COUNTY OF SANTA BARBARA

Planning and Development

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Draft Mitigated Negative Declaration

Bradley 5-3 Well Sump Remediation

23LUP-00066 / 23NGD-00009
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1.0 REQUEST/PROJECT DESCRIPTION

The project is for a Land Use Permit (Case No. 23LUP-00066) to implement the actions described in the Site Assessment Report and Remedial Action Work Plan dated January 20, 2023 prepared by Atlas Technical Consultants LLC, including excavation of approximately 2,700 cubic yards (0.17 acres) of hydrocarbon impacted soil and the historic well sump from the Bradley 5-3 oil well sump location. Excavation of hydrocarbon-impacted material surrounding the oil well sump is proposed to extend to a maximum depth of approximately 10 feet below ground surface (bgs) within an approximately 32,000-square-foot (0.7-acres) work area Hydrocarbon-impacted soil may be temporarily stockpiled onsite. Temporary chain link fencing with access gates will be installed around the work area. The project will result in approximately 2,700 cubic yards of impacted soil to be removed and replaced with clean fill. Following excavation, inspection and verification sampling will be performed. Up to 25 confirmation samples will be collected within the sump area. When confirmatory soil samples collected from the bottom and sides of the excavation indicate that TPH concentrations are below the Environmental Health Services investigation level of 100 mg/kg, and other compounds are below their respective Environmental Screening Level or accessible limits are reached, the cleanup objective will be considered achieved.

Impacted soil will be excavated, stored, loaded into dump trucks, and transported off-site to the Santa Maria Landfill for disposal. Plastic sheeting or geotextile fabric will be placed on the ground surface in the load out area (as necessary) to prevent hydrocarbon-impacted material from coming in contact with the underlying surface.

Clean fill will be placed in lifts and compacted. Imported backfill and clean excavated soil (soil above the impacted zone) may be stockpiled onsite and re-used as backfill. The project will include approximately 185 truck trips for export material and 185 truck trips for import material. The property will be restored to existing conditions by grading the area to as near original grade as possible and removing the temporary fencing. The anticipated duration of the project is approximately 4 to 6 weeks. One week for site set-up; two to three weeks to excavate and backfill / compact; and one week for site restoration and landscaping. Heavy equipment will not be used at the site before 8 a.m. or after 5 p.m. Monday through Friday, with no weekend or after hours work unless dictated by unforeseen circumstances.

The total area of disturbance of the excavation of the sump and lease road is approximately 0.90 acres. The project site is located at 3700 Telephone Road and is associated with Assessor Parcel Numbers (APN) 129-010-011, zoned Ag-II-40, in Santa Barbara County, California within the Fourth supervisorial district.

2.0 PROJECT LOCATION

The Bradley 5-3 oil well is situated on a 633.83-acre parcel identified by the Santa Barbara County Assessor's Office as assessor parcel number (APN) 129-010-011 and zoned AG-II-40. The parcel is located east of the City of Santa Maria and east of Telephone Road. The Assessor's Office lists the address for the parcel as 3700 Telephone Road; however, postings at the entrance to the site indicate the address is 3850 Telephone Road. Online mapping applications do not accurately locate the site using either address. The oil well and sump is located approximately 0.84 miles east of Telephone Road, and approximately 1.17 miles north of E. Clark Avenue, within the Fourth supervisorial district (Figure 1).

2.1 Site Information	
Comprehensive Plan Designation	Rural, Agriculture, A-II-40, (one dwelling unit per 40 acres)
Zoning District, Ordinance	County Land Use and Development Code, AG-II-40, minimum lot size 40 acres

Site Size	633.83-acres
Present Use & Development	129-010-036: AG-II-40, Multi-Family Residence 129-010-032: AG-II-40, Greenhouses
Surrounding Uses/Zoning	North: AG-II-40, Row Crops and Single-Family Residences South: AG-II-100 & AG-II-40, Hoop houses, Row crops East: AG-II-40, Row Crops West: AG-II-100, Row Crops
Access	Telephone Road
Public Services	Water Supply: Private onsite well Sewage: N/A Fire: County Fire Police: County Sherriff

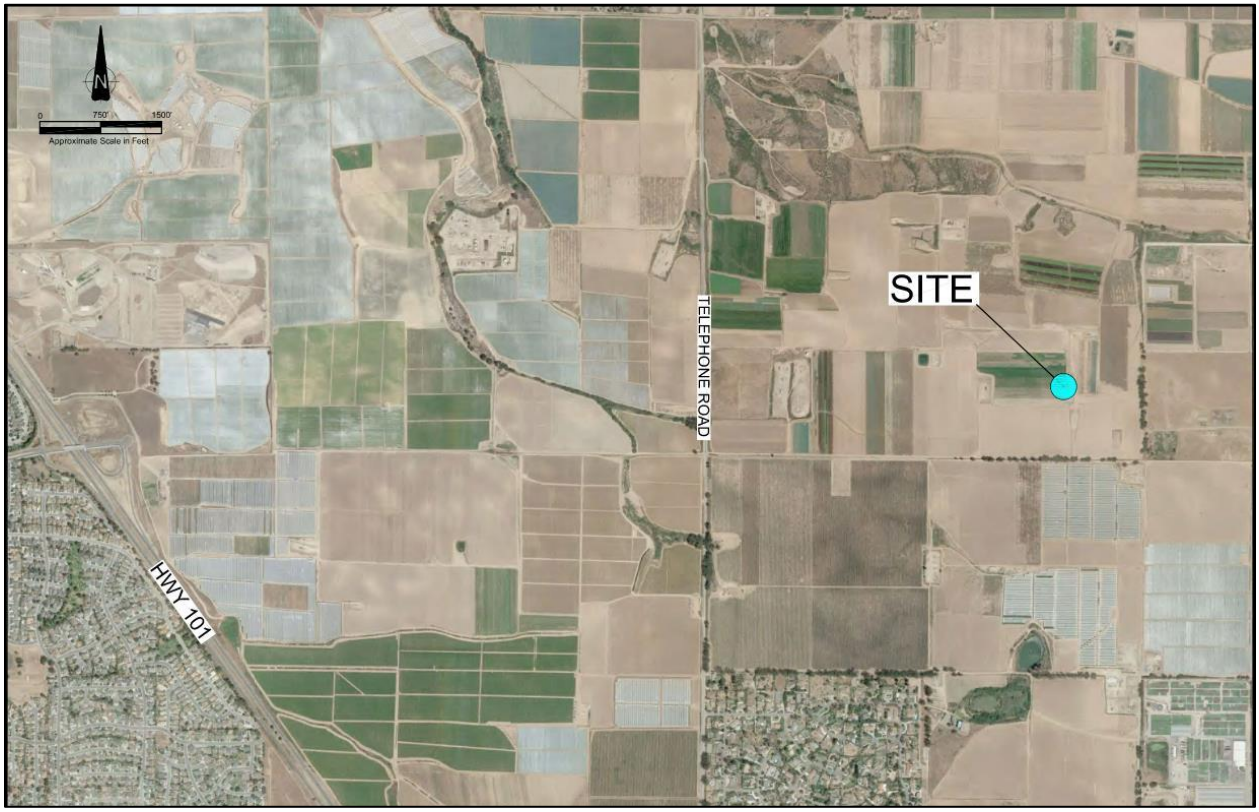


FIGURE 1. SITE LOCATION MAP. ACCESS VIA TELEPHONE ROAD.

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SETTING

The project site is located on a parcel, used for agricultural operations, primarily for row crops. The project site is surrounded by lands used primarily for agricultural purposes including rotational crops onsite. The site is located within the Santa Maria Valley Oil Field and multiple plugged wells can be found within the vicinity. Topography in the project vicinity is moderately sloping, with an elevation of approximately 650 to 700 feet (200 to 215 meters). The surrounding landscape consists of agricultural land use (i.e., row crops) and active oil production. The topography, soils, and vegetation throughout the project area have been, and continue to be, impacted at various levels due to these on-going activities. Historical oil production activities at the

Bradley 5–3 oil well location occurred between 1952 and 1966 and resulted in an area of hydrocarbon impacted soil.

The project is located within the potential range of the California Tiger Salamander (CTS) (Ambystoma californiense), a federally-listed endangered species. There are no known archaeological or historical sites in the vicinity of the project. The Bradley 5-3 oil well is identified as American Petroleum Institute (API) number 08302507.

3.2 ENVIRONMENTAL BASELINE

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

4.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

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

Potentially Significant and Unavoidable 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.

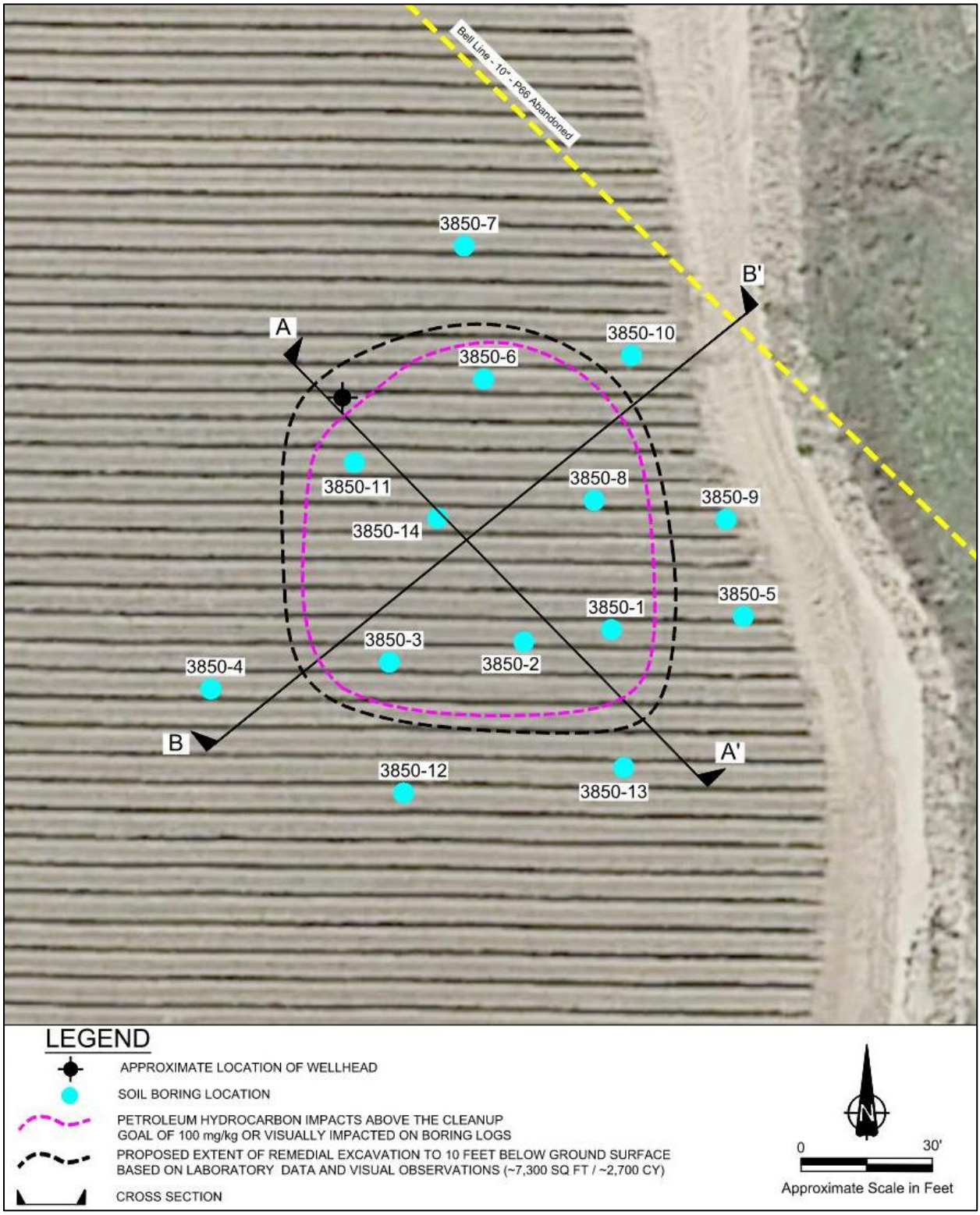


FIGURE 2. SITE PLAN WITH SOIL BORING LOCATIONS.

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	

Existing Setting. The project site is located approximately 2 miles east of US Highway 101, in a rural area and a private drive near Telephone Road. Public views in this area are dominated by rolling hills, scattered vegetation and heavy agricultural development. The site is not visible from any designated scenic vistas (Figures 3 & 4).

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

FIGURE 3. VIEW NORTH TOWARD THE PROJECT AREA, ACCESS ROAD, AND ROW CROPS (LEFT) AND RUDERAL BERMS AND ACCESS ROAD (RIGHT).

Impact Discussion:

(a-d). The proposed project comprises excavating approximately 2,700 cubic yards (0.17 acres) of hydrocarbon impacted soil from the Bradley 5-3 oil well sump location, replacing with clean fill and compacting, and restoring the project site to previous conditions. No project components, including structures, land alterations or lighting, would be visible from any public highways, railroads, trails, beaches or other recreation areas and public open spaces. Construction activities would not be visible from Telephone Road due to the distance of the site from the public roadway. The project may be temporarily visible from Clark Ave and the private driveway leading to the site, but would not cause unique visual changes to the area due to existing agricultural activities that occur on the site and the temporary nature of construction. A temporary chain-link fence will be installed around the work area with access gates that will be locked during nonworking hours. The project would not result in any permanent structures or long-term changes to the aesthetics of the project site. The anticipated duration of the project is approximately 4 to 6 weeks. One week for site set-up; two to four weeks to excavate and backfill / compact; and one week for site restoration and landscaping. The post-construction visual contrast should diminish quickly as the affected areas would be backfilled and re-sloped to existing conditions.

The proposed project does not include the installation of any lighting fixtures. Per standard County regulations, construction activities would be limited to daytime hours between 8 AM and 5 PM 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. Project components, including land alterations or lighting, would not be visible from Telephone Road during construction activities (Figures 1 and 2 below). Once grading activities are complete, the project site would look comparable as existing conditions. The project would not affect neighboring areas with glare or night lighting. The project would have *less than significant impacts* to aesthetics.

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

FIGURE 4. VIEW SOUTH ALONG THE EXISTING AGRICULTURAL ACCESS ROAD WITH THE PROJECT AREA AND ROW CROPS (RIGHT) AND RUDERAL BERM (LEFT).

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. *Background.* Agricultural lands play a critical economic and environmental role in Santa Barbara County. Agriculture continues to be Santa Barbara County's major producing industry with a gross production value of over $1.6 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.

Physical. The project site is designated Ag-II-40 by the County Land Use Element. The existing 633.83-acre parcel (APN 129-010-011) currently supports row crops, oil wells, and agricultural activities. The property adjoins agricultural parcels ranging from approximately 20 to 630 acres; these neighboring properties to the north, south, east, and west also support agricultural operations such as row crops, nurseries, processing facilities, and Ag ponds, as well as oil production. The site is underlain by non-prime Class 3 soils, specifically Garey sandy loam (2-9%). The subject parcel is not currently under a Williamson Act contract. The contract is for rotational crops and covers 122-acres. Agricultural activities occurred on the property since at least the 1930's and overlapped the Bradley 5–3 oil well and sump prior to and after the life of the well. The proposed project site has remained relatively unchanged since the early 2000s.

Impact Discussion:

(a, b). The property currently contains hydrocarbon impacted soil in the vicinity of the Bradley 5-3 oil well, which was previously capped and abandoned in 1966. Approximately 0.7-acres of existing Ag land will be temporary blocked off with a chain link fence while remediation activities are completed. The impacted material primarily underlies active agricultural land and remediation activities would result in temporary disturbance of the Ag land. Field observations and laboratory results indicate that hydrocarbon-impacted material may extend up to a depth of approximately 9 feet bgs; therefore, remedial excavation is projected to extend to a maximum depth of approximately 10 feet bgs. Sidewalls of the excavation will generally be sloped no steeper than 1:1 (vertical to horizontal) ratio for slope stability. Upon the completion of the confirmation soil sampling, the excavated areas will be backfilled with clean, imported soil. Imported fill material will be predominately granular, non-expansive, and contain no more than 40 percent fines and be free of rock or similar irreducible material greater than 12 inches in any dimension. The material shall not include organic or other deleterious materials. The excavation will be backfilled and compacted in lifts not exceeding 12 inches in depth and the soil shall be compacted to 90 percent compaction.

Project-related grading activities would have the potential to cause short-term fugitive dust that could have the potential to impact adjacent agriculture. Dust 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. See Section 4.3a Air Quality.

The proposed project would not remove any acreage from permanent agricultural production and would not impact any neighboring agricultural operations (Figures 1 & 2). The project would not result in the conversion of agricultural land to non-agricultural use, nor would it impair agricultural land productivity or conflict with the Agricultural Preserve Program since the individual work area is small in size and the activities are temporary in nature. The project would result in the temporary impairment of 0.17-acres of agricultural land to remove petroleum hydrocarbon-containing soil that could be an ongoing impediment to agricultural land productivity. The proposed remediation would not substantially interfere with existing Ag and residential actives. The project would have *an insignificant impact* on neighboring agricultural operations.

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 issue constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the threshold of significance for agricultural resources. Therefore, the project's contribution to the regionally significant loss of agricultural resources is not considerable, and its cumulative effect on regional agriculture is insignificant.

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 (O_3) and a state non-attainment area for particulate matter (PM_{10}). 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 PM_{10} 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, NOx 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). The scope of the project includes installation of a temporary chain link fencing around the temporary workspace (approximately 0.7-acres) to delineate work boundaries; excavate hydrocarbon-impacted material; testing of soil to determine extent of impact; transportation of excavated material for disposal; restoring topography and removing the temporary chain link fence.

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 PM2.5. Dust and odors will be monitored during loading of trucks. Once loading is complete, a tarp or cover will be extended over the entire load. Construction activities such as excavation, backfilling, stockpiling soil, and vehicle traffic may generate dust and particulate matter when the exposed soil surfaces are dry. 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 project description and provided recommended additional standard dust mitigation measures, in a letter dated April 11, 2023. These standards are included as Attachment 4. With the incorporation of these dust measures, 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.

Short-term emissions of ozone precursors (NOx 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 removing approximately 2,700 cubic yards (0.17 acres) of contaminated soil. Additional impacted soils above ESLs would be removed as encountered during supplemental investigation. 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 6.6 miles north.

Short-term thresholds for NOx and ROC emissions from construction equipment have not been established in the County. Per the Santa Barbara County Environmental Thresholds and Guidelines Manual Published January 2021, emissions of NOx from construction equipment in the County are estimated at 1,000 tons per year of NOx. When compared to the total NOx emission inventory for the County of approximately 17,000 tons per year, construction emissions from all projects Countywide comprise approximately six percent of the 1990 county-wide emission inventory for NOx (Santa Barbara County 1993 Rate-of Progress Plan). In general, this amount is not considered significant. However, due to the non-attainment status of the air basin for ozone, contractors would be required to adhere to diesel particulate and NOx emission reduction measures as required by County Planning, and outlined in Attachment 4, 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.

After remediated, the site would return to agricultural activities (row crops). 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 significant new vehicle emissions (i.e., new vehicular trips to or from the site would be fewer than 100). It would not involve new stationary sources (i.e., equipment, machinery, hazardous materials storage, industrial or chemical processing, etc.) that would increase the amount of pollutants released into the atmosphere. The project would also not generate additional smoke, ash, odors, or long term dust after construction. The project's contribution to global warming from the generation of greenhouse gases would be negligible.

With implementation of standard County Air Quality conditions specified in Air-01 and the additional standard dust mitigation measures, included as Attachment 4, the project's air emissions would not be substantial. Therefore, the project would 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 4 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 would fall below the Screening Threshold and, therefore, would not require further analysis.

Impact Discussion:

(a, b). Generate GHG Emissions. The limited nature and duration of construction activities would not generate considerable greenhouse gas emissions. The project would *not conflict* with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, the project would not exceed the County's Screening Threshold of 300 MTCO2e/year for non-industrial stationary source projects, and the impact would be *less than significant*.

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 would 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 unique, rare, threatened or endangered species of animals?		X			

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
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 June 16, 2023 and a biological report was prepared by SWCA Environmental Consultants. The survey area included the proposed project footprint and immediate surrounding landscape, and a visual scan of adjacent properties.

The proposed project is located in a rural agricultural area of Santa Barbara County, southeast of the City of Santa Maria. Historical and current anthropogenic disturbances to the natural environment occur throughout the survey area and adjacent properties (e.g., oil extraction, agricultural operations). The survey area is dominated by active agricultural fields (i.e., row crops) and adjacent ruderal, weedy soil berms between crops and roads. No special-status botanical or wildlife species, avian nesting behavior and/or active nests were observed during the survey. Botta's pocket gopher (Thommomys bottae) burrows were detected in the sandy, friable soil berms adjacent to the agricultural fields, but none were detected on the roads or in the proposed project impact area. The following analysis is based on this information.

Flora:

The topography, soils, and vegetation throughout the project site have been impacted due to agricultural activities since the 1930s. The majority of the project site is utilized for rotational row crops. Due to the intensive agricultural use of the site, no special-status botanical species or CDFW-designated sensitive natural communities were documented during the survey. The 2022-2023 rain year provided sufficient precipitation for germination in the region and the survey was conducted within the typical blooming and/or fruiting period for most regionally occurring special-status species. Based on this and the floristic nature of survey completed on site, it is expected that special-status plant species would have been detectable at the time of the surveys, if present.

Fauna:

The CNDDB search within 2 miles of the project site are shown in Figure 5 above. No special-status species were documented during the survey. Further, the potential for special-status wildlife species to occur in the proposed project site is considered low due to the lack of natural habitat and historical, current, and future agricultural activities (i.e., discing). Due to the lack of natural habitat and highly disturbed condition of the vegetated areas, the potential for special-status wildlife species to occur in the proposed project site is considered low within and adjacent to the project site. Based on the results of the background literature review and observations made in the field, it was determined that three special-status wildlife species have a very low potential to temporarily occur within the survey area during upland migratory and dispersal movements through the actively farmed agricultural field:

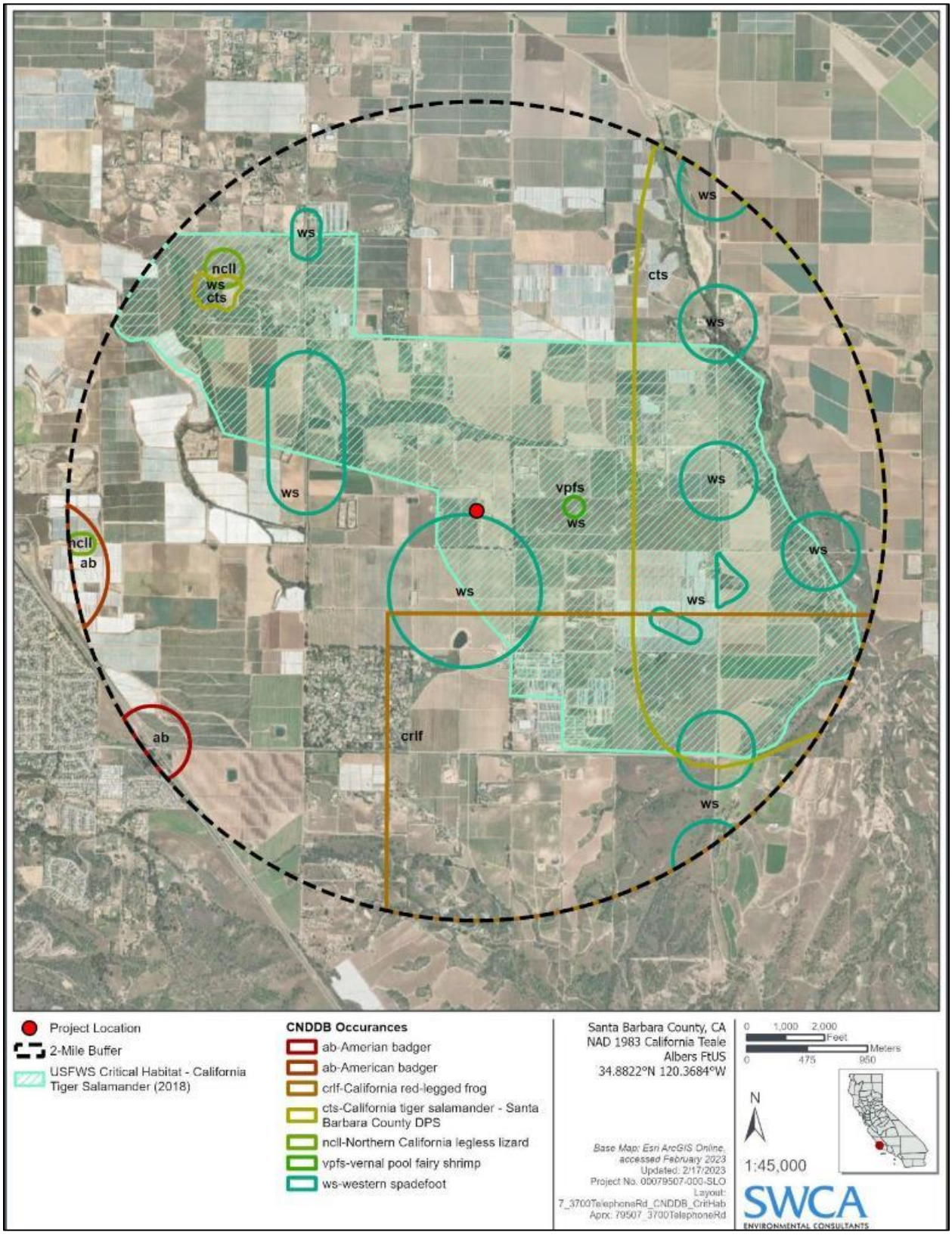


FIGURE 5. TWO-MILE USFWS CRITICAL HABITAT AND CDFW CNDDB OCCURRENCES MAP.

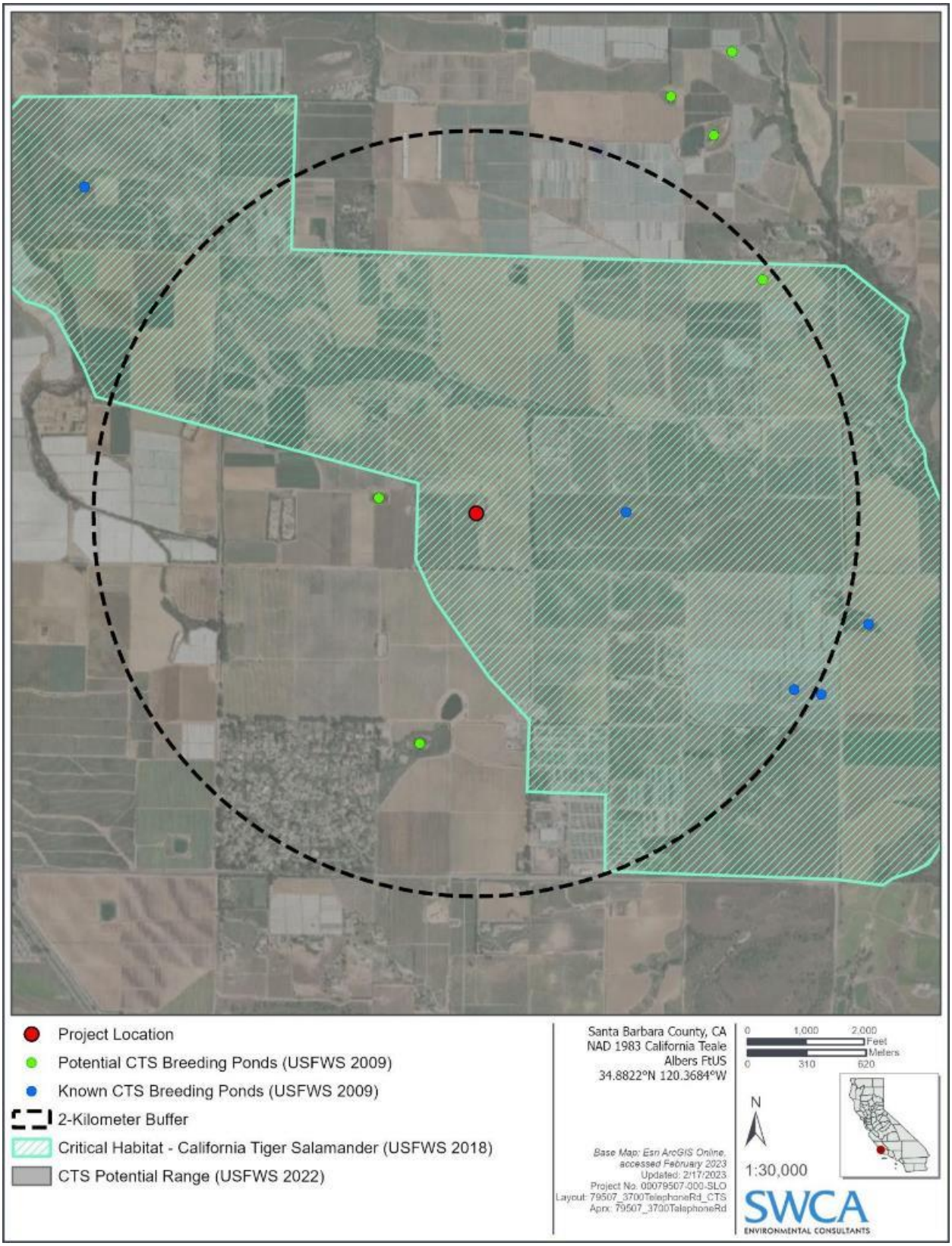


FIGURE 6. KNOWN AND POTENTIAL CTS BREEDING PONDS WITHIN 2-KILOMETERS OF THE PROJECT SITE.

California red-legged frog (CRLF; Rana draytonii); Federal Threatened, State Species of Special Concern. California red-legged frog may be found in upland habitats near breeding areas and along intermittent drainages connecting wetlands. California red-legged frogs require cold-water-pond habitats such as pools, streams, and ponds with emergent and submergent vegetation. Although California red-legged frogs can inhabit either ephemeral or permanent streams or ponds, populations probably cannot be maintained in ephemeral streams in which all surface water disappears. Breeding typically occurs over a one-to-two-week period between late November and early April (depending on local environmental conditions) and females lay egg masses in the water which the male externally fertilizes. Adults are highly aquatic when active but depend less on permanent water bodies than other frog species. Adults may take refuge during dry periods in small mammal burrows or leaf litter in riparian habitats. Although California red-legged frogs typically remain near streams or ponds, studies suggest that they are capable of moving two miles or more in upland habitat or through ephemeral drainages.

According to CNDDB records (CDFW 2023), the nearest documented occurrence for this species is within a non-specific area approximately 0.5-mile southeast of the project site from 2007. Local biological knowledge also supports their presence in other locations within 2 miles of the project. However, there is no suitable reproductive habitat in the survey area and no suitable upland habitat (i.e., lowland grasslands) in the proposed impact area. Based on the dispersal capabilities of the species, there is very low potential for CRLF to temporarily occur on site during suitable conditions (i.e., rain events, nighttime).

California tiger salamander (CTS; Ambystoma californiense); Federal Endangered, State Threatened. This species is restricted to vernal pools and seasonal ponds (including many constructed stock ponds) in grassland and oak savanna plant communities, predominantly from sea level to 2,000 feet, in central California. Adult and post-metamorphic CTS estivate in small mammal burrows, such as California ground squirrels, in appropriate upland habitat during the dry summer and autumn months. CTS have been reported to travel 2 kilometers (1.3 miles) between breeding ponds and upland habitat, with an average migration distance of 562 meters (1,844 feet). Breeding sites generally consist of natural ephemeral pools or artificial ponds that mimic them (e.g., stock ponds that are allowed to dry). Peak migration of metamorphs leaving their natal ponds is typically from May to July.

According to CNDDB records, the nearest documented occurrence for this species is within a non-specific area approximately 0.78 mile east of the project site from 1991. There are two known CTS breeding ponds 0.50 mile east and 1.15 miles southeast of the project site as well as two potential CTS breeding ponds 0.34 mile west and 0.74 mile southwest of the project site (Figure 6 below). However, based on the limited dispersal capabilities of the species and numerous obstructions between breeding ponds and the project site (roads, cultivated agriculture, heavy equipment use, etc.) there is low potential for CTS to occur on site.

Western spadefoot (Spea hammondii); State Species of Special Concern. Western spadefoot toad generally inhabits lowlands, sandy washes, and river floodplains but also may be found in woodlands, grasslands, and chaparral where soils are sandy and loose. This species occupies small mammal burrows or uses the hardened spades on its feet to burrow underground where it remains buried for most of the year, only emerging at night during the rainy season to breed in ephemeral pools, sand or gravel washes, and small streams that are often seasonal.

According to CNDDB records, the nearest documented occurrence for this species is approximately 0.35-mile south of the project site from 2000. Although suitable reproductive habitat and upland habitat may occur within the project vicinity, historic, current, and on-going agricultural impacts (i.e., discing) may prevent western spadefoot from persisting in the project impact area. However, based on the dispersal capabilities of the species, there is low potential for western spadefoot to occur on site during suitable conditions (i.e., rain events, nighttime).

Migratory Nesting Birds. The agricultural field and adjacent ruderal vegetation provide little habitat for nesting birds and raptors. However, migratory nesting birds and raptors may occur within the project vicinity. The potential to encounter and disrupt these species is highest during the nesting season (generally February 1 through August 31) when nests are likely to be active, and eggs and young are present.

Hydrology:

No hydrological resources under the jurisdiction of state (i.e., Regional Water Quality Control Board, CDFW) or federal (i.e., Army Corps of Engineers) agencies, including vernal pools, are present within or immediately adjacent to the survey area. However, natural and man-made ponds, and other water bodies are located in the landscape outside of the survey area.

USFWS General Conservation Plan

In June 2022, the U.S. Fish and Wildlife Service (USFWS or the Service) finalized a General Conservation Plan (GCP) for Oil and Gas Activities associated with issuance of Endangered Species Act section 10(a)(1)(B) permits for the Santa Barbara County distinct population segment of the California tiger salamander, California red-legged frog, and Lompoc yerba santa within Santa Barbara County, California. The GCP streamlines the application for a Section 10(a)(1)(B) incidental take permit by allowing the Service to develop a single general conservation plan for a local area. Individual non-federal entities may apply for an incidental take permit, provided they commit to complying with the monitoring, minimization, and mitigation measures in the general conservation plan.

The project is considered a Midstream Activity, which includes habitat restoration activities and therefore falls under the GCP covered activities. The GCP analyses the impacts to listed species and identifies mitigation measures to minimize all unavoidable impacts according to the Mitigation Strategies for the California tiger salamander, California red-legged frog and the anticipated impacts described in the proposed project package application.

According to the GCP, the Service provided impacts to habitat as a proxy to quantify take levels and define the permitted take limits. Within the Western Santa Maria area, there is approximately 12,963 acres of CTS habitat and the GCP allows 260 acres to be temporarily impacted. No permanent impacts to or loss of California red-legged frog aquatic breeding habitat is allowed under the GCP, but it is expected that activities with a duration of 1 year or fewer would impact only one-third of the adult lifespan of the average California red-legged frog and mitigation required to offset impacts would be one-third that of an equivalent permanent impacts.

Impact Discussion:

(a-d). Plant species. The majority of the project site is characterized as active agricultural development, specifically row crops. Although ruderal vegetation is within the survey area, the quality is considered very low due to current baseline conditions and associated impacts. The proposed project has been designed to minimize impacts to the maximum extent feasible. Specifically, the project footprint overlaps only existing access roads and actively farmed row crops, avoiding impacts to ruderal habitats. The proposed project does not contain any permanent features and temporary impacts would be confined within the footprint of actively farmed row crops. Farming will continue after the completion of the proposed soil remediation project. The project would result in the temporary loss of a minimal amount of agriculture (0.7-acres) and replacement of 0.17-acres of soil, which does not provide significant habitat value. No special-status botanical species were observed during the survey, and none will be impacted. Additionally, no CDFW-designated sensitive natural communities or hydrologic resources under federal or state agency jurisdiction occur within the survey area, and none will be impacted. The proposed project would replace the contaminated soil with clean fill and restore the project site to existing conditions, therefore creating a cleaner environmental for agriculture to grow. The proposed project would not result in a reduction in the numbers or restriction in the range of any

unique, rare or threatened species of plants. Because the project site is currently un-vegetated and disturbed, impacts to plant species and quality of vegetation are *less than significant*.

(e, f). Specimen trees Herbicides. A narrow stand of Eucalyptus trees line the private access road to the south of the project site. This roadway would be used for access to the project site but the trees are not within the area of disturbance and are not proposed to be removed. The proposed project would not result in the introduction of herbicides, pesticides, animal life, human habitation or other factors that would change or hamper the existing habitat. Therefore, *no impacts* are expected to specimen trees.

(i). Critical habitat. The project location occurs within USFWS-designated critical habitat for the Santa Barbara County Distinct Population Segment for CTS. However, the upland habitat in the project footprint, between potentially suitable critical habitat features in the landscape, is of very low quality, lacking appropriate habitat (i.e., grasslands, oak savannah, coastal scrub) and undergoes regular disturbance relating to agricultural activities (i.e., discing). The proposed soil remediation project will temporarily disturb the actively farmed row crops. Upon completion of the proposed project, the site will be restored to pre-construction conditions and farming will continue. As such, no impacts to USFWS-designated critical habitat for the Santa Barbara County Distinct Population Segment for CTS is expected to occur. No mapped hydrologic resources under federal or state agency jurisdiction occur within the survey area. Therefore, impacts to critical habitat are *less than significant*.

(g, h). Special Status Wildlife Species. CRLF, CTS, and Western spadefoot have a low potential to occur in the project area from migratory or dispersal movements. Botta's pocket gopher burrows were detected in the sandy, friable soil berms adjacent to the surrounding agricultural fields and there are no significant barriers in the landscape between these berm areas and agricultural ponds located approximately 0.34-mile west and 0.50-mile east of the proposed project. These burrows could provide seasonal/temporary refuge for CRLF, CTS, and western spadefoot during upland migratory and dispersal movements. However, the agricultural row crops within the proposed project area contain low quality upland habitat that may allow dispersal of special status species. Direct impacts to CTS, Western Spadefoot, and CRLF, however unlikely their presence may be, could occur from being crushed or trampled by vehicles and equipment.

No special-status wildlife species were observed during the biological survey and no suitable reproductive habitat for CRLF, CTS, or western spadefoot occurs in the proposed project footprint. No temporary/seasonal refugia (i.e., small mammal burrows) were detected in the proposed project footprint and none are expected to occur or persist long enough to allow species survival prior to project implementation. Additionally, repeated agricultural plowing and discing, or deep-ripping, of upland habitats destroy small mammal burrow systems. Therefore, there is a low potential for special status species to disperse into the project area. In the event special status species are found during project construction activities, impacts to these special status species would be mitigated through the use of Environmental Awareness Training (BIO-1), Site Maintenance and General Measures (Bio-2), Special Status Species Surveys and Monitoring (BIO-3), and California Tiger Salamander Impact Avoidance and Minimization (Bio-4). Because CTS and CRLF are federally endangered species, a Section 10(a)(1)(B) incidental take permit of the Service is required when protocol surveys are not performed. Therefore, consultation with the USFWS should be completed prior to ground disturbing activities. The USFWS GCP provides avoidance, minimization, and mitigation measures, which are incorporated into mitigation measure BIO-5. Therefore the potential of take of CRLF, CTS, and western spadefoot during remediation activities would be *less than significant with mitigation*.

Habitat of low suitability for nesting birds and raptors is present within the project site and they may be affected if activities occur during the typical avian nesting season (i.e., February 1 – September 15). Therefore, standard nesting bird protection measures (BIO-6) requiring pre-construction bird surveys shall be completed if construction work occurs during the bird nesting season would reduce impacts to raptors and birds to *a less than significant level*.

(j). Migratory movement. The project would not result in the construction of any permanent structures. Construction activities would be temporary and would not interfere substantially with the movement of any native resident or migratory wildlife species. The net removal of contaminated soil throughout the project area would not impact the ability for wildlife species to move freely among areas of suitable habitat. Therefore, *no impacts* to wildlife movement by the proposed project are expected to occur.

(k). Human factors. The project would not result in the construction of any permanent structures, however construction activities would introduce light, fencing, noise, and human presence to the site. Standard BMPs and site maintenance measures (BIO-2) would *mitigate* impacts from human caused factors to a *less than significant level*.

Cumulative Impacts. Since the project would not significantly impact biological resources onsite, it would not have a cumulatively considerable effect on the County's biological resources.

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

BIO-1 Environmental Awareness Training. An environmental awareness training shall be presented to all construction personnel by a qualified biologist prior to the start of project activities. The training shall include color photographs and a description of the ecology of all special-status species known or determined to have potential to occur, specifically California tiger salamander, California red-legged frog, and Western spadefoot as well as other sensitive resources requiring avoidance near project impact areas. The training shall also include a description of protection measures required by discretionary permits (if required), an overview of the Endangered Species Act (ESA), implications of noncompliance with the ESA, and required avoidance and minimization measures.

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-2 Site Maintenance and General Measures. The following measures shall be implemented to further mitigate impacts to burrowing sensitive species:

- The use of heavy equipment and vehicles shall be limited to the proposed project limits and defined staging areas/access points. The boundaries of each work area shall be clearly defined and marked with high visibility fencing. No work shall occur outside these limits.
- Staging of equipment and materials shall occur in designated areas with appropriate demarcation and perimeter controls.
- Washing of concrete, paint, or equipment, and refueling and maintenance of equipment shall occur only in designated areas. Sandbags and/or absorbent pads shall be available to prevent spilled fuel from leaving the site. Inadvertent fluid releases shall be stopped and cleaned immediately.
- After completion of the project's construction activities, all protective fencing/flagging used to delineate the work area shall be removed from the project and disposed of in appropriate waste receptacles or reused.

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 Land Use Permit issuance.

MONITORING: P&D compliance monitoring staff shall site inspect for installation prior to Final Building Inspection Clearance.

BIO-3 Special Status Surveys and Monitoring. The following measures shall be implemented to further mitigate impacts to burrowing sensitive species:

- A qualified biologist shall conduct a pre-construction survey immediately prior to the start of work to ensure special-status amphibians and reptiles are not present within proposed work areas. During the survey, the biologist shall gently disturb or rake the upper layers of exposed sandy soil to inspect the site for northern California legless lizards. This shall include all equipment staging areas and access routes.
- The boundaries of the work area, including material storage areas, equipment staging areas, and delivery and turnaround locations, shall be delineated and clearly marked in the field. No work shall occur outside these limits.
- Construction monitoring shall also be conducted by a qualified biologist during all initial ground disturbing and vegetation removal activities (e.g., grading, grubbing, vegetation trimming) within suitable habitat. Upon completion of initial ground disturbance, the qualified biologist or monitor will periodically (minimum twice per week) visit the project site throughout the construction and restoration periods to ensure that the biological avoidance and minimization measures are being adhered to and to resolve any potential non-compliance issues.
- If California Tiger Salamander, California red-legged frog and/or western spadefoot toad are found during pre-construction surveys or monitoring, work shall be halted, and they shall be allowed to leave the work area on their own volition or be hand captured and relocated to suitable habitat outside of the area of impact. In the event CTS or CRLF is found, P&D, USFWS, and CDFW would be contacted. Work would not resume until approval to do so is provided by the agencies.
- To minimize the potential for impacts to dispersing/migrating amphibians, work shall occur during dry conditions, as feasible. If work must occur during the typical rainy season (November through April), no work shall occur 48 hours prior to significant rain events (>0.25 inch), or during the 48 hours after these events, to the extent practicable. If work must occur 48 hours prior to significant rain events (>0.25 inch), or during the 48 hours after these events, a qualified biologist will conduct a pre-activity survey to ensure that the work area is clear of special-status amphibians.
- All project activities shall be limited to daylight hours only. At no time shall any nighttime work be permitted.
- Steep-walled excavations (e.g., trenches) that may act as pitfall traps will be inspected for wildlife at least once per day and immediately before backfilling.
- Prior to the start of remediation activities, the project site will be enclosed with silt fence or fabric material at the discretion of a qualified biologist. The fence would be buried 6 inches deep and extend at least 30 inches above ground. Exclusionary fencing will be maintained for the duration of the project. When remediation activities have been completed, the fence material would be removed.
- All trenches, pits, and holes would be sloped at the end of each work day to prevent entrapment of wildlife.

PLAN REQUIREMENTS AND TIMING: This condition shall be printed on project plans submitted for Land Use 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-4 California Tiger Salamander Impact Avoidance and Minimization. In addition to BIO-3 above, the following recommendations have been provided to avoid impacts to CTS:

- Prior to any ground disturbing activities within the project disturbance footprint, all rodent burrows shall be identified and clearly marked by a qualified biologist for avoidance, daily. This shall include all equipment staging areas and access routes; or
- If full avoidance of suitable rodent burrows is not feasible, consultation with the resource agencies would be initiated to obtain a CDFW Incidental Take Permit (ITP) and USFWS authorization.
- Upon locating California tiger salamander or California red-legged frog individuals that may be dead or injured as a result of project-related activities, notification will be made within 72 hours to the Service Ventura Field Office at (805) 644-1766. Notification of dead or injured California tiger salamander should also be made to the Department at (562) 342-7100.

PLAN REQUIREMENTS AND TIMING: This condition shall be printed on project plans submitted for Land Use 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-5 Fish and Wildlife Jurisdiction Advisory. The project site is within the range of the California Tiger Salamander, a Federally Endangered and State Threatened species, and the California Red Legged Frog, a Federally Endangered and State Species of Special Concern. Based upon a report prepared by SWCA dated July 2023, it has been determined that the probability for the California Tiger Salamander and the California Red Legged Frog occurrence on the site is low. The issuance of this permit does not relieve the permit-holder of any duties, obligations, or responsibilities under the federal or California Endangered Species Act or any other law. The permit-holder shall contact the necessary jurisdictional agencies to ascertain his or her level of risk under the federal and California Endangered Species Act in implementing the project herein permitted.

Indemnity for Violation of the Endangered Species Act: The applicant shall defend, indemnify and hold harmless the County or its agents, officers and employees from any and all claims, actions, proceedings, demands, damages, costs, expenses (including attorney's fees), judgments or liabilities, against the County or its agents, offices or employees brought by any entity or person for any and all actions or omissions of the applicant or his agents, employees or other independent contractors arising out of this permit alleged to be in violation of the federal or California Endangered Species Acts (16 USC Sec. 1531 et seq.; Cal. Fish and Game Code Sec. 2050 et sec.). This permit does not authorize, approved or otherwise support a "take" of any listed species as defined under the federal or California Endangered Species Acts. Applicant shall notify County immediately of any potential violation of the federal and/or California Endangered Species Act.

BIO-6 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 construction 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.

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		
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: 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 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.			X		

County Environmental Thresholds. Chapter 8 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (2008, revised February 27, 2018) 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. The site is over an actively farmed agricultural field and therefore, cultural resources are not expected to occur within the vicinity of the proposed project.

On September 26, 2023, 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 pursuant to Public Resources Code (PRC) Section 21080.3.1 and in accordance with the provisions of Assembly Bill (AB) 52, and included a description of the proposed project. No reply was received and no tribal cultural resources (TCRs) were identified on the subject parcel.

Impact Discussion:

(a - d). As discussed above, no cultural resources are expected to occur within or adjacent to the project area. As a result, the proposed project would not cause a substantial adverse change in the significance of any historical resource, cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource, disturb any human remains, or cause a substantial adverse change in the significance of a tribal cultural resource. In order to comply with cultural resource policies, the development project would be conditioned with a standard archaeological discovery clause which requires that any previously unidentified cultural resources discovered during site development are

treated in accordance with the County's Cultural Resources Guidelines [Chapter 8 of the County's Environmental Thresholds and Guidelines Manual (rev.2/2018)]. The disturbed nature of the project site combined with its historical use minimizes the potential for an intact near-surface site. As a result of this, impacts would be *less than significant*.

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. No impacts are identified. No mitigations are necessary.

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:

(a - b). 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 excavation and concrete removal work, 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. No adverse impacts would result.

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 impacts are identified. No mitigation is required.

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	

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
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). The project is not located within a High Fire Hazard Area. 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		
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		

Environmental 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, c, l). Potential to Result in Geologic Hazards. The project site is not underlain by any known fault. Liquefaction potential in the area has been determined to be moderate. Any potential for expansive soils would be mitigated by the use of non-expansive engineered fill. The groundwater data indicated that subsurface drilling was performed at two locations within approximately 0.7 miles of the Site. Groundwater was not encountered at a depth of 35 feet bgs or at 75 feet bgs. Contact with groundwater is not anticipated due to the shallow depth of the proposed remedial excavation (approximately 10 feet bgs). There would not be any exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mudslides or ground failure resulting from the proposed project. The proposed project would not involve any permanent changes in topography. No excessive spoils, tailings or overburden is proposed. Per the plan requirements, shallow soil samples would also be collected to confirm the removal of petroleum hydrocarbon-containing soils in excess of action levels. Assessment and remediation would be conducted according to the work plans approved by the appropriate agency. All soils-related hazards would be *less than significant* through the normal grading permit review.

(b, i). Potential for Grading-Related Impacts. As discussed in the project description, the proposed project is comprised of approximately 2,700 cubic yards of excavation of hydrocarbon impacted soil, which would be replaced with clean fill in lifts and compacting, and restoring the project site to previous conditions. Petroleum hydrocarbon-containing soils would be handled in accordance with the project's approved Site Assessment Report and Remedial Action Work Plan (Atlas, January 20, 2023) (Attachment 3). As mentioned, confirmation soil samples would be collected and chemically analyzed to ensure that the excavation activities have adequately removed soils with petroleum hydrocarbon concentrations in excess of County Environmental Health Services (EHS) approved cleanup levels. EHS would provide oversight of the sample collection and would ensure that the remediation activities are conducted in compliance with the approved work plan and EHS requirements. Field observations and laboratory results indicate that hydrocarbon-impacted material may extend up to a depth of approximately 9 feet bgs; therefore, remedial excavation is projected to extend to a maximum depth of approximately 10 feet bgs. Sidewalls of the excavation will generally be sloped no steeper than 1:1 (vertical to horizontal) ratio for slope stability. The excavation sites would be backfilled with clean overburden and imported soil and topsoil would be replaced. Topography would be restored to match the surrounding area. Impacts would be temporary and *less than significant*.

(e, j). Potential Erosion and Sedimentation or loss of topsoil Impacts. Grading operations that would occur on the project site would include clearing the existing agriculture within the disturbance area, excavating the contaminated soil, replacing the excavation with clean fill, and reestablishing the agriculture. Excavated overburden soils would be used as backfill material and therefore there would be no loss of topsoil. In addition, prior to excavation, topsoil would be removed and stockpiled. It would then be replaced within the upper two feet once the excavation is complete. The area is surrounded by active agriculture with built in erosion control mechanism. Therefore impacts to topsoil and erosion would be *less than significant.*

(d, f, g, h, k). Other Potential Geological Hazards. Soil samples results from the recent site assessment activities indicate that the soil to be excavated will be classified as non-hazardous. The project would not cause destruction, covering or modification of any unique geologic, paleontologic, 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. This grading work would occur on relatively flat surfaces (approximately 0-10% gradients). The project is not located within the vicinity of the ocean and would not be subject to issues associated with seas-level rise. Any vibrations from construction work that would affect adjoining areas (agricutlre) 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.

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:

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		

Environmental 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.

FIGURE 7. WELL SITES WITHIN AND ADJACENT TO PARCEL BOUNDARIES. THE PARCEL IS WITHIN THE SANTA MARIA VALLEY OIL FIELD.

Existing Setting. The subject property is located approximately 2 miles east of the City of Santa Maria, California. The site is located within the Santa Maria Valley Oil Field and the parcel contains 45 oil wells (Figure 7 above). The Site currently consists of agricultural row crops. According to records obtained from the Department of Conservation, Geologic Energy Management Division (CalGEM) website, the site also contains the Bradley 5-3 oil well, identified as American Petroleum Institute (API) number 08302507. The oil well was completed in October of 1952 and it produced oil. The well was abandoned in October of 1966. According to the CalGEM website, the status of the well is "Plugged & Abandoned". According to available records, the former sump was not evaluated and no records of previous site assessments conducted at this property were found.

On November 15, 16, 17 and 18, 2022, Atlas advanced 14 soil borings designated 3850-1 through 3850-14 (Figure 2). The original scope of work proposed that soil borings be advanced to a depth of approximately 20 feet bgs. The surface of the investigation area was agricultural land. With the exception of the hydrocarbon-impacted material encountered, subsurface soils were generally silty sand. Some sand, clayey silt, and clayey silty-sand were also encountered. Very hard and clayey silty-sand was encountered at a depth of approximately 15 feet bgs in soil borings 3850-6 and 3850-7 that caused refusal of the core barrel. Similar lithology was encountered in soil bring 3850-14 at a depth of 24 feet bgs that caused refusal. The total depth of exploration was approximately 26 feet bgs in soil boring 3850-6. No oilfield debris was observed and no groundwater was encountered.

Field observations and laboratory results indicate that hydrocarbon-impacted material may extend up to a depth of approximately 9 feet bgs; therefore, remedial excavation is projected to extend to a maximum depth of approximately 10 feet bgs. Sidewalls of the excavation will generally be sloped no steeper than 1:1 (vertical to horizontal) ratio for slope stability. Soil samples results from the recent site assessment

activities indicate that the soil to be excavated will be classified as non-hazardous. The primary waste material that will be generated by this project is petroleum-hydrocarbon impacted soil. The impacted soil will be transported by a licensed waste hauler under non-hazardous manifest to the Santa Maria Landfill, a California Licensed waste disposal facility, which is approximately 6.6 miles north of the site.

Environmental 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, g, h). The project site was historically used for oil and agricultural production. The proposed project would result in the one-time excavation and removal of petroleum hydrocarbon (TPH) impacted soil and temporary transportation of removed soils from the Bradley 5-3 oil well sump location. A temporary chain-link fence will be installed around the 0.7-acre work area with access gates that will be locked during off working hours. 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. Hazardous materials encountered during the remediation, including contaminated soils, would be required to be handled in accordance with the approved Remedial Action Plan Attachment 3). Plastic sheeting or geotextile fabric will be placed on the ground surface in the load out area (as necessary) to prevent hydrocarbon-impacted material from coming in contact with the underlying surface. The stockpiled material would be covered with sheeting or a soil binder at the end of each workday and prior to precipitation events. Stockpiles will be removed for disposal within 24 hours. Stockpiles will be covered prior to rainfall 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). 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 primary mechanism to ensure employee, environmental, and public safety at the project site is a site Health and Safety Plan (HASP). The applicant prepared HASP identified roles and responsibilities of key site personnel; hazard analysis for all chemical, physical, and physiochemical hazards anticipated; a personnel protection plan; site safety procedures for specific site operations, (e.g., soil sampling, drilling, etc.); a decontamination plan; and an emergency response/contingency plan. Site visitors entering active remediation areas will be required to participate in a site safety orientation, review job safety analysis (as necessary), and review and sign the HASP. The applicant has already prepared a HASP for this project. Prior to any field work, all site workers were required to review and sign the HASP to acknowledge their understanding of the information contained in the HASP. The HASP is site-specific and task-specific, describing hazardous conditions that may be encountered and prescribes the necessary safety protocols to protect employees from these hazards. Air monitoring would be required by the SBCAPCD during site activities to monitor and prevent contaminants from leaving the Project Site. With these, impacts from the release of hazardous substances is *less than significant*.

(d, e, f). The project would not interfere with any emergency response or evacuation plans, nor would it create a potential public health or safety hazard. The work sites involving heavy equipment are not readily accessible to the public. Impacts would be *less than significant.*

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

Mitigation and Residual Impact. No potentially significant impacts would occur and no mitigation measures are necessary.

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

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	

Existing Setting. The oil well and sump is located approximately 0.84 miles east of Telephone Road. The project site is within an Ag-II-40 (agriculture) land use designation. Onsite resources and development include row crops and other agricultural uses. Forty-five (45) abandoned oil wells are located within the

property lines of the subject parcels (Figure 7). The site is sloped and does not contain any hydrologic features.

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, c– j). The proposed project comprises excavating approximately 2,700 cubic yards of hydrocarbon impacted soil, replacing with clean fill in lifts and compacting, and restoring the project site to previous conditions. 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 would not result in the addition of any structures or a change in land use, does not involve the extension of a sewer trunk line, and does not conflict with any airport safety zones. No short or long-term adverse impacts to land uses would result from the proposed project. No open space would be lost. No negative economic or social effects would result from the proposed remediation project. The project is compatible with existing land uses and would have *no impact*.

(b). The intent of the project is to remove and remediate hydrocarbon-containing soils in a manner that protects existing resources. This is consistent with oil and gas and water quality policies listed in Section 9 of this document. On the other hand, the ground disturbance caused by the necessary excavations and soil treatment for the project may affect agricultural and biological resources that are protected by policies in the Agricultural, Conservation and Land Use Elements of the Comprehensive Plan (also listed in Section 9). The project site is within the range of the Endangered California Tiger Salamander, and the Threatened California Red-Legged Frog. Because of these varied Comprehensive Plan policies that relate to both oil development and conservation of resources, the proposed project and the applicable policies need to be balanced such that the risks are minimized and impacts are reduced. Impacts to existing land use policies are *less than significant*.

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		

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
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). 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. No residential dwellings are located within 1,600 feet of the limits of disturbance. Noise sources existing in the project area include noise associated with agricultural operations.

Impact Discussion:

(a, c.) The proposed project would be short-term in nature and consist of targeted soil removal in areas where soil hydrocarbon concentrations exceed ESLs and confirmation soil sampling, 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 the time to prepare the site, excavate hydrocarbon-impacted soils, backfill the excavation and restore the Site is expected to take approximately 4 to 6 weeks. Heavy equipment will not be used at the site before 8 a.m. or after 5 p.m. construction work will occur Monday through Friday, with no weekend or after hours work unless dictated by unforeseen circumstances. There are no noise sensitive uses within 1,600 feet of the project site. The highest construction noise levels would most likely result from the use of heavy construction equipment, including bulldozers, excavators, loaders, etc. No nighttime work is proposed. Therefore, short term and noise impacts will be *less than significant*.

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

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

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:

(a - e). 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 approximately 6.6 miles north of the site. The proposed project would not generate solid waste in excess of County thresholds. The project would not cause the need for new or altered sewer system facilities as it is already in the service district, and the District has adequate capacity to serve the project. No additional drainages or water quality control facilities would be necessary to serve the project. 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.

No designated parks or recreational facilities are located within the project's vicinity. Additionally, 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.

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

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		
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 oil well and sump is located approximately 0.84 miles east of Telephone Road, accessed by a private driveway. Telephone Road 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. The project site is in a rural area approximately 2 miles east of the City of Santa Maria Telephone Road 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).

Environmental 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 polices 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 for land use projects including Residential, Employment, Regional Retail, Mixed-Use Projects, and Other Land Use types.

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.

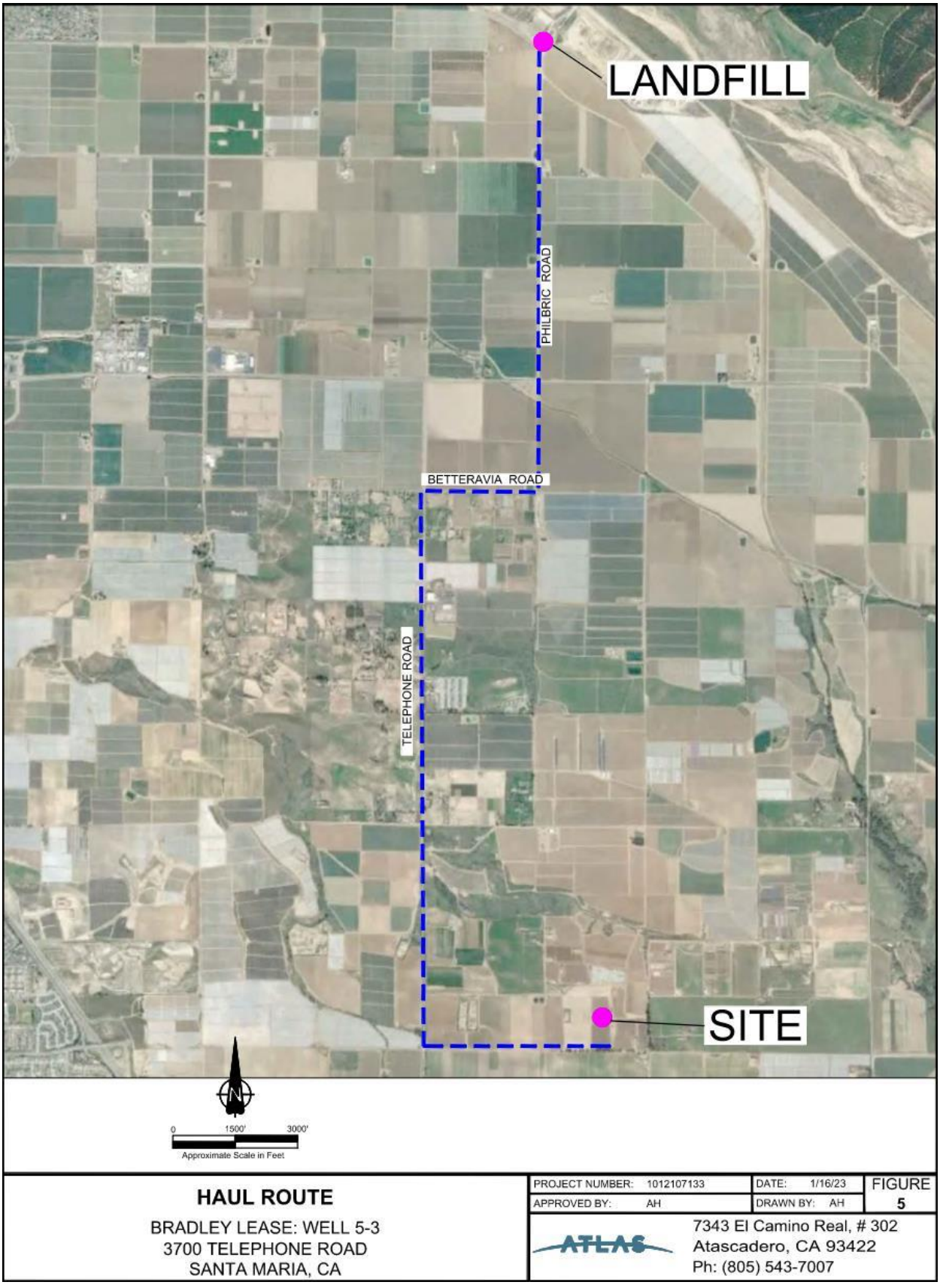


FIGURE 8. TRUCK TRIP FROM THE PROJECT SITE TO THE SANTA MARIA LANDFILL.

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). The scope of the project includes targeted soil removal in areas where soil hydrocarbon concentrations exceed ESLs and confirmation soil sampling. Once excavation activities are complete, the site topography would be brought back to existing conditions. 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 will access the site (APN 129-010-011) via a private driveway connecting to Telephone Road. From the driveway, existing Ag roads will be used to access the contamination and staging area. Soil will be stockpiled and construction equipment would remain onsite until soil disposal. The primary waste material that will be generated by this project is petroleum-hydrocarbon impacted soil. Off-site disposal of all waste materials will be performed in accordance with local, county, state and federal regulations. Transportation of the various waste materials will be performed under the appropriate manifest, Bill of Lading, and material shipping/tracking documentation. The project would be consistent with programs, plans, ordinances, and policies related to circulation. Therefore the project would have a *less than significant impact* to existing programs.

(b). Approximately 185 truck trips are expected to be made for export soil and 185 truck trips for import soil. The export material would be disposed of at the Santa Maria Regional Landfill, approximately 6.6 miles north, trucks would exit the site via existing Ag roads then use Telephone Road traveling north, turn onto Betteravia Road, and access the Santa Maria Landfill via Philbric Road (Figure 8). 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 Telephone Road. No change in traffic patterns, VMT, or ADT would result from the proposed Project. 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.

(c). The proposed project is located on a parcel used for residential and agricultural activities. Once trucks and equipment enter the site, the project would not impact traffic flow of the surrounding roads. Flaggers will be utilized as needed to help manage truck traffic associated with the project. 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 to surrounding areas is currently available along Telephone Road 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		
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	

Will the proposal result in:	Poten. Signif. and Unavoid.	Signif. But Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
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		

Environmental 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 uses[1] 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-d). None of the proposed activities are expected to significantly alter currents or the course or direction of water movements, percolation rates, surface waters or drainage patterns. The project would not create additional storm water runoff because no new impermeable surfaces (i.e. structures, driveways, patios, etc.) are proposed. Construction activities such as grading could potentially create temporary runoff and erosion problems. Application of standard County grading, erosion, and drainage-control measures would ensure that no significant increase of erosion or storm water runoff would occur. Adherance to standard County grading, erosion, and drainage-control measures would ensure that no significant increase of erosion or storm water runoff would occur. Impacts would be reduced to *less than significant levels*.

(e, f). The inland project is not located in or near any mapped 100-year floodplains and would not alter the course or flow of flood water, or result in exposure of people or property to water related hazards such as flooding. Therefore *no impacts* are expected to occur.

(g, h, i, j). The project site was historically used for oil and agricultural production. The proposed project would result in the one-time excavation and removal of petroleum hydrocarbon (TPH) impacted soil and temporary transportation of removed soils from the Bradley 5-3 oil well sump location. The excavation would be backfilled and compacted following excavation. The excavation site would be restored and the soil stabilized. The groundwater data indicated that subsurface drilling was performed at two locations within approximately 0.7 miles of the Site. Groundwater was not encountered at a depth of 35 feet bgs or at 75 feet bgs. Due to the shallow depth of the proposed remedial excavation (approximately 10 feet bgs) contact with groundwater is not anticipated. The proposed project would not decrease available surface or groundwater supplies nor degrade groundwater quality. No streams, ponds, or reservoirs are in the vicinity which could be polluted or impacted by the project. Water needed for dust suppression on the upland portions of the project would be provided by construction water trucks and runoff minimized through standard erosion control BMPs, as required by County Code. The project would not involve the placement of septic disposal systems. The project's impact on water supplies would therefore be *less than significant*.

(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. Plastic sheeting or geotextile fabric will be placed on the ground surface in the load out area (as necessary) to prevent hydrocarbon-impacted material from coming in contact with the underlying surface. The stockpiled material for each work area would be covered with sheeting or a soil binder at the end of each workday

[1] 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.

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 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 5.1 County Departments Consulted

Police, Fire, Public Works, Flood Control, Parks, Environmental Health, Special Districts, APCD

5.2 Comprehensive Plan

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

5.3 Other Sources

X	Field work	X	Ag Preserve maps
	Calculations	X	Flood Control maps
X	Project plans	X	Other technical references
	Traffic studies		(reports, survey, etc.)
X	Records	X	Planning files, maps, reports
X	Grading plans	X	Zoning maps
X	Elevation, architectural renderings	X	Soils maps/reports
X	Published geological map/reports	X	Plant maps
X	Topographical maps	X	Archaeological maps and reports
			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 and Biological Resources.

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, Agriculture, Cultural Resources, Geologic Processes, Hazardous Materials/Risk of Upset, Land Use, Noise, Transportation, and Water Resources.

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

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 site remediation activities would be performed in order to prevent further possible degradation of the environment from petroleum-contaminated soils. As discussed in Section 4.4 (Biological Resources), the project does 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. However, mitigation measures have been identified to reduce impacts to biological resources to less than significant levels. The proposed project would not contribute significantly to greenhouse gas emissions or significantly increase energy consumption. As discussed in Section 4.5 (Cultural Resources), no known cultural artifacts are located within the vicinity. Standard County regulations requiring work to stop in the event of discovery would prevent any significant impacts from occurring. 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 within rural agricultural areas in Santa Maria. 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.

9.1 Zoning Requirements: The project site is zoned AG-II-40, minimum lot size 40 acres, under the County Land Use & Development Code, and is subject to the requirements of this zone district.

9.2 Comprehensive Plan Requirements: The proposed project is subject to the following Policies of the County Comprehensive Plan:

Land Use Development Policy 13: Oil and gas facilities shall be dismantled and removed, their host sites cleaned of contamination and reclaimed to natural conditions, or conditions to accommodate reasonably foreseeable development, in an orderly and timely manner that avoids long-term impacts to the health, safety, and welfare of the public and environment.

Hillside & Watershed Protection Policy 1: Plans for development shall minimize cut / 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.

Hillside & Watershed Protection Policy 2: All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

Hillside & Watershed Protection Policy 4: Sediment basins (including debris basins, de-silting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.

Hillside & Watershed Protection Policy 5: Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.

Hillside & Watershed Protection Policy 6: Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.

Hillside & Watershed Protection Policy 7: Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

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.

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

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

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

Potentially significant unavoidable adverse impact areas:

_____ With Public Hearing ____X____ Without Public Hearing

PREVIOUS DOCUMENT: Not Applicable

PROJECT EVALUATOR: **Errin Briggs** **DATE:** October 16, 2023

11.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

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

SIGNATURE: Katie Nall **INITIAL STUDY DATE**: October 17, 2023

SIGNATURE: **NEGATIVE DECLARATION DATE**: November 17, 2023

SIGNATURE: **REVISION DATE:**

SIGNATURE: **FINAL NEGATIVE DECLARATION DATE:**

12.0 ATTACHMENTS

1. Vicinity Map
2. Site Plan
3. Remedial Action Workplan for the California Lease (SMU #20059), dated January 20, 2023
4. APCD Fugitive Dust Control Measures and Diesel Particulate and NOx Emission Reduction Measures

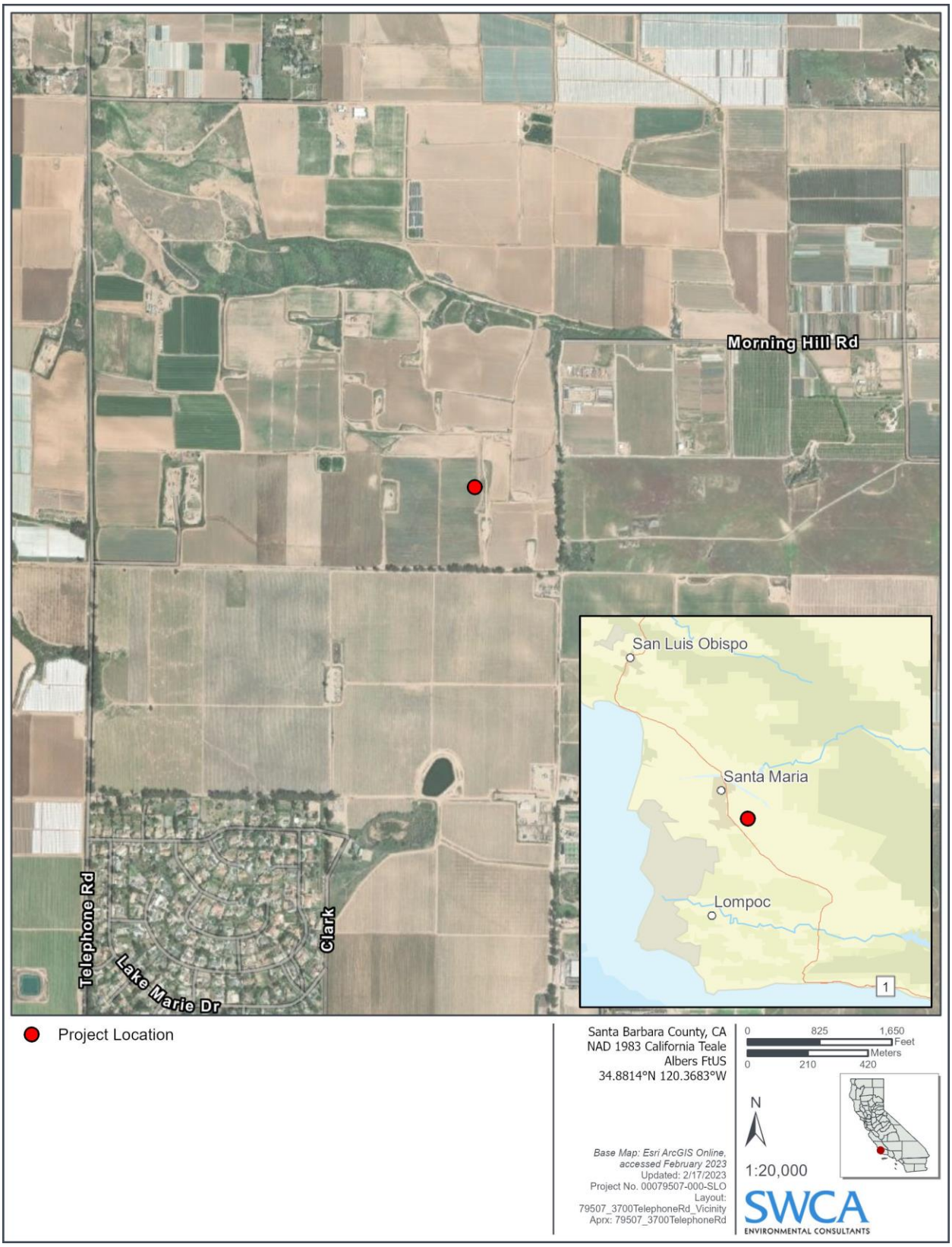
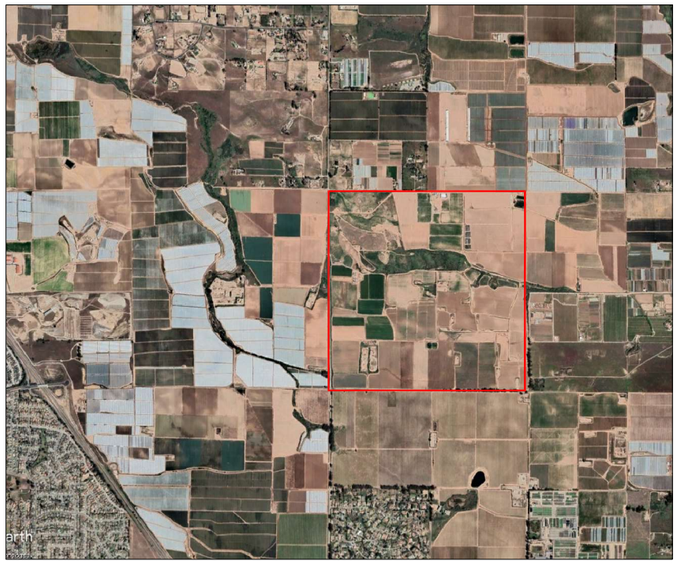


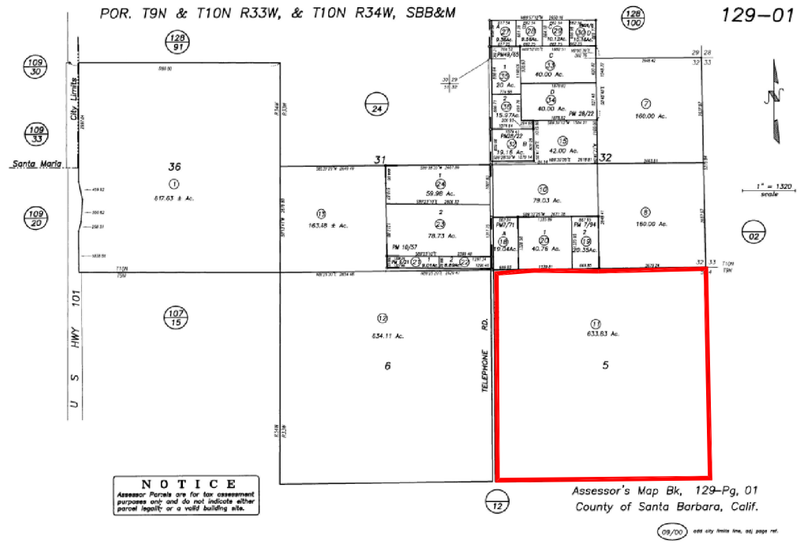
Figure 1. Project Location Map

GRADING PLAN
FOR
3700 TELEPHONE ROAD
SANTA MARIA, CALIFORNIA

BY
ATLAS TECHNICAL CONSULTANTS LLC

3700 TELEPHONE ROAD





PARCEL #: 129-010-011

SCOPE OF WORK

The scope of work for this project is to excavate hydrocarbon impacted soil on 3700 Telephone Road and transport to the Santa Maria Landfill. It is expected that a maximum of 2,700 cubic yards of soil will be excavated. Following excavation, inspection and verification sampling will be performed. Clean fill will be placed in lifts and compacted. The property will be restored to previous conditions.

INDEX OF DRAWINGS

GRADING NOTE:

GRADING CUT ≤ 2,700 CUBIC YARDS
GRADING FILL ≤ 2,700 CUBIC YARDS

COVER SHEET
BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CALIFORNIA

PROJECT NUMBER: 1012107133		DATE: 6/26/23	FIGURE COVER
APPROVED BY: AH		DRAWN BY: AH	

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007

Grading Plan General Notes

Grading Cut: 2,700 cubic yards - Grading Fill: 2,700 cubic yards

1. Excavation, backfill and grading work are being accomplished for the purpose of removing hydrocarbon impacted soil. The project is being conducted within the ConocoPhillips' Voluntary Oil Field Sump Remediation Program. The remedial activities will be conducted under the regulatory oversight of the Santa Barbara County Public Health Department (SBCPHD) Environmental Health Services Division (EHS). USA will be notified and a private utility locating service will mark all on-site underground structures and utilities. Utilities are not expected to be present. If utilities are located during site activities they will be terminated a minimum of five feet or more from the proposed excavation area.
2. All grading is to comply with Chapter 18 and Appendix J of the current version of the California Building Code at the time of application.
3. All proposed grading, except for off-site import earth, shall be maintained within the boundaries of the site for which the grading permit is issued.
4. Backfill material shall be moisture conditioned and compacted as follows:
   a. Fill material, if needed, shall not include organic, frozen, or other deleterious materials and no rock or similar irreducible material greater than 12 inches in any dimension shall be included in fills.
   b. All fill material shall be compacted to 90% of maximum density as determined by ASTM D 698 Standard Proctor, in lifts not exceeding 12 inches in depth. A certified soils engineer will verify the compaction testing.
   c. The compaction report, verifying 90% compaction of backfilled soil, shall be made available to the County of Santa Barbara inspector prior to final inspection.
5. Compaction testing as noted above is required and test results shall be provided to the County of Santa Barbara Grading Division. Soil compaction tests verifying minimum 90 percent compaction of fill material shall be provided to the Grading Division prior to final inspection being requested for the project.
6. The location of the existing utilities, if present, shall be field verified by hand digging prior to any excavation activities.
7. The final grade after backfill shall match the existing pre-excavation grade +/- 1".
8. Temporary chain link fencing with access gates that can be locked after hours will be installed around the work area as shown on **Figure 3**.
9. Activities at the site will not exceed noise standards as detailed in Santa Barbara County, California - Code of Ordinances, Chapter 40.
10. EROSION CONTROL CERTIFICATION
    a. I hereby certify that all erosion and siltation control measures will be installed per the plans and also to my satisfaction to prevent the illegal discharge of storm water pollutants from the project site. The undersigned shall be the designated responsible person for the successful implementation of these methods. The undersigned shall also ensure that damages to the erosion and siltation control measures due to construction processes or severe storms and shall be repaired immediately to fully functioning condition.

    Alex Hartig, PE, QSD 6/26/2023
    Responsible Person

    805 -234-1504
    24 Hour Contact Telephone Number
11. DUST CONTROL MEASURES
    a. The grading permit holder, the general contractor, and the owner/ developer shall comply with the dust control measures required by the County of Santa Barbara.
    b. Dust control measures capable of preventing the migration of dirt and dust off site, in a manner acceptable to the County of Santa Barbara, shall be implemented and maintained during all earth moving and grading phases of a project. Failure to do so will result in the issuance of a "Stop Work" order that will not be released until such time as an adequate program is implemented.
    c. During the earth moving and grading phases of the project, water shall be applied in sufficient quantities to prevent dust from leaving the site. In addition, the entire site area of disturbed soils shall be wetted down during the early morning hours and at the end of each day in such a manner as to create a crust.
    d. During the construction phase of the project, water shall be used to keep all areas of vehicular movement damp enough to prevent dust being raised and leaving the site. As a minimum, this will include the wetting down of such areas in the late morning hours and at close of each day's activities. Increased watering frequency will be required as necessary to prevent dust from leaving the site.
    e. All trucks hauling excavated soil from the site shall be covered with a tarpaulin to prevent dust from blowing off the truck.
    f. All alley ways, circulation routes, haul routes, street and sidewalks shall be kept clean and clear of dirt, dust and debris in a manner acceptable to the County of Santa Barbara. The flushing of dirt or debris to storm drain or sanitary sewer facilities shall not be permitted. Failure to keep these areas clean will result in the issuance of a "stop work" order which will not be released until such time as the area is cleaned in a manner acceptable to the city.
    g. Earth moving and grading activities shall be limited to the hours between 7:00 AM and 4:00 PM Monday through Friday and no construction Saturday and Sunday, unless dictated by unforeseen emergency conditions. Idling, warming-up, and servicing vehicles or equipment shall also be limited to these hours.
    h. After completion of the grading, the entire area of disturbed soil shall be restored to previous conditions. After completion of the grading, the entire area of disturbed soil shall be treated to prevent dust from leaving the site. This may be accomplished by any one of the following methods:
       - The seeding and or watering of the site until such time as the ground cover has taken root.
       - The spreading of soil binders
    i. The wetting down of the area in such a manner as to create a crust on the surface and the repeated soaking of the area, as necessary, to maintain the crust and prevent soil blowing.
    j. The Contractor or Builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary to prevent the transport of dust off-site. This person's duty shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such person or persons is provided below.
    k. All dust control measures shall be performed in accordance with Santa Barbara County Air Pollution Control District regulations and shall remain in place until the final inspection by the County of Santa Barbara.
    l. A Soil Excavation >1,000 cubic yard permit will be secured from the Santa Barbara County Air Pollution Control District (SBCAPCD). Atlas will monitor and control dust per SBCAPCD permit requirements. Additionally, when contaminated soil is exposed Atlas will: 1. Cover all piles 2. Cover contaminated soil when not working on the area 3. Backfill the excavation when equipment is removed 4. Truck out all contaminated soil dug out within 24 hours.

    Alex Hartig, PE, QSD 6/26/2023
    Responsible Person

    805 234-1504
    24 Hour Contact Telephone Number
12. Only construction activity resulting in a land disturbance of one acre or more must obtain a General Permit For Stormwater Discharges. The total disturbed area will be less than one acre. Storm water management shall comply with the County of Santa Barbara Storm Water Management Program and the California Green Building Standards Code. Where storm water is conveyed to a public drainage system, collection point, gutter or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the enforcing agency. Atlas will take all precautions appropriate to minimize storm water pollution associated with construction activities as well as implement an Erosion and Sediment Control Plan as outlined on **Figure 5**.
13. The General Contractor is responsible for obtaining a "Dig Alert Identification Number" a minimum of 2 days prior to any excavation activity.
14. These plans shall comply with 2019 California Building Code, California Residential Code, & the California Green Building Standards Code. The anticipated duration of the project is approximately 5 to 6 weeks. One week for site set-up; three to four weeks to excavate and backfill / compact; and one week for site restoration and landscaping. Start date will be dependent upon final issuance of permits.
15. Biological assessment measures and protocols will be determined upon completion of a biological survey and issuance of a Land Use Permit by Santa Barbara County. If required, Atlas will secure an Incidental Take Permit (ITP) from US Fish and Wildlife Services and follow protocols outlined in the Final General Conservation Plan (GCP) for Oil and Gas Activities, issued in June of 2022.

GENERAL NOTES
BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CALIFORNIA

PROJECT NUMBER: 1012107133	DATE: 6/26/2023	FIGURE
APPROVED BY: AH	DRAWN BY: AH	1

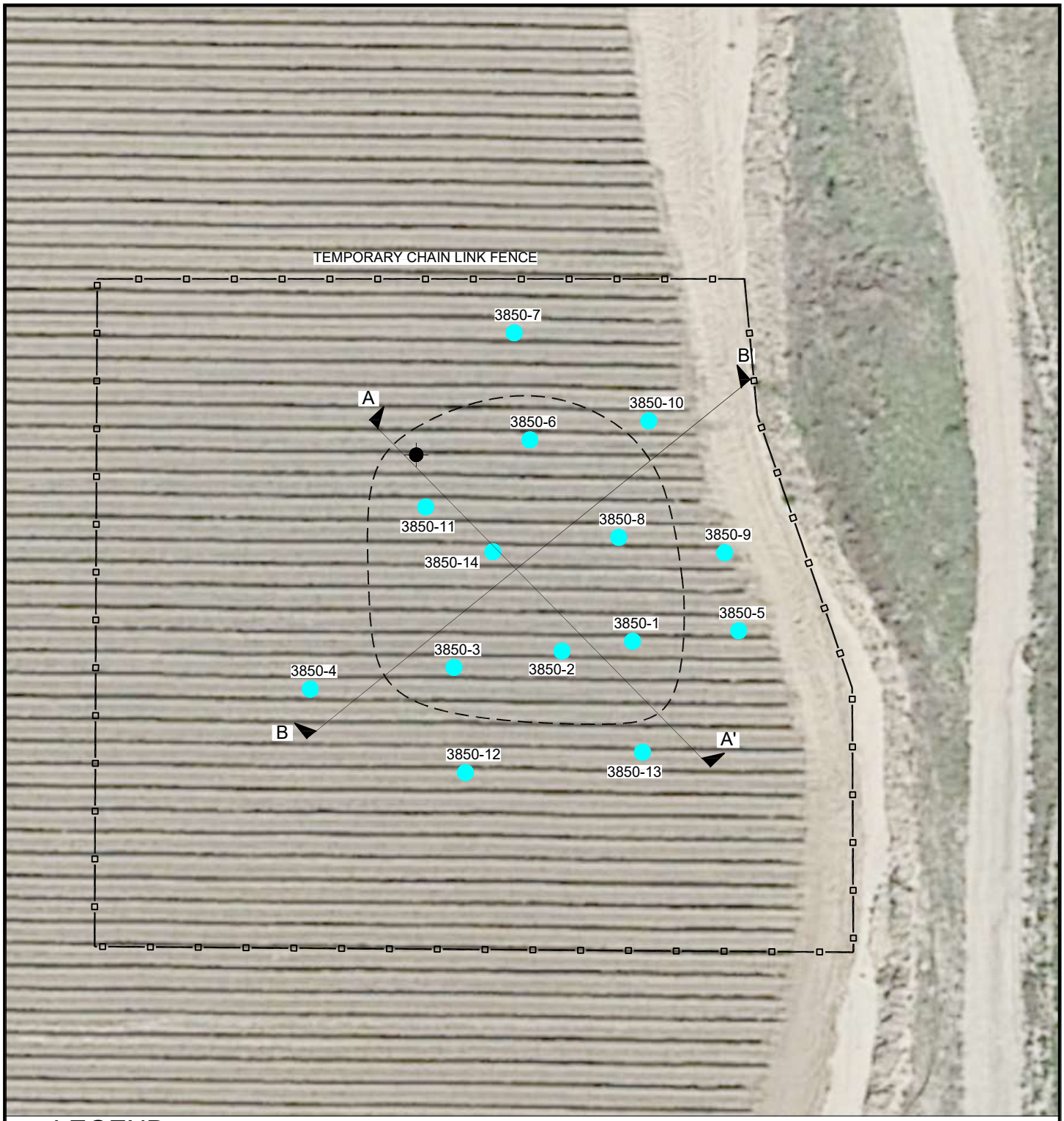
ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007

SITE LOCATION MAP

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER: 1012107133		DATE: 6/26/23	FIGURE 2
APPROVED BY: AH		DRAWN BY: OR	

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007



LEGEND

- APPROXIMATE LOCATION OF WELLHEAD
- SOIL BORING LOCATION
- PROPOSED EXTENT OF REMEDIAL EXCAVATION TO 10 FEET BELOW GROUND SURFACE BASED ON LABORATORY DATA AND VISUAL OBSERVATIONS (~7,300 SQ FT / ~2,700 CY)
- CROSS SECTION

N

0 40'

Approximate Scale in Feet

SITE PLAN WITH CROSS SECTION LINES

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER: 1012107133		DATE: 6/26/23	FIGURE 3
APPROVED BY: AH		DRAWN BY: AH	

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007

LEGEND

3850-5 — SOIL BORING ID

(13,700) — SAMPLE LOCATION AND AGGREGATE CONCENTRATION OF TPH (C4-C40)
ND - NOT DETECTED ABOVE REPORTING LIMIT

ND — TOTAL DEPTH OF BORING

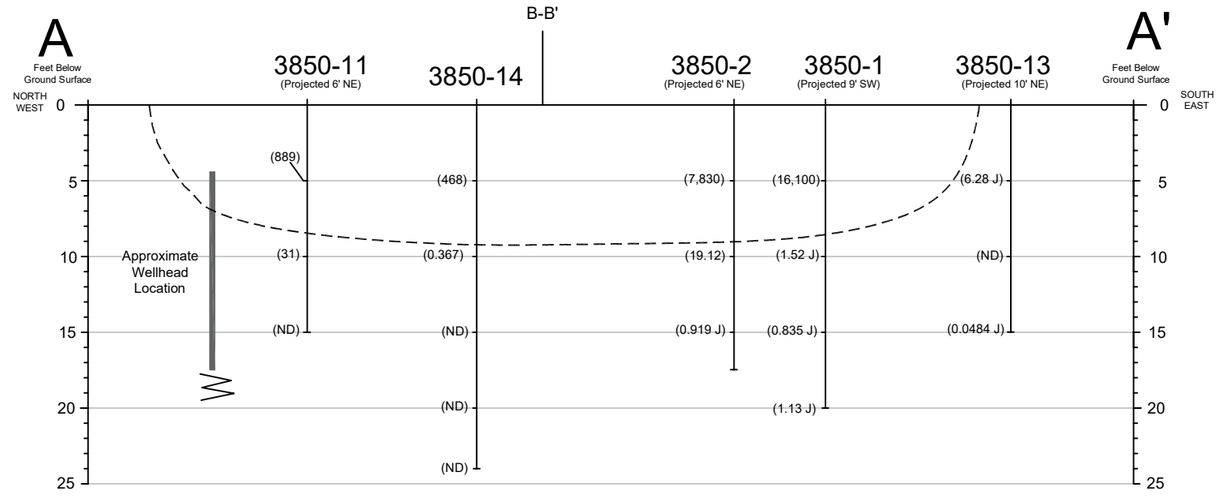
PROPOSED EXTENT OF REMEDIAL EXCAVATION TO 10 FEET BELOW GROUND SURFACE BASED ON LABORATORY DATA AND VISUAL OBSERVATIONS (~7,300 SQ FT / ~2,700 CY)

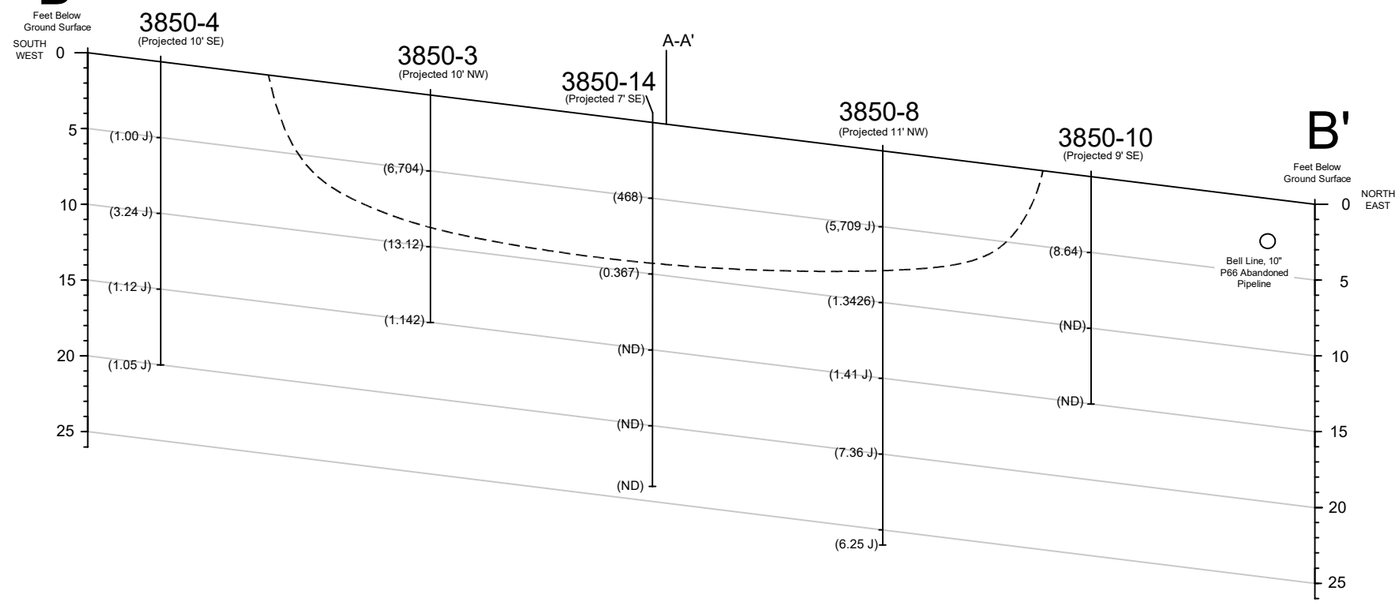
SCALE

Horizontal 0 — 20'

Vertical 0 — 10'

Horizontal 1" = 20'
Vertical 1" = 10'





CROSS SECTIONS A-A' AND B-B'

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER: 1012107133		DATE: 6/26/23	FIGURE
APPROVED BY: AH		DRAWN BY: AH	4

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7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007

Erosion and Sediment Control Plan:

Water and soil cement (as needed) will be applied to soil and temporary stockpiles to prevent soil erosion due to wind. Straw wattles and sandbags will be placed at site boundaries and nearest storm drain inlet as needed to prevent sediment transport offsite. Storm water management shall comply with the California Green Building Standards Code. Where storm water is conveyed to a public drainage system, collection point, gutter or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the enforcing agency. Best Management Practices (BMPS) to be implemented:

A. Existing Vegetation - Existing vegetation will be protected wherever possible.
B. Waste Management - All construction waste shall be contained and disposed of properly; no construction material will be washed to the street.
C. Vehicles and Equipment - All construction vehicles and equipment will not cause dirt or mud to be tracked off site. Tires of vehicles leaving the site will be inspected and swept clean (as needed) to ensure dirt and/or mud is not tracked off-site. Additionally, stabilized construction entrance/exits will be installed for vehicles transporting materials to and from the site. Hydrocarbon impacted soil will be loaded onto end dumps/transfer trucks on the loading area within the properties.
D. Catch Basin Protection - Storm drain inlets (if present) will be covered or otherwise protected from receiving sediment, mud, dirt, or any debris.
E. Sediment Filters/Barriers - A properly installed silt fence or equivalent will be installed around the site perimeter as needed and located so that all runoff from the construction site is filtered prior to leaving the site.
F. Plastic Sheeting or Equivalent - All temporary stockpiles will be protected with tarp or equivalent soil binding material (soil-cement).

Biological Protocols:

Biological assessment measures and protocols will be determined upon completion of a biological survey and issuance of a Land Use Permit by Santa Barbara County. If required, Atlas will secure an Incidental Take Permit (ITP) from US Fish and Wildlife Services and follow protocols outlined in the Final General Conservation Plan (GCP) for Oil and Gas Activities, issued in June of 2022.

APPROXIMATE LOCATION OF WELLHEAD

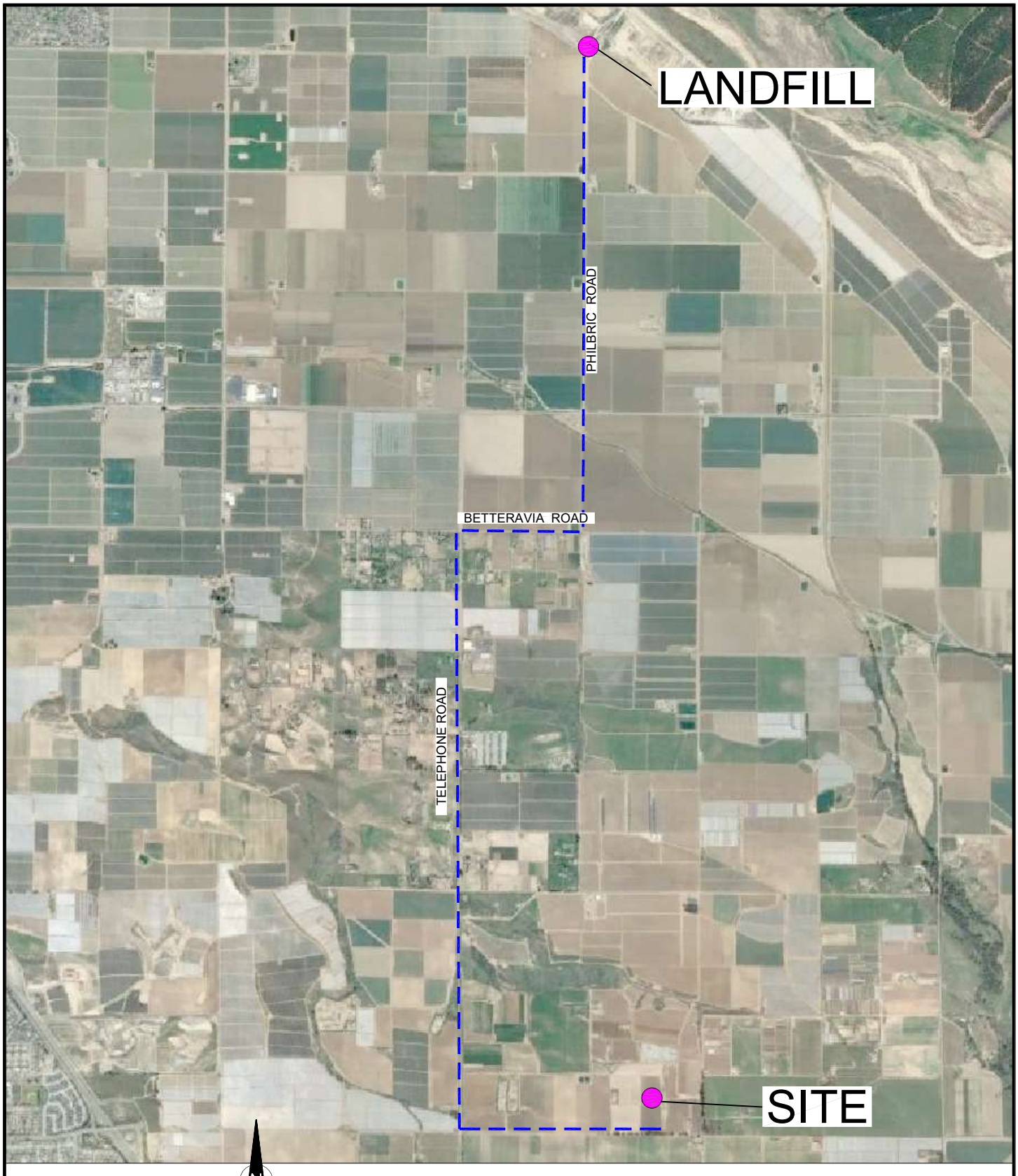
PROPOSED EXTENT OF REMEDIAL EXCAVATION TO 10 FEET BELOW GROUND SURFACE BASED ON LABORATORY DATA AND VISUAL OBSERVATIONS (~7,300 SQ FT / ~2,700 CY)

EROSION AND SEDIMENT CONTROL PLAN

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER: 1012107133		DATE: 6/26/23	FIGURE
APPROVED BY: AH		DRAWN BY: AH	5

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007



HAUL ROUTE

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER: 1012107133		DATE: 6/26/23	FIGURE
APPROVED BY: AH		DRAWN BY: AH	6

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
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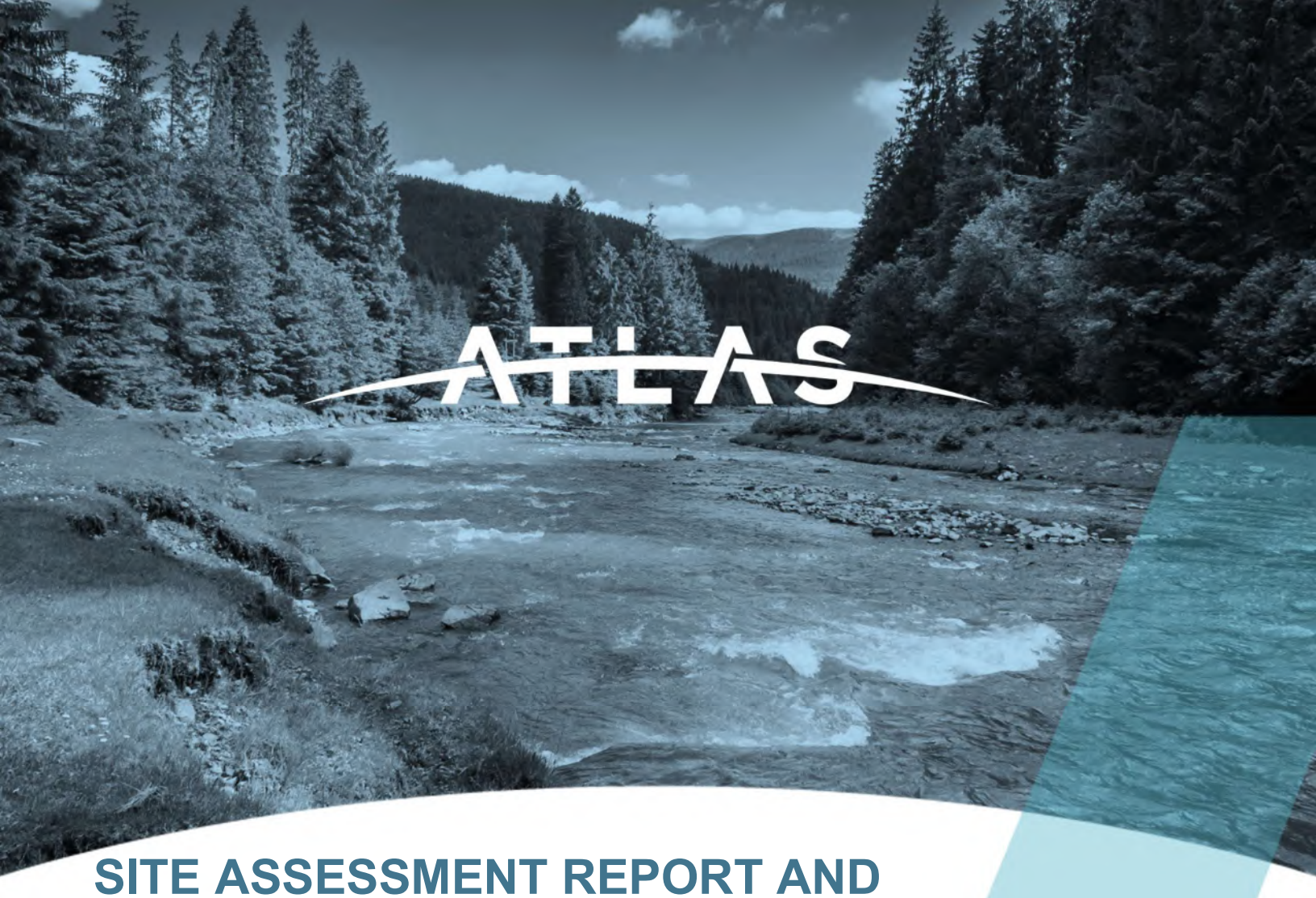

SITE ASSESSMENT REPORT AND REMEDIAL ACTION PLAN

BRADLEY 5-3 OIL WELL SUMP

3700 TELEPHONE ROAD, SANTA MARIA, CALIFORNIA

APN 129-010-011, API 083-02507, SMU-2 SITE 20268, GEOTRACKER ID T10000018637

PREPARED FOR:

ConocoPhillips

P.O Box 2197
Houston, TX 77252

PREPARED BY:

Atlas Technical Consultants LLC
7343 El Camino Real #302
Atascadero, CA 93422

January 20, 2023

1330 Marsh Street
San Luis Obispo, CA 9934010
(805) 543-7007 | oneatlas.com

January 20, 2023

Atlas No. 1012107133

Marissa Censullo
Hazardous Materials Specialist II
SMU and LUFT Program
SANTA BARBARA COUNTY PUBLIC HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH SERVICES
2125 S. Centerpointe Parkway, Room 333
Santa Maria, California 93455

Subject: **Site Assessment Report and Remedial Action Plan, Bradley 5-3 Oil Well Sump, 3700 Telephone Road, Santa Maria, CA.**

Dear Ms. Censullo:

On behalf of ConocoPhillips, Atlas Technical Consultants LLC (Atlas), is pleased to present this Site Assessment Report and Remedial Action Plan. The document describes the site assessment activities conducted at the Bradley 5-3 Oil Well Sump located at 3700 Telephone Road in Santa Maria, California (Site). The site assessment results indicate that petroleum-hydrocarbon impacted soil is present at the site; therefore, this document also includes a Remedial Action Plan (RAP) that describes the proposed course of action to remediate the Site.

CERTIFICATION

The information provided in this Site Assessment Report and Remedial Action Plan, dated January 20, 2023, for the Bradley 5-3 Oil Well Sump located at 3700 Telephone Road, Santa Maria, California, was prepared under the supervision of an Atlas California Professional Engineer/Geologist.

A professional engineer/geologist's certification of conditions comprises a declaration of his or her professional judgment. It does not constitute a warranty or guarantee, expressed or implied, nor does it relieve any other party of its responsibility to abide by contract documents, applicable codes, standards, regulations and ordinances.

If you have any questions, please call us at (805) 543-7007.

Respectfully submitted,
Atlas Technical Consultants LLC

Alex Hartig, P.E.
Senior Engineer

Chris Nevison
Senior Geologist

Distribution: Mr. Bill Borgh, bill.borgh@conocophillips.com

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TABLES

FIGURES

APPENDICES

1. INTRODUCTION

On behalf of ConocoPhillips, Atlas has prepared this Site Assessment Report and Remedial Action Plan for the Bradley 5-3 Oil Well Sump located at 3700 Telephone Road in Santa Maria, California (**Figure 1**). ConocoPhillips performed the work as part of a voluntary oilfield remediation program. The work was conducted under the regulatory oversight of the Santa Barbara County Public Health Department, Environmental Health Services (EHS).

This document also includes a Remedial Action Plan (RAP) that describes the proposed course of action to remediate hydrocarbon impacts at the Site.

2. BACKGROUND

The Bradley 5-3 oil well is situated on a 633.83-acre parcel identified by the Santa Barbara County Assessor's Office as assessor parcel number (APN) 129-010-011. The parcel is located east of the City of Santa Maria and east of Telephone Road. The Assessor's Office lists the address for the parcel as 3700 Telephone Road; however, postings at the entrance to the site indicate the address is 3850 Telephone Road. Online mapping applications do not accurately locate the site using either address. The oil well and sump is located approximately 0.84 miles east of Telephone Road, and approximately 1.17 miles north of E. Clark Avenue (**Figure 2**).

According to records obtained from the Department of Conservation, Geologic Energy Management Division (CalGEM) website, the Bradley 5-3 oil well is identified as American Petroleum Institute (API) number 08302507. The oil well was completed in October of 1952 and it produced oil. The well was abandoned in October of 1966. According to the CalGEM website, the status of the well is "Plugged & Abandoned". According to available records, the former sump was not evaluated and Atlas found no records of previous site assessments conducted at this property.

Atlas developed a Work Plan to Evaluate the Former Bradley Lease Well 5-3 Sump (Atlas 2022). The Work Plan described historical aerial-photograph research, current land use, government database research, hydrology, and the proposed scope of work. The EHS approved the Work Plan in a letter dated July 8, 2022 (**Appendix A**). Atlas performed the scope of work in November 2022, and the results are described in the sections below.

3. SCOPE OF WORK

The primary objective of the proposed work was to determine whether petroleum-hydrocarbon impacted material are present at the site, and if hydrocarbon impacts are found, to delineate the vertical and lateral extent of the impacts. The scope of work for this site assessment complies with the Work Plan (Atlas, 2022) that was submitted to the EHS, and with the directives stated in the approval letter from the EHS. The scope of work included:

- Verify the location of the wellhead, and mark the location of buried utility lines in the vicinity of the proposed borings:
- Prior to advancing the borings, clear each location of utilities using a non-conductive hand auger to 120% of the proposed borehole diameter and five feet below ground surface (bgs):
- Advance up to 13 soil borings with a direct-push drill rig utilizing acetate sleeves to a target depth of approximately 20 feet bgs:
- Collect and field-screen representative soil samples every five feet or where soil impacts are observed:
- Cut and cap acetate sleeve at each appropriate sample depth to prevent the loss of Volatile Organic Compounds (VOC):
- Cut open the remaining acetate sleeve to allow visual logging of the soil and to collect soil sample in laboratory-provided glass jars. Samples collected in glass jars will be collected from depths immediately adjacent to the undisturbed samples and analyzed for Total Petroleum Hydrocarbon (TPH), polynuclear aromatic hydrocarbons (PAH), and California Assessment Manual (CAM) Title 22 metals:
- Screen soil samples with a calibrated photoionization detector (PID):
- Collect field measurements to record the depth and lateral extent of hydrocarbon impacts:
- Document the field activities and related observations:
- Submit selected soil samples for laboratory analysis:
- Restore each subsurface penetration through concrete/asphalt.

4. FIELD ACTIVITIES

4.1 Pre-Field activities

4.1.1 Health and Safety

Atlas prepared and implemented a Health and Safety Plan (HASP) for this project. Prior to any field work, all site workers were required to review and sign the HASP to acknowledge their understanding of the information contained in the HASP. The HASP is site-specific and task-specific, describing hazardous conditions that may be encountered and prescribes the necessary safety protocols to protect employees from these hazards.

The HASP identified roles and responsibilities of key site personnel; hazard analysis for all chemical, physical, and physiochemical hazards anticipated; a personnel protection plan; site safety procedures for specific site operations, (e.g., soil sampling, drilling, etc.); a decontamination plan; and an emergency response/contingency plan.

4.2 Site Assessment Activities

4.2.1 Utility Location

Prior to any drilling, Atlas contacted Underground Services Alert (USA) to mark buried utility lines at the site. Additionally, a geophysical survey was performed to identify underground utilities and to locate the well head.

4.2.2 Subsurface Investigation

On November 15, 16, 17 and 18, 2022, Atlas advanced 14 soil borings designated 3850-1 through 3850-14. The original scope of work proposed that soil borings be advanced to a depth of approximately 20 feet bgs. The first two soil borings (3850-1 and 3850-2) were advanced to depths of 20 feet bgs and 17.5 feet bgs, respectively. Observations of soil in the first two soil borings indicated that hydrocarbon impacted material was relatively shallow and only extended to approximately 5 feet bgs. Therefore, it was determined that 15-foot soil borings would be adequate to define the vertical extent of the impacted material. The remaining soil borings were advanced to a depth of approximately 15 feet bgs with two exceptions. Soil borings 3850-8 and 3850-14 were targeted to reach a depth of 29 feet bgs to demonstrate the presence of at least 20 feet of clean soil below the deepest impacted material (encountered in soil boring 3850-6 at a depth of 9 feet); however, the soil borings met refusal at 26 feet and 24 feet bgs respectively.

Soil samples were generally collected every five feet and where impacted soil was observed. Undisturbed samples, collected for the analysis of VOCs, were collected by cutting out a 6-inch portion of the acetate sleeve at the appropriate depth, covering each end with Teflon, and capping each end, to prevent the loss of VOCs. Following the collection of undisturbed samples for the analysis of VOCs, the remaining acetate sleeves were cut open to allow visual logging of the soil and the collection of samples in pre-cleaned laboratory provided glass jars. Samples collected in glass jars were collected from depths immediately adjacent to the undisturbed samples, and analyzed for TPH, PAH, and California Assessment Manual (CAM) Title 22 metals.

The soil was logged in general accordance with the United Soil Classification System (USCS). Atlas staff examined soil collected from each boring for evidence of hydrocarbon impacts including asphaltic material, staining, and odor. All soil samples were screened with a calibrated photoionization detector (PID). Down-hole equipment was decontaminated between borings using a three-stage decontamination procedure.

Following completion of the borings, the borings were backfilled with hydrated bentonite chips to within approximately 6-inches of ground surface. The surface of each boring was filled with native soil to approximately match the surrounding surface.

Soil boring locations are shown on **Figure 3** and cross-sections are presented on **Figure 4**. Soil boring logs are presented in **Appendix B**.

4.2.3 Sample Analysis

Soil samples were preserved in coolers chilled with ice, and transported under chain-of-custody to Pace Analytical, an Environmental Laboratory Accreditation Program (ELAP) Certified Laboratory. Forty eight (48) soil samples were analyzed for:

- TPH in the gasoline hydrocarbon range by gas chromatograph (GC), EPA Test Method 8015.
- TPH in the diesel and motor-oil range by GC, EPA Test Method 8015;

In accordance with the Work Plan, approximately 30% (18) of the samples were selected for additional analysis based upon field observations including odor, PID screening, color, and representative spatial distribution. The soil samples were additionally analyzed for:

- VOC by EPA Test Method 8260B;
- PAH by EPA Test Method 8270C using selected ion monitoring (SIM); and
- CAM 17 Metals using EPA Test Methods 6010B and 7471A.

4.3 Field Observations

4.3.1 Lithology

The surface of the investigation area was agricultural land. With the exception of the hydrocarbon-impacted material encountered, subsurface soils were generally silty sand. Some sand, clayey silt, and clayey silty-sand were also encountered. Very hard and clayey silty-sand was encountered at a depth of approximately 15 feet bgs in soil borings 3850-6 and 3850-7 that caused refusal of the core barrel. Similar lithology was encountered in soil bring 3850-14 at a depth of 24 feet bgs that caused refusal. The total depth of exploration was approximately 26 feet bgs in soil boring 3850-6.

No oilfield debris was observed and no groundwater was encountered.

4.3.2 Hydrocarbon-Impacted Material

Evidence of hydrocarbon-impacted was observed. The top of the impacted material ranged from 1.5 feet bgs in soil boring 3850-1, to 9 feet bgs in soil borings 3850-6 and 3850-14. A brief description of the material observed in the impacted borings is presented below:

- 3850-1: 1.5 to 5.0 feet bgs; black silty sand with slight hydrocarbon (HC) odor.
- 3850-2: 1.5 to 5.0 feet bgs; black silty sand with slight HC odor.
- 3850-3: 1.5 to 5.0 feet bgs; black silty sand with slight HC odor.
- 3850-6: 2.0 to 9.0 feet bgs; black material with some free oil and moderate HC odor.
- 3850-8: 1.5 to 5.0 feet bgs; black silty sand with slight HC odor.
- 3850-11: 4.5 to 5.0 feet bgs; dark grayish-brown silty sand.
- 3850-14: 3.0 to 9.0 feet bgs; black silty sand with slight HC odor.

4.4 Investigation Derived Waste

The waste generated during field activates was containerized in labeled DOT-approved 55-gallon drums. The drums were temporarily stored on site while the waste was characterized. Waste hauler Belshire Environmental Services, Inc (Belshire) will remove the drums under non-hazardous waste manifest documentation in accordance with local, county, state and federal regulations on January 25, 2023. The drums will be disposed at US Ecology in Beatty, Nevada. Disposal documentation will be uploaded to GeoTracker when available.

5. RESULTS

Analytical results for the soil samples are discussed below.

TPH

The laboratory reported TPH in 39 of the 48 soil samples analyzed. Aggregate TPH concentrations in the carbon range C_5 – C_{40} (representing gasoline, diesel, and motor oil combined) ranged from non-detect to 19,490 mg/kg in soil boring 3850-6 at a depth of 5 feet bgs (3850-6-5). The EHS uses 100 mg/kg as the investigation level (IL) for TPH for lateral and vertical delineation of hydrocarbon impacts. Seven of the soil samples contained TPH in concentrations above the EHS IL.

VOC

The laboratory reported one or more VOC in all 18 samples analyzed for VOC. None of the VOC exceeded their respective Environmental Screening Levels for Direct Exposure Human Health Risk Levels for Commercial/Industrial Shallow Soil Exposure (ESL 2019).

PAH

The laboratory reported one or more PAH in 7 of the 18 samples analyzed for PAH. None of the PAH exceeded their respective Environmental Screening Levels for Direct Exposure Human Health Risk Levels for Commercial/Industrial Shallow Soil Exposure (ESL 2019).

Metals

The laboratory reported arsenic in all of the samples that were analyzed for CAM 17 metals. Arsenic concentrations ranged from 0.634 J (an estimated value) in soil sample 3850-5-5, to 4.51 mg/kg in soil sample 3850-8-5. Although the concentrations of arsenic are above the Commercial/Industrial ESL (0.31 mg/kg), the EHS acknowledges that background levels for arsenic in the Santa Maria Valley range up to approximately 10 mg/kg, and none of the soil samples contained arsenic concentrations above 10 mg/kg. No other metals exceeded their respective Commercial/Industrial Shallow Soil Exposure ESLs.

A summary table of analytical results for organic compounds is presented in **Table 1**. A summary table of analytical results for metals is presented in **Table 2**. The laboratory analytical reports are presented in **Appendix C**.

6. CONCLUSIONS AND RECOMMENDATIONS

The field observations and laboratory data indicate that the hydrocarbon impacts at 3700 Telephone Road consist of hydrocarbon-impacted material that is related to historical oil production activities conducted at the Bradley 5-3 oil well. Based on laboratory data and field observations, hydrocarbon-impacted material with aggregate TPH concentrations above 100 mg/kg are present at a minimum depth of approximately 1.5 feet and extend to a maximum depth of approximately 9 feet bgs. Laboratory results of soil sample 2850-11-5 collected at a depth of 5 feet near the Bradley 5-3 wellhead indicate that a layer of impacted soil with aggregate TPH concentrations above 100 mg/kg also extends towards the wellhead.

Atlas recommends the targeted excavation of petroleum-hydrocarbon impacted material and additionally recommends that the wellhead be assessed for leakage, and that impacted material be removed where encountered in the vicinity of the wellhead. The objective of the targeted excavation is to remove soil and impacted material that exceeds the EHS IL for aggregate TPH of 100 mg/kg or Commercial/Industrial Shallow Soil Exposure ESLs.

The proposed remedial approach is presented in further detail in the following sections of this document.

7. REMEDIAL ACTION PLAN (RAP)

This RAP describes the proposed methods to remediate impacted soil and to assess the wellhead for leakage.

The scope of work is summarized as follows:

- Obtain property access agreements;
- Contact Underground Service Alert (USA);
- At least 48 hours in advance of the start of assessment activities, notify:
  - EHS;
  - CalGEM;
  - County of Santa Barbara County;
- Mobilize to the Site and set-up fencing, cones, delineators and/or caution tape to delineate work boundaries;
- Excavate hydrocarbon-impacted material.
- When confirmatory soil samples collected from the bottom and sides of the excavation indicate that aggregate TPH concentrations are below the EHS IL of 100 mg/kg, and other compounds are below their respective ESL, or accessible limits are reached, the cleanup objective will be considered achieved;
- At the Bradley 5-3 wellhead:
  - Document the condition of the wellhead and the surrounding soils;
  - Test the atmosphere immediately adjacent to the wellhead for VOCs;

- Coordinate with the California Geologic Energy Management Division (CalGEM) to document the condition and the location of the wellhead, and to test the atmosphere immediately adjacent to the wellhead for VOCs.

- Transport impacted soil and material to a California licensed waste disposal facility;
- Backfill the excavation with clean fill soils and restore the site as needed;

7.1 Health and Safety Plan

Atlas has established a Safety and Health Program (SHP) to protect the personal health and safety of all Atlas employees, subcontractors and the public. The SHP defines safety practices and procedures to be instituted in all Atlas work places, as applicable. The program meets, and often exceeds, the requirements promulgated by the Occupational Safety and Health Act (OSHA). As part of the SHP, all Atlas personnel are appropriately trained and under a Medical Surveillance Program in accordance with OSHA 40 CFR 1910.120.

Atlas's primary mechanism to increase employee, environmental, and public safety at the project site will be the HASP. Atlas will prepare and implement a HASP for this project based on the scope of work and the associated potential hazards. All individuals working under the purview of Atlas will be required to review and sign the HASP to acknowledge their understanding of the information contained within. The HASP will be site-specific and task-specific, describing potentially hazardous conditions that may be encountered and prescribing the necessary safety protocols to protect employees from these hazards. The HASP will be implemented on site by all Atlas personnel and all subcontractors.

At a minimum, the HASP will identify: roles and responsibilities of key site personnel; hazard analysis for all potential chemical, physical, and physiochemical hazards anticipated; a personnel protection plan; site safety procedures for specific site operations; a decontamination plan; and an emergency response/contingency plan. The HASP will specify levels of protection for site personnel on a task-specific basis. Atlas will provide on-going evaluation of all potentially hazardous conditions as the project is undertaken, and if necessary, will prescribe additional safety protocols to protect personnel, the public, and the environment.

7.2 Permits and Notifications

Atlas and their subcontractors will obtain required permits and approvals prior to conducting the work. EHS personnel will be notified at least 48 hours in advance of the start of excavation activities. A list of permits and notifications identified to date include:

- Haul agreement from the County of Santa Barbara;
- Waste profile from the Santa Maria Landfill or other California licensed waste disposal facility;
- Permit to excavate impacted soil from the Santa Barbara County Air Pollution Control District (SBCAPCD);
- Grading permit from the County of Santa Barbara, as needed;

- Underground Service Alert (USA) of Southern California / DigAlert Notification.

ConocoPhillips will provide notification to business and homeowners in the area.

7.3 Remedial Field Activities

The following sections describe the planned work activities to be completed including, but not limited to, excavation and backfill, offsite disposal of hydrocarbon-impacted materials, and site restoration.

7.3.1 Work Schedule

Heavy equipment will not be used at the site before 8 a.m. or after 5 p.m. Atlas and its subcontractors will work Monday through Friday, with no weekend or after hours work unless dictated by unforeseen circumstances.

7.3.2 Mobilization

Upon approval of this RAP from the EHS, approval of all permits, and community notification by ConocoPhillips, Atlas will mobilize personnel and equipment to perform the work described in this plan. Mobilization shall include, but is not limited to:

- Reviewing the conditions of permits required for the project;
- Establishing lines of communication between site workers, ConocoPhillips, EHS, SBCAPCD, a California licensed waste-disposal facility, and the County of Santa Barbara;
- Conducting a project kick-off meeting for Atlas workers, subcontracted site workers, and lead agencies;
- Review the site-specific HASP for Atlas employees and subcontractors;
- Establishing a staging area at the site; and
- Deploying personnel and equipment to the site.

Atlas and their subcontractors will obtain the required local and county approvals prior to beginning the work. ConocoPhillips will coordinate any required public notifications.

7.3.3 Pre-Construction and Post-Construction Survey

Atlas will perform a pre-construction survey. The pre-construction survey will document the pre-existing exterior physical conditions of the property such as, surrounding land, roads, structures and streets. The survey shall record deficiencies by means of written notes, sketches, photographs, videotape, recorded audio narrative or any other format or combination thereof that sufficiently depicts the pre-construction conditions.

Atlas will perform a post-construction survey upon the completion of the work described in this RAP. The post-construction survey will re-evaluate all structures and features examined during the pre-construction survey and the results will be compared.

Items that are recognized to be in need of repair or replacement due to damage reportedly caused by the construction activities shall be repaired/replaced in accordance with County permit conditions.

7.3.4 Demolition

The impacted material primarily underlies agricultural land; therefore, demolition will not be required.

7.3.5 Excavation

Field observations and laboratory results indicate that hydrocarbon-impacted material may extend up to a depth of approximately 9 feet bgs; therefore, Atlas anticipates this remedial excavation to extend to a maximum depth of approximately 10 feet bgs. Sidewalls of the excavation will generally be sloped no steeper than 1:1 (vertical to horizontal) ratio for slope stability.

Hydrocarbon-impacted soil will be excavated, loaded into dump trucks, and transported off-site for disposal as described below in section 7.3.7.

Atlas submitted depth-to-groundwater data to the EHS in the Work Plan to Evaluate the Former Bradley Lease Well 5-3 (Atlas 2022). The groundwater data indicated that subsurface drilling was performed at two locations within approximately 0.7 miles of the Site. Groundwater was not encountered at a depth of 35 feet bgs or at 75 feet bgs. Due to the shallow depth of the proposed remedial excavation (approximately 10 feet bgs) contact with groundwater is not anticipated.

7.3.6 Waste Characterization of Hydrocarbon-Impacted Soil

Soil samples results from the recent site assessment activities performed by Atlas indicate that the soil to be excavated will be classified as non-hazardous. Before any excavation work commences, Atlas will coordinate with the proposed disposal facility to complete the profiling process and ensure that all waste profiling requirements are fulfilled.

7.3.7 Waste Management, Transportation and Disposal

Off-site disposal of all waste materials will be performed in accordance with local, county, state and federal regulations. Transportation of the various waste materials will be performed under the appropriate manifest, Bill of Lading, and material shipping/tracking documentation. Details of the management, transportation and disposal are provided below.

WASTE MANAGEMENT

The primary waste material that will be generated by this project is petroleum-hydrocarbon impacted soil. The impacted soil will be transported by a licensed waste hauler under non-hazardous manifest to a California Licensed waste disposal facility.

TRANSPORTATION PROCEDURES & TRUCK ROUTES

Transportation of waste materials will be performed in compliance with applicable regulations. The transportation contractor(s) will have the necessary licenses and permits to transport the excavated

material to the disposal facility. The transportation contractor will follow the truck route presented on **Figure 5** when transporting soil from the Site to the disposal facility or returning to the Site from the disposal facility.

Dust and odors will be monitored during loading of trucks. Once loading is complete, a tarp or cover will be extended over the entire load. Atlas will maintain a log of the loading operations, and will implement the following engineering controls during loading operations:

- Plastic sheeting or geotextile fabric will be placed on the ground surface in the load out area (as necessary) to prevent hydrocarbon-impacted material from coming in contact with the underlying surface; and
- Prior to exiting the work zone, truck tires and bodies will be cleaned (as necessary) while the vehicle is staged on the covered surface to prevent potential tracking of material off-site.

STOCKPILING OF MATERIALS

Hydrocarbon-impacted soil may be temporarily stockpiled onsite. Hydrocarbon-impacted soil stockpiles, if any, will be handled in accordance with the SBCAPCD permit requirements. Stockpiles will be removed for disposal within 24 hours. Stockpiles will be covered prior to rainfall events.

7.3.8 Confirmation Soil Sampling and Analyses

Confirmation soil samples will be collected from the bottom and sidewalls of the excavations to confirm that the soil TPH cleanup criteria (100 mg/kg) is achieved.

For small excavations, the EHS has recommended that one soil sample be collected for every 500 square feet of excavation bottom, and one for each 25 linear feet of sidewall (EHS 2019a). For large excavations, the EHS has recommended that one soil sample be collected for every 2,500 square feet of excavation bottom, and one for each 50 linear feet of sidewall (EHS 2021b). For the large excavation proposed at the Bradley 3-5 oil well and sump, Atlas proposes up to 25 confirmation samples; a soil sample for every 2,500 square feet of excavation bottom, and one for each 50 linear feet of sidewall; however, the confirmation sample locations shall be determined in the field based on site conditions and input from the EHS.

Confirmation samples will be submitted to an Environmental Laboratory Accreditation Program (ELAP) Certified Laboratory and analyzed for:

- TPH (full range) by U.S. Environmental Protection Agency (EPA) Test Method (TM) 8015.
- VOC by EPA TM 8260B,
- PAH by EPA TM 8270-SIM, and
- CAM 17 Metals by EPA TM 6010/7471A.

Confirmation samples are typically submitted for expedited same-day or 24-hour turn-around.

7.3.9 Excavation and Sample Location Survey

The perimeter of the remedial excavation and soil sampling locations will be surveyed by a subcontracted land surveyor.

7.3.10 Backfilling of Excavation

Upon the completion of the confirmation soil sampling, the excavated areas will be backfilled with clean, imported soil. The imported soil will meet or exceed the requirements outlined by the State of California Department of Toxic Substances Control (DTSC) document titled Information Advisory, Clean Imported Fill Material, dated October 2001; additionally,

- Imported fill material will be predominately granular, non-expansive, and contain no more than 40 percent fines (portion passing No. 200 sieve);
- Imported soils will be free of rock or similar irreducible material greater than 12 inches in any dimension. The material shall not include organic or other deleterious materials;
- The excavation will be backfilled and compacted in lifts not exceeding 12 inches in depth;
- The soil shall be compacted to 90 percent compaction, as determined by ASTM D 1557, Modified Proctor or as required by the County of Santa Barbra grading permit.

7.3.11 Site Security

Atlas will implement several programs and engineering controls to protect the health and safety of on-site workers and the public throughout the duration of the project. Details on the programs and engineering controls are described in the sections below.

TEMPORARY FENCING

A temporary chain-link fence will be installed around the work area. Access gates will be installed in the temporary chain-link fence. Atlas will be responsible for controlling unauthorized access to the work area. During off working hours, the temporary gates will be locked.

SITE ACCESS

On-site work will be performed Monday through Friday only and heavy machinery work will be restricted to between 8 a.m. and 5 p.m., unless dictated by unforeseen circumstances.

During work hours, Atlas will monitor access to the site. Site visitors entering active remediation areas will be required to participate in a site safety orientation, review job safety analysis (as necessary), and review and sign the HASP. Only those visitors with proper health and safety training and personal protection equipment (PPE) will be allowed to enter the active remediation areas. During off working hours, the temporary gates will be locked.

7.3.12 Traffic management

Truck traffic associated with the remedial activities may affect normal traffic flow on Telephone Road. Flaggers will be utilized as needed to help manage truck traffic associated with the project. The haul route is presented on **Figure 5**.

7.3.13 Air Monitoring

Upon approval of this RAP and prior to the commencement of field activities, Atlas will prepare and submit an Application for Soil Excavation and associated forms to the SBCAPCD for review and approval.

Atlas will conduct monitoring of airborne particulate matter and organic vapor concentrations during excavation hours in accordance with SBCAPCD permit requirements including perimeter ambient air monitoring for dust and reactive organic compounds (ROC), stockpile monitoring for ROC, and work zone air monitoring. Monitoring will also be used to control worker exposure and off-site emissions in compliance with this RAP, the site-specific HASP, and California Occupational Safety & Health Administration (Cal/OSHA).

7.3.14 Dust and Noise Controls

DUST CONTROL

Construction activities such as excavation, backfilling, stockpiling soil, and vehicle traffic may generate dust and particulate matter when the exposed soil surfaces are dry. In order to mitigate this, dust control measures have been developed and will be performed during field activities. Atlas and subcontractors will employ the following dust control measures as necessary throughout the project:

- Covering the soil in the haul trucks;
- Covering or wetting debris, soil, or other materials when not in use;
- Minimizing drop heights while loading and unloading soil;
- Spraying water to wet the soils and suppress dust;
- Use of soil binding agents such as Soil-Sement®, if needed.
- Cleaning vehicles and tires prior to leaving the site;
- Sweeping adjacent streets, if needed;
- Suspending the excavation, loading or unloading of soil during periods of high winds or when dust control measures are deemed ineffective in the prevention of visible dust plumes.

NOISE CONTROL

Heavy equipment will operate during normal work hours of 8 a.m.to 5 p.m. Monday through Friday, unless dictated by unforeseen circumstance. A decibel meter will be posted at the Site to monitor any

potential exceedance of noise levels above the OSHA time-weighted average (TWA) 8 hour day average standard of 90 decibels (dB), or the ConocoPhillips threshold of 82 dB TWA.

7.3.15 Site Restoration and Demobilization

Site restoration will be performed by Atlas following backfilling and compaction activities. Site restoration will include the following:

- Grading of the excavated area to as near original grade as possible;
- Removing temporary fencing;
- Demobilizing the equipment; and
- Performing a final cleanup of the property and the adjacent access roads as needed.

8. REPORTING

Within 90 days of completion of the work proposed under this RAP, a closure report will be prepared and submitted to the EHS. The report will be uploaded to GeoTracker under global ID# T10000017408 (Geo_Report) and will include the following:

- Site history and previous investigation results;
- Summary of the remediation and restoration activities;
- Copies of permits obtained for the project;
- Volumes of material exported and imported;
- Laboratory data submitted as an electronic data file (EDF);
- Site plan and cross-sections showing pre-remediation and post remediation limits of the hydrocarbon-impacted soils, as well as confirmation sample locations;
- Signed waste manifests for soils and materials disposed at off-site facilities; and
- Conclusions and recommendations regarding regulatory closure of the site.

A confirmation of the GeoTracker upload will be emailed to the EHS.

9. SCHEDULE

Atlas will start the permit application process following the EHS approval of this RAP and authorization from ConocoPhillips. The proposed remedial work is anticipated to occur in the second or third quarter of 2023; however, the permit application process, agency approval, and the needs of stakeholders may influence the schedule. The time to prepare the site, excavate hydrocarbon-impacted soils, backfill the excavation and restore the Site is expected to take approximately 4 to 6 weeks.

10. LIMITATIONS

Atlas's professional services have been performed, findings obtained, and recommendations prepared in accordance with principles and practices in the fields of environmental science and engineering. Atlas is not responsible for the independent conclusions, opinions, or recommendations made by others based on the results and designs presented in this plan.

The passage of time may result in a change in the environmental characteristics at this Site and surrounding properties. This report does not warrant against future operations or conditions, nor does it warrant operations or conditions present of a type or at a location not investigated.

It must be noted that no investigation can absolutely rule out the existence of any hazardous materials at a given site. If a higher level of confidence is required than can be defined by this scope of work, then additional investigation would, of course, be required.

This remedial action plan was prepared for the exclusive use and sole reliance of ConocoPhillips for the specific application defined for this project at Bradley 5-3 Oil Well Sump. Atlas will release this plan to other parties only with prior approval from ConocoPhillips. Atlas performed the services for this project in accordance with the terms of the contract between Atlas and ConocoPhillips.

Atlas makes no warranty, either expressed or implied, as to its findings, opinions, recommendations, specifications, or professional advice, except that they were formulated after being prepared in accordance with generally accepted standards of care and diligence normally practiced by recognized consulting firms performing services of similar nature.

11. REFERENCES

Atlas 2022, Atlas Technical Consultants, Work Plan To Evaluate The Former Bradley Lease Well 5-3 Sump, Santa Maria, California, API# 08302507, APN# 129-010-011. June 9, 2022.

EHS 2019a, Santa Barbara County Public Health Department, Environmental Health Services Division (EHS), Site Mitigation Unit (SMU), Letter from Marissa Censullo, EHS, to Bill Borgh, ConocoPhillips, Subject: Remedial Action Plan, Former Romalho 1 Oil Lease – 2201 Thornburg Street, Santa Maria, CA 93455, APN 111-060-020, SMU-2 Site # 20250. March 14, 2018.

EHS 2021b, Censullo, Marissa, Santa Barbara County Public Health Department, email to Mr. Alex Hartig, ATC Group Services, Subject: COP, Tank Battery, A question about verification sample frequency. April 27, 2021.

TABLES

Table 1
Summary of Analytical Data - Organics
Bradley 5-3 Sump, Subsurface Soil Assessment
3700 Telephone Road, Santa Maria, California 93454

Sample Name	Date	TPH g (C_5 - C_{12}) mg/kg	TPH d (C_{12} - C_{22}) mg/kg	TPH o (C_{22} - C_{40}) mg/kg	VOCs mg/kg		PNAs mg/kg	
3850-1-5	11/15/2022	<0.135	**6680**	**9,420**	1,2,4-Trimethylbenzene	**0.00353 J**	Acenaphthene	**0.306**
					1-Methylnaphthalene	**3.97**	Benzo(A)Anthracene	**0.0224 J**
					2-Methylnaphthalene	**4.23**	Benzo(G,H,I)Perylene	**0.0249 J**
					Ethylbenzene	**0.00339 J**	Chrysene	**0.214**
					Styrene	**0.0152 J**	Fluorene	**0.440**
					Xylenes, Total	**0.00726 J**	Naphthalene	**0.915**
							Phenanthrene	**1.03**
3850-1-10	11/15/2022	<0.112	**1.52 J**	<4.48	Ethylbenzene	**0.0019 J**	ND	
					Methylene Chloride	**0.0134 J**		
					Styrene	**0.0121 BJ**		
					Tetrachloroethene	**0.00264 J**		
					Toluene	**0.00183 J**		
					Xylenes, Total	**0.00291 J**		
3850-1-15	11/15/2022	<0.106	**0.835 J**	<4.23	--		--	
3850-1-20	11/15/2022	<0.115	**1.13 J**	<4.59	--		--	
3850-2-5	11/15/2022	**0.187**	**3,260**	**4,570**	1,2,3-Trimethylbenzene	**0.0129**	Acenaphthene	**0.112**
					1,2,4-Trimethylbenzene	**0.139**	Benzo(A)Anthracene	**0.00919**
					1-Methylnaphthalene	**2.39**	Benzo(G,H,I)Perylene	**0.0105**
					2-Methylnaphthalene	**2.24**	Chrysene	**0.0992**
					Benzene	**0.00818**	Fluoranthene	**0.0217**
					Ethylbenzene	**0.412**	Fluorene	**0.186**
					Isopropylbenzene	**0.129**	Naphthalene	**0.608**
					Methylene Chloride	**0.0126 J**	Phenanthrene	**0.406**
					Naphthalene	**0.190**		
					N-Butylbenzene	**0.147**		
					N-Propylbenzene	**0.302**		
					P-Isopropyltoluene	**0.0733**		
					Sec-Butylbenzene	**0.179**		
					Styrene	**0.0119 BJ**		
					Toluene	**0.00578 J**		
					Xylenes, Total	**0.0234**		
3850-2-10	11/15/2022	<0.112	**7.48**	**11.64 J**	--		--	
3850-2-15	11/15/2022	<0.115	**0.919 J**	<4.59	Ethylbenzene	**0.00795**	ND	
					Isopropylbenzene	**0.00126 J**		
					Methylene Chloride	**0.0122 J**		
					Naphthalene	**0.0211**		
					N-Propylbenzene	**0.0042 J**		
					Sec-Butylbenzene	**0.00636 J**		
					Styrene	**0.0132 BJ**		
					Xylenes, Total	**0.00433 J**		
3850-3-5	11/16/2022	**23.7 B**	**2,620**	**4,060**	1,2,3-Trimethylbenzene	**0.0234**	Acenaphthene	**0.369**
					1,2,4-Trimethylbenzene	**0.0229**	Benzo(A)Anthracene	**0.0285 J**
					1-Methylnaphthalene	**4.62**	Benzo(B)Fluoranthene	**0.0285 J**
					2-Methylnaphthalene	**4.44**	Benzo(G,H,I)Perylene	**0.0270 J**
					Ethylbenzene	**0.0343**	Chrysene	**0.258**
					Isopropylbenzene	**0.00815**	Dibenz(A,H)Anthracene	**0.0335 J**
					Methylene Chloride	**0.0117 J**	Fluoranthene	**0.0591 J**
					Naphthalene	**0.0223**	Fluorene	**0.550**
					N-Butylbenzene	**0.00649 J**	Naphthalene	**1.04**
					N-Propylbenzene	**0.0230**	Phenanthrene	**1.06**
					P-Isopropyltoluene	**0.0163**	Pyrene	**0.155**
					Sec-Butylbenzene	**0.0130 J**		
					Styrene	**0.0147 BJ**		
					Toluene	**0.00193 J**		
					Xylenes, Total	**0.00637 J**		
3850-3-10	11/16/2022	<0.109	**5.04**	**8.08 J**	--		--	
3850-3-15	11/16/2022	**0.207**	**0.935 J**	<4.28	Methylene Chloride	**0.0122 J**	ND	
					Styrene	**0.0128 BJ**		
					Xylenes, Total	**0.00321 J**		

Table 1
Summary of Analytical Data - Organics
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3700 Telephone Road, Santa Maria, California 93454

Sample Name	Date	TPH g (C_5 - C_{12}) mg/kg	TPH d (C_{12} - C_{22}) mg/kg	TPH o (C_{22} - C_{40}) mg/kg	VOCs mg/kg		PNAs mg/kg	
3850-4-5	11/16/2022	<0.106	**1.00 J**	<4.28	--		--	
3850-4-10	11/16/2022	<0.107	**1.73 J**	**1.51 J**	--		--	
3850-4-15	11/16/2022	<0.111	**1.12 BJ**	<4.44	--		--	
3850-4-20	11/16/2022	<0.112	**1.05 BJ**	<4.50	--		--	
3850-5-5	11/16/2022	<0.110	**1.22 BJ**	<4.40	Ethylbenzene Methylene Chloride Styrene Xylenes, Total	**0.00228 J** **0.0121 J** **0.0116 BJ** **0.00358 J**	ND	
3850-5-10	11/16/2022	<0.111	**2.56 BJ**	<4.46	--		--	
3850-5-15	11/16/2022	<0.109	**3.81 BJ**	<4.34	--		--	
3850-6-5	11/16/2022	**200**	**8,110**	**11,180**	1,2,3-Trimethylbenzene 1,2,4-Trimethylbenzene 1-Methylnaphthalene 2-Methylnaphthalene Benzene Ethylbenzene Isopropylbenzene Methylene Chloride Naphthalene N-Butylbenzene N-Propylbenzene P-Isopropyltoluene Sec-Butylbenzene Styrene Xylenes, Total	**0.987** **0.721** **13.6** **13.9** **0.130** **1.79** **0.335** **0.0125 J** **0.594** **0.353** **0.831** **0.203** **0.287** **0.0136 BJ** **0.216**	Acenaphthene Benzo(A)Anthracene Benzo(B)Fluoranthene Benzo(G,H,I)Perylene Chrysene Dibenz(A,H)Anthracene Fluoranthene Fluorene Naphthalene Phenanthrene Pyrene	**1.07** **0.0694 J** **0.0628 J** **0.0801 J** **0.468** **0.0584 J** **0.133 J** **1.49** **4.10** **2.48** **0.332**
3850-6-10	11/16/2022	<0.107	**1.34 BJ**	<4.29	1,2,3-Trimethylbenzene 1,2,4-Trimethylbenzene 2-Methylnaphthalene Benzene Ethylbenzene Isopropylbenzene Methylene Chloride Naphthalene N-Butylbenzene N-Propylbenzene P-Isopropyltoluene Sec-Butylbenzene Styrene Xylenes, Total	**0.0122** **0.00715** **0.0164 J** **0.000993 J** **0.0237** **0.00452** **0.0128 J** **0.0604** **0.00670** **0.00894** **0.00689** **0.00701 J** **0.0148 B** **0.00718 J**	Naphthalene	**0.00701 J**
3850-6-15	11/16/2022	**0.0953 J**	**1.48 BJ**	<4.53	--		--	
3850-7-5	11/16/2022	<0.110	**1.40 BJ**	<4.41	--		--	
3850-7-10	11/16/2022	<0.109	**1.28 BJ**	<4.34	--		--	
3850-7-14	11/16/2022	<0.108	**1.89 BJ**	<4.34	--		--	
3850-8-5	11/17/2022	**1.35**	**2,740**	**2,968 J**	1-Methylnaphthalene 2-Methylnaphthalene Ethylbenzene Isopropylbenzene Methylene Chloride Naphthalene N-Propylbenzene Sec-Butylbenzene Styrene Toluene Xylenes, Total	**3.49** **3.87** **0.0117** **0.00262 J** **0.0215 J** **0.0151 J** **0.0108 J** **0.0117 J** **0.0236 BJ** **0.00404 J** **0.00441 J**	Acenaphthene Chrysene Fluoranthene Fluorene Naphthalene Phenanthrene Pyrene	**0.261** **0.106** **0.0322 J** **0.375** **1.18** **0.565** **0.0775**
3850-8-10	11/17/2022	**0.0526 BJ**	**1.29 BJ**	<4.38	Ethylbenzene Methylene Chloride Styrene Xylenes, Total	**0.00319** **0.0131 J** **0.0136 BJ** **0.00351 J**	ND	
3850-8-15	11/17/2022	<0.112	**1.41 BJ**	<4.50	--		--	

Table 1
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Bradley 5-3 Sump, Subsurface Soil Assessment
3700 Telephone Road, Santa Maria, California 93454

Sample Name	Date	TPH g (C_5 - C_{12}) mg/kg	TPH d (C_{12} - C_{22}) mg/kg	TPH o (C_{22} - C_{40}) mg/kg	VOCs mg/kg		PNAs mg/kg	
3850-8-20	11/17/2022	<0.113	**3.91 BJ**	**3.45 J**	--		--	
3850-8-26	11/17/2022	<0.107	**3.75 BJ**	**2.45 J**	1,2,4-Trimethylbenzene Ethylbenzene Methylene Chloride Styrene Toluene Xylenes, Total	**0.00389 J** **0.00355** **0.0121 J** **0.0141 BJ** **0.00160 J** **0.00872**	ND	
3850-9-5	11/17/2022	<0.111	**1.13 BJ**	<4.43	--		--	
3850-9-10	11/17/2022	<0.110	**1.18 BJ**	<4.41	--		--	
3850-9-15	11/17/2022	<0.110	**1.24 BJ**	<4.40	--		--	
3850-10-5	11/17/2022	<0.111	**2.82 BJ**	**5.82**	Ethylbenzene Methylene Chloride Styrene Xylenes, Total	**0.00213 J** **0.0128 J** **0.0134 BJ** **0.00188 J**	ND	
3850-10-10	11/17/2022	<0.109	<4.35	<4.35	--		--	
3850-10-15	11/17/2022	<0.113	<4.51	<4.51	--		--	
3850-11-5	11/17/2022	**0.698**	**236**	**652**	--		--	
3850-11-10	11/17/2022	**0.0398 BJ**	**9.61**	**21.02**	Ethylbenzene Methylene Chloride Styrene Toluene Xylenes, Total	**0.00201 J** **0.0119 J** **0.0115 BJ** **0.00197 J** **0.00204 J**	ND	
3850-11-15	11/17/2022	<0.110	<4.39	<4.39	--		--	
3850-12-5	11/17/2022	<0.106	<4.23	<4.23	--		--	
3850-12-10	11/17/2022	<0.110	<4.42	<4.42	--		--	
3850-12-15	11/17/2022	<0.111	<4.46	<4.46	--		--	
3850-13-5	11/17/2022	<0.107	<4.28	**6.28 J**	Ethylbenzene Methylene Chloride Styrene Xylenes, Total	**0.00172 J** **0.0118 J** **0.0118 BJ** **0.00251 J**	ND	
3850-13-10	11/17/2022	<0.113	<4.52	<4.52	--		--	
3850-13-15	11/17/2022	**0.0484 J**	<4.28	<4.28	--		--	
3850-14-5	11/18/2022	**0.0924 J**	**158**	**310**	1,2,3-Trimethylbenzene 1-Methylnaphthalene 2-Methylnaphthalene Benzene Ethylbenzene Isopropylbenzene Methylene Chloride Naphthalene N-Propylbenzene P-Isopropyltoluene Sec-Butylbenzene Styrene Xylenes, Total	**0.00293 J** **0.0946** **0.0797** **0.000858 J** **0.00701** **0.00154 J** **0.0127 J** **0.0171** **0.00408 J** **0.00369 J** **0.00553 J** **0.0123 J** **0.00225 J**	Acenaphthene Chrysene Fluorene Naphthalene Phenanthrene	**0.00950** **0.00258 J** **0.0148 J** **0.0291** **0.0137**
3850-14-10	11/18/2022	**0.367**	<4.49	<4.49	Ethylbenzene Isopropylbenzene Methylene Chloride N-Propylbenzene Sec-Butylbenzene Styrene Xylenes, Total	**0.00216 J** **0.000654 J** **0.0140 J** **0.00156 J** **0.00424 J** **0.0126 BJ** **0.00203 J**	ND	
3850-14-15	11/18/2022	<0.108	<4.34 J6	<4.34 J6	--		--	
3850-14-20	11/18/2022	<0.114	<4.55	<4.55	--		--	
3850-14-24	11/18/2022	<0.113	<4.53	<4.53	Ethylbenzene Methylene Chloride Styrene Xylenes, Total	**0.00151 J** **0.0114 J** **0.0128 BJ** **0.00207 J**	ND	

Table 1
Summary of Analytical Data - Organics
Bradley 5-3 Sump, Subsurface Soil Assessment
3700 Telephone Road, Santa Maria, California 93454

Sample Name	Date	TPH g (C_5 - C_{12}) mg/kg	TPH d (C_{12} - C_{22}) mg/kg	TPH o (C_{22} - C_{40}) mg/kg	VOCs mg/kg		PNAs mg/kg	
EHS Screening Level		100			NA		NA	
Tier 1 ESL		100	260	1,600	NA		NA	
Commercial / Industrial ESL		2,000	1,200	180,000	1,2,3-Trimethylbenzene	NV	Acenaphthene	45,000
					1,2,4-Trimethylbenzene	NV	Benzo(a)anthracene	20
					1-Methylnaphthalene	NV	Benzo(a)pyrene	2.1
					2-Methylnaphthalene	3,000	Chrysene	2100
					Benzene	1.4	Dibenz(a,h)anthracene	2.1
					Ethylbenzene	26	Fluoranthene	30000
					Isopropylbenzene	NV	Fluorene	30000
					Methylene Chloride	25	Naphthalene	17
					Naphthalene	17	Phenanthrene	NV
					N-Propylbenzene	NV	Pyrene	23000
					N-Propyltoluene	NV		
					P-Isopropyltoluene	NV		
					Sec-Butylbenzene	NV		
					Styrene	33,000		
					Tetrachloroethene (PCE)	2.7		
					Toluene	5,300		
					Xylenes, Total	2,500		

Notes:

All analyses were conducted at Pace Analytical (PACE) in Mt. Juliet, Tennessee. Environmental Laboratory Accreditation Program (ELAP) #2932.

Analytical results and screening levels are presented in milligrams per kilogram (mg/kg)

Analytical results above the laboratory reporting limit (RL) are displayed in **bold font**.

Analytical results above the EHS Screening Level, or the Commercial/Industrial Environmental Screening Level (ESL) are highlighted in yellow.

Abbreviations:

mg/kg	milligrams per kilogram.
PQL	Practical Quantitation Limit
<5.0	Less than the laboratory PQL of 5.0 mg/kg.
TPH g (C5-C12)	Gasoline range total petroleum hydrocarbons by Method 8015.
TPH d (C12-C22)	Diesel range hydrocarbons by Method 8015B.
TPH o (C22-C40)	Motor Oil range hydrocarbons by Method 8015B.
VOCs	Volatile Organic Compounds by EPA Method 8260B. Only results above the laboratory PQL are displayed. The laboratory PQL and MDL for all analytes is available on the laboratory report.
PAHs	Polynuclear Aromatic Compounds (Semi Volatile Organic Compounds) by GC/MS with Selected Ion Monitoring, by EPA Method 8270C-SIM. Only results above the PQL are displayed. The laboratory PQL and MDL for each analyte is available on the analytical laboratory report.
NV	No value. Where NV is displayed the screening level for the compound is not listed, or no value is given.
ND	Not detected above the laboratory PQL. The laboratory PQL for all analytes is available on the laboratory report.
NA	Not applicable, Not analyzed.
J	Result less than the laboratory reporting limit but greater than the method detection limit. The reported concentration is an estimated value.
B	The same analyte is found in the associated blank
J6	Diesel range hydrocarbons by Method 8015B.
ESL	California Water Boards, Environmental Screening Levels, (ESLs), San Francisco Bay Regional Water Quality Control Board, Table: Summary of Soil ESLs (mg/kg), Direct Exposure Human Health Risk Levels (Table S-1), Commercial Industrial: Shallow Soil Exposure. January 2019. The value represents the lowest of the Cancer, Non-cancer hazard. <https://www.waterboards.ca.gov/rwqcb2/water_issues/programs/esl.html> viewed December 5, 2022.

Table 2
Summary of Analytical Data - Metals
Bradley 5-3 Sump, Subsurface Soil Assessment
3700 Telephone Road, Santa Maria, California 93454

Sample Name	Date	Antimony mg/kg	Arsenic mg/kg	Barium mg/kg	Beryllium mg/kg	Cadmium mg/kg	Chromium mg/kg	Cobalt mg/kg	Copper mg/kg	Lead mg/kg	Mercury mg/kg	Molybdenum mg/kg	Nickel mg/kg	Selenium mg/kg	Silver mg/kg	Thallium mg/kg	Vanadium mg/kg	Zinc mg/kg
3850-1-5	11/15/2022	<2.69	**1.66 J**	**171**	**0.393**	**1.21**	**19.4**	**3.84**	**10.2**	**19.3**	<0.0539	**2.68**	**24.7**	<2.69	<1.35	<2.69	**41.3**	**36.1**
3850-1-10	11/15/2022	**0.658 J**	**0.929 J**	**59.3**	**0.428**	**0.222 J**	**17.2**	**5.13**	**6.53**	**5.15**	**0.0398 J**	**0.573**	**10.9**	<2.24	<1.12	<2.24	**32.2**	**19.7**
3850-1-15	11/15/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-1-20	11/15/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-2-5	11/15/2022	<2.25	<2.25	**137**	**0.267**	**0.351 J**	**9.57**	**2.89**	**5.01**	**4.81**	<0.0450	**0.756**	**8.01**	<2.25	<1.12	<2.25	**19.1**	**12.0**
3850-2-10	11/15/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-2-15	11/15/2022	**1.04 J**	<2.29	**47.1**	**0.462**	**0.285 J**	**22.7**	**4.43**	**13.0**	**5.77**	<0.0459	**1.46**	**13.8**	<2.29	<1.15	<2.29	**41.0**	**31.9**
3850-3-5	11/16/2022	<2.22	<2.22	**186**	**0.358**	**0.380 J**	**12.1**	**3.86**	**7.55**	**12.5**	<0.0445	**0.841**	**15.9**	<2.22	<1.11	<2.22	**36.2**	**17.8**
3850-3-10	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-3-15	11/16/2022	<2.14	<2.14	**9.19**	**0.158 J**	**0.0639 J**	**5.92**	**1.09**	**2.80**	**1.44**	<0.0428	**0.200 J**	**3.00**	<2.14	<1.07	<2.14	**8.89**	**5.38**
3850-4-5	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-4-10	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-4-15	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-4-20	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-5-5	11/16/2022	<2.20	**0.634 J**	**39.8**	**0.487**	**0.212 J**	**12.4**	**5.10**	**6.73**	**2.50**	**0.0376 J**	**0.320 J**	**13.5**	<2.20	<1.10	<2.20	**20.7**	**13.8**
3850-5-10	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-5-15	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-6-5	11/16/2022	**0.663 J**	<2.23	**75.6**	**0.321**	**0.218 J**	**10.4**	**3.68**	**6.68**	**3.38**	<0.0447	**1.27**	**12.7**	<2.23	<1.12	<2.23	**31.0**	**12.4**
3850-6-10	11/16/2022	<2.15	**1.50 J**	**18.6**	**0.233**	**0.0738 J**	**7.06**	**3.63**	**3.15**	**2.30**	<0.0429	<0.536	**4.13**	<2.15	<1.07	<2.15	**12.9**	**8.16**
3850-6-15	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-7-5	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-7-10	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-7-14	11/16/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-8-5	11/17/2022	<3.20	**4.51**	**185**	**0.397**	**1.93**	**24.0**	**3.93**	**12.5**	**39.0**	<0.0640	**2.49**	**25.5**	**1.59 J**	<1.60	<3.20	**46.1**	**44.8**
3850-8-10	11/17/2022	<2.19	**2.24**	**27.3**	**0.353**	**0.155 J**	**12.5**	**3.18**	**5.68**	**4.08**	<0.0438	**0.214 J**	**8.19**	<2.19	<1.09	<2.19	**21.4**	**15.0**
3850-8-15	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-8-20	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-8-26	11/17/2022	<2.15	**1.43 J**	**25.1**	**0.358**	**0.110 J**	**10.1**	**2.12**	**5.95**	**2.97**	<0.0430	**0.249 J**	**8.22**	<2.15	<1.07	<2.15	**19.0**	**16.8**
3850-9-5	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-9-10	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-9-15	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-10-5	11/17/2022	<2.23	**1.87 J**	**52.5**	**0.472**	**0.134 J**	**15.6**	**5.04**	**6.23**	**4.15**	**0.0306 J**	<0.557	**13.1**	<2.23	<1.11	<2.23	**25.1**	**18.4**
3850-10-10	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-10-15	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-11-5	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-11-10	11/17/2022	<2.23	**2.34**	**43.8**	**0.322**	**0.154 J**	**14.5**	**2.31**	**4.85**	**4.22**	**0.0299 J**	<0.558	**8.39**	<2.23	<1.12	<2.23	**26.9**	**17.0**
3850-11-15	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-12-5	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-12-10	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-12-15	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Table 2
Summary of Analytical Data - Metals
Bradley 5-3 Sump, Subsurface Soil Assessment
3700 Telephone Road, Santa Maria, California 93454

Sample Name	Date	Antimony mg/kg	Arsenic mg/kg	Barium mg/kg	Beryllium mg/kg	Cadmium mg/kg	Chromium mg/kg	Cobalt mg/kg	Copper mg/kg	Lead mg/kg	Mercury mg/kg	Molybdenum mg/kg	Nickel mg/kg	Selenium mg/kg	Silver mg/kg	Thallium mg/kg	Vanadium mg/kg	Zinc mg/kg
3850-13-5	11/17/2022	<2.14	**1.29 J**	**23.2**	**0.199 J**	**0.0817 J**	**6.34**	**2.12**	**2.42**	**1.98**	<0.0428	<0.535	**4.44**	<2.14	<1.07	<2.14	**11.3**	**6.53**
3850-13-10	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-13-15	11/17/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-14-5	11/18/2022	<2.19	**1.22 J**	**55.2**	**0.293**	**0.142 J**	**9.68**	**4.76**	**5.48**	**3.57**	<0.0439	**2.43**	**6.86**	<2.19	<1.10	<2.19	**18.0**	**11.8**
3850-14-10	11/18/2022	<2.25	**2.04 J**	**28.6**	**0.352**	**0.123 J**	**12.4**	**2.33**	**5.27**	**3.49**	<0.0449	<0.561	**8.20**	<2.25	<1.12	<2.25	**20.5**	**14.7**
3850-14-15	11/18/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-14-20	11/18/2022	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
3850-14-24	11/18/2022	<2.27	**2.75**	**49.0**	**0.523**	**0.199 J**	**18.1**	**3.83**	**10.8**	**5.26**	<0.0453	**0.378 J**	**12.4**	<2.27	<1.13	<2.27	**31.9**	**33.6**
Commercial / Industrial ESL(1)		160	0.31	220,000	230	1100	NV	350	47,000	320	190	5800	11,000	5,800	5,800	12	5,800	350000

Notes:
(1) Source: California Water Boards, Environmental Screening Levels, (ESLs), San Francisco Bay Regional Water Quality Control Board, Table: Summary of Soil ESLs (mg/kg), Direct Exposure Human Health Risk Levels (Table S-1), Commercial/Industrial: Shallow Soil Exposure, lower of the Cancer Risk, and Non-cancer Hazard. January 2019 (Rev 2) <https://www.waterboards.ca.gov/rwqcb2/water_issues/programs/esl.html> viewed December 5, 2022.

Analytical results and screening levels are presented in milligrams per kilogram (mg/kg) for soil

All analyses were conducted at Pace Analytical (PACE) in Mt. Juliet, Tennessee. Environmental Laboratory Accreditation Program (ELAP) #2932.

Metals were analyzed with EPA Test Method 6010B. Mercury was analyzed with EPA Test Method 7471A.

Analytical results above the laboratory practical quantitation limit (PQL) are displayed in **bold font.**

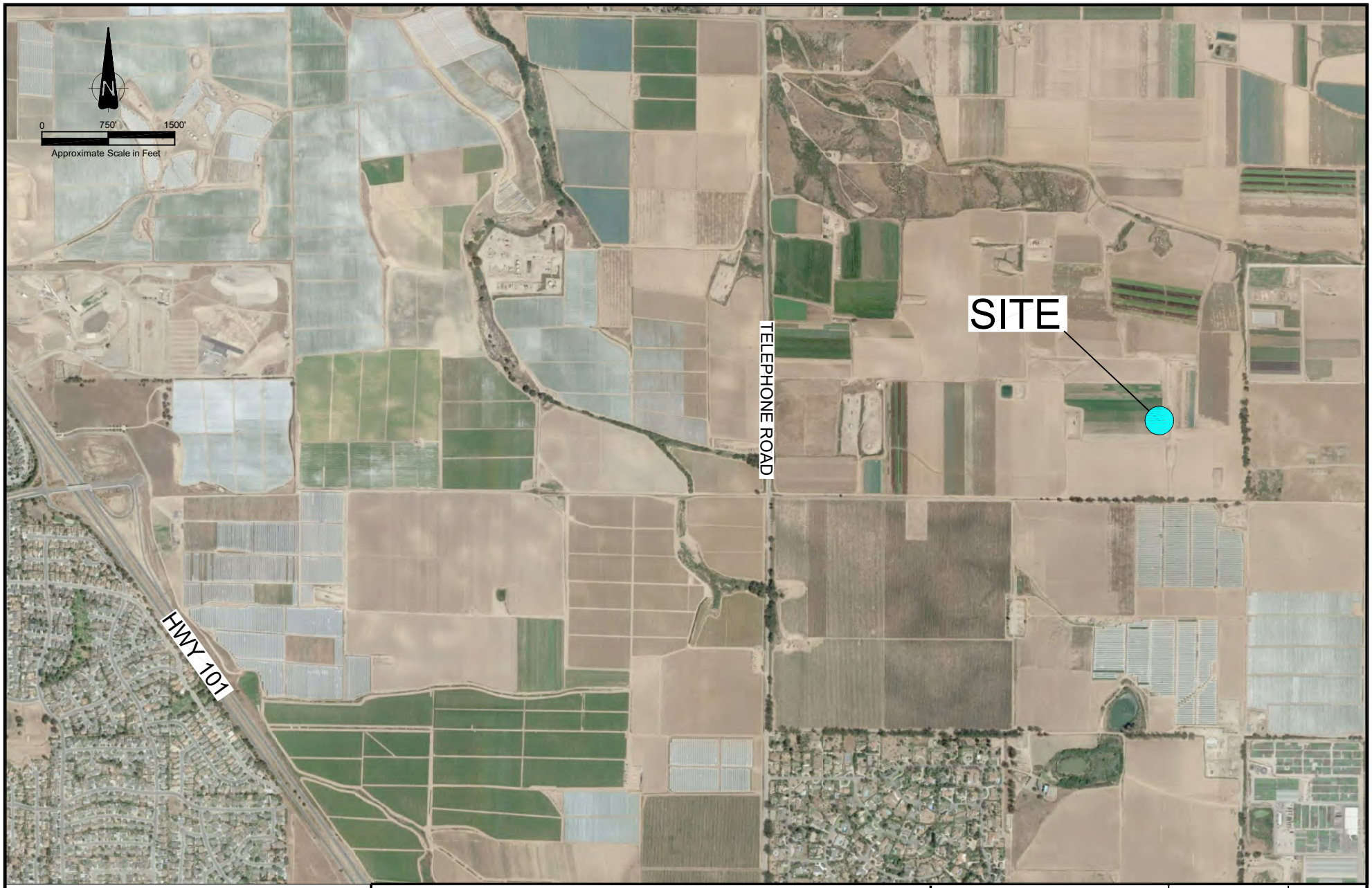
Highlighted cells reflect values equal to or greater than the Commercial/Industrial ESL (except for arsenic. See note on arsenic below).

The Commercial/Industrial ESL for arsenic is 0.31 mg/kg. However, the EHS acknowledges that background concentrations of arsenic in soils throughout the Santa Maria Valley are known to range to approximately 10 mg/kg. (Fontes, Barbara A., Santa Barbara County Fire Department. Letter to: Ms. Heather Boyd, Conoco Phillips. October 26, 2004. Arsenic concentrations below 10 mg/kg are therefore not highlighted.

Abbreviations:

PQL	Practical Quantitation Limit.
<5.0	Less than the laboratory PQL of 5.0 mg/kg.
NV	No value. Where NV is displayed the screening level for the compound is not listed, or no value is given.
--	Not applicable, Not analyzed.
J	Result less than the laboratory practical quantitation limit but greater than the method detection limit. The reported concentration is an estimated value.

FIGURES



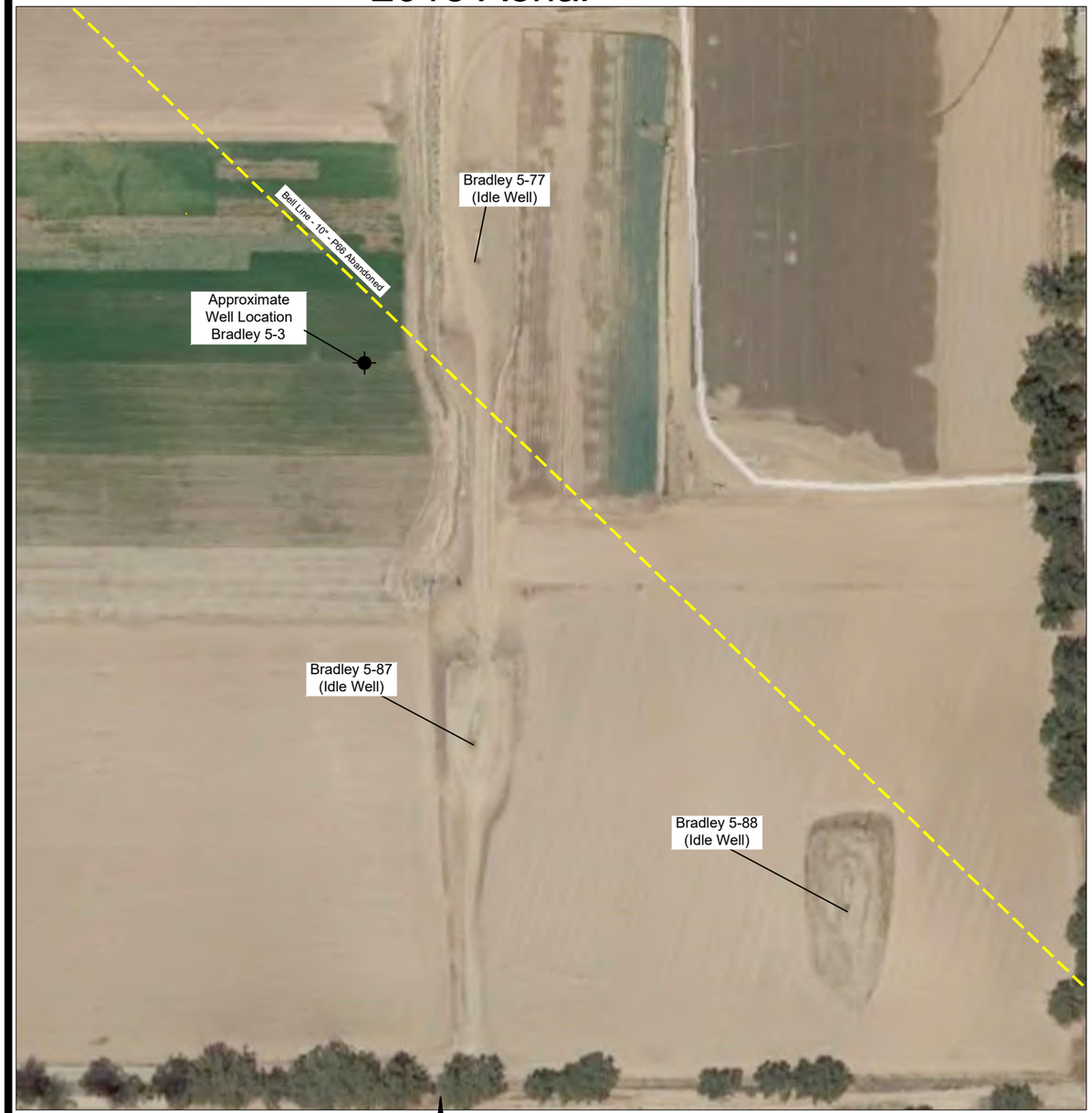
SITE LOCATION MAP

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

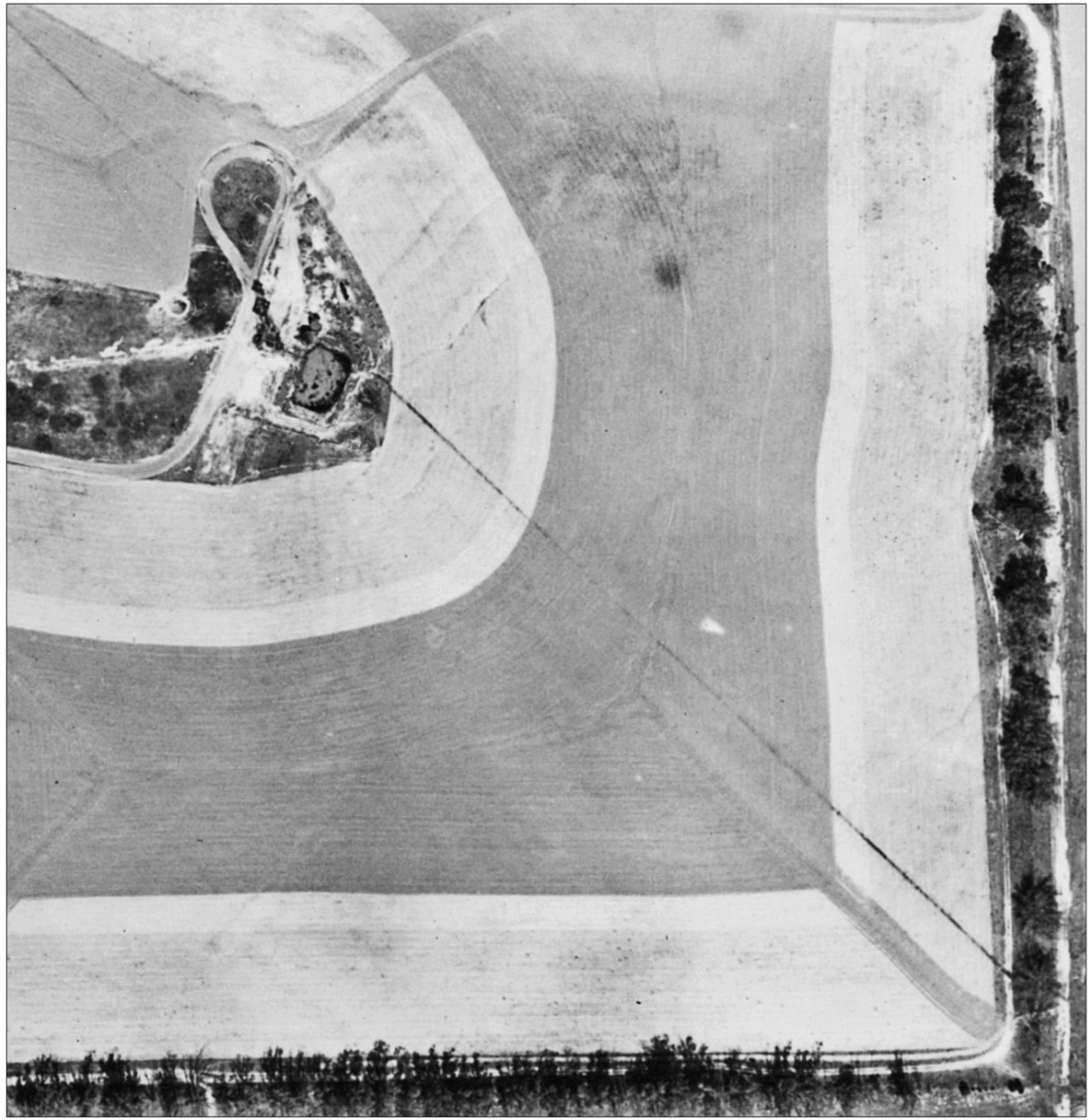
PROJECT NUMBER: Z079007133		DATE: 1/16/23	FIGURE 1
APPROVED BY: AH		DRAWN BY: OR	

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007

2018 Aerial



1956 Aerial



N

0 200' 400'

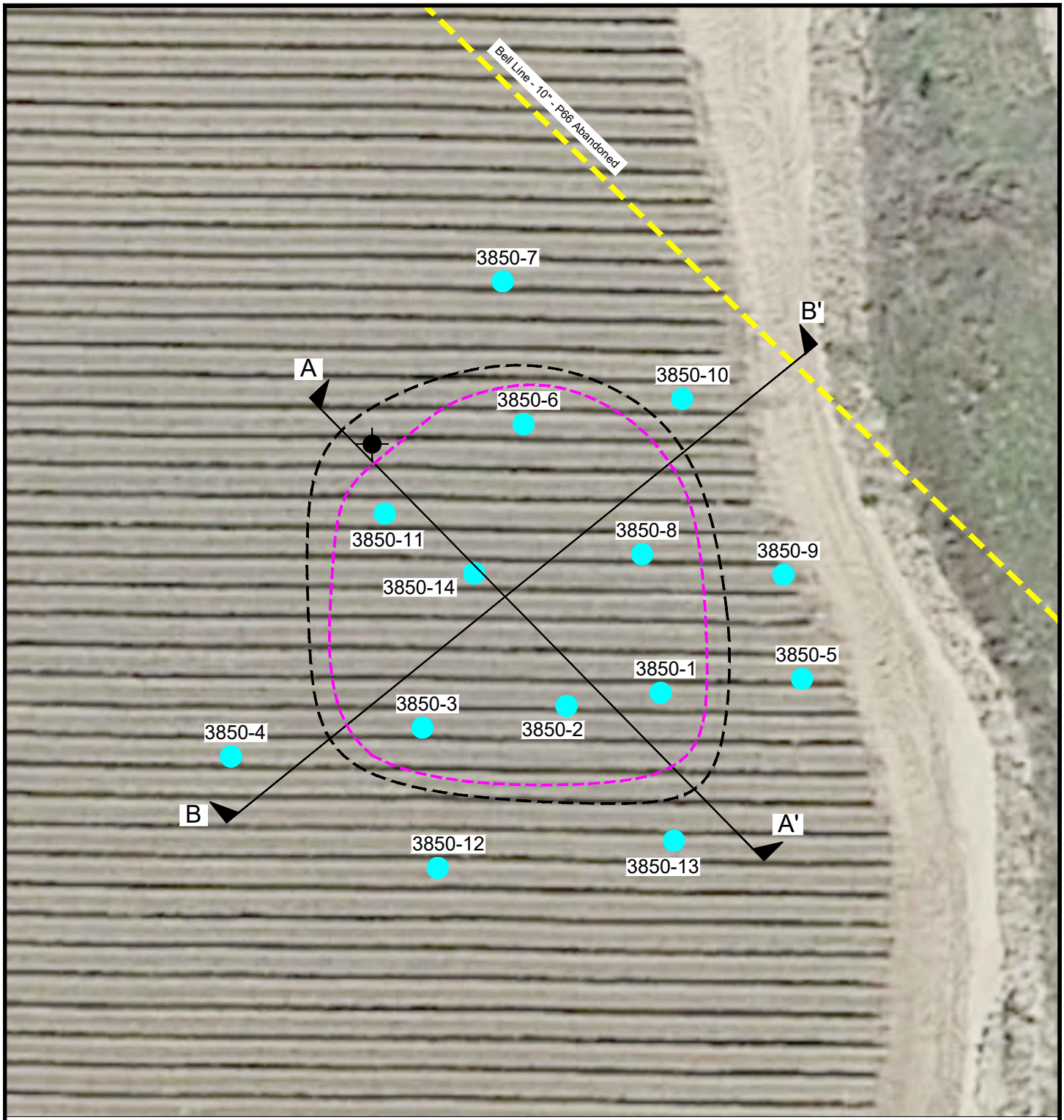
Approximate Scale in Feet

SITE PLAN

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER:	Z079007133	DATE:	1/16/23	FIGURE 2
APPROVED BY:	AH	DRAWN BY:	AH	

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007



LEGEND

- APPROXIMATE LOCATION OF WELLHEAD
- SOIL BORING LOCATION
- PETROLEUM HYDROCARBON IMPACTS ABOVE THE CLEANUP GOAL OF 100 mg/kg OR VISUALLY IMPACTED ON BORING LOGS
- PROPOSED EXTENT OF REMEDIAL EXCAVATION TO 10 FEET BELOW GROUND SURFACE BASED ON LABORATORY DATA AND VISUAL OBSERVATIONS (~7,300 SQ FT / ~2,700 CY)
- CROSS SECTION

N

0 30'

Approximate Scale in Feet

SITE PLAN WITH SOIL BORING LOCATIONS

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER: 1012107133		DATE: 1/16/23	FIGURE 3
APPROVED BY: AH		DRAWN BY: AH	

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007

LEGEND

3850-5 — SOIL BORING ID

(13,700) — SAMPLE LOCATION AND AGGREGATE CONCENTRATION OF TPH (C4-C40)
ND - NOT DETECTED ABOVE REPORTING LIMIT

ND — TOTAL DEPTH OF BORING

PETROLEUM HYDROCARBON IMPACTS ABOVE THE CLEANUP GOAL OF 100 mg/kg OR VISUALLY IMPACTED ON BORING LOGS

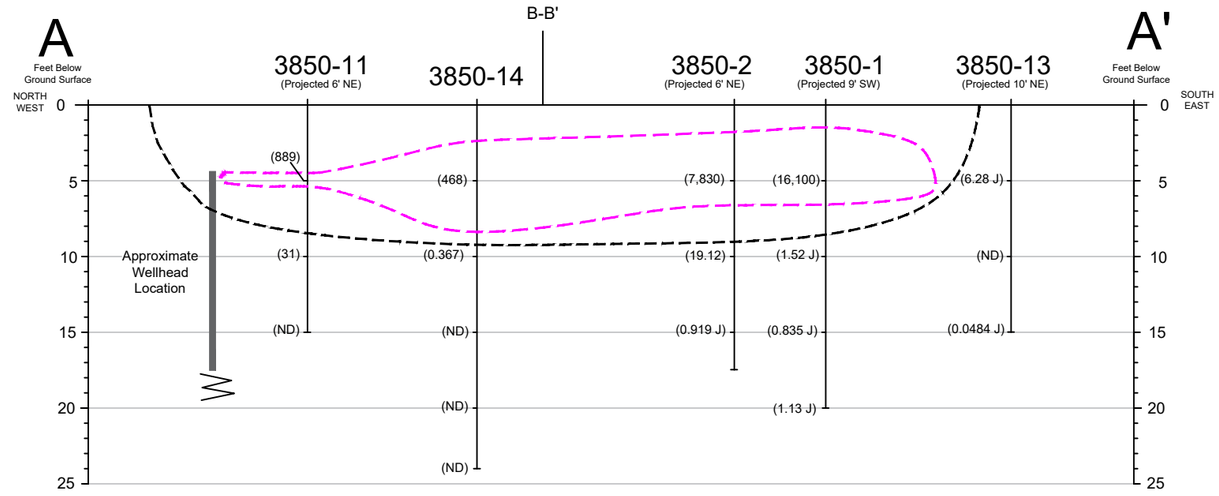
PROPOSED EXTENT OF REMEDIAL EXCAVATION TO 10 FEET BELOW GROUND SURFACE BASED ON LABORATORY DATA AND VISUAL OBSERVATIONS (~7,300 SQ FT / ~2,700 CY)

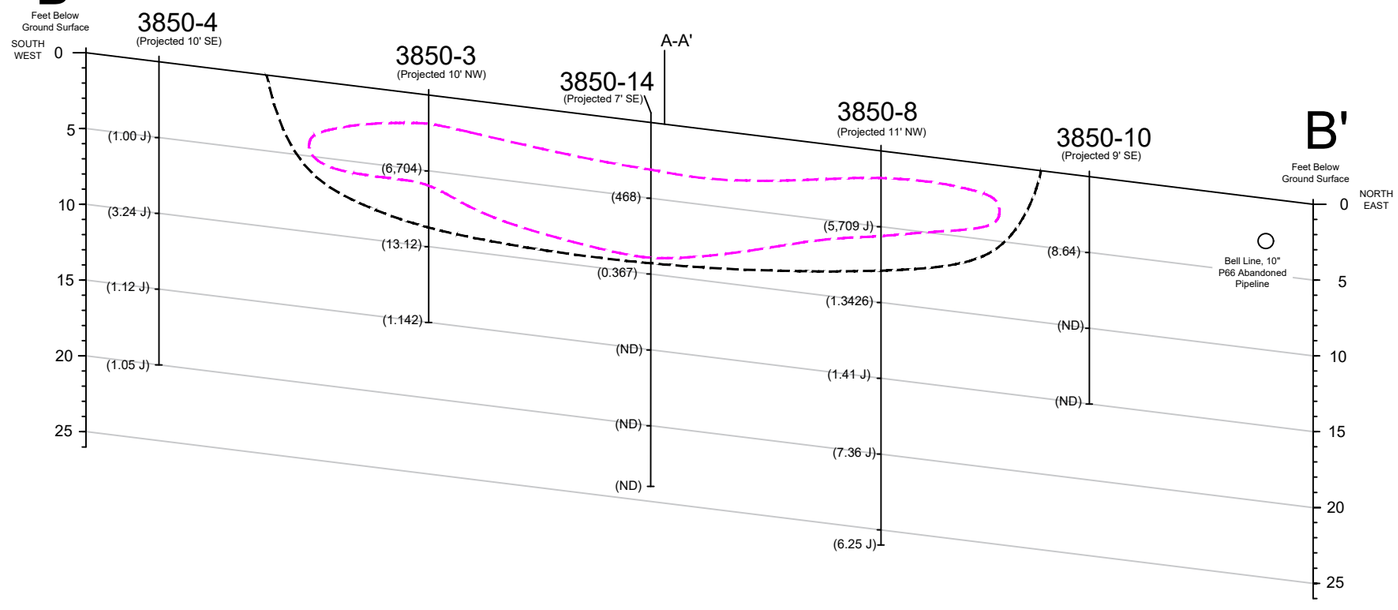
SCALE

Horizontal: 0 — 20'

Vertical: 0 — 10'

Horizontal 1" = 20'
Vertical 1" = 10'





CROSS SECTIONS A-A' AND B-B'

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER: Z079007133		DATE: 1/19/23	FIGURE
APPROVED BY: AH		DRAWN BY: AH	4

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007

HAUL ROUTE

BRADLEY LEASE: WELL 5-3
3700 TELEPHONE ROAD
SANTA MARIA, CA

PROJECT NUMBER: 1012107133		DATE: 1/16/23	FIGURE
APPROVED BY: AH		DRAWN BY: AH	5

ATLAS
7343 El Camino Real, # 302
Atascadero, CA 93422
Ph: (805) 543-7007

apcd air pollution control district
SANTA BARBARA COUNTY

April 11, 2023

Katie Nall
Santa Barbara County
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

Sent Via Email: nallk@countyofsb.org

Re: Santa Barbara County Air Pollution Control District Suggested Conditions for Bradley Lease Soil Remediation Project ConocoPhillips, 23LUP-00000-00066

Dear Katie Nall:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of the excavation of approximately 2,700 cubic yards (CY) of contaminated soil from a 32,000 square foot (0.75 acre) area at the Bradley 5-3 oil well sump location. Excavation is proposed to extend to a maximum depth of approximately 10 feet below ground surface. Hydrocarbon impacted soil may be temporarily stockpiled onsite. Non-Hazardous Hydrocarbon Impacted soil will be disposed of at the Santa Maria Regional Landfill and clean fill will be placed in lifts and compacted onsite. When results confirm the site-specific cleanup goals are met, the excavated area will be backfilled with approximately 2,700 CY of imported clean fill and clean fill generated onsite. The work area will be graded and restored to as near original conditions as possible. The project is anticipated to require approximately 185 truck trips for export soil and 185 truck trips for import soil. The entire project, including site preparation, excavation, backfilling, and restoration, is expected to take approximately four to five weeks. The subject site is located at 3700 Telephone Road and is associated with Assessor Parcel Map Book as APN 129-010-011, zoned Ag-II-40, in the unincorporated Santa Maria area.

The proposed project is subject to the following **regulatory requirements** that should be included as conditions of approval in the applicable land use permit:

1. Prior to grading/building permit issuance, **District Authority to Construct and/or Permit to Operate permits** will be required for the excavation ("dig-and-haul") of contaminated soil. Proof of receipt of the required District permits shall be submitted by the applicant to planning staff. See www.ourair.org/permit-applications to download the necessary permit application(s).

2. 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.

3. Construction/demolition activities are subject to District Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*. This rule establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites, includes measures for minimizing fugitive dust from on-site activities, and from trucks moving on- and off-site. Please see www.ourair.org/wp-content/uploads/rule345.pdf. Activities subject to Rule 345 are also subject to Rule 302 (*Visible Emissions*) and Rule 303 (*Nuisance*).

4. At all times, the 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 https://ww2.arb.ca.gov/capp-resource-center/heavy-duty-diesel-vehicle-idling-information for more information.

In addition, the District recommends that the following best practices be considered for inclusion as conditions of approval, in the interest of reducing emissions of criteria air pollutants, toxic air contaminants, dust and odors:

5. 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.

6. 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.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8301 or via email at WongB@sbcapcd.org.

Sincerely,

Bryan Wong,
Air Quality Specialist
Planning Division

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

cc: William Sarraf, Supervisor, District Engineering Division
Planning Chron File

air pollution control district
SANTA BARBARA COUNTY

ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

These measures should be required for all projects involving earthmoving activities regardless of the project size or duration. Projects are expected to manage fugitive dust emissions such that emissions do not exceed APCD's visible emissions limit (APCD Rule 302), create a public nuisance (APCD Rule 303), and are in compliance with the APCD's requirements and standards for visible dust (APCD Rule 345).

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60 minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained 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.
- Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces.
- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.
- If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than one day 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.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area by watering, OR using roll-compaction, OR revegetating, OR by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks etc. to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures 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 grading/building permit issuance and/or map clearance.

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: 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.

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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 (NOx), 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, NOx 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-NOx 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.