

CALIFORNIA COASTAL COMMISSION

45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5200
FAX (415) 904-5400
TDD (415) 597-5885



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original staff report

Tu14b

October 5, 2015

To: Coastal Commission and Interested Parties

From: Charles Lester, Executive Director
Alison Dettmer, Deputy Director
Mark Delaplaine, Manager, Energy, Ocean Resources and Federal Consistency Division

Subject: **Addendum to 9-15-0620 – Venoco, Line 96 Decommissioning**

This addendum provides revisions to the staff report. The proposed modifications to the staff report do not change staff's recommendation that the Commission approve the project with conditions.

Revisions to the Staff Recommended Condition 2

Additions are shown below in underline and deletions in ~~strikethrough~~.

On Page 5 of the staff report, Special Condition No.2 shall be revised as follows:

2. Pre-Construction Monarch Butterfly Survey and Monitoring During Construction. PRIOR TO COMMENCEMENT OF CONSTRUCTION AT VALVE BOX 1291, the Permittee shall submit to the Executive Director for his review and approval a preconstruction survey by a qualified biologist acceptable to the Executive Director. The survey shall be completed by October 15, 2015. ~~Construction activities for the Valve Box 1291 removal shall be completed prior to the onset of the monarch butterfly overwintering season, and outside the raptor nesting season (February thru August).~~ If the survey results establishes, or if the on-site monitor establishes, that butterfly aggregations are found within 200 feet of the work area, the biologist, in coordination with appropriate agencies, construction activities within the 200-foot buffer area shall have the authority to be halted delay the start of work until monarchs have left the site or to allow work to proceed with appropriate protective measures.

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STAFF REPORT: REGULAR CALENDAR

Application No.: 9-15-0620

Applicant: Venoco, Inc.

Location: Ellwood Onshore Facility (7979 Hollister Ave.) to the former Ellwood Marine Terminal, Goleta, Santa Barbara County

Project Description: Decommissioning of 3.3 mi. of former Line 96, including filling with grout, removal of several sections of pipeline, and removal of one of three existing underground Valve Boxes (Valve Box 1291) (Exhibits 1 and 2).

Staff Recommendation: Approval with conditions

SUMMARY OF STAFF RECOMMENDATION

Venoco, Inc. (Venoco) proposes the decommissioning of an approximately 3.3 mile segment of the Line 96 oil pipeline which historically transported oil from the Ellwood Onshore Facility (EOF) to the Ellwood Marine Terminal (EMT) in Goleta. The Ellwood Marine Terminal has been decommissioned, and this segment of the old Line 96 is no longer in use. The pipeline replacing it, also called Line 96, currently transports oil from the EOF to a connection point on the Plains All American Pipeline near Las Flores Canyon. The decommissioning activities raise several Coastal Act issues, due to: (1) the proximity of environmentally sensitive habitat and

wetlands in the project vicinity; (2) the proximity of recreational trails to temporary construction sites; (3) the potential for runoff and sedimentation, which could affect water quality; and (4) the potential for disturbance of cultural resources.

The City of Goleta has reviewed the project and addressed a number of these coastal resource (and other local) concerns through its environmental analysis and conditions of approval (Exhibit 8). Under the applicant's proposal and the City's mitigation measures, project elements within known sensitive habitats and wetlands would be left in place, with one exception, which is the proposed removal of the upper portions of a Vault Valve Box (Valve Box 1291), located adjacent to a eucalyptus windrow providing habitat for monarch butterfly overwintering, and within an area (Ellwood Mesa) containing a combination of native and non-native grasslands. The eucalyptus groves and native grasslands, where they predominate, are environmentally sensitive habitat areas (ESHAs). Work in this area would be limited to restoration, confined to a small area (up to 100 sq. ft. area), of limited duration a (one- to two-day period), and no native grasses would be adversely affected. Moreover, the project has been scheduled to avoid the monarch overwintering season, and the area would be restored with native grasses.

In order to assure that both ESHA and wetland habitat are adequately protected and to find the project consistent with Sections 30240 and 30233 of the Coastal Act, the staff recommends the Commission attach the following special conditions. **Special Condition 1** requires submittal of pre-project surveys identifying, flagging, and avoiding sensitive habitats and wetlands. **Special Condition 2** requires plans for biological surveying and monitoring to avoid construction when aggregations of monarchs are present, as well as monitoring by a certified arborist to assure protection of eucalyptus tree roots. **Special Condition 3** requires development of monitoring and success criteria for restoration efforts, as well as submittal of all revegetation, monitoring and restoration plans, with provisions for remediation as necessary to assure success.

With these conditions, the staff recommends the Commission find the project will: (1) avoid wetlands and be consistent with Section 30233; (2) be consistent with Section 30240, as a "use dependent on the resources" (i.e. restoration), and because the project includes avoidance, minimization, mitigation, and monitoring measures sufficient to protect ESHA against any significant disruption or degradation of the habitat values and be compatible with the continuance of the ESHAs.

The staff also recommends several additional conditions to protect public access and recreation, water quality, and cultural resources (**Special Conditions 4-6**). With these conditions, the staff recommends the Commission find the project is consistent with the public access and recreation, water quality, and cultural resource policies (Sections 30210, 30214, 30231 and 30244) of the Coastal Act.

The staff therefore recommends that the Commission **approve** coastal development permit application 9-15-0620, as conditioned. The standard of review for proposed project is the Chapter 3 policies of the Coastal Act, because the City of Goleta does not have a certified Local Coastal Program.

TABLE OF CONTENTS

I. MOTION AND RESOLUTION.....	4
II. STANDARD CONDITIONS	4
III. SPECIAL CONDITIONS	5
IV. FINDINGS AND DECLARATIONS.....	8
A. PROJECT DESCRIPTION	8
B. OTHER AGENCY APPROVALS	9
C. ENVIRONMENTALLY SENSITIVE HABITAT AND WETLANDS.....	9
D. WATER QUALITY	13
E. PUBLIC ACCESS AND RECREATION	14
F. CULTURAL RESOURCES.....	15
G. CALIFORNIA ENVIRONMENTAL QUALITY ACT.....	16

APPENDICES

[Appendix A – Substantive File Documents](#)

EXHIBITS

- Exhibit 1 – Project Location & Work Areas
- Exhibit 2 – Project In Relation to Coastal Zone Boundary
- Exhibit 3 – Easternmost Project Areas and Sensitive Habitats - EOF
- Exhibit 4 – Mid-Portion Project Areas and Sensitive Habitats - GUSD
- Exhibit 5 – Mid-Portion Project Areas and Sensitive Habitats – UCSB North Campus
- Exhibit 6 – Southernmost Project Areas and Sensitive Habitats – Ellwood Mesa and EMT
- Exhibit 7 – Valve Box 1291 Photo adjacent to Eucalyptus Trees
- Exhibit 8 – City of Goleta Conditions
- Exhibit 9 – Biological Survey at Valve Box 1291 and Wetland Assessment

I. MOTION AND RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit 9-15-0620 subject to the conditions set forth in the staff recommendation.*

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in conditional approval of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves Coastal Development Permit 9-15-0620 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

The coastal development permit (9-15-0620) is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the Permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the Permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

1. Pre-Construction Wetland and ESHA Flagging, Staking, and Construction Monitoring.

A. PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittee shall submit to the Executive Director for his review and approval preconstruction flagging, staking, and monitoring plans sufficient to avoid all wetlands and environmentally sensitive habitat identified on Exhibits 3-6, except for the Valve Box 1291 removal area wherein restoration work may occur. Such habitats shall include all wetlands (as defined under the Coastal Act), monarch butterfly, purple needlegrass, and southern tarplant habitat identified on Exhibits 3-6 (with the exception of Staging Areas 3 and 4 shown on Exhibit 5). No development shall occur within 100 ft. of the mapped habitat areas other than the restoration work authorized at the Valve Box 1291 site.

B. DURING CONSTRUCTION the plan shall assure that a biologist deemed qualified by the Executive Director shall remain on-site for any construction to mark and assure avoidance of any wetlands or environmentally sensitive habitats, and shall have the authority to halt construction in the event unanticipated adverse effects occur, including but not limited to the arrival of aggregations of monarch butterflies as described in Special Condition 2. Any such halting of construction shall be reported to the Executive Director, and construction shall not recommence without an amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required. The plans shall also assure that a certified arborist will be present during the partial Valve Box 1291 removal, to assure that no tree roots are disturbed, and that the filling of the box is undertaken in a manner further protecting tree roots.

2. Pre-Construction Monarch Butterfly Survey and Monitoring During Construction.

PRIOR TO COMMENCEMENT OF CONSTRUCTION AT VALVE BOX 1291, the Permittee shall submit to the Executive Director for his review and approval a preconstruction survey by a qualified biologist acceptable to the Executive Director. The survey shall be completed by October 15, 2015. Construction activities for the Valve Box 1291 removal shall be completed prior to the onset of the monarch butterfly overwintering season, and outside the raptor nesting season (February thru August). If the survey establishes that butterfly aggregations are found within 200 feet of the work area, construction activities within the 200-foot buffer area shall be halted until monarchs have left the site.

3. Post-Construction Monitoring and Restoration. NO MORE THAN 60 DAYS FOLLOWING COMPLETION OF PROJECT ACTIVITIES, the Permittee shall submit a post-construction report describing the level of success of the measures that were required to avoid, protect and restore wetlands and ESHA. In addition, the monitoring and restoration plans shall include:

(a) A description of restoration activities including specific methodologies for invasive species removal and native vegetation planting. The sand/soil mixture proposed to fill the abandoned vault box shall include a hydroseed mix consisting only of native seed obtained from the Ellwood-Devereux Open Space native plant stock. The mixture shall prevent the invasion and/or spread of undesired plant species and shall result in the restoration of native wildlife habitat and a plant palette consisting of entirely native species.

(b) Interim and final performance criteria for each of the three years of post-planting site monitoring that reflect a goal of achieving 90 percent vegetative cover of the restoration site with native species.

(c) The installation of different plant species in different zones that reflect the habitat present in those zones.

(d) The restoration of native plant communities in areas from which non-native or invasive plants are removed.

(e) A monitoring plan describing the type of monitoring activities that will be used to assess whether the Permittee is meeting the required restoration performance criteria.

(f) An adaptive management plan that includes contingency measures in case performance criteria are not achieved.

(g) A timeline for restoration implementation, monitoring and reporting activities.

Within 30 days of completion of decommissioning activities, the Permittee shall commence implementation of the Restoration and Monitoring Plan. Compliance with this plan shall include annual monitoring and reporting to the Executive Director for three years. If at the completion of the three year monitoring and reporting period (dated from the completion of planting activities), the Executive Director determines that the performance criteria described within the plan have not been met, the Permittee shall submit, within 60 days of the Executive Director's determination, a coastal development permit amendment application proposing a new Restoration and Monitoring Plan.

4. Storm Water Pollution Prevention Program. PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittee shall submit a Project-specific Storm Water Pollution Prevention Plan to the Executive Director, for his review and approval, for all pipeline removal activities occurring in pipeline segments 3 and 5. This plan shall prevent adverse impacts to nearby waterways, and the constructed wetlands located in the adjacent North Campus Faculty Housing project on UCSB property, resulting from any construction-related incidental spills. Best Management Practices such as temporary berms and sedimentation traps, including silt fencing, straw bales, and sand bags, shall be installed prior to work involving ground disturbance. In addition, the plan shall specify site restoration activities, including: (1) disturbed soils will be compacted to the same level of compaction as existed prior to pipeline removal and to match compaction of the soils immediately to the area of work; (2) the moisture

content shall match that of the immediately adjacent soils; (3) fill may be native soil, provided it is free of contamination; and (4) soil stabilization/erosion controls to reduce runoff and dust will be implemented.

5. Construction Traffic and Noise. PRIOR TO COMMENCEMENT OF CONSTRUCTION, the Permittee shall submit a Construction Traffic Control Plan to the Executive Director for his review and approval. The plan shall include, but not be limited to, the following:

(a) Measures to minimize delays and construction scheduling during weekends and holidays and minimize the effects of any temporary detours for pedestrians and bicyclists, to the maximum extent feasible, at all times.

(b) Measures to assure that no construction parking will occur in public parking lots (i.e. Haskell's Beach and Ellwood Mesa/Sperling Preserve lots).

(c) Limitations confining noise generating construction activity and equipment maintenance to the hours between 8 AM and 5 PM, Monday through Friday.

(d) Prohibitions on construction during State holidays (e.g., Thanksgiving, Labor Day) (with the exception of low noise generating construction activities such as pipeline grouting or similar activities which are located away from sensitive receptors are not subject to these restrictions, and which can occur within 12-14 hour workdays).

(e) Limitations on the use of roadways by construction vehicles and haul trucks in order to avoid popular recreation areas and sensitive receptors to the maximum extent feasible.

6. Protection of Archaeological Resources.

A. If an area of historic or prehistoric cultural resources or human remains are discovered during the course of the project, all construction shall cease and shall not recommence except as provided in subsection (B) hereof, and a qualified cultural resource specialist shall analyze the significance of the find.

B. A Permittee seeking to recommence construction following discovery of the cultural deposits shall submit an archaeological plan for the review and approval of the Executive Director, prepared in consultation with the local Tribal Historic Preservation Officers.

(i) If the Executive Director approves the Archaeological Plan and determines that the Archaeological Plan's recommended changes to the proposed development or mitigation measures are *de minimis* in nature and scope, construction may recommence after this determination is made by the Executive Director.

(ii) If the Executive Director approves the Archaeological Plan but determines that the changes therein are not *de minimis*, construction may not recommence until after an amendment to this permit is approved by the Commission.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

Venoco proposes to decommission 3.3 miles of the portion of Line 96 that is no longer in service, but which formerly transported oil between the Ellwood Onshore Facility (EOF) and the now-decommissioned Ellwood Marine Terminal (EMT) in Goleta. The pipeline that replaced it (also called Line 96) currently transports oil from the EOF to a connection point on the Plains All American Pipeline near Las Flores Canyon.

Venoco proposes to first pump a decommissioning grout into the entire 3.3 mi. of pipeline (from the EMT to the EOT), to remove two segments of pipeline (Segments 3 and 5, which are located on Goleta Union School District, and UC Santa Barbara properties, respectively), and to remove portions of one of three existing Valve Vault Boxes (Valve Box 1291, located within the City-owned Ellwood Mesa Open Space area). (Note: The terms Valve Box and Vault Box tend to be used interchangeably; a Vault Box contains a Valve within it; this report will refer to them as Valve Boxes hereafter.)

Line 96 is generally located six ft. below grade, and in areas of relatively level terrain throughout its length. From northwest to southeast, it begins at the EOF, follows Hollister Ave. for two miles east to Pacific Oaks Rd., then south to Phelps Rd., where it traverses southwest, adjacent to Goleta Union School District-owned open space area and the currently-under-construction UC Santa Barbara North Campus Housing Project. The line then runs south along the east side of the City-owned Ellwood Mesa property, to just south of Valve Box 1291, where it turns east, traversing to the EMT. The Line is within the coastal zone from the EOF to approximately the Hollister Ave./Pebble Beach Dr. intersection, outside the coastal zone for the remainder of Hollister Ave. eastward, and southward along Pacific Oaks Rd. (Exhibit 2). It then reenters the coastal zone just east of where El Encanto runs under Phelps Rd. (Exhibit 4), and it remains in the coastal zone to its terminus at the EMT.

Line 96 was installed by Mobil Pacific Pipeline Co. in 1982. Venoco took ownership in 1997. The line was replaced by the Line 96 Modification Project on February 15, 2012 (authorized by the Commission in CDP E-11-003). The line was pigged and flushed, dewatered, and filled with an inert gas in preparation for abandonment. The Commission's and City of Goleta's approvals of the Line 96 Modification Project required the abandonment of the existing pipeline. During those authorization reviews, Venoco agreed to decommission the no-longer used portions of existing Line 96, with commitments to, among other things: (1) restore UCSB property affected by 2016; (2) apply for a permit in a manner "addressing" removal of all above-ground infrastructure (understood by all parties to mean in part that Venoco would leave in place pipeline sections in environmentally sensitive habitat areas; and (3) provide for remediation and site restoration. In addition, a "Franchise Agreement" between the City and Venoco specifies that the decommissioning be completed by January 16, 2016.¹

¹ Section 9B of a Franchise Agreement between Venoco and the City of Goleta states that Line 96 shall be abandoned in place or removed within 18 months of the City approving the Line 96 Decommissioning Development Permit/Conditional Use Permit (DP/CUP No. 12-045-DP/CUP).

The grouting procedure will last two days, involving approximately 18 slurry pump trucks and ancillary equipment. The line contains three valve boxes; two will remain in place (one is outside the coastal zone, and the other is still in use for the new line 96), and the upper portions of Valve Box 1291 will be removed. The box lid and walls will be removed to a depth of 18 in. below existing grade. Holes will be drilled through the floor, and the box area will be filled with City-approved sand/soil mixture and compacted.

B. OTHER AGENCY APPROVALS

City of Goleta

The City of Goleta issued a Development Plan adopting the Final Mitigated Negative Declaration 14-MND-02, adopting the Mitigation Monitoring and Reporting Program, and approving Development Plan and Major Conditional Use Permit with conditions for the project on July 28, 2014. The City's conditions are contained in Exhibit 8.

C. ENVIRONMENTALLY SENSITIVE HABITAT AND WETLANDS

Section 30107.5 of the Coastal Act states:

"Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

Section 30240 of the Coastal Act states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30233(a) of the Coastal Act states:

The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the ... [7 limited allowable uses]....

Past Commission actions have well established the Commission's position that the dense patches of native grasslands, and the eucalyptus groves providing monarch butterfly habitat as well as raptor habitat, on Ellwood Mesa and in other undeveloped areas of Goleta, qualify as environmentally sensitive habitat areas as defined in Section 30107.5 and as protected under Section 30240 of the Coastal Act (CCC Permits E-11-03 - Ellwood Pipeline, Inc.; E-11-02 - City of Goleta; 4-04-084/4-04-085 - City of Goleta/Comstock Homes; and CCC approval of Major Amendment 1-06, UCSB Certified Long Range Development Plan (LRDP) for North Campus Housing Project).

The City of Goleta's review of the proposed project recognized the significance of these habitats, and, as noted in the Project Description section of this report above, Venoco had previously committed to leaving segments of the pipeline in place in wetlands and ESHA along the project corridor. Pipeline segments would also be left in place where the pipelines cross beneath streams and creeks (e.g., Devereaux Creek and El Encanto Creek). Venoco has mapped the sensitive habitats (including wetlands) in the vicinity of the pipeline corridor (Exhibits 3-6). As the City of Goleta's Initial Study/Mitigated Negative Declaration (MND) notes, the vast majority of the areas where construction activities would be located are those in previously disturbed areas, devoid of wetlands or environmentally sensitive habitat (ESHA). The City's MND states (p. 28-29):

The portions of the pipeline that extend beneath the western portion of the UCSB parcel and the City's Ellwood Mesa Open Space property are surrounded by natural habitat, consisting primarily of eucalyptus windrows, coyote brush, grasslands, seasonal wetlands, riparian areas, and semi-perennial wetlands. Portions of these habitats have been designated as Environmentally Sensitive Habitats Areas (ESHA) by the City of Goleta. Several types of riparian and wetland habitat are also known to occur on the City's Ellwood Mesa Open Space property. These include willow riparian, seasonal wetlands, and semi-perennial wetlands. Willow riparian communities are dominated by a closed canopy of arroyo willow with variable understory. Semi-perennial wetlands are dominated by various annual and perennial wetland species including alkali heath, pickleweed, and curly dock.

Coastal sage scrub and grassland habitats are also common and typically include coyote brush scrub dominated by coyote brush with occasional elderberry. The grasslands are generally dominated by non-native grasses and forbs such as various species of Italian rye grass, bromes, plantain, and wild oat. Native species such as beardless wild rye and purple needlegrass are also present. All grassland and shrublands within the City's Ellwood Mesa Open Space property are considered sensitive biological habitats.

The Commission agrees with the applicant's and City's conclusions concerning the segments of the pipeline that are proposed to be left in place to avoid wetlands and ESHA. The Commission also agrees with the applicant and the City that the staging areas to be used for pumping grout into the pipeline, proposed at each end of the pipeline, would not be located in or adversely affect wetlands or ESHA. The Commission finds that the proposed removal of two of the pipeline segments in the coastal zone would not occur within or adversely affect wetlands or

ESHA. One of these segments would be on UCSB property, which is currently being developed for a North Campus housing project, and which has been graded and is thus disturbed. The other would be on the adjacent land to the east, owned by the Goleta Union School District (GUSD), which is predominantly undisturbed and does contain wetlands and ESHA, but not in sufficient proximity to be affected by the pipeline removal. As noted above, while a portion of Line 96 on the GUSD property runs underneath El Encanto Creek (a.k.a. Phelps Ditch) (Exhibit 4), this portion of the pipeline will be left in place.

The Commission staff nevertheless identified two areas where additional information was needed before the Commission could determine the entire project's consistency with the ESHA and wetland policies of the Coastal Act. The first of these concerns related to an area which appeared to be disturbed, located immediately northwest of the UCSB North Campus Housing Project area. Venoco's mapping of this area initially depicted a "wetland/vernal" habitat in this area, and the area coincided with one of several proposed "Staging Areas" (Staging Area 4 - Exhibit 5). The second area was the site of the proposed demolition of Valve Box 1291 in the Ellwood Open Space area, which was located adjacent to Eucalyptus groves providing monarch butterfly overwintering habitat, and in an area surrounded on its other three sides by an area initially characterized generally as having a combination of native and non-native grasslands. The initial habitat mapping submitted by Venoco had not identified the grasslands in this area at the same level of detail as was provided for other project segments of the decommissioning project, and while Venoco's initial submittal characterized the area as "primarily non-native grassland," it was unclear to the Commission staff whether any native grassland would be affected in the area surrounding the Valve Box. The staff therefore requested additional habitat surveying and information for these two areas.

Venoco responded to both of these Commission staff's request for additional information, with an additional analysis conducted by a biological consultant selected by the City (Storrer Environmental Services)² (Exhibit 9). Concerning the first issue raised in the preceding paragraph, the potential wetland within a staging area adjacent to UCSB land, the analysis included a wetland delineation and concluded that:

No wetland indicators were observed in Staging Areas 3 & 4. This area is highly compacted and dominated by non-native and ruderal plant species. If this area historically supported riparian/marsh/vernal habitat, it no longer appears to hold water for long enough periods of time to develop wetland characteristics. As such, no ESH is currently present in Staging Areas 3 & 4.

The Commission staff ecologist (Dr. John Dixon) has reviewed this additional information and agrees no wetland indicators are present in Staging Areas 3 & 4 identified on Exhibit 5. The Commission therefore finds that it is not necessary to require avoidance of this area in order to find the project consistent with Section 30233 of the Coastal Act. No other project components would be located within a wetland.

² Results of a Biological Survey at Valve Box 1291 and Wetland Assessment at Staging Areas 3 & 4 – Venoco Line 96 Decommissioning Project, Storrer Environmental Services, September 15, 2015.

Concerning the Commission staff's second area of inquiry, the proposed work at Valve Box 1291 on Ellwood Mesa, several issues need to be examined under the Coastal Act ESHA policy: whether the project is an allowed use within ESHA, whether the monarch butterfly habitat would be affected, and whether native grasslands would be disturbed. The City Goleta's Initial Study/Mitigated Negative Declaration had stated (p. 30):

The proposed removal of Valve Box 1291 at the end of Pipeline Segment 6 would disturb an area totaling approximately 100 square feet. This Valve box is located within the confines of an ESHA because it is within the drip line of the north-south oriented eucalyptus windrow. This eucalyptus windrow has been designated as a Monarch Butterfly Habitat Area and/or Raptor Roosting Habitat per Figure 4-1 in the City's General Plan Conservation Element. The abandonment of this Valve box would include the removal of the lid and roof structure, followed by demolition of the box walls to a minimum depth of 18 in. below existing grade. Holes would be knocked through the Valve to permit drainage of any impounded moisture. Finally, the entire box would be filled with an approved sand/soil mixture and compacted per the City of Goleta Building and Safety requirements. Although demolition activities are not anticipated to result in tree removal or excavation outside of the 100 square foot construction footprint, significant impacts to candidate, sensitive or special status species, including the eucalyptus windrows, their associated understory, monarch butterflies, and nesting birds could occur if these activities are not appropriately confined and/or monitored. In addition, the sand/soil mixture proposed to fill the abandoned Valve box could contribute to the proliferation of non-native plant species within this sensitive ecological area if non-invasive species are included within the mixture. With the implementation of mitigation measures BIO-1, BIO-2, and BIO-3, impacts would be less than significant.

In order to determine Coastal Act consistency, and for the reasons stated above, the Commission staff requested additional information from Venoco regarding the extent of native grasslands in the immediate vicinity of Valve Box 1291. In response, the additional analysis/survey referenced above also provided a more detailed survey of the grassland habitats in the vicinity of this Valve Box. This additional survey states (Exhibit 9):

The area adjacent to Valve Box 1291 is dominated by non-native grassland plant species. Five purple needlegrass plants are located in the vicinity of the valve box, but based on the description of project activities, these plants are outside of the work area. In addition, the purple needlegrass plants observed are already impacted and trampled by recreational activity. Based on the description of work activities, no disturbance of the recreational trail will occur, therefore, disturbance to native vegetation (designated ESH) west of the trail is not anticipated.

Based on this additional survey, the Commission agrees that the activity at Valve Box 1291 does not constitute work within or affecting any native grassland ESHA; the soils immediately surrounding the Valve Box are vegetated by non-native grasses. However, the Valve Box is located within the drip line of the eucalyptus trees providing monarch habitat, and in sufficient

proximity to the eucalyptus groves to lead the Commission to conclude the site of Valve Box 1291 *does* constitute ESHA, due to the fact that the grove provides habitat for overwintering monarch butterflies. Nevertheless, because the applicant proposes restoration of the site (i.e., removal of concrete in an area surrounded by non-native grasses, to be replaced with native grasses), the Commission is able to find the project, as conditioned, consistent with the requirement of Section 30240(a) that limits development within ESHA to “uses dependent on the resources.” The Commission also finds that restoration of the site with native grasslands would assist regional efforts underway to restore the Mesa to native grassland ESHA, and that restoration of the Ellwood Mesa non-native grasslands with native grassland is one of the important planning goals frequently articulated in planning documents for the Mesa.³

In order to assure that ESHA and wetland habitat are adequately protected and to find the project consistent with the remaining tests of Section 30240(a) and (b), the Commission further finds that the following special conditions are necessary. **Special Condition 1** requires submittal of pre-project surveys identifying, flagging, and avoiding sensitive habitats and wetlands. **Special Condition 2** requires biological surveying and monitoring to assure that construction activities will not occur when aggregations of monarchs are present, as well as monitoring by a certified arborist to assure protection of protect eucalyptus tree roots. **Special Condition 3** requires development of monitoring and success criteria for restoration efforts, as well as submittal of all revegetation, monitoring and restoration plans to the Executive Director, with provisions for remediation as necessary to assure success.

With these conditions, the Commission finds that the project will be conducted in a manner which will avoid all wetland impacts, will protect all ESHA in the project vicinity against any significant disruption or degradation of the habitat values, and will be compatible with the continuance of the ESHAs. The Commission therefore concludes that the project, as conditioned, is consistent with Sections 30240 and 30233 of the Coastal Act.

D. WATER QUALITY

Coastal Act Section 30231 states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

³ See for example, Ellwood Mesa Coastal Trails and Habitat Restoration Project, City of Goleta and Santa Barbara Trails Council, May 3, 2013.

The portions of Line 96 slated for removal do not currently contain any hydrocarbons. Therefore the project's water quality issues would be limited to temporary construction activities. The City of Goleta's CEQA document noted that because pipeline Segments 1, 2, 4, 6 and 7 would be decommissioned in place, no impacts would occur. For Pipeline Segments 3, 4, and 5, and Valve Box 1291, where demolition, excavation, and restoration are proposed, the City's MND (p. 45) states:

The removal of Pipeline Segments 3 and 5 would require excavation and would require the temporary staging of construction debris and/or excavated soils within areas near Devereux Creek and the newly constructed wetlands located on the UCSB parcel. If these disturbed areas are not managed properly during rain events, they could result in an incremental impairment of surface water quality in this drainage and the nearby Pacific Ocean. Impacts would be minimized during all phases of construction through compliance with the Construction General Permit and compliance with the City's grading regulations. Moreover, the applicant would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) for the pipeline removal activities, which must include erosion and sediment control BMPs, as well as BMPs that control other potential construction-related emissions. Examples of BMPs that may be implemented during pipeline removal activities include, but are not limited to, temporary drains and swales, silt fences, sediment traps, removal of sediment from construction vehicles, and the restriction of cement wash out areas. These BMPs would limit not only sediment discharge, but also pollutants associated with sediments, including, but not limited to nutrients, heavy metals, and certain pesticides and herbicides. The development and implementation of a SWPPP is a standard requirement that would apply to the proposed project. ... Furthermore, the temporary construction areas would be restored to their pre-project conditions. ... Therefore, water quality impacts would be less than significant. [Emphasis in original]

In addition to the mitigation measures set forth above, the proposed project minimizes adverse effects from the proposed filling of the existing pipeline with a bentonite-cement mixture by using a mixture that is non-toxic, of neutral pH, and will be cured in place prior to any removal activities. Moreover, controls will be in place at the pumping sites to avoid and minimize any impacts from accidental spills. **Special Condition 4** requires Executive Director review and approval of the water quality plans, consistent with the above-referenced protection measures. The Commission therefore finds that, as conditioned, the project will minimize adverse water quality impacts and be consistent with Coastal Act Section 30231.

E. PUBLIC ACCESS AND RECREATION

Coastal Act Section 30210 states:

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Coastal Act Section 30214 states in part:

(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:

...

(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area

As noted above, the southern portions of the project (Pipeline Segments 3-7) traverse the eastern portions of the City's Ellwood Mesa open space area, which is heavily used by pedestrians and bicyclists. In its review the City noted that Venoco had proposed a traffic management plan that would avoid obstructions to recreational traffic, and would avoid staging of construction equipment within trail alignments. There is, however, the potential for temporary effects on trail use within the City's Ellwood Mesa open space area, which is used by pedestrians, in part because construction equipment must temporarily use that area to avoid trees or other sensitive vegetation. The City of Goleta's CEQA document stated (MND, p. 8):

Vehicles would use this existing trail located approximately 50-100 feet south of the Valve box, where there is sufficient space to allow equipment passage without impacting trees or vegetation. As a result, this eastwest trail may be partially obstructed in order to avoid impacts to existing native vegetation. As a result of construction equipment staging, the existing northsouth trail on the City's Ellwood Mesa Open Space property adjacent to the Valve box may also be temporarily obstructed. If any trails are obstructed, Venoco would provide appropriate pedestrian, bicycle, and equestrian traffic controls (warning signs, trail detour signs, orange safety cones, etc.). Traffic controls and/or the establishment of pedestrian/bicycle/equestrian detour(s) would occur during normal business hours and would only be required for a maximum of two working days.

Therefore, to minimize adverse effects on public recreational use, **Special Condition 5** requires noise and traffic limitations, confining construction activities to weekdays and non-holidays, and implementing temporary detours during recreational activities. The Commission finds the project, as conditioned to minimize temporary impacts on public access and recreation, is consistent with Coastal Act Sections 30210 and 30214.

F. CULTURAL RESOURCES

Coastal Act Section 30244 states:

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

Venoco's consultant (Rincon Consultants) conducted a cultural resources survey, which included identification of 17 recorded resources within 0.25 miles of the project site. Only one of the cultural resources (P-42-001750- H) surveyed was sufficiently near the project site to be potentially affected. However, the cultural resource is not located in a segment proposed for pipeline removal. Further, if cultural resources are encountered during construction activities, the City's CEQA document and the Applicant's project proposal include a mitigation measure to cease all work and contact a qualified cultural resources specialist to analyze the significance of the find and formulate further mitigation.

Consistent with this proposed mitigation measure and in order to assure the project will protect cultural resources and address unanticipated impacts to cultural resources that do occur, the Commission attaches **Special Condition 6**. As conditioned to ensure adequate protection for any archeological resources that may be inadvertently discovered during authorized pipeline removal work, the Commission finds the project is consistent with Section 30244 of the Coastal Act.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The City of Goleta served as the lead agency for the project for CEQA purposes. The City adopted a final mitigated negative declaration for the project on July 28, 2014.

Section 13096 of the Commission's administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as modified by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act ("CEQA"). Section 21080.5(d)(2)(A) of CEQA prohibits approval of a proposed development if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant impacts that the activity may have on the environment.

The Commission incorporates its findings on Coastal Act consistency at this point as if set forth in full. As discussed above, the proposed project has been conditioned to be consistent with the policies of the Coastal Act. As specifically discussed in these above findings, which are hereby incorporated by reference, mitigation measures that will minimize or avoid all significant adverse environmental impacts have been required. As conditioned, there are no other feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impacts which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned, is consistent with the requirements of the Coastal Act to conform to CEQA.

APPENDIX A: SUBSTANTIVE FILE DOCUMENTS

Line 96 Decommissioning Project, Final Initial Study – Mitigated Negative Declaration, Case No. 12-045-DP-CUP, 14-MND-02, City of Goleta/Rincon Consultants, Inc., July 2014.

Coastal Commission Permit E-11-03, Ellwood Pipeline, Inc., Installation of Line 96, approved September 9, 2011.

Coastal Commission Permit E-11-02, City of Goleta, Ellwood Mesa oil well and water well abandonments (and associated activities), April 14, 2011.

UCSB Major Amendment 1-06 to UCSB Certified Long Range Development Plan (LRDP) for North Campus Housing Project, approved November 17, 2006.

DRAFT Ellwood-Devereaux Coast Open Space and Habitat Management Plan, City of Goleta/Santa Barbara County/UCSB, March 2004.

Ellwood Mesa Coastal Trails and Habitat Restoration Project, City of Goleta and Santa Barbara Trails Council, May 3, 2013.

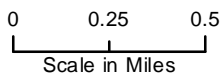
Coastal Commission Permit 4-04-084 (City of Goleta) and 4-04-085 (Comstock Homes), retire development on the privately-owned Ellwood Mesa parcels through buyout and transfer of development to a portion of the City-owned Santa Barbara Shores property adjacent to Hollister Avenue. Goleta, approved January 12, 2005.

Franchise Agreement For a Gas, Oil and Water Pipeline between Ellwood Pipeline, Inc. and City of Goleta, September 20, 2011.

Results of a Biological Survey at Valve Box 1291 and Wetland Assessment at Staging Areas 3 & 4 – Venoco Line 96 Decommissioning Project , Storrer Environmental Services, September 15, 2015.



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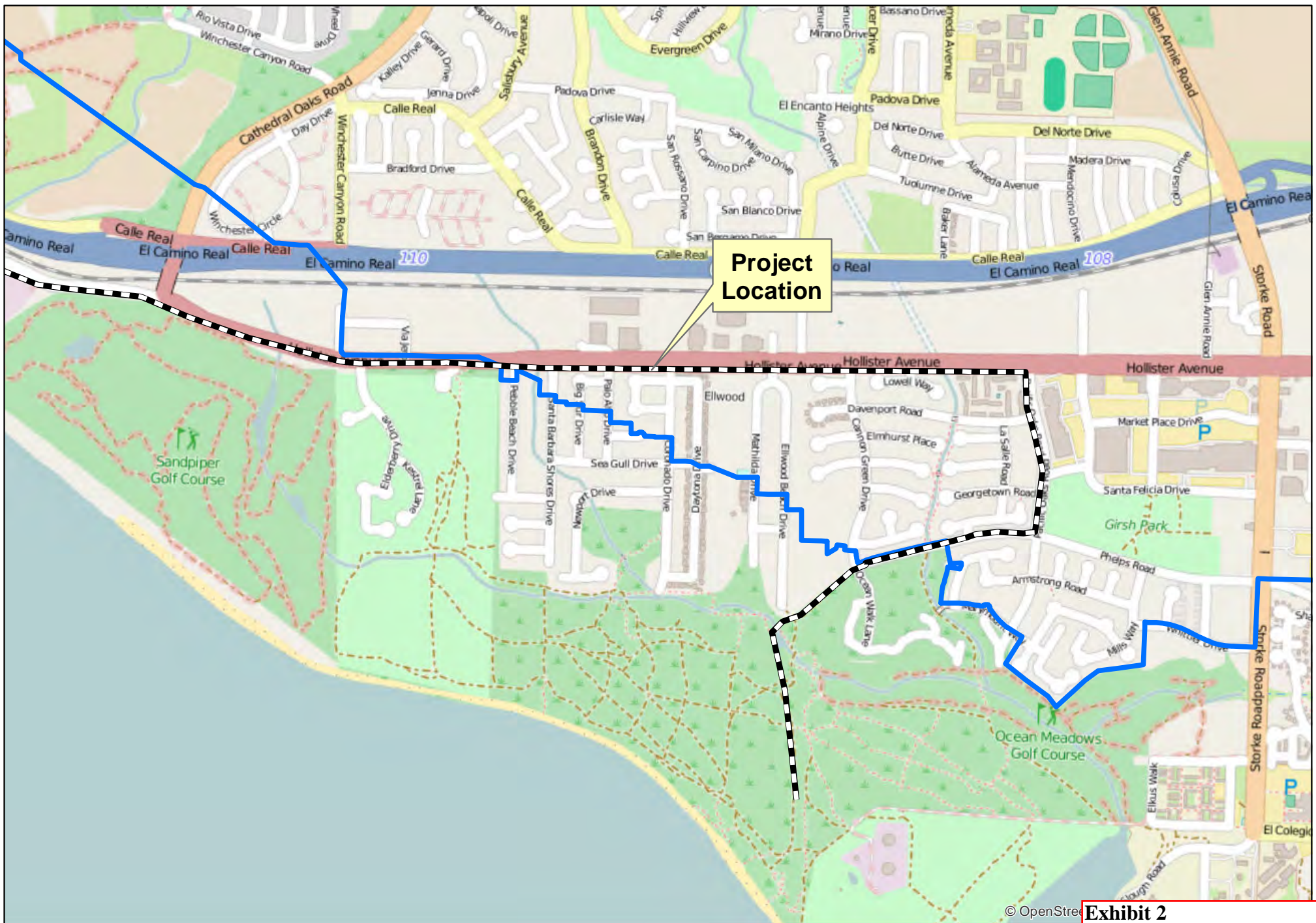


Regional Location

Exhibit 1
9-15-0620
Location



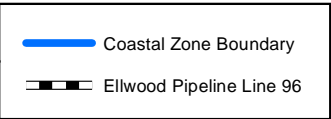
Proposed Work Areas and
Pipeline Segments **Exhibit 1, p. 2**
9-15-0620
Work Areas



Project Location

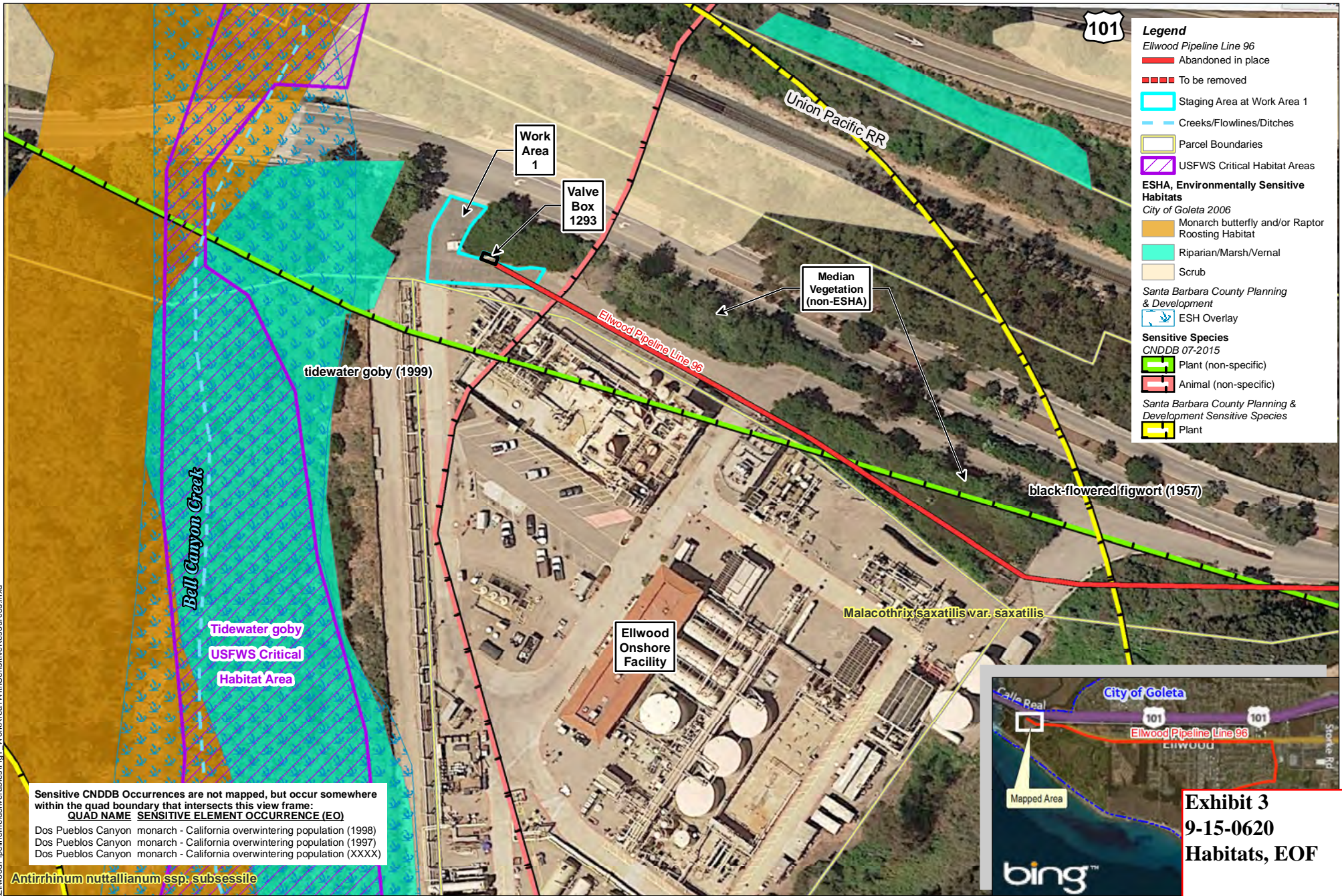
© OpenStreetMap

Exhibit 2
9-15-0620
Coastal Zone



Technical Services Division - GIS Unit

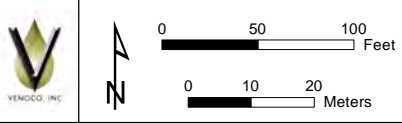
For Illustrative Purposes Only. Locations Approximate.
 Source: ESRI.



- Legend**
- Ellwood Pipeline Line 96
 - Abandoned in place
 - To be removed
 - Staging Area at Work Area 1
 - Creeks/Flowlines/Ditches
 - Parcel Boundaries
 - USFWS Critical Habitat Areas
 - ESHA, Environmentally Sensitive Habitats**
 - City of Goleta 2006
 - Monarch butterfly and/or Raptor Roosting Habitat
 - Riparian/Marsh/Vernal
 - Scrub
 - Santa Barbara County Planning & Development
 - ESH Overlay
 - Sensitive Species**
 - CNDDB 07-2015
 - Plant (non-specific)
 - Animal (non-specific)
 - Santa Barbara County Planning & Development Sensitive Species
 - Plant

Sensitive CNDDB Occurrences are not mapped, but occur somewhere within the quad boundary that intersects this view frame:

QUAD NAME	SENSITIVE ELEMENT OCCURRENCE (EO)
Dos Pueblos Canyon	monarch - California overwintering population (1998)
Dos Pueblos Canyon	monarch - California overwintering population (1997)
Dos Pueblos Canyon	monarch - California overwintering population (XXXX)



Source: [1] Google earth, Imagery Date: 5/1/2015, [2] The Santa Barbara County Clerk-Recorder-Assessor's Mapping Division, 06 January 2015; [3] Flowlines mapped by URS 2012; [4] City of Goleta 2006, [5] Santa Barbara County Planning & Development, Apr 22, 2014, [6] US Fish & Wildlife Service (Mar 15, 2015), [7] California Natural Diversity Database (CNDDDB,

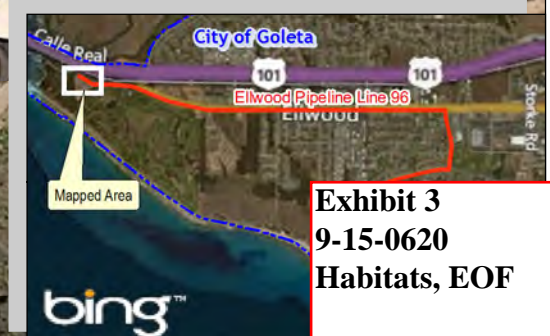
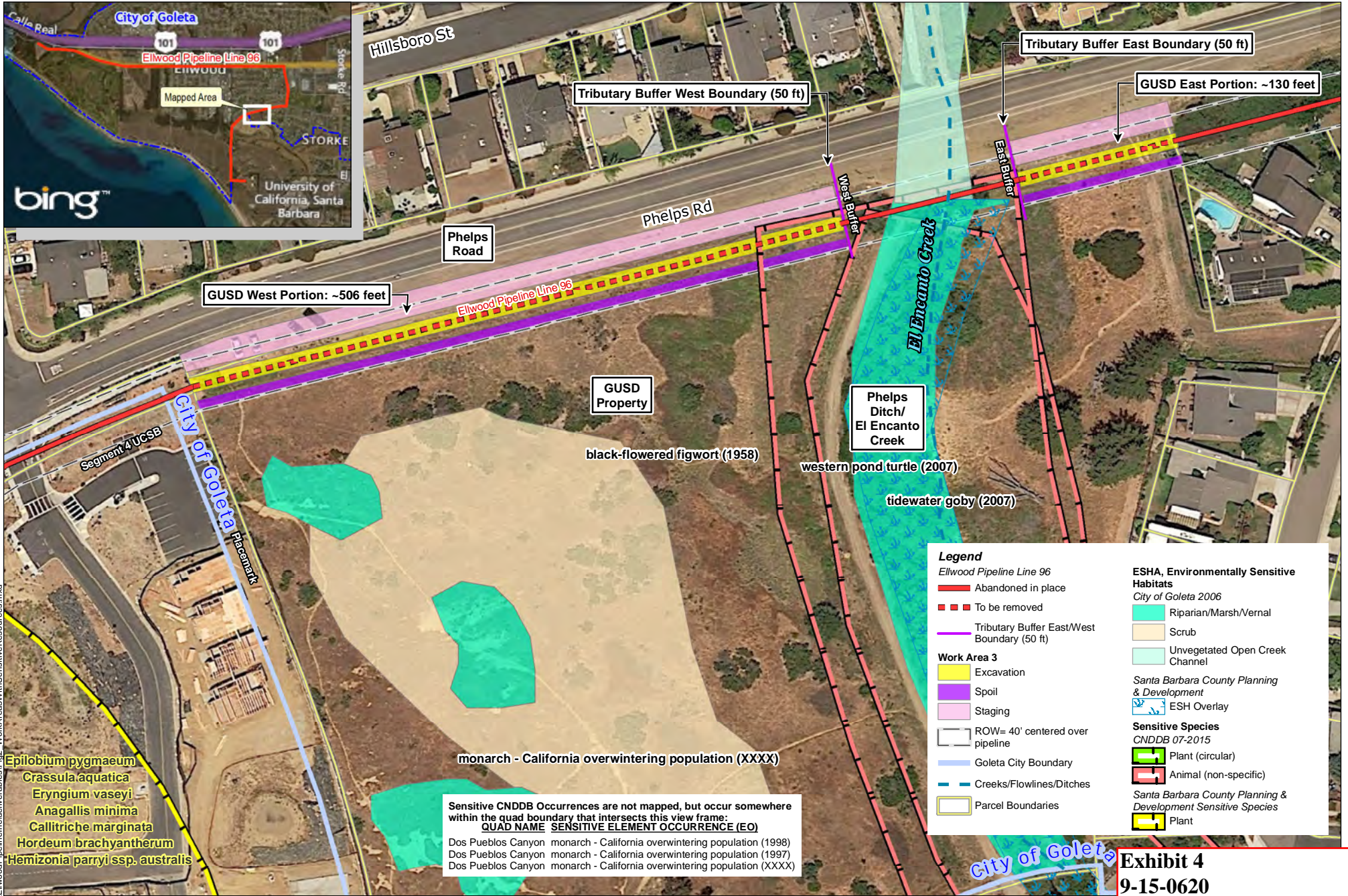


Exhibit 3
9-15-0620
Habitats, EOF

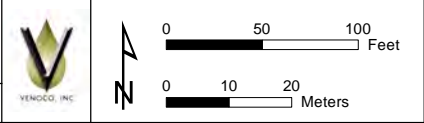
Figure 1. Work Area 1 with Sensitive Resources 2015



V:\Projects\GIS - Proj\EllwoodPipeline\deliverables\Fig2 - WorkArea3\WithSensitiveResources.mxd

Venoco, Inc. Line 96 Decommissioning Project
Ellwood Pipeline Inc.
 Goleta, CA

AECOM



Source: [1] Google earth, Imagery Date: 5/1/2015, [2] The Santa Barbara County Clerk-Recorder-Assessor's Mapping Division, 06 January 2015; [3] Flowlines mapped by URS 2012; [4] City of Goleta 2006, [5] Santa Barbara County Planning & Development, Apr 22, 2014, [6] US Fish & Wildlife Service (Mar 15, 2015), [7] California Natural Diversity Database (CNDDDB,

Figure 2. Work Area 3 Resources

Exhibit 4
9-15-0620
Habitats, GUSD

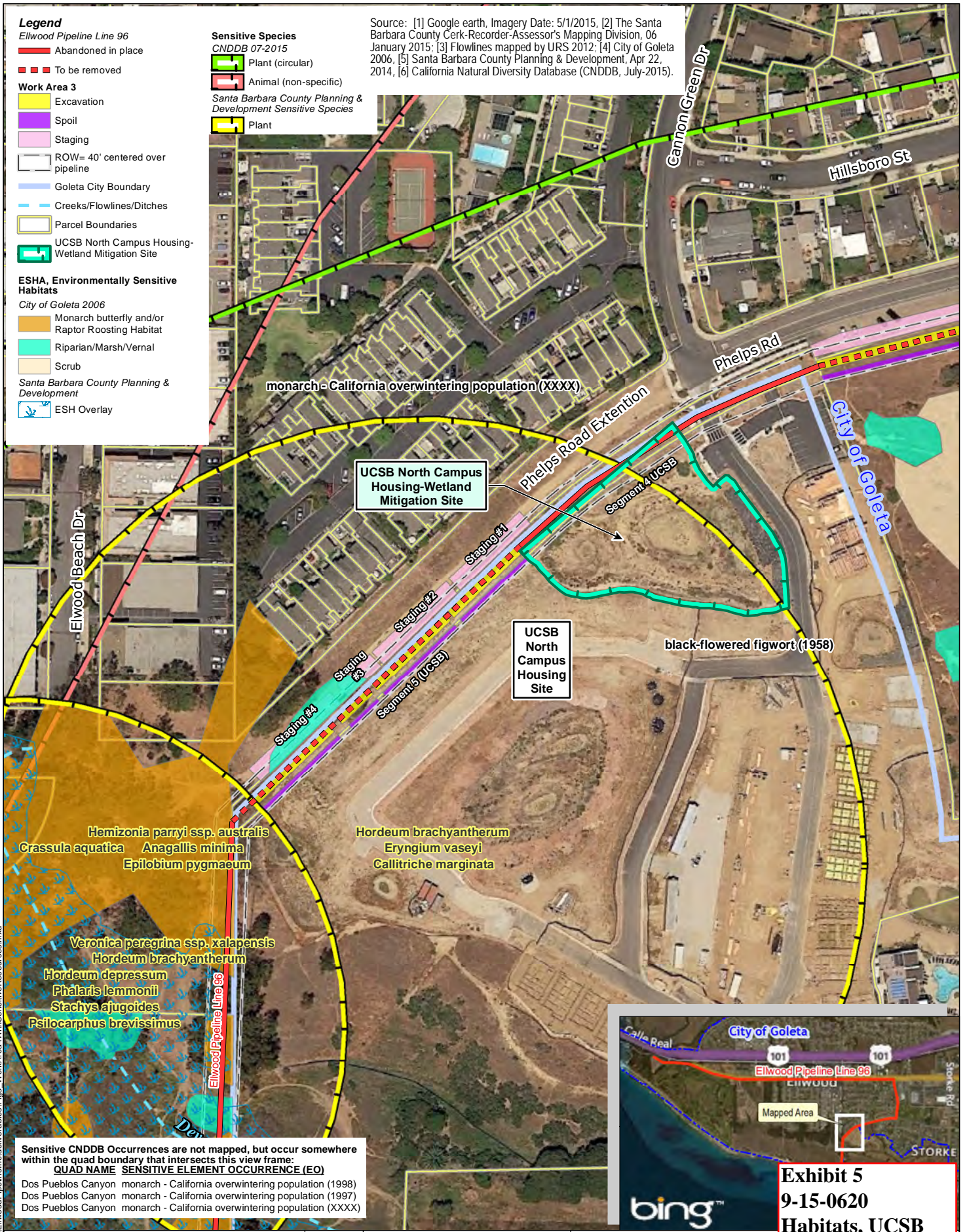
Legend

- Ellwood Pipeline Line 96**
 Abandoned in place
 To be removed
- Work Area 3**
 Excavation
 Spoil
 Staging
 ROW= 40' centered over pipeline
 Goleta City Boundary
 Creeks/Flowlines/Ditches
 Parcel Boundaries
 UCSB North Campus Housing-Wetland Mitigation Site
- ESHA, Environmentally Sensitive Habitats**
 City of Goleta 2006
 Monarch butterfly and/or Raptor Roosting Habitat
 Riparian/Marsh/Vernal
 Scrub
 Santa Barbara County Planning & Development
 ESH Overlay

Sensitive Species

- CNDDB 07-2015
 Plant (circular)
 Animal (non-specific)
 Santa Barbara County Planning & Development Sensitive Species
 Plant

Source: [1] Google earth, Imagery Date: 5/1/2015, [2] The Santa Barbara County Clerk-Recorder-Assessor's Mapping Division, 06 January 2015; [3] Flowlines mapped by URS 2012; [4] City of Goleta 2006, [5] Santa Barbara County Planning & Development, Apr 22, 2014, [6] California Natural Diversity Database (CNDDDB, July-2015).



monarch - California overwintering population (XXXX)

UCSB North Campus Housing-Wetland Mitigation Site

UCSB North Campus Housing Site

black-flowered figwort (1958)

Hemizonia parryi ssp. *australis*
Crassula aquatica *Anagallis minima*
Epilobium pygmaeum

Hordeum brachyantherum
Eryngium vaseyi
Callitriche marginata

Veronica peregrina ssp. *xalapensis*
Hordeum brachyantherum
Hordeum depressum
Phalaris lemmonii
Stachys ajugoides
Psilocarphus brevissimus

Sensitive CNDDB Occurrences are not mapped, but occur somewhere within the quad boundary that intersects this view frame:
 QUAD NAME SENSITIVE ELEMENT OCCURRENCE (EO)
 Dos Pueblos Canyon monarch - California overwintering population (1998)
 Dos Pueblos Canyon monarch - California overwintering population (1997)
 Dos Pueblos Canyon monarch - California overwintering population (XXXX)

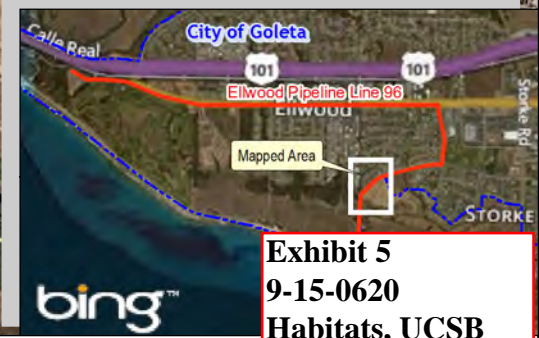


Exhibit 5
9-15-0620
Habitats, UCSB

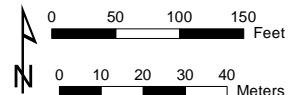
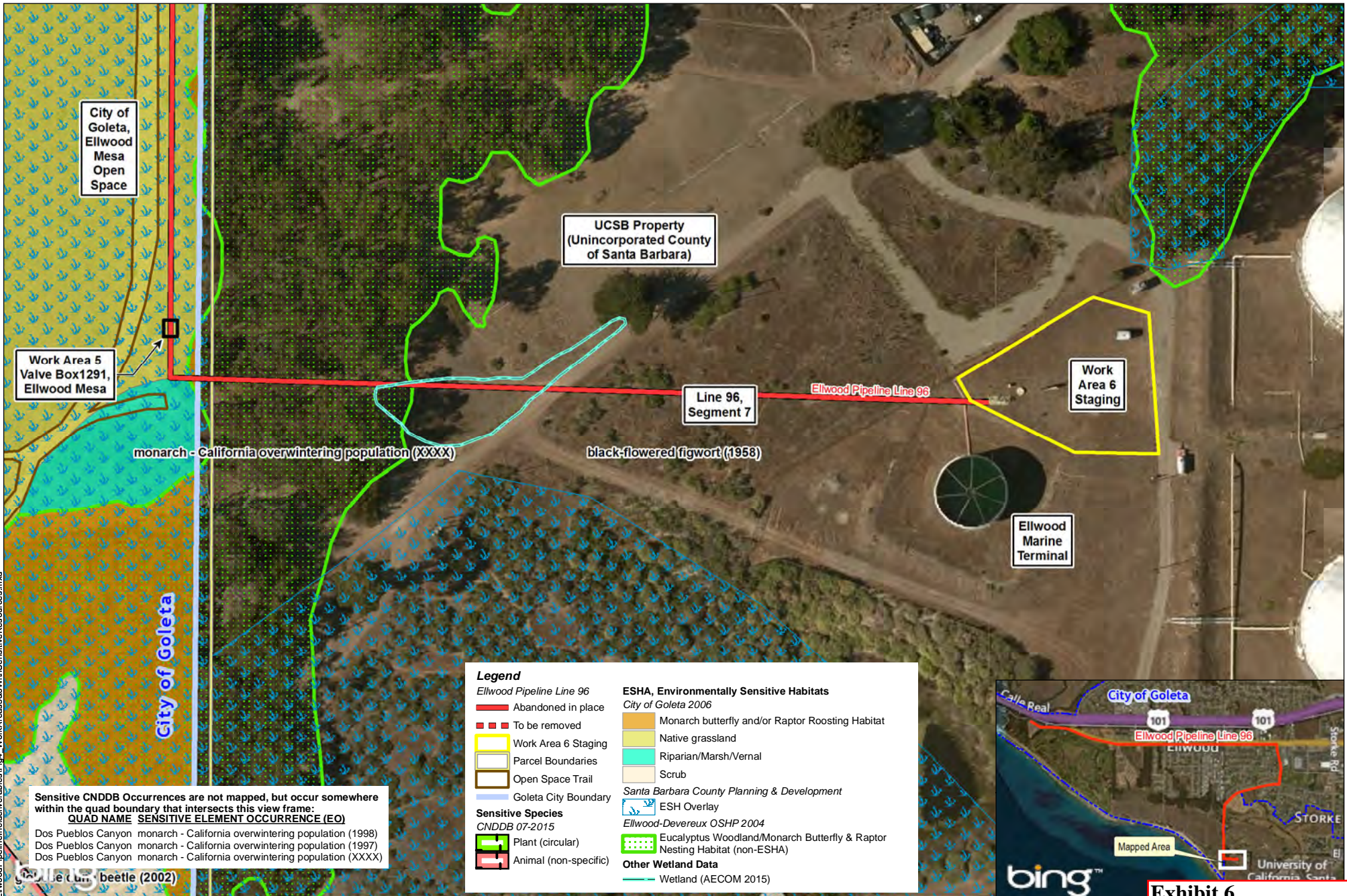


Figure 3. Work Area 3 with Resources



Sensitive CNDDDB Occurrences are not mapped, but occur somewhere within the quad boundary that intersects this view frame:

QUAD NAME	SENSITIVE ELEMENT OCCURRENCE (EO)
Dos Pueblos Canyon	monarch - California overwintering population (1998)
Dos Pueblos Canyon	monarch - California overwintering population (1997)
Dos Pueblos Canyon	monarch - California overwintering population (XXXX)

Legend

Ellwood Pipeline Line 96

- Abandoned in place
- To be removed
- Work Area 6 Staging
- Parcel Boundaries
- Open Space Trail
- Goleta City Boundary

Sensitive Species
CNDDDB 07-2015

- Plant (circular)
- Animal (non-specific)

ESHA, Environmentally Sensitive Habitats
City of Goleta 2006

- Monarch butterfly and/or Raptor Roosting Habitat
- Native grassland
- Riparian/Marsh/Vernal
- Scrub

Santa Barbara County Planning & Development

- ESH Overlay

Ellwood-Devereux OSHP 2004

- Eucalyptus Woodland/Monarch Butterfly & Raptor Nesting Habitat (non-ESHA)

Other Wetland Data

- Wetland (AECOM 2015)

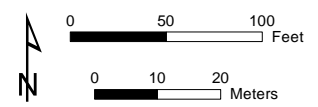


Figure 4. Work Area 5 & 6 w Resources

Exhibit 6
9-15-0620
Habitats, Elmore
Mesa, EMT



Proposed Work Areas

**Exhibit 7
9-15-0620
Valve Box 1291 Photo
Grout Pumping Photo**

RESOLUTION 14-10
EXHIBIT 4
DEVELOPMENT PLAN AND MAJOR CONDITIONAL USE PERMIT CONDITIONS OF
APPROVAL
LINE 96 DECOMMISSIONING PROJECT
CASE NO. 12-045-DP/CUP

In addition to all applicable provisions of the Goleta Municipal Code (GMC), Ellwood Pipeline Inc. (Venoco, Inc.) (Permittee) agrees to comply with the following provisions as conditions for the City of Goleta's approval of Case No. 12-045-DP/CUP.

1. **AUTHORIZATION:** Any proposed deviations from the exhibits, project description, or conditions must be submitted to the City of Goleta for its review and approval. Deviations without the above-described approval will constitute a violation of the permit approval. The exhibits associated with this permit include:

Line 96 Decommissioning Project description, dated June 14, 2012, prepared by Ellwood Pipeline, Inc. (Venoco, Inc.) including the associated maps.

2. **AUTHORIZED DEVELOPMENT:**

The Project consists of the decommissioning of approximately 3.3 miles of existing oil transmission pipelines. The project activities would include the pumping of a non-hazardous pipeline decommissioning grout mixture into Line 96 from the EMT to the EOF, the removal of pipeline segments 3 and 5, the demolition of Vault Box 1291, the removal of the cathodic rectifier beneath Hollister Avenue and other appurtenant oil pipeline facilities, the staging of various pieces of construction equipment, and restoration surrounding Vault Box 1291.

The excavation, grading, development, use, and maintenance of the property; the size, arrangement, and location of construction equipment staging areas and other improvements; and the protection and preservation of resources must substantially conform to the project description and abide by the conditions of approval below. All plans must be submitted for review and approval and must be implemented as approved by the City of Goleta. Minor changes to the project description are subject to the approval of the Director of Planning and Environmental Review, or designee (collectively, the "Director").

CONDITIONS OF APPROVAL FROM INITIAL STUDY- MITIGATED NEGATIVE DECLARATION 14-MND-02

Biological Resources

3. **Protection of Sensitive Species.** The project engineer shall submit a demolition plan for Vault Box 1291, Pipeline Segment 3, and Pipeline Segment 5 subject to review and approval by the City's Building Official, the City's Planning Director, and representatives of the Goleta Union School District and UCSB. The plan shall clearly designate "SENSITIVE RESOURCE ZONE(S)" on the demolition plan in the vicinity of Vault Box 1291, Pipeline Segment 3, Pipeline Segment 4, and Pipeline Segment 5. The SENSITIVE RESOURCE ZONE(S) shall be clearly established in the field and shall be clearly marked with flagging and stakes, or construction fencing. No construction or demolition activity or equipment staging shall occur within these designated sensitive resource zones.

Exhibit 8
9-15-0620
City Conditions

Plan Requirements and Timing: This condition must be printed on project plans submitted for Coastal Development Permit, Land Use Permit, and Building Permit/Demolition Permit approval. Fencing must be graphically depicted on all project plans submitted for approval of any Land Use Permit and/or Building Permit/Demolition Permit Approval.

Monitoring: City Planning and Environmental Review staff, Goleta Union School District representatives, and UCSB representatives must review plans and confirm fence installation before Building Permit/Demolition Permit issuance. City Planning and Environmental Review staff must conduct site inspections to ensure compliance during all construction activities.

4. Habitat Restoration. The sand/soil mixture proposed to fill the abandoned vault box shall include a hydroseed mix consisting only of native seed obtained from the Ellwood-Devereux Open Space native plan stock. The mixture shall prevent the invasion and/or spread of undesired plant species and shall result in the restoration of native wildlife habitat and a plant palette consisting of entirely native species.

Plan Requirements and Timing: The hydroseed mix specification sheet shall be prepared by a biologist specializing in native plant restoration. This plan shall be submitted prior to the issuance of Building/Demolition Permits.

Monitoring: The hydroseed specification sheet shall be reviewed and approved by City Planning and Environmental Review staff and/or the City's biologist prior to issuance of Building/Demolition Permits.

5. Nesting Birds. If no vegetation or tree removal would occur during the avian breeding season (typically February through August, but variable based on seasonal climatic conditions) no surveys are required. If vegetation clearing and/or tree removal would occur during the avian breeding season, pre-construction surveys shall be conducted by a qualified avian biologist approved by the City no more than three days prior to the initiation of vegetation clearance activities. If any active nests are found, all project work shall be conducted at a suitable distance (buffer area) determined by the City-approved biologist to ensure active nests are not disturbed and that any young have fledged and become independent of the adults. Project activities may encroach into the buffer only after receiving approval from the City-approved biologist. The limits of construction to avoid nests shall be established in the field with flagging and stakes or construction fencing.

Plan Requirements and Timing: The permittee must submit the name and qualifications of the project biologist that will conduct such survey work to the City for staff review and approval. The results of the survey must be submitted to the City for staff review and approval before the issuance of any grading or building permits for the project.

Monitoring: City Planning and Environmental Review staff must verify compliance before the issuance of any Building/Demolition Permits for the project as well as conduct periodic site inspections to verify compliance with any restrictions on

construction activity posted by either this mitigation measure and/or the biological survey prepared before commencement of project construction.

Cultural Resources

6. Human Remains. Before initiating construction, excavation, or vegetation removal, the permittee and construction crew must meet on-site with a City-approved archeologist and appropriate local Native American representative(s) and present the procedures to be followed in the unlikely event human remains are uncovered. These procedures must include those identified in California Public Resources Code Section 5097.98. In addition, a satisfactory disposition of the remains must be agreed upon by the City-approved archaeologist and appropriate local Native American representatives so as to limit future disturbance. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then identify the person(s) thought to be the Most Likely Descendant (MLD) of the deceased Native American, who will then help determine what course of action should be taken with the remains.

Plan Requirements and Timing: Before the City issues Building/Demolition Permits, the permittee must provide the City Planning and Environmental Review staff the contact information of the Native American representative and the agreed upon procedures to be followed. In the event that remains are found and if the remains are found to be of Native American origin, the County Coroner will notify the Native American Heritage Commission and the Commission will name the Most Likely Descendant (MLD). The MLD, consulting archaeologist, permittee, and City Planning and Environmental Review Staff will consult as to the disposition of the remains. If the remains are identified as non-Native American, the County Coroner will take possession of the remains and comply with all state and local requirements.

Monitoring: The Planning and Environmental Review Director, or designee, must confirm that the County Coroner is notified in the event human remains are found, and that the Native American Heritage Commission is contacted if the remains are of Native American origin.

Noise

7. Construction Timing. Noise generating construction activity and equipment maintenance must be limited to the hours between 8 AM and 5 PM, Monday through Friday. No construction can occur on State holidays (e.g., Thanksgiving, Labor Day). Low noise generating construction activities such as pipeline grouting or similar activities which are located away from sensitive receptors are not subject to these restrictions and can occur within 12-14 hour workdays.

Plan Requirements and Timing: At least one sign near the project site entrance on Phelps Road stating these restrictions must be posted on the site. Signs must be a minimum size of 24" x 48." Signs must be in place before the beginning of and throughout grading and construction activities. Violations may result in suspension of permits.

Monitoring: City Planning and Environmental Review staff must monitor compliance with restrictions on construction hours and must promptly investigate and respond to all complaints.

8. Construction Vehicle Travel Route. Construction vehicles and haul must utilize roadways which avoid residential neighborhoods and sensitive receptors where possible.

Plan Requirements and Timing: The permittee must submit a proposed construction vehicle and hauling route. This information must be reviewed and approved by City staff before any LUP approval for the project. The approved route must be used for the duration of construction.

Monitoring: City Planning and Environmental Review staff must periodically inspect the site to ensure compliance.

9. Electrical Power. Electrical power must be used to run air compressors and similar power tools. If a diesel generator is used to provide electrical power for air compressors and similar power tools, the appropriate level of acoustical shielding shall be utilized.

Plan Requirements and Timing: The equipment area with appropriate acoustic shielding must be designated on all grading and/or demolition plans. Equipment and any required acoustical shielding must remain in the designated location throughout construction activities.

Monitoring: City Planning and Environmental Review staff must periodically inspect the site to ensure compliance with all noise attenuation requirements.

GENERAL CONDITIONS

10. A project-specific Storm Water Pollution Prevention Plan shall be prepared and submitted to the California Regional Board, Central Coast Region and City, for all pipeline removal activities occurring in pipeline segments 3 and 5. This plan will prevent adverse impacts to nearby waterways and the constructed wetlands located in the adjacent UCSB North Campus Faculty Housing project resulting from any incidental construction-related spills. Best management practices such as temporary berms and sedimentation traps, including silt fencing, straw bales, and sandbags, shall be installed prior to work involving ground disturbance. In addition, the plan shall specify site restoration activities, including: (1) disturbed soils will be compacted to the same level of compaction as existed prior to pipeline removal and to match compaction of the soils immediately adjacent to the area of work, (2) the moisture content shall match that of the immediately adjacent soils, (3) fill may be native soil, provided it is free of contamination, and (4) soil stabilization/erosion controls to reduce runoff and dist will be implemented in accordance with City and UCSB policies .

11. Violation of any of these Conditions of Approval is unlawful, prohibited, and a violation of the Goleta Municipal Code. The City reserves the right to initiate civil, criminal, and/or administrative enforcement or, after notice and a public hearing, to revoke this permit or modify these Conditions of Approval if it is found that there is a violation of these Conditions of Approval or the Goleta Municipal Code or that the project operates as or

causes a public nuisance. This Condition of Approval is not intended to, nor does it limit in any manner whatsoever the ability of the City to take appropriate enforcement actions.

12. The permittee is responsible for the completeness and accuracy of all plans, forms, and supporting materials submitted in connection with the project. Any errors or discrepancies found therein are a violation of this permit.
13. Approval of the Final Development Plan expires five (5) years after approval of the Coastal Development Permit by the California Coastal Commission unless, before the expiration date, substantial physical construction has been completed on the Development Plan or a Time Extension has been applied for by the applicant. The decision maker with jurisdiction over the project may, upon good cause shown, grant a time extension for one (1) year. If the applicant requests a Time Extension, the project may be revised to include updated language to standard conditions and/or may include revised/additional conditions which reflect changed circumstances or additional identified project impacts.
14. No permits for development, including grading, may be issued except in conformance with an approved Final Development Plan, except as may be modified by the California Coastal Commission in its approval of a Coastal Development Permit. Substantial conformity must be determined by the Director.
15. Before commencing any work pertaining to the demolition, removal, transport, alteration, or any other project related activity, the applicant must obtain a Land Use Permit from the City of Goleta. These permits are required by ordinance and are necessary to ensure implementation of the conditions imposed on the project by the City. Before any permit may be issued by the City of Goleta, the applicant must obtain written clearance for each development phase from all Departments/Agencies having conditions or project approval, including the Goleta School District and UCSB representatives. Such clearance must indicate that the applicant has satisfied all pre-construction conditions. A form for such clearance is available from the Planning and Environmental Review Department.
16. The applicant is responsible for informing all subcontractors, consultants, engineers, or other business entities and volunteers providing services related to the project of their responsibilities to comply with all pertinent requirements herein and in the City of Goleta Municipal Code, including the requirement that a business license be obtained by all entities doing business in the City as well as hours of operation requirements in the City.
17. When exhibits and/or written conditions of approval are in conflict, the written conditions must prevail.
18. The applicant is responsible for the completeness and accuracy of all forms and supporting materials submitted in connection with any application. Any errors or discrepancies found therein may constitute grounds for the revocation of any approvals.
19. A Monitoring and Compliance Program (MCP) shall be funded by the permittee and submitted to the City of Goleta at least five (5) days prior to the start of construction activities. The MCP shall, at minimum, include the following:

- a. All conditions imposed on this project and the impact areas they are mitigating by subject area.
- b. A plan for coordination and implementation of all conditions and the plans and programs required therein.
- c. A description of all measures that will be implemented to assure compliance, including pre-construction and construction requirements, field monitoring, data collection, management and coordination of all field personnel and feedback to field personnel and affected agencies. MCP Contractor feedback responsibilities include weekly, monthly and/or as specified in the MCP reports to be prepared throughout construction. These shall include status of development, status of conditions, incidents of noncompliance and their results and any other relevant or requested data. Further, a final report summarizing project compliance or noncompliance and the results of such, and any other relevant or requested data shall be submitted to the City within 30-days of construction completion.

The MCP preparer and contractor shall be selected by the City. These individuals shall be under contract and responsible to the City. All costs shall be funded by the permittee. The MCP contractor shall appoint at least one Onsite Monitor (OM) responsible for overall monitoring, but shall employ as many qualified specialists as necessary (as determined by the City) to oversee specific conditions (e.g., archaeologists, biologists). In addition, the OM has the authority and the ability to ensure compliance with all project conditions and to stop work in an emergency. The MCP shall also provide for any appropriate procedures not specified in the conditions of approval to be carried out if they are necessary to avoid environmental impacts. Planning and Environmental Services Permit Compliance shall oversee the MCP. In addition to funding the MCP, the permittee shall pay Permit Compliance fees for project construction/implementation.

The decision of the Director shall be final in the event of any dispute.

20. The permittee shall schedule a pre-construction meeting at the project site with City staff. The pre-construction meeting shall be attended by the permittee and/or its agent, key construction personnel and other pertinent agency representatives. The construction conference shall include a review of all resource protection and other mitigation measures and project conditions.

Plan Requirements and Timing: The permittee shall schedule this meeting at least 5 days in advance of the start of construction. Pre-construction meetings shall occur in an as-needed basis to address the various phases of construction and site clean-up at the discretion of the City qualified biological monitor.

Monitoring: City staff shall verify compliance prior to the start of construction activities.

21. The permittee shall comply with the following Santa Barbara County Fire Department (SBCFD) conditions:

- a. If visual contamination or chemical odors are detected while implementing approved work, the permittee shall stop work immediately and contact the SBCFD Hazardous Materials Unit (HMU). If visual contamination or chemical odors are detected while implementing approved work on land owned by the Goleta Union School District, UCSB, and the City of Goleta, the permittee shall stop work immediately and contact the SBCFD Hazardous Materials Unit (HMU) and the underlying land owner. Resumption of work requires approval of the HMU and underlying landowner.
 - b. A hot work program must be submitted to, and approved by, the SBCFD prior to construction.
 - c. The permittee shall apply for and obtain permits from SBCFD for the use and storage of hazardous material/hazardous wastes are required prior to operation of the project.
22. Prior to issuance of any Land Use Permit, the permittee shall secure all required property owner authorizations or other documentation, including encroachment permits or easements to the satisfaction of the City allowing the project on or within property not owned by the permittee, including, but not limited to property owned by the City of Goleta, Goleta Union School District, and UCSB. The applicant shall notify the City of Goleta, Goleta Union School District and UCSB of all decommissioning activities at least 60 days prior to any decommissioning activities on land owned by the City of Goleta, Goleta Union School District, and UCSB. All ground disturbance activities may be monitored by representatives of the City of Goleta, Goleta Union School District, and UCSB,
23. The permittee shall obtain from the City's Planning and Environmental Services Department a Land Use Permit prior to commencement of any uses and/or development authorized by this permit.
24. The permittee shall obtain from the City's Planning and Environmental Services Department all Building, Electrical, Well or other Permits required by Title 15 of the Goleta Municipal Code prior to the construction, erection, moving, alteration, enlarging, rebuilding of any building, structure, or improvement, or any other action(s) requiring a Building Permit pursuant to Title 15 of the Goleta Municipal Code.
25. The permittee shall obtain from the City's Public Works Department all Encroachment Permits required by Title 12 of the Goleta Municipal Code prior to the construction, erection, moving, alteration, enlarging, rebuilding of any building, structure, or improvement, or any other action(s) requiring an Encroachment Permit pursuant to Title 12 of the Goleta Municipal Code.
26. Any new, expanded, or changed use on the project site shall be subject to City review and approval. The City shall determine whether the new, expanded, or changed use on the project site requires the permittee to seek additional approval, permits, or other action by the City. Failure of the permittee to obtain the above-described review and approval of the City is a violation of this permit.

27. Traffic Control Plan. The permittee shall prepare, provide funding for, and implement a Traffic Control Plan for approval by the City as a part of the Public Work's encroachment permit.

Plan Requirements: The plan shall include, but not be limited to the following:

- a) Provide traffic controls when lanes are closed due to construction or work occurs within the public right of way per the California Manual of Uniform Traffic Control Devices (CAMUTCD),;
- b) Close the pipeline removal trench for the non-work hours with approved backfill to be level with the street grade or plating as appropriate;
- c) Provide detours and access for emergency vehicles at all times;
- d) Provide alternative routes for bicycles and pedestrians ;
- e) Notify the residents or owners of any properties within 1,000 feet and/or adjacent to the project route of the construction schedule at least one week before construction in their vicinity;
- f) Provide access to the affected properties and businesses during the construction;
- g) Provide a video of the existing road condition. If damage occurs due to construction-related activities the road will be repaired to restore the road to its preconstruction condition or better;
- h) No construction parking will occur in public parking lots (i.e. Haskells Beach and Ellwood Mesa/Sperling Preserve lots) or on City streets.
- i) For construction, the permittee shall limit truck deliveries and commuters/personnel to the west Hollister-Highway 101 on and off ramps and shall not utilize the Storke Road and Hollister Avenue intersection or the Storke Road Highway 101 on/off ramps during peak hours (peak hours are defined as 6 a.m. to 8 a.m. and 4 p.m. to 6 p.m).

Timing: The plan shall be submitted to, and approved by, the Public Work's Department prior to any LUP issuance. The requirements of the plan shall be enforced throughout construction.

Monitoring: City staff, or their designee, shall conduct site inspections, monitor plan implementation, and review monitoring reports to ensure compliance.

END OF CONDITIONS



2565 Puesta Del Sol Road #3
Santa Barbara, CA 93105
(805) 682-2065
storrer.john@verizon.net

Jasch Janowicz
City of Goleta
Planning and Environmental Review
130 Cremona Drive, Suite B
Goleta, CA 93117

September 15, 2015

Re: Results of a Biological Survey at Valve Box 1291 and Wetland Assessment at Staging Areas 3 & 4 – Venoco Line 96 Decommissioning Project, Goleta, California

Mr. Janowicz:

This correspondence (Report) provides the results of a biological survey within Work Area 5 (Valve Box 1291) and a wetland assessment within Work Area 4 (Staging Areas 3 & 4) completed for the Venoco Line 96 Decommissioning Project (Project). The surveys were performed to confirm presence/absence of Environmentally Sensitive Habitat (ESH) previously mapped by the City of Goleta (City) within the work area at Valve Box 1291 and Staging Areas 3 & 4 (City 2006).

Our understanding of proposed work activities at Valve Box 1291 and Staging Areas 3 & 4 is based on the August 10, 2015 Response to Comments Letter (Letter) from Venoco, Inc. (Venoco) to the California Coastal Commission (Commission) in support of a Coastal Development Permit Application (#9-15-0620). An AECOM biologist conducted a survey at Valve Box 1291 and Staging Areas 3 & 4 on July 31, 2015. The results of the AECOM survey are described in the Letter.

Description of Work Activities

Valve Box 1291 will be removed and demolished as part of the Project. Ground disturbance will be limited to the vault box and the immediate area adjacent to the vault. Impacts to nearby trees are not anticipated and the adjacent recreational trail is not expected to be obstructed or disturbed.

Staging Areas 3 & 4 will primarily use the unpaved Phelps Road extension. The portion of Line 96 adjacent to Staging Areas 3 & 4 will be excavated and removed.

**Exhibit 9
9-15-0620
Consultant Report**

Existing Conditions

Valve Box 1291 is situated between a eucalyptus windrow (designated ESH) on the eastern perimeter of the Ellwood Mesa Open Space and a recreational trail that runs north-south (see Attachment A - Figure 1). The valve box is located adjacent to the dripline of the eucalyptus windrow and the recreational trail is approximately 25 feet to the west. A smaller footpath is also present approximately 15 feet to the west of the valve box. This smaller footpath has created a wedge-shaped area between the two trails. The area west of the eucalyptus windrow, including the trails, was previously mapped as native grassland habitat (designated ESH) (City 2006). During the July 31, 2015 survey, AECOM concluded that the vegetation adjacent to the valve box is primarily non-native grassland.

Staging Areas 3 & 4 are located immediately north of the UCSB North Campus Housing Site, between a fence line demarcating the UCSB property boundary and the existing unpaved portion of the Phelps Road extension (See Attachment A - Figure 2). The fence line is located at the toe of a berm and the Line 96 pipeline is located just south of the fence line, beneath the berm. The majority of Staging Area 4 and the western portion of Staging Area 3 were previously mapped as riparian/marsh/vernal habitat (designated ESH) (City 2006). The mapped riparian/marsh/vernal habitat includes the unpaved portion of the Phelps Road extension. The area surveyed, between the Phelps Road extension and the fence line, ranges from 15 to 20 feet wide.

Methodology

The biological survey and wetland assessment were conducted on September 4, 2015 by Jessica Peak and John Storrer of Storrer Environmental Services (SES), under contract to the City.

The biological survey at Valve Box 1291 included the work area directly adjacent to Valve Box 1291 and a 100-foot buffer around the vault. The survey was performed by walking meandering transects throughout the habitat within 100 feet of Valve Box 1291 and recording all identifiable vascular plant species. The vascular plant inventory is included as Attachment C.

The wetland assessment at Staging Areas 3 & 4 included examination of the topography, vegetation, and soils between the Phelps Road extension to the north and the fence line (property boundary) directly to the south. The area was evaluated to determine presence/absence of hydrophytic vegetation, hydric soils, and wetland hydrology. Data were collected at one sampling location in the middle of Staging Area 4 and the area previously mapped as riparian/marsh/vernal wetland. Data collection was consistent with “Routine” procedures detailed in the *1987 Manual* (Environmental Laboratory 1987) and in the *Arid West Regional Supplement* (USACE 2008). Wetland data forms are included as Attachment D.

Results

Valve Box 1291

The area adjacent to Valve Box 1291, between the eucalyptus windrow and the recreational trail, consists of non-native grassland habitat (see Attachment B – Site Photographs). Dominant species include non-native grasses and forbs including ripgut brome (*Bromus diandrus*), slender wild oat (*Avena barbata*), Italian wild rye (*Festuca perennis*), English plantain (*Plantago lanceolata*), and Australian saltbush (*Atriplex semibaccata*). Scattered native species, including clustered tarplant (*Deinandra fasciculata*), coyote brush (*Baccharis pilularis*), and sawtooth goldenbush (*Hazardia squarrosa* var. *obtusa*) are also present. One spreading rush (*Juncus patens*) and an approximate 20 square-foot area of salt grass (*Distichlis spicata*) are located directly adjacent to the valve box, within the disturbance area (see Attachment B – Site Photographs).

Five purple needlegrass (*Stipa pulchra*) plants were observed in the vicinity of the Valve Box 1291 work area. Purple needlegrass plants are located along the eastern edge of the recreational trail, on the edge of the footpath, and in the wedge-shaped area between the two trails. Locations of purple needlegrass plants are depicted in Attachment A – Figure 1. All of the purple needlegrass plants observed are in highly disturbed areas and have been trampled by recreational activity associated with the trails (see Attachment B – Site Photographs). No purple needlegrass plants were observed around Valve Box 1291. The closest purple needlegrass plant is approximately 40 feet from the valve box.

Staging Areas 3 & 4

The area previously mapped as riparian/marsh/vernal habitat, between the Phelps Road extension and the fence line (UCSB property boundary), also consists of non-native grassland habitat. Topography in this area is slightly concave, resulting in a narrow low spot between the Phelps Road extension and the existing berm. The wetland sample point is located within this slightly depressed area, in the middle of Staging Area 4 (see Attachment A – Figure 2).

Vegetation – The vegetation within Staging Areas 3 & 4 is highly disturbed by recreational activity associated with the Phelps Road extension and consists primarily of non-native and ruderal species (see Attachment B – Site Photographs). The area is dominated by non-native, annual grasses including ripgut brome, soft chess (*Bromus hordeaceus*), hare barley (*Hordeum murinum* ssp. *leporinum*), and Italian ryegrass. Facultative wetland species such as English plantain, red sand-spurry (*Spergularia rubra*), and Australian saltbush are present but represent less than 10% of the vegetative cover combined. One dominant facultative wetland species, Italian ryegrass, was observed; however, hydrophytic vegetation indicators were not met (see Attachment D – Wetland Data Forms).

Soils – Soils within Staging Areas 3 & 4 are highly compacted and based on a review of soils data from the NRCS Web Soil Survey, the soils underlying the are designated as Xerorthents (XA), cut and fill areas (NRCS 2015) (see Attachment A – Figure 3).

Xerorthents consist of mechanically removed and mixed soil material in which horizons are no longer discernible. Cut and fill areas are typically well drained.

One soil pit was excavated to a depth of 6 inches. At that point, a restrictive layer prevented further excavation. Soil texture was primarily sandy/loam, with minimal clay content. Fill material was present throughout the soil pit, resulting in mottling of the soil profile. Soil matrix color was brown (10YR 4/3) with strong brown mottles (7.5YR 5/6) (see Attachment B – Site Photographs)). No hydric soil indicators were observed (see Attachment D – Wetland Data Forms).

Hydrology – Although the topography within the wetland sample plot is slightly concave and may hold water for short periods of time, no primary or secondary wetland hydrology indicators were observed.

Conclusion

Findings described in this Report are consistent with the results of the AECOM survey conducted on July 31, 2015. The area adjacent to Valve Box 1291 is dominated by non-native grassland plant species. Five purple needlegrass plants are located in the vicinity of the valve box, but based on the description of project activities, these plants are outside of the work area. In addition, the purple needlegrass plants observed are already impacted and trampled by recreational activity. Based on the description of work activities, no disturbance of the recreational trail will occur, therefore, disturbance to native vegetation (designated ESH) west of the trail is not anticipated.

No wetland indicators were observed in Staging Areas 3 & 4. This area is highly compacted and dominated by non-native and ruderal plant species. If this area historically supported riparian/marsh/vernal habitat, it no longer appears to hold water for long enough periods of time to develop wetland characteristics. As such, no ESH is currently present in Staging Areas 3 & 4.

References

City of Goleta (City). Planning and Environmental Services Department. 2006. *Goleta General Plan/Coastal Land Use Plan*. Adopted October 2.

Environmental Laboratory. 1987. *U.S. Army Corps of Engineers Wetlands Delineation Manual*. Technical Report Y-87-1. U.S. Army Corps of Engineers Waterways Experiment Station, Vicksburg, MS.

Natural Resources Conservation Service, United States Department of Agriculture (NRCS). 2015. Web Soil Survey. Retrieved from <http://websoilsurvey.nrcs.usda.gov>. Accessed: September 2015.

U.S. Army Corps of Engineers (USACE). 2008. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (Version 2.0), ERDC/EL TR-08-28, U.S. Army Engineer Research and Development Center, Vicksburg, MS.

Please feel free to contact me if you have any questions or concerns regarding the findings described in this Report.

Sincerely,

A handwritten signature in black ink that reads "Jessica Peak". The signature is written in a cursive style with a long horizontal line extending to the right from the end of the name.

Jessica Peak
Botanist
Storrer Environmental Services, LLC

Attachments:

- Attachment A: Figures
- Attachment B: Site Photographs
- Attachment C: Vascular Plant List – Valve Box 1291
- Attachment D: Wetland Delineation Forms

ATTACHMENT A
FIGURES

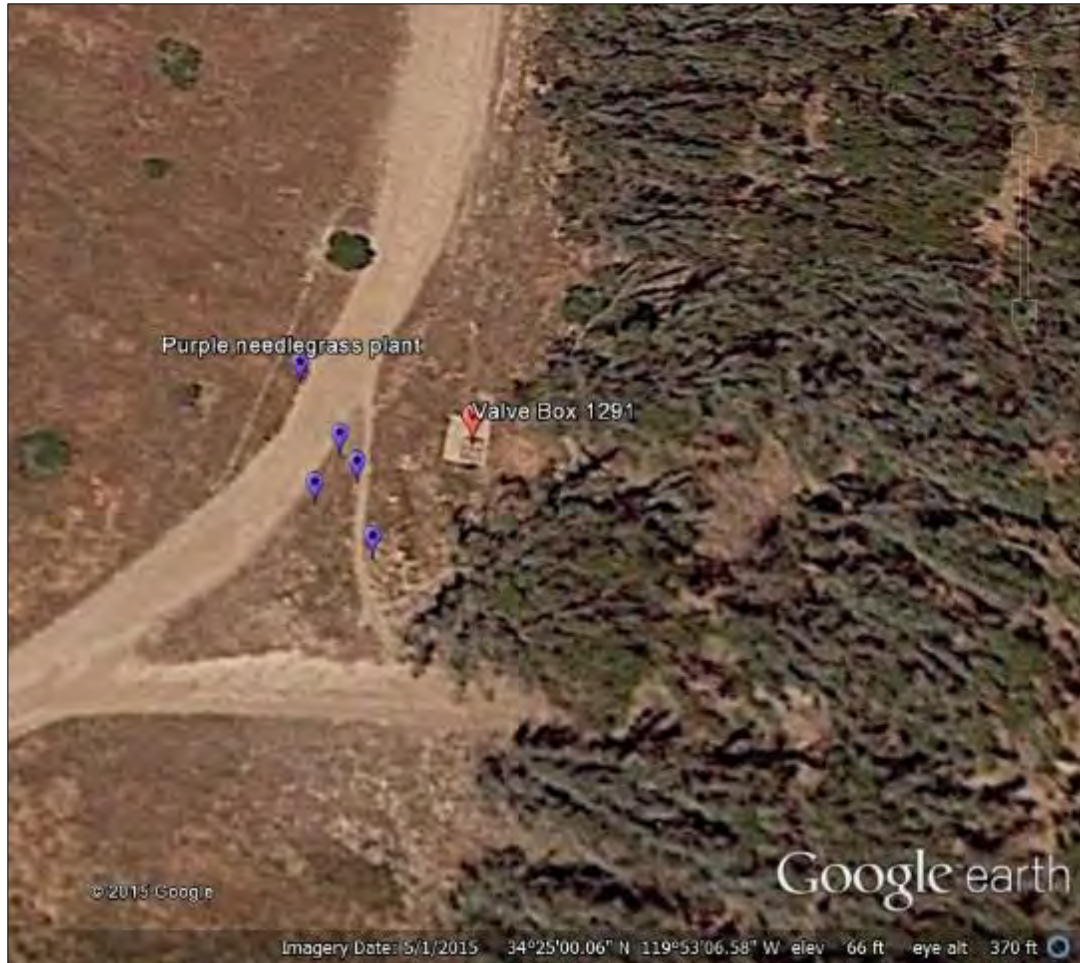


Figure 1: Location of purple needlegrass plants in the vicinity of Valve Box 1291.



Figure 2: Location of wetland sampling point in Staging Area 4.



Figure 3: NRCS Web Soil Survey Soil Map of Work Area 4.

ATTACHMENT B
SITE PHOTOGRAPHS
SEPTEMBER 4, 2015 FIELD SURVEY



Photo 1: View of Valve Box 1291 and surrounding habitat (aspect north).



Photo 2: Spreading rush and salt grass located next to Valve Box 1291.



Photo 3: Trampled purple needlegrass plant located in the wedge-shaped area between the footpath and recreational trail near Valve Box 1291.



Photo 4: View of Staging Area 4 and wetland sample point (aspect east).



Photo 5: View of soil test pit and surrounding vegetation.



Photo 6: View of soil matrix color (10YR 4/3).

ATTACHMENT C
VASCULAR PLANT INVENTORY – VALVE BOX 1291

Vascular Plant Species Observed in the Vicinity of Valve Box 1291
 Venoco Line 96 Decommissioning Project, Goleta, California

Family	Scientific Name	Common Name
	ANGIOSPERMS - Dicots	
<u>Apiaceae</u>		
	<i>Foeniculum vulgare*</i>	wild fennel
<u>Asteraceae</u>		
	<i>Baccharis pilularis</i>	coyote brush
	<i>Deinandra fasciculata</i>	clustered tarplant
	<i>Hazardia squarrosa</i> var. <i>obtusa</i>	sawtooth goldenbush
<u>Chenopodiaceae</u>		
	<i>Atriplex semibaccata*</i>	Australian saltbush
<u>Myrtaceae</u>		
	<i>Eucalyptus globulus**</i>	blue gum
<u>Plantaginaceae</u>		
	<i>Plantago lanceolata*</i>	English plantain
<u>Scrophulariaceae</u>		
	<i>Myoporum laetum**</i>	myoporum
	ANGIOSPERMS- Monocots	
<u>Juncaceae</u>		
	<i>Juncus patens</i>	spreading rush
<u>Poaceae</u>		
	<i>Avena barbata*</i>	slender wild oats
	<i>Bromus diandrus*</i>	ripgut brome
	<i>Distichlis spicata</i>	salt grass
	<i>Festuca perennis*</i>	Italian rye
	<i>Stipa pulchra</i>	purple needlegrass

Notes: Scientific nomenclature follows *The Jepson Manual: Vascular Plants of California, Second Edition*, Baldwin et al. (2012).
 An "*" indicates non-native species which have become naturalized or persist without cultivation.
 An "**" indicates non-native species which been planted as landscaping or is an agricultural crop plant.

ATTACHMENT D
WETLAND DATA FORMS

WETLAND DETERMINATION DATA FORM – Arid West Region

Project Site: Line 96 - Staging Areas 3 & 4 City/County: Goleta/Santa Barbara Sampling Date: 09/04/2015
 Applicant/Owner: Venoco, Inc. State: CA Sampling Point: SP1
 Investigator(s): Jessica Peak, John Storrer Section, Township, Range: _____
 Landform (hillslope, terrace, etc.): terrace Local relief (concave, convex, none): concave Slope (%): 5
 Subregion (LRR): LRR C Lat: 34 25'23.14" N Long: 119 53'4.64" W Datum: _____
 Soil Map Unit Name: Xerorthents, cut and fill areas NWI classification: _____
 Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Hydric Soil Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>			
Wetland Hydrology Present?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>			
Remarks: Fill material present in the upper soil profile. Area highly compacted by vehicles and recreational activity.					

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30 ft x 30 ft)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test Worksheet:																
1. <u><i>Eucalyptus globulus</i></u>	<u>2</u>	<u>no</u>	<u>NL (UPL)</u>	Number of Dominant Species That Are OBL, FACW, or FAC: <u>1</u> (A) Total Number of Dominant Species Across All Strata: <u>4</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>25</u> (A/B)																
2. _____	_____	_____	_____																	
3. _____	_____	_____	_____																	
4. _____	_____	_____	_____																	
50% = _____, 20% = _____	<u>2</u>	= Total Cover		Prevalence Index worksheet: <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Total % Cover of:</td> <td style="text-align: center;">Multiply by:</td> </tr> <tr> <td>OBL species <u>0</u></td> <td>x1 = <u>0</u></td> </tr> <tr> <td>FACW species <u>0</u></td> <td>x2 = <u>0</u></td> </tr> <tr> <td>FAC species <u>29</u></td> <td>x3 = <u>87</u></td> </tr> <tr> <td>FACU species <u>36</u></td> <td>x4 = <u>144</u></td> </tr> <tr> <td>UPL species <u>22</u></td> <td>x5 = <u>110</u></td> </tr> <tr> <td>Column Totals: <u>87</u> (A)</td> <td><u>341</u> (B)</td> </tr> <tr> <td colspan="2" style="text-align: center;">Prevalence Index = B/A = <u>3.9</u></td> </tr> </table>	Total % Cover of:	Multiply by:	OBL species <u>0</u>	x1 = <u>0</u>	FACW species <u>0</u>	x2 = <u>0</u>	FAC species <u>29</u>	x3 = <u>87</u>	FACU species <u>36</u>	x4 = <u>144</u>	UPL species <u>22</u>	x5 = <u>110</u>	Column Totals: <u>87</u> (A)	<u>341</u> (B)	Prevalence Index = B/A = <u>3.9</u>	
Total % Cover of:	Multiply by:																			
OBL species <u>0</u>	x1 = <u>0</u>																			
FACW species <u>0</u>	x2 = <u>0</u>																			
FAC species <u>29</u>	x3 = <u>87</u>																			
FACU species <u>36</u>	x4 = <u>144</u>																			
UPL species <u>22</u>	x5 = <u>110</u>																			
Column Totals: <u>87</u> (A)	<u>341</u> (B)																			
Prevalence Index = B/A = <u>3.9</u>																				
Sapling/Shrub Stratum (Plot size: 20 ft x 20 ft)																				
1. <u>None</u>	_____	_____	_____																	
2. _____	_____	_____	_____																	
3. _____	_____	_____	_____																	
4. _____	_____	_____	_____																	
5. _____	_____	_____	_____																	
50% = _____, 20% = _____	<u>0</u>	= Total Cover																		
Herb Stratum (Plot size: 15 ft x 20 ft)																				
1. <u><i>Plantago lanceolata</i></u>	<u>5</u>	<u>no</u>	<u>FAC</u>	Hydrophytic Vegetation Indicators: <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.																
2. <u><i>Festuca perennis</i></u>	<u>20</u>	<u>yes</u>	<u>FAC</u>																	
3. <u><i>Hordeum murinum</i></u>	<u>20</u>	<u>yes</u>	<u>FACU</u>																	
4. <u><i>Bromus diandrus</i></u>	<u>20</u>	<u>yes</u>	<u>NL (UPL)</u>																	
5. <u><i>Bromus hordeaceus</i></u>	<u>15</u>	<u>yes</u>	<u>FACU</u>																	
6. <u><i>Spergularia rubra</i></u>	<u>3</u>	<u>no</u>	<u>FAC</u>																	
7. <u><i>Atriplex semibaccata</i></u>	<u>1</u>	<u>no</u>	<u>FAC</u>																	
8. <u><i>Salsola tragus</i></u>	<u>1</u>	<u>no</u>	<u>FACU</u>																	
50% = _____, 20% = _____	<u>85</u>	= Total Cover																		
Woody Vine Stratum (Plot size: _____)																				
1. <u>None</u>	_____	_____	_____																	
2. _____	_____	_____	_____																	
50% = _____, 20% = _____	<u>0</u>	= Total Cover																		
% Bare Ground in Herb Stratum <u>15</u>	% Cover of Biotic Crust _____																			
Remarks: Majority of vegetation dead/trampled. Sample plot dominated by non-native annual grasses and forbs.				Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>																

SOIL

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (Moist)	%	Type ¹	Loc ²		
0-6	10YR 4/3	98	_____	_____	_____	_____	sandy/loam	Some clay content
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____

¹Type: C= Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. ²Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)		Indicators for Problematic Hydric Soils³:	
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> 1 cm Muck (A9) (LRR C)	
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> 2 cm Muck (A10) (LRR B)	
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Loamy Mucky Mineral (F1)	<input type="checkbox"/> Reduced Vertic (F18)	
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Red Parent Material (TF2)	
<input type="checkbox"/> Stratified Layers (A5) (LRR C)	<input type="checkbox"/> Depleted Matrix (F3)	<input type="checkbox"/> Other (Explain in Remarks)	
<input type="checkbox"/> 1 cm Muck (A9) (LRR D)	<input type="checkbox"/> Redox Dark Surface (F6)		
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Dark Surface (F7)		
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Depressions (F8)		
<input type="checkbox"/> Sandy Mucky Mineral (S1)	<input type="checkbox"/> Vernal Pools (F9)		
<input type="checkbox"/> Sandy Gleyed Matrix (S4)			

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present): Type: <u>hardpan</u> Depth (Inches): <u>6</u>	Hydric Soils Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Remarks: Fill material present causing mixed soil profile; high chroma matrix with mottles that are 7.5YR 5/6. Horizons are no longer discernible. Area highly compacted. No hydric soil indicators present.

HYDROLOGY

Wetland Hydrology Indicators:	
Primary Indicators (minimum of one required; check all that apply)	Secondary Indicators (2 or more required)
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> Salt Crust (B11)
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Biotic Crust (B12)
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Aquatic Invertebrates (B13)
<input type="checkbox"/> Water Marks (B1) (Nonriverine)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)
<input type="checkbox"/> Sediment Deposits (B2) (Nonriverine)	<input type="checkbox"/> Oxidized Rhizospheres along Living Roots (C3)
<input type="checkbox"/> Drift Deposits (B3) (Nonriverine)	<input type="checkbox"/> Presence of Reduced Iron (C4)
<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)	<input type="checkbox"/> Thin Muck Surface (C7)
<input type="checkbox"/> Water-Stained Leaves (B9)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> Water Marks (B1) (Riverine)	<input type="checkbox"/> Water Marks (B1) (Riverine)
<input type="checkbox"/> Sediment Deposits (B2) (Riverine)	<input type="checkbox"/> Sediment Deposits (B2) (Riverine)
<input type="checkbox"/> Drift Deposits (B3) (Riverine)	<input type="checkbox"/> Drift Deposits (B3) (Riverine)
<input type="checkbox"/> Drainage Patterns (B10)	<input type="checkbox"/> Drainage Patterns (B10)
<input type="checkbox"/> Dry-Season Water Table (C2)	<input type="checkbox"/> Dry-Season Water Table (C2)
<input type="checkbox"/> Crayfish Burrows (C8)	<input type="checkbox"/> Crayfish Burrows (C8)
<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)
<input type="checkbox"/> Shallow Aquitard (D3)	<input type="checkbox"/> Shallow Aquitard (D3)
<input type="checkbox"/> FAC-Neutral Test (D5)	<input type="checkbox"/> FAC-Neutral Test (D5)

Field Observations:	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____	
Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____	
Saturation Present? (includes capillary fringe) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): _____	

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: No hydrology indicators present.