Education & Awareness Plan Bio.1f: Marine Wildlife Contingency & Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring & Protection Bio.1h: Wildlife Relocation Monitoring
	Bio.2	ESHA	II	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance
	Bio.3	Wetlands	II	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Requirements Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Program
	Bio.4	Movement of Wildlife	III	-
	Bio.5	Policy Conflicts	II	Bio.5: Tree Removal Mitigation
	Bio.6	Conservation Plan Conflicts	III	-
	Bio.7	**Accidental Oil Spills**	**I**	**Bio.7: Oil Spill Contingency Plan**
Cultural Resources	Cul.1	Known Resource CA-SBA-6	II	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
	Cul.2	Human Remains	II	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery
Geology & Soils	Geo.1	Earthquake Fault	III	-
	Geo.2	Erosion	II	Geo.2: Erosion Control Best Management Practices
	Geo.3	Sedimentation	II	Measure Geo.2
	Geo.4	Unstable Bluffs	II	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removal

Table ES.1 Summary of Project Impacts and Mitigation Measures

Issue Area	Impact	Description	Class*	Mitigation Measures
				Geo.4c: Bluff Stabilization Following Pipeline Removal
	Geo.5	Expansive Soils	III	-
	Geo.6	Septic Tanks	III	-
	Geo.7	Paleontological/Geologic Feature	II	Measures Cul.1a-f
Climate Change & GHG	GHG.1	GHG Emissions	II	GHG.1: GHG Emissions Reductions
	GHG.2	Plans	II	Measure GHG.1
Hazardous Materials & Risk of Upset	Haz.1	Routine Operations	II	Haz.1: Contaminated Soil Handling
	Haz.2	**Accidental Releases**	**I**	**Haz.2a: Spill Response Planning** **Haz.2b: Asbestos and Lead Planning**
	Haz.3	Schools	III	-
	Haz.4	Site Contamination	III	-
	Haz.5	Airports	III	-
	Haz.6	Emergency Response	III	-
	Haz.7	Wildland Fires	II	Haz.7: Fire Response Planning
Hydrology & Water Resources	**WR.1**	**Standards**	**I**	**WR.1: Stormwater Pollution Prevention Plan**
	WR.2	Groundwater Supplies	III	-
	WR.3	Drainage Patterns	III	-
	WR.4	Pollutants	III	-
	WR.5	Control Plans	III	-
Land Use & Planning	LU.1	Create Divisions	III	-
	LU.2	Policy Conflict	III	-
Noise & Vibration	N.1	12-hour CNEL	III	
	N.2	Hourly Average Ambient Noise	II	N.2a: Noise Barriers N.2b: Nighttime Activities
	N.3	Vibration	III	-
	N.4	Airport Noise Conflicts	III	-
Transportation & Circulation	T.1	Policy Conflicts	III	-
	T.2	VMT	III	-
	T.3	Traffic Hazards	III	-
	T.4	Emergency Access	III	-
Tribal Cultural Resources	TCR.1	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b
	TCR.2	Tribal Cultural Resources	II	Measures Cul.1a through Cul.2b
Other	All	Ag, Energy, Mineral, Housing, Public Services, Recreation, Utilities, Wildfire	III	-

*Class I = Significant and Unavoidable; Class II = Less than Significant with Mitigation; Class III = Less than Significant; Class IV = Beneficial.

ES.6.1.1 Significant and Unavoidable Class I Impacts

Significant and unavoidable Class I impacts would occur related to biological resources, hazardous materials and risk of upset, and hydrology and water resources. See Table ES.4 for a description of the Project Class I impacts and the required mitigation measures for each respective impact.

ES.6.1.2 Beneficial Class IV Impacts

No beneficial impacts are associated with the Project.

ES.6.2 Impacts Associated with the Alternatives

As discussed in Section ES.5, several alternatives to the Project were evaluated that had the potential to reduce significant impacts. The relative impacts of each of these alternatives to the Project are summarized below.

ES.6.2.1 No Project Alternative

As described above, under the No Project Alternative the Project as applied for would not occur and the Facility would remain in place and not be decommissioned. This assumes that the Project would not move forward and that no facilities are removed, some accessible contaminated materials could still be removed and remediated in accordance with agency requirements. The No Project Alternative does not meet the purpose of the Project and fails to meet most of the Project objectives.

Equally, the offshore facilities scheduled for decommissioning would not occur and pipelines would remain in place. However, regulatory agencies are likely to still require that remediation activities take place and the contaminated soil excavated and removed from the site. The Applicant would have to fulfill the obligations under their existing regulatory requirements for remediation under the U.S. EPA and the SBCEHS. It is possible that the Applicant would still be required to remediate the Project Site as ordered by the various agencies.

If the Project does not move forward, facilities such as Tank 861 would remain in place and would remain visible from the seal area and public trails; however, because the facility is well screened from surrounding neighbors, and the dominant views from the trail are towards the ocean and the seal rookery, this would not constitute a significant impact. However, it should be noted that elimination of visible industrial equipment in a scenic area would be beneficial and leaving them in place as part of the No Project Alternative would continue to expose passersby to an industrial facility. The No Project Alternative would fail to meet most of the objectives of the Project since it would not remove onshore and offshore facilities and it would not ensure the excavation and remediation of all impacted soils within the Facility.

Under the No Project Alternative, no impacts to air quality would occur since no equipment would be used for decommissioning and no trucks would be used to transport decommissioned materials. Trucks would still be used to transport contaminated materials although it might be significantly less since above ground facilities would remain and excavation could not be completed under Tank 861 and other facilities. It is likely that additional remediation would have to occur at a later date once a landowner proposes some other development at the site and effectuates the removal of the facilities onsite. Air impacts of the proposed Project were considered less than significant and impacts of the reduced activities under the No Project Alternative would be less than those for the proposed Project. Impacts to greenhouse gases (GHG) from trucking of contaminated materials would be less than those for the proposed Project since fewer activities would occur, and fewer emissions of GHGs would be generated. Mitigation measure GHG.1 would still be applicable. Trees and other vegetation would not be removed to facilitate remediation activities and no impacts to biological resources would occur. However, if facilities are not removed, then some contaminated soils under existing facilities would remain in place and could potentially leach into underground water resources or the contaminated soils erode as part of storm cycles and be drained into the ocean, causing potential impacts.

Hazards impacts are likely to be significant since facilities would not be removed and could continue to deteriorate and result in potential spills of material left in pipelines or in other facilities. The No Project Alternative also would not address the seven idle wells within the property and those wells could

potentially leak in the future and result in impacts to biological resources and water resources as with the proposed Project.

Cultural resources impacts would still occur since it is likely that regulatory agencies would still require excavation and remediation of contaminated materials. Some of the contaminated materials are within sensitive cultural resources sites and impacts would still occur. Mitigation measures under the cultural resources section would still be applicable (mitigation measures Cul.1a through Cul.1f, Cul.2a, and Cul.2b) to mitigate some of the impacts including the preparation of a Cultural Resources Management Plan and requirements for the presence of Native American monitors. Impacts would be similar to those identified under the proposed Project.

Impacts to geological resources and soils would be similar to those for the proposed Project since excavation of contaminated soils is likely to be required. Requirements for an Erosion Control Plan and best management practices would still occur and would mitigate impacts to less than significant. Pipelines would not be removed through the bluff area and erosion impacts in that area could continue to occur with those facilities being left in place.

Impacts to land use would be considered significant but mitigable since the facility would not be decommissioned and future land uses would be hampered by the existence of these obsolete industrial facilities. Also, environmental impacts could occur as a result of leaving facilities behind, such as oil seeps and idle wells that could leak in the future and cause impacts to biological and water resources.

Impacts from noise under the No Project Alternative would be substantially less than the proposed Project since only the remediation activities would occur, but there would be no impacts associated with offshore or onshore decommissioning activities.

ES.6.2.2 Full Removal of Facilities Alternative

This alternative would have similar aesthetic impacts as the proposed Project since the site is well screened from public viewing areas. However, the public trail and seal viewing area have good views of the equipment and removal of all facilities would be beneficial to those passersby. It should be noted that the dominant attractions for the passersby on the trail are the Pacific Ocean and seal rookery. The addition of a rig to plug and abandon the seven wells within the site would have some added temporary aesthetic impacts beyond those from the proposed Project; however, those impacts would be temporary. Additional mitigation could include temporary screening barriers, which could also help diminish noise impacts, if needed.

This alternative would result in more emissions than the proposed Project since it would include additional work efforts to plug and abandon wells and remove additional pipelines, which would require more equipment. It would also result in additional GHG emissions for the same reasons stated above. Impacts associated with GHGs from trucking of contaminated materials would be slightly more than those for the proposed Project since more activities would occur, and higher emissions of GHGs would be generated. The intensity of work would most likely be the same as the proposed Project, but the duration would increase, which would increase emissions. The same GHG mitigation measure, GHG.1, for the proposed Project would apply for this alternative.

Trees and other vegetation would be removed to facilitate remediation activities and impacts to biological resources would be similar to those from the proposed Project.

Hazards impacts are likely to be similar to those of the proposed Project since facilities would be removed and there could be accidental releases during the decommissioning process and result in potential spills

of material left in pipelines or in other facilities. This alternative would address the seven idle wells within the property and those wells could potentially leak during the plugging and abandonment process but would permanently remove any potential risk of future oil spills. In the event of a leak, impacts would occur to biological and water resources similar to the proposed Project and require the same mitigation measures. Under this alternative, the seeps would also be addressed, and this would prevent future releases of oil that could occur from the seeps during storm events if left in place.

Cultural resources impacts would still occur since the Project would still require excavation and remediation of contaminated materials. Some of the contaminated materials are within sensitive cultural resources sites and impacts would still occur. Mitigation measures under the cultural resources section would still be applicable (mitigation measures Cul.1a through Cul.1f, Cul.2a, and Cul.2b) to mitigate some of the impacts including the preparation of a Cultural Resources Management Plan and requirements for the presence of Native American monitors. Impacts would be similar to those identified under the proposed Project.

Impacts to geological resources and soils would be similar to those for the proposed Project since excavation of additional pipelines on the bluff could have erosional impacts. Requirements for an Erosion Control Plan and best management practices would still be required and would mitigate impacts to less than significant. Mitigation measures Geo.4a, 4b, and 4c would still be required to mitigate any potential impacts to the bluff area similar to the proposed Project.

Land use impacts would be beneficial since the facility would be completely cleaned up and wells properly plugged and abandoned, resulting in a site ready for development.

Impacts from noise under this alternative would be more than the proposed Project since additional activities would occur as part of the added well abandonment and the added pipeline removal, with the added impacts associated with offshore or onshore decommissioning activities. Peak noise is probably the same, but the duration of the impact would likely increase. Mitigation measures N.2a and N.2b would still apply.

Traffic impacts would be slightly higher than those of the proposed Project. Duration would be longer, meaning more vehicle miles traveled, but peak impacts would probably be the same. Impacts would still be considered to be less than significant under this alternative.

ES.6.3 Impacts Associated with the Cumulative Development

Section 15130(a)(1) of the CEQA Guidelines (14 California Code of Regulations [CCR], Div. 6, Ch. 3) states that a "cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." CEQA requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable" (14 CCR §15130(a)). Section 3.0 of this EIR provides a list of past, present, and probable future projects that could have cumulative effects with the Project. Table ES.2 provides a summary of the Project's cumulative effects.

Table ES.2 Cumulative Impacts

Issue Area	Proposed Project Cumulative Impacts	Cumulative Impacts Additional Mitigation Measures
Aesthetics	Class III	None
Air Quality	Class III	None
Biological Resources	Class I	None
Cultural Resources	Class II	None

Table ES.2 Cumulative Impacts

Issue Area	Proposed Project Cumulative Impacts	Cumulative Impacts Additional Mitigation Measures
Geology & Soils	Class III	None
Climate Change & GHG	Class II	None
Hazardous Materials & Risk of Upset	Class III	None
Hydrology & Water Resources	Class III	None
Land Use & Planning	Class III	None
Noise & Vibration	Class III	None
Transportation & Circulation	Class III	None
Tribal Cultural Resources	Class II	None

Significant and unavoidable Class I cumulative impacts to biological resources would be realized in the event of an accidental oil spill from the Project Site or the offshore pipelines.

ES.7 Environmentally Superior Alternative

Section 5.0, Alternatives, provides an analysis of the impacts of each selected alternative, compares the impacts of each alternative to the Project, and identifies the Environmentally Superior Alternative. Table ES.3 provides a relative comparison of the Class I, Class II, and Class III impacts of each alternative to the Project by issue area and impact.

Table ES.3 Alternatives Comparison

Issue Area	Proposed Project	No Project	Full Removal
Aesthetics	Class III	Class III	Class II
Air Quality	Class III	Class III↓	Class III↑
Biological Resources	Class I	Class I	Class I
Cultural Resources	Class II	Class II	Class II
Geology & Soils	Class II	Class II	Class II↑
Climate Change & GHG	Class II	Class II↓	Class II↑
Hazardous Materials & Risk of Upset	Class I	Class I	Class I
Hydrology & Water Resources	Class I	Class I	Class I
Land Use & Planning	Class III	Class II	Class IV
Noise & Vibration	Class II	Class II↓	Class II↑
Transportation & Circulation	Class III	Class III↓	Class III↑
Tribal Cultural Resources	Class II	Class II	Class II
Other	Class III	Class III	Class II

Notes: ↓ = decrease in severity, ↑ = increase in severity

As the discussion above indicates, impacts from the various alternatives and the proposed Project are similar in classification for those impacts that are significant and mitigable. There are also some slight differences in severity as indicated above for those impacts that are significant and mitigable and for those impacts that are less than significant. However, because the Full Removal Alternative would result in a long-term reduction of the significant and unavoidable impact of oil spills and the long term reduction of the potential biological and water resources impacts as a result of fully abandoning the facilities, the Full Removal Alternative is found to be the environmentally superior alternative.

Table ES.4 Proposed Project Class I Impacts
Impacts That Are Significant and Unavoidable Levels

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

Impact #	Description of Impact	Phase	Mitigation Measures
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.7	Any accidental oil spill and subsequent clean-up efforts have the potential to directly affect any part of the population of a threatened, endangered, or candidate species or result in the loss or disturbance to its habitat, specifically, species that inhabit Carpinteria Salt Marsh, Carpinteria Creek, or forage along the coast along the CPF.	Construction	Bio.7: Oil Spill Contingency Plan
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.2	The Project may create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Construction	Haz.2a: Spill Response Planning Haz.2b: Asbestos and Lead Planning
HYDROLOGY AND WATER RESOURCES (Section 4.8)			
WR.1	Surface water quality may be impaired during Project decommissioning. As a result, the Project could violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Accidental discharge of petroleum hydrocarbons into marine waters could adversely affect water quality.	Construction	WR.1: Stormwater Pollution Prevention Plan

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

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

Impact #	Description of Impact	Phase	Mitigation Measure
AESTHETICS (Section 4.1)			
A.4	The Project would create a temporary new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Construction	A.4: Beach/Nearshore Night-Lighting Minimization
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.1	The proposed Project could potentially affect federal or state-listed threatened, endangered, or rare plant and animal species, other special status species, or habitat that supports these species, including nesting birds and marine species.	Construction	Bio.1a: Agency Approvals Bio.1b: Habitat Restoration/Revegetation Plan Bio.1c: Pre-construction Wildlife Surveys Bio.1d: Fencing Bio.1e: Worker Education and Awareness Plan Bio.1f: Marine Wildlife Contingency and Training Plan Implementation Bio.1g: Harbor Seal Rookery Monitoring and Protection Bio.1h: Wildlife Relocation Monitoring
Bio.2	The proposed Project could have an adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, including City of Carpinteria and Coastal Commission defined ESHA ,or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries. .	Construction	Bio.2a: ESHA Impact Avoidance Bio.2b: Scrub Mitigation Bio.2c: Essential Fish Habitat Avoidance
Bio.3	Project activities would have an adverse effect on state or federally protected wetlands and/or Waters of the US/State (including riparian areas) as defined by Sections 401 and 404 of the Clean Water Act, or other state and local agencies.	Construction	Bio.3a: Permitting Compliance with USACE, RWQCB, and CDFW Regulations Bio.3b: Wetlands Pre-construction Survey Bio.3c: Coastal Wetlands Mitigation and Monitoring Plan
Bio.5	The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Construction	Bio.5: Tree Removal Mitigation

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

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

Impact #	Description of Impact	Phase	Mitigation Measure
CULTURAL RESOURCES (Section 4.4)			
Cul.1	Grading and excavation associated with decommissioning would potentially result in a substantial adverse change in the significance of an archaeological resource. Specifically, the Project would cause disturbance to known and unknown CA-SBA-6 deposits. Equally, in the event of an oil spill, the spill and cleanup efforts would potentially result in disturbance to cultural resources.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
Cul.2	The Project would disturb human remains, including those interred outside of dedicated cemeteries.	Construction	Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery
CLIMATE CHANGE AND GREENHOUSE GASES (Section 4.6)			
GHG.1	Construction GHG emissions (including mobile sources) would exceed the Santa Barbara County threshold of significance and therefore GHG emissions, either directly or indirectly, may have a significant impact on the environment.	Construction	GHG.1: GHG Emissions Reductions
GHG.2	The Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Construction	GHG.1: GHG Emissions Reductions
GEOLOGY AND SOILS (Section 4.5)			
Geo.2	The Project could result in substantial soil erosion or the loss of topsoil.	Construction	Geo.2: Erosion Control Best Management Practices
Geo.3	Ground-disturbing activities would potentially result in erosion-induced siltation of nearby drainages and the Pacific Ocean.	Construction	Geo.2: Erosion Control Best Management Practices
Geo.4	Part of the Project location incudes the Carpinteria Bluffs, a geologic unit that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site erosion.	Construction	Geo.4a: Bluff Stabilization Plan Geo.4b: Bluff Stabilization During Pipeline Removals Geo.4c: Bluff Stabilization Following Pipeline Removal

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

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

Impact #	Description of Impact	Phase	Mitigation Measure
Geo.7	The Project would potentially impact a unique paleontological resource or site or unique geologic feature.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.1	The Project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.		Haz.1: Contaminated Soil Handling
Haz.7	The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Construction	Haz.7: Fire Response Planning
NOISE AND VIBRATION (Section 4.10)			
N.2	The Project would result in the generation of a temporary increase in hourly average ambient noise levels in the vicinity of the Project.	Construction	N.2a: Noise Barriers N.2b: Nighttime Activities
TRIBAL CULTURAL RESOURCES (Section 4.12)			
TCR.1	The proposed decommissioning and remediation Project activities would directly affect known or suspected tribal cultural resources.	Construction	Cul.1a: Cultural Resources Management Plan Cul.1b: Worker Cultural Resources Awareness Program Cul.1c: Cultural Resources Monitoring Cul.1d: Exclusion Zones Cul.1e: Phase III Data Recovery Excavations Cul.1f: Curation of Project Materials Cul.2a: On-Call Forensic Anthropologist Cul.2b: Human Remains Discovery
TCR.2	The Project would/cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and	Construction	Same as above: Cul.1a through Cul.2b

Table ES.5 Proposed Project Class II Impacts
Impacts That Can Be Mitigated to Less Than Significant Levels

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

Impact #	Description of Impact	Phase	Mitigation Measure
	scope of the landscape, sacred place, or object with cultural value to a California Native American tribe.		

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
AESTHETICS (Section 4.1)			
A.1	The Project would not have a substantial adverse effect on a scenic vista.	Construction	None required.
A.2	The Project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	Construction	None required.
A.3	The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, nor would the Project conflict with applicable zoning and other regulations governing scenic quality.	Construction	None required.
AIR QUALITY (Section 4.2)			
AQ.1	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard.	Construction	None required.
AQ.2	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Construction	None required.
AQ.3	Expose sensitive receptors to substantial pollutant concentrations.	Construction	None required.
AQ.4	Conflict with or obstruct implementation of the applicable air quality plan.	Construction	None required.
BIOLOGICAL RESOURCES (Section 4.3)			
Bio.4	The Project could interfere substantially with the movement of wildlife or any resident or migratory fish species.	Construction	None required.
Bio.6	The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	Construction	None required.
GEOLOGY & SOILS (Section 4.5)			
Geo.1	The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.	Construction	None required.

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
Geo.5	The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994); therefore, there would be no substantial direct or indirect risks to life or property.	Construction	None required.
Geo.6	The Project Site does not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	Construction	None required.
HAZARDOUS MATERIALS AND RISK OF UPSET (Section 4.7)			
Haz.3	The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Construction	None required.
Haz.4	The Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would not create a significant hazard to the public or the environment.	Construction	None required.
Haz.5	The Project is not located with an airport land use plan nor within two miles of a public or public use airport.	Construction	None required.
Haz.6	The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Construction	None required.
HYDROLOGY AND WATER RESOURCES (Section 4.8)			
WR.2	The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.	Construction	None required.
WR.3	The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces.	Construction	None required.
WR.4	The Project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation.	Construction	None required.

Table ES.6 Proposed Project Class III Impacts
Less Than Significant Impacts

Impact #	Description of Impact	Phase	Mitigation Measures
WR.5	The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Construction	None required.
LAND USE AND PLANNING (Section 4.9)			
LU.1	The Project would not physically divide an established community.	Construction	None required.
LU.2	The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Construction	None required.
NOISE AND VIBRATION (Section 4.10)			
N.1	The Project would result in the generation of a temporary increase in CNEL average ambient noise levels in the vicinity of the Project.	Construction	None required.
N.3	The Project could result in the generation of excessive ground borne vibration or ground borne noise levels during construction/demolition activities.	Construction	None required.
N.4	The Project would not result in excessive noise for people residing or working within two miles of a public, or public use, airport.	Construction	None required.
TRANSPORTATION AND CIRCULATION (Section 4.11)			
T.1	The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Construction	None required.
T.2	The Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).	Construction	None required.
T.3	The Project would not substantially increase hazards.	Construction	None required.
T.4	The Project would not result in inadequate emergency access.	Construction	None required.