CALENDAR ITEM
C75

A 35

12/05/12
PRC 3120.1
PRC 3242.1
W 9409.32
C. Basavalinganadoddi
J. Wong

S 19

C. Herzog

CONSIDER ADOPTION OF A MITIGATED NEGATIVE DECLARATION AND APPROVAL OF PLATFORM HOLLY TO SHORE POWER CABLE REPLACEMENT PROJECT, STATE OIL AND GAS LEASE NOS. PRC 3120.1 AND PRC 3242.1, SOUTH ELLWOOD FIELD, SANTA BARBARA COUNTY

APPLICANT:

Venoco, Inc.
Attn.: Bruce Carter, Project Manager
6267 Carpinteria Avenue, Suite 100
Carpinteria, CA 93013

PROJECT LOCATION

Venoco, Inc. (Venoco) proposes to replace an existing power cable that runs from the Ellwood Onshore Facility (EOF) to the offshore Platform Holly. The EOF is located at 7979 Hollister Avenue in the City of Goleta, Santa Barbara County. The facility is located southwest of the intersection of U.S. Highway 101 (US-101) and Hollister Avenue and south of the Union Pacific Railroad tracks. Sandpiper Golf Course is located to the east of the facility, and the Bacara Resort and Ellwood Pier are located to the west. Platform Holly is located on State Oil and Gas Lease PRC 3242.1 in about 211 feet of water in the Pacific Ocean, approximately two (2) miles southwest of Coal Oil Point. The proposed cable alignment would follow the general route of the existing cable and all routing would be through existing easements. It would begin at the onshore supply transformer located in the EOF and would be routed underground through an High Density Polypropylene (HDPE) conduit installed using Horizontal Directional Drilling (HDD) technology below the golf course, beach and surf zone and then be laid on the seafloor to the Platform Holly. The HDD replacement cable

alignment originates at the entry pit in the gravel access road outside of, but adjacent to, the EOF and continues south under a portion of the Sandpiper Golf Course, under the beach and surf zones to the exit pit located about 1,400 feet offshore at a water depth of 30 feet. Exhibit A (attached hereto) shows the general Project location.

PROJECT BACKGROUND AND OBJECTIVES

The purpose of the Project is to replace the existing 46-year-old, 16.5 kilovolt (kV) subsea power cable between the EOF and Platform Holly as part of repair and maintenance. The new power cable would be an in-kind replacement, with similar electrical power transmission capability to support existing operations; however, the cable would use newer technology fiber optics to replace the existing wire telecommunications, allowing for improved voice and data signals. All routing would be through existing easements. Venoco also proposes to disconnect the existing cable and leave it in place at this time, to minimize disturbance of ocean habitat and interference with other active lines and the newly installed cable. The existing cable is buried in the sandy ocean bottom and the final disposition of the cable would be analyzed in a separate environmental document prepared pursuant to the California Environmental Quality Act (CEQA) as part of final Platform Holly decommissioning.

The primary objectives of the Project include:

- Replacement of the existing power cable to support operations and utilize current technology.
- Improvement of voice and data signal transmissions.

As required by the CEQA, the California State Lands Commission (CSLC) is the lead agency for the Project and has prepared an Initial Study/Proposed Mitigated Negative Declaration (IS/MND) which is presented here to the Commission for adoption, a necessary step before the Commission may take action to approve the Project. The IS/MND is prepared due to the potential significant impacts of the use of HDD to install the cable in the nearshore and because of the Project's proximity to Bell Canyon Creek, which is within the City of Goleta.

PROJECT DESCRIPTION:

The Project is to replace the existing 46-year-old, 16.5 kV power cable between the EOF and Platform Holly as part of repair and maintenance. The existing cable is a 3-3/8 inch, 16.5 kV submarine cable bundle, consisting of a conduit containing three conductors and integral communication cables, shielded by polyethylene inner jackets covered with high density tallow polyethylene and galvanized steel armor wires. The replacement cable would be delivered to the Project site on a lay barge after the preparatory work is completed both at

Platform Holly and onshore. The cable would be pulled from the barge into the EOF through the pre-installed HDPE conduit and trench to a cable termination vault in the existing supply transformer at the EOF. The offshore cable would then be laid on the seafloor using the lay barge to Platform Holly and connected to an existing switch that connects to the Platform Holly transformer.

Prior to the initiation of construction, a detailed survey of the proposed subsea route would be performed using "Wide Area" Differential Global Positioning System technology, multi-beam bathymetry, side scan sonar, and/or sub-bottom profiler. The route survey would be used to confirm engineering for the replacement cable installation and to ensure that all bottom features, including submerged cultural resources such as shipwrecks, are identified to minimize disturbances during construction. The seafloor surveys would also identify and document sensitive areas (e.g., areas of hard-bottom habitat, eelgrass), existing pipelines, and cables, etc. to confirm anchor placement and crossings.

The replacement cable would begin at a new termination vault under the south end of the existing supply transformer at the EOF and be routed underground to a HDD site just west, but outside of the EOF fence. Exhibit B (attached hereto) shows the EOF plot plan with locations of the new termination vault and HDD site. It would then be routed via a HDD-installed 10-inch HDPE conduit under the beach and surf zone and re-surface offshore at the HDD exit pit on the seafloor. The conduit would be placed 35 to 50 feet below the beach zone and the HDD exit pit would be constructed on the ocean floor at 30-foot water depth. The HDD alignment is approximately 2,200 feet long (800 feet onshore and 1,400 feet offshore). The cable would then be laid on the seafloor for the remaining distance of approximately 13,500 feet to Platform Holly. Exhibit C (attached hereto) shows the HDD drilling plan and profile.

At Platform Holly, the cable would either be installed in a new 8-inch-diameter "I" tube riser that would be placed near an existing riser or, if feasible, Venoco would use an existing 6-inch-diameter spare riser that would be converted for use as the new cable riser. The cable would then be connected to the existing transformers on the Platform Holly. No modifications to the onshore or offshore transformers or switchgear are proposed. An elevation view of Platform Holly looking west is provided in Exhibit D, attached hereto.

Venoco proposes to disconnect the existing cable and leave it in place at this time, because removal of the existing power cable would disturb ocean habitat and could interfere with other active lines and the newly installed cable. On December 3, 2011, an external Remotely Operated Vehicle (ROV) survey was conducted along the pipeline bundle, adjacent to the power cable. The cable was not visible in the survey results, indicating that it has become buried in the sandy

ocean bottom over the years. Final disposition of the cable would be addressed in a separate CEQA document as part of final Platform Holly decommissioning.

Construction activities are expected to take place approximately over a 9-week period. Construction would be designed and phased to limit the amount of downtime that is required, and also to minimize risk of operational upsets. Although most of the construction is expected to occur during daylight and weekday shifts, for safety and continuity, some of these activities would be done on a 24-hour-per-day basis. In addition, preparatory work requiring only a limited number of workers or resources may be scheduled to occur at night, immediately preceding a daylight shift involving a greater number of workers or equipment.

THE MITIGATED NEGATIVE DECLARATION REPORT (MND):

Because the Commission is the lead agency for the Project pursuant to the CEQA (Pub. Resources Code, § 21000 et seq.), Commission staff had an Initial Study performed to discover whether or not the Project may have a significant effect on the environment (State CEQA Guidelines, § 15063).

Although the Initial Study identified several potentially significant impacts to Aesthetics, Cultural Resources, Hydrology/Water Quality, Transportation/Traffic, Hazards and Hazardous Materials, and Biological Resources, mitigation measures were proposed and agreed to by Venoco, Inc. prior to public review that would avoid or mitigate the identified potentially significant impacts "to a point where no significant effects would occur" (State CEQA Guidelines, § 15070, subd. (b)(1)). Consequently, the Initial Study concluded that "there is no substantial evidence, in light of the whole record before the agency, that the project, as revised, may have a significant effect on the environment" (State CEQA Guidelines, § 15070, subd. (b)(2)), and a Mitigated Negative Declaration (MND) was prepared.

The Proposed MND, together with the Initial Study, was circulated for a 30-day public review period from October 5, 2012, through November 5, 2012. Four comment letters were received from the following:

- California Coastal Commission
- City of Goleta
- Native American Heritage Commission
- Santa Barbara County Air Pollution Control District

The commenters provided input regarding several aspects of the Project, but the most common comments involved: (a) cultural resources; (b) the possibility of a HDD frac-out that could migrate into the adjacent Bell Canyon Creek corridor or into coastal waters and affect sensitive habitat and special-status species; (c)

Project effects on the marine environment; (d) air quality impacts due to Project construction; (e) noise impacts due to Project construction;, (f) traffic impacts due to Project construction; and (g) a request for clarification of the location of Project components in regards to City of Goleta or Santa Barbara County jurisdiction.

In response to these comments existing mitigation measures were rearranged and/or modified, and new Mitigation Measures or Applicant Proposed Measures (APMs) were added to further reduce impacts identified in the Proposed MND.

These revisions include:

- Mitigation Measure BIO-5, Spill Response and Horizontal Directional Drilling (HDD) Fluid Release Monitoring and Contingency Plan, was modified to incorporate APM-1, Horizontal Directional Drilling (HDD) Monitor.
- In addition, BIO-5, Spill Response and Horizontal Directional Drilling (HDD) Fluid Release Monitoring and Contingency Plan, was modified and a portion of BIO-5 was split out to form a new, separate mitigation measure BIO-6, Habitat Restoration Plan.
- T-1, Construction Traffic Control Plan was modified.

The following new mitigation measures were also added:

- APM-1. Measures to Reduce Dust Emissions from Construction.
- APM-2. Measures to Reduce NOx Emissions from Construction.
- APM-3. Geotechnical Report for Horizontal Directional Drilling (HDD) Installation.
- N-1. Noise Reduction Plan.

Commission staff has revised the Proposed MND to reflect the above-described changes. New information has also been added that clarifies, amplifies, or makes insignificant modifications to the Proposed MND. After careful review of the changes, staff has determined that the changes do not constitute a "substantial revision" as defined in State CEQA Guidelines, section 15073.5, subdivision (b):

(1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
(2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant and new measures or revisions must be required.

No new significant effects have been identified in the Proposed MND. The revisions to the mitigation measures will further reduce previously identified effects. Important to staff's determination is its conclusion that the revisions are in response to recommendations by commenters that do not give rise to new significant effects, but rather are intended to provide increased environmental protection to effects that are either not significant or are already mitigated to a less-than-significant level.

As a result, staff concluded that recirculation of the Proposed MND prior to Commission consideration is not required. The State CEQA Guidelines, section 15073.5, subdivision (c) provides that recirculation is not required when:

(1) Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1.

(2) New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.

(3) Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.

(4) New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

To the extent that BIO-5, Spill Response and Horizontal Directional Drilling (HDD) Fluid Release Monitoring and Contingency Plan, has been modified to incorporate APM-1, Horizontal Directional Drilling (HDD) Monitor, and form a related Mitigation Measure BIO-6, Habitat Restoration Plan, the requirements of CEQA and the State CEQA Guidelines section 15074.1 - Substitution of Mitigation Measures in a Proposed Mitigated Negative Declaration, have been met. (Pub. Resources Code, § 21080, subd. (f).) APM-1 was deleted and replaced with two measures that are equivalent or more effective and will not in themselves cause any potentially significant effect on the environment. A written finding making this conclusion is required under Public Resources Code section 21080, subdivision (f), and the State CEQA Guidelines section 15074.1, subdivision (b)(2), and is included in the Recommended Action.

OTHER PERTINENT INFORMATION:

1. Pursuant to the Commission's delegation of authority and the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15025), the staff has prepared a Proposed MND identified as CSLC MND No. 764, State Clearinghouse No. 2012101024. Based upon the Initial Study and the Proposed MND, there is no substantial evidence that the project will have a significant effect on the environment; California Code of Regulations, Title 14, section 15074, subdivision (b). A Mitigation Monitoring Program has been prepared in conformance with the provisions of CEQA (Pub. Resources Code, § 21081.6), and is contained in Exhibit C, attached hereto.

2. This activity involves lands identified as possessing significant environmental values pursuant to Public Resources Code section 6370 et seq., but such activity will not affect those significant lands. Based upon the staff's consultation with the persons nominating such lands and through the CEQA review process, it is the staff's opinion that the project, as proposed, is consistent with its use classification.

STATUTORY AND OTHER REFERENCES:

A. California Code of Regulations, Title 2, Article 2.9, section 2100.
B. California Code of Regulations, Title 14, section 15074.

EXHIBITS:

A. Project Location
B. Ellwood Onshore Facility (EOF) Plot Plan
C. Horizontal Directional Drilling (HDD) Plan and Profile
D. Elevation View (looking west) of Platform Holly
E. Mitigation Monitoring and Reporting Program

RECOMMENDED ACTION:

It is recommended that the Commission:

CEQA FINDINGS:

1. Certify that the Proposed MND, CSLC MND No. 764, State Clearinghouse No. 2012101024, was prepared for this project in compliance with the provisions of CEQA, that the Commission has reviewed and considered the information contained therein and in the comments received in response thereto and that the Proposed MND reflects the Commission's independent judgment and analysis.

2. Mitigation Measure APM-1, Horizontal Directional Drilling (HDD) Monitor, was deleted and incorporated into revised Mitigation Measure BIO-5, Spill Response and Horizontal Directional Drilling (HDD) Fluid

Release Monitoring and Contingency Plan. In addition, a portion of BIO-5 was split out to form a new, separate Mitigation Measure BIO-6, Habitat Restoration Plan. Revised BIO-5 in combination with the new BIO-6 are equivalent or more effective than the original measures in mitigating or avoiding the potential significant effect and will not in themselves cause any potentially significant effect on the environment. Revised BIO-5 and new BIO-6 are included in the Mitigation Monitoring Program, as contained in Exhibit E, attached hereto.

3. Adopt the Proposed MND and determine that the project, as approved, will not have a significant effect on the environment.

4. Adopt the Mitigation Monitoring Program, as contained in Exhibit E, attached hereto. Compliance with the Mitigation Monitoring Program is a condition of Project approval.

SIGNIFICANT LANDS INVENTORY FINDING:

Find that this activity is consistent with the use classification designated by the Commission for the land pursuant to Public Resources Code section 6370 et seq.

AUTHORIZATION:

Authorize approval of Platform Holly to Shore Power Cable Replacement Project to replace the existing subsea power cable between the onshore Ellwood Onshore Facility and the offshore Platform Holly as part of repair and maintenance.

PRC 3120.1
PRC 3242.1
W 9409.32

Exhibit A
Project Location

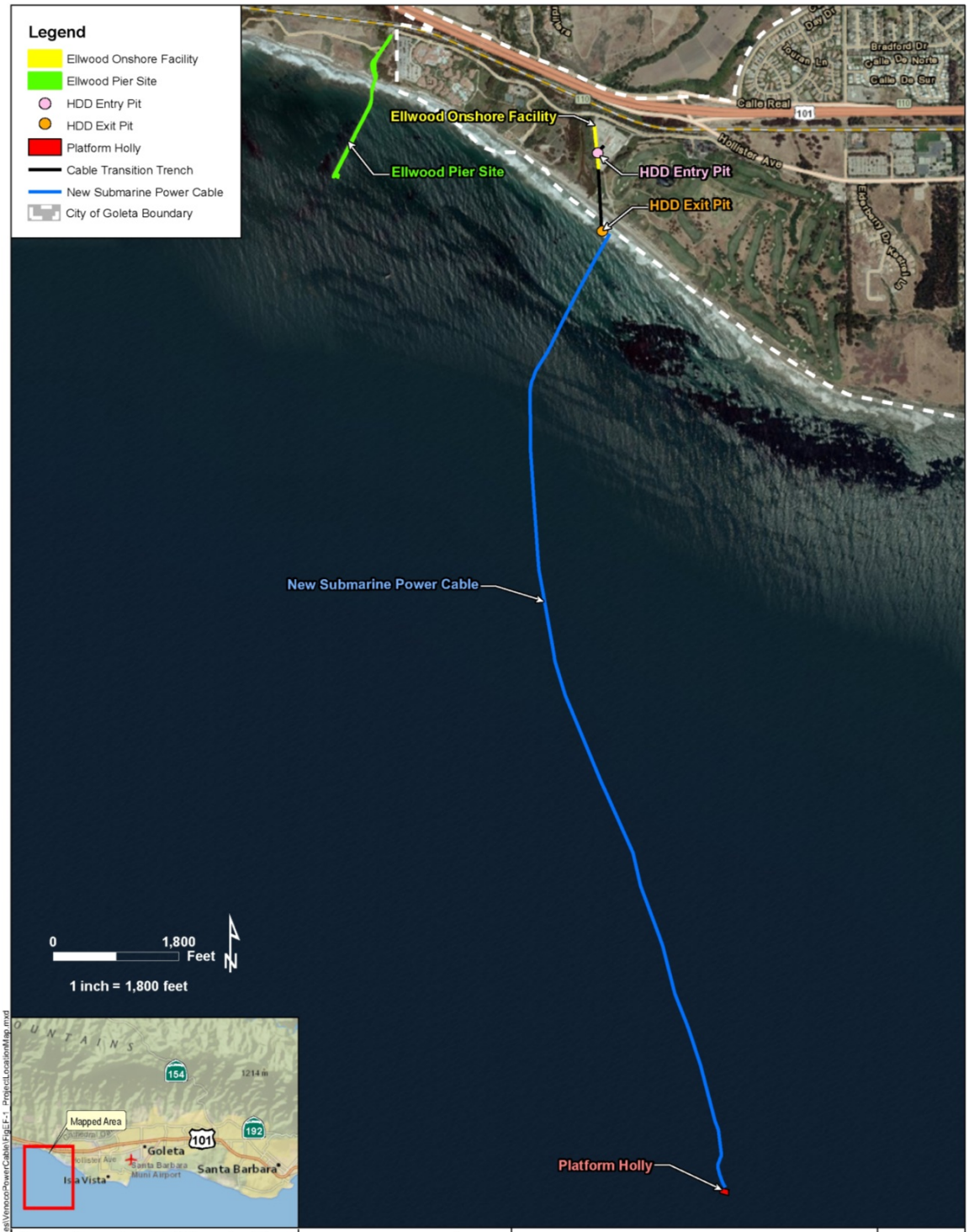


Exhibit B

Ellwood Onshore Facility (EOF) Plot Plan

PRC 3120.1
PRC 3252.1
W 9409.32

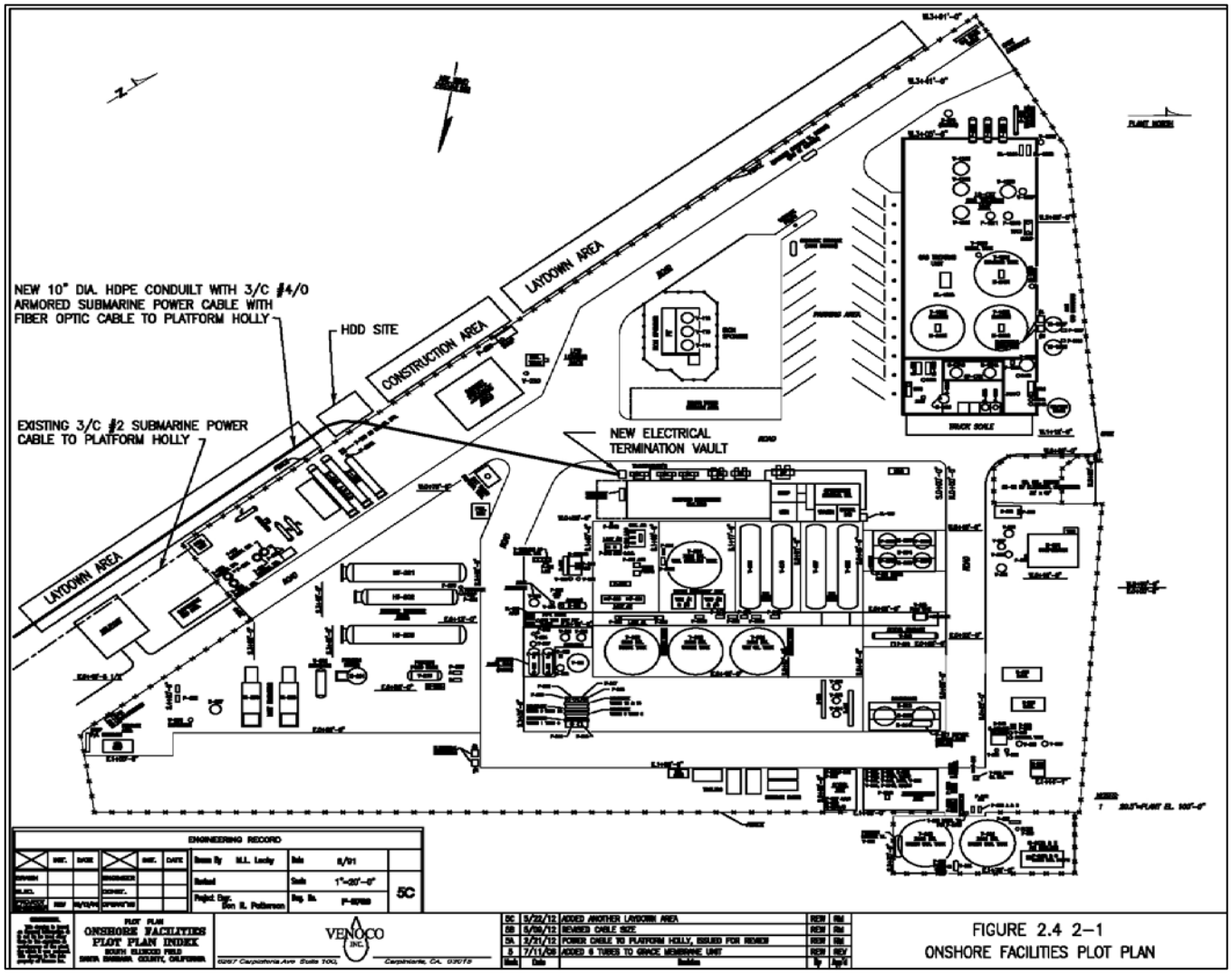
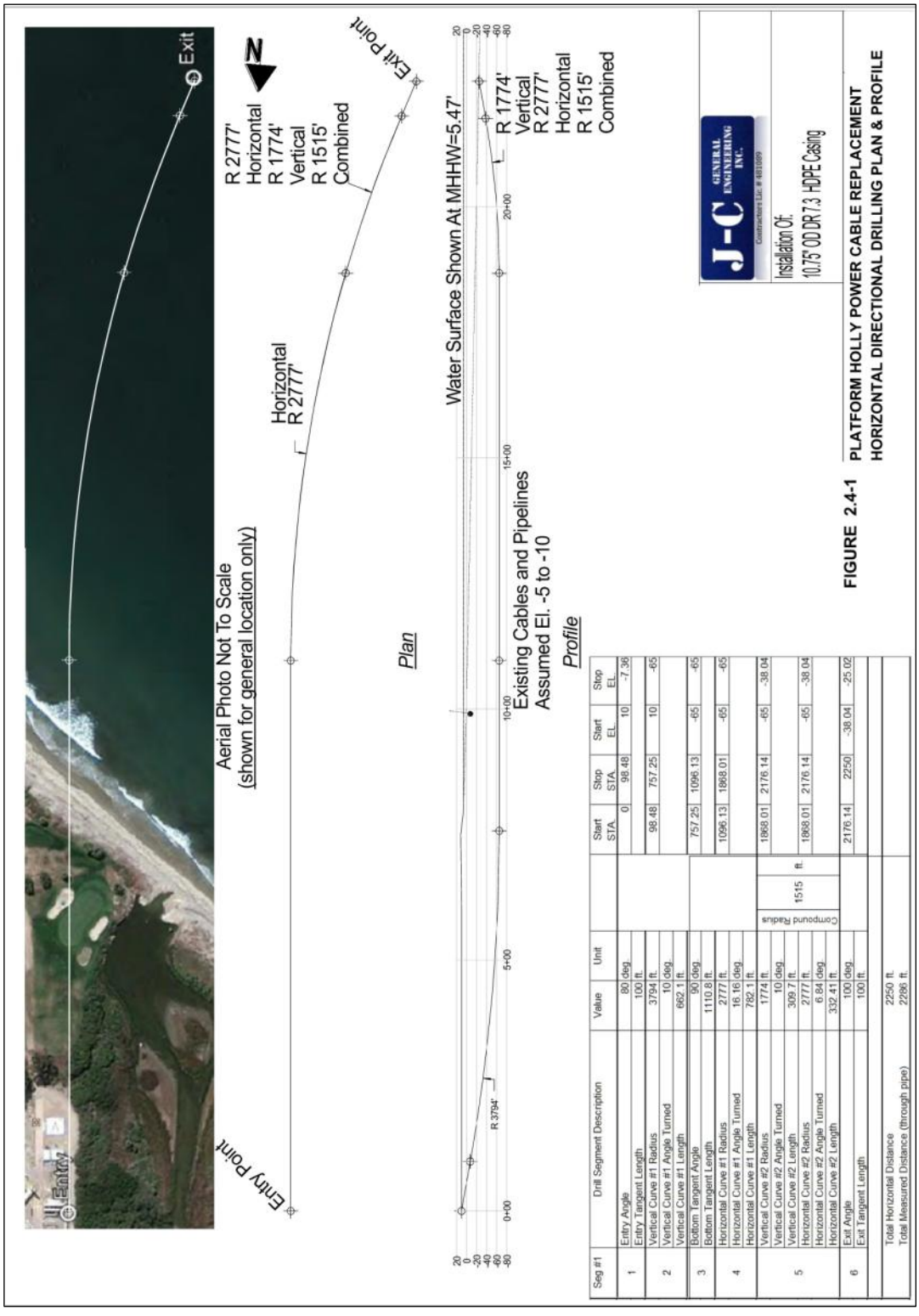


Exhibit C

PRC 3120.1
PRC 3242.1
W 9409.32

Horizontal Directional Drilling (HDD) Plan and Profile



Seg #1	Drill Segment Description	Value	Unit		Start STA	Stop STA	Start EL	Stop EL
1	Entry Angle	80	deg		0	98.48	10	-7.36
	Entry Tangent Length	100	ft.					
2	Vertical Curve #1 Radius	3794	ft.		98.48	757.25	10	-65
	Vertical Curve #1 Angle Turned	10	deg					
	Vertical Curve #1 Length	662.1	ft.					
3	Bottom Tangent Angle	90	deg		757.25	1096.13	-65	-65
	Bottom Tangent Length	1110.8	ft.					
4	Horizontal Curve #1 Radius	2777	ft.		1096.13	1868.01	-65	-65
	Horizontal Curve #1 Angle Turned	16.16	deg					
	Horizontal Curve #1 Length	782.1	ft.					
5	Vertical Curve #2 Radius	1774	ft.	Compound Radius	1868.01	2176.14	-65	-38.04
	Vertical Curve #2 Angle Turned	10	deg	1515 ft.				
	Vertical Curve #2 Length	309.7	ft.					
	Horizontal Curve #2 Radius	2777	ft.		1868.01	2176.14	-65	-38.04
	Horizontal Curve #2 Angle Turned	6.84	deg					
	Horizontal Curve #2 Length	332.41	ft.					
6	Exit Angle	100	deg		2176.14	2250	-38.04	-25.02
	Exit Tangent Length	100	ft.					
	Total Horizontal Distance	2250	ft.					
	Total Measured Distance (through pipe)	2286	ft.					

FIGURE 2.4-1 **PLATFORM HOLLY POWER CABLE REPLACEMENT**
HORIZONTAL DIRECTIONAL DRILLING PLAN & PROFILE

PRC 3120.1
PRC 3242.1
W 9409.32

Exhibit D

Elevation View (looking west) of Platform Holly

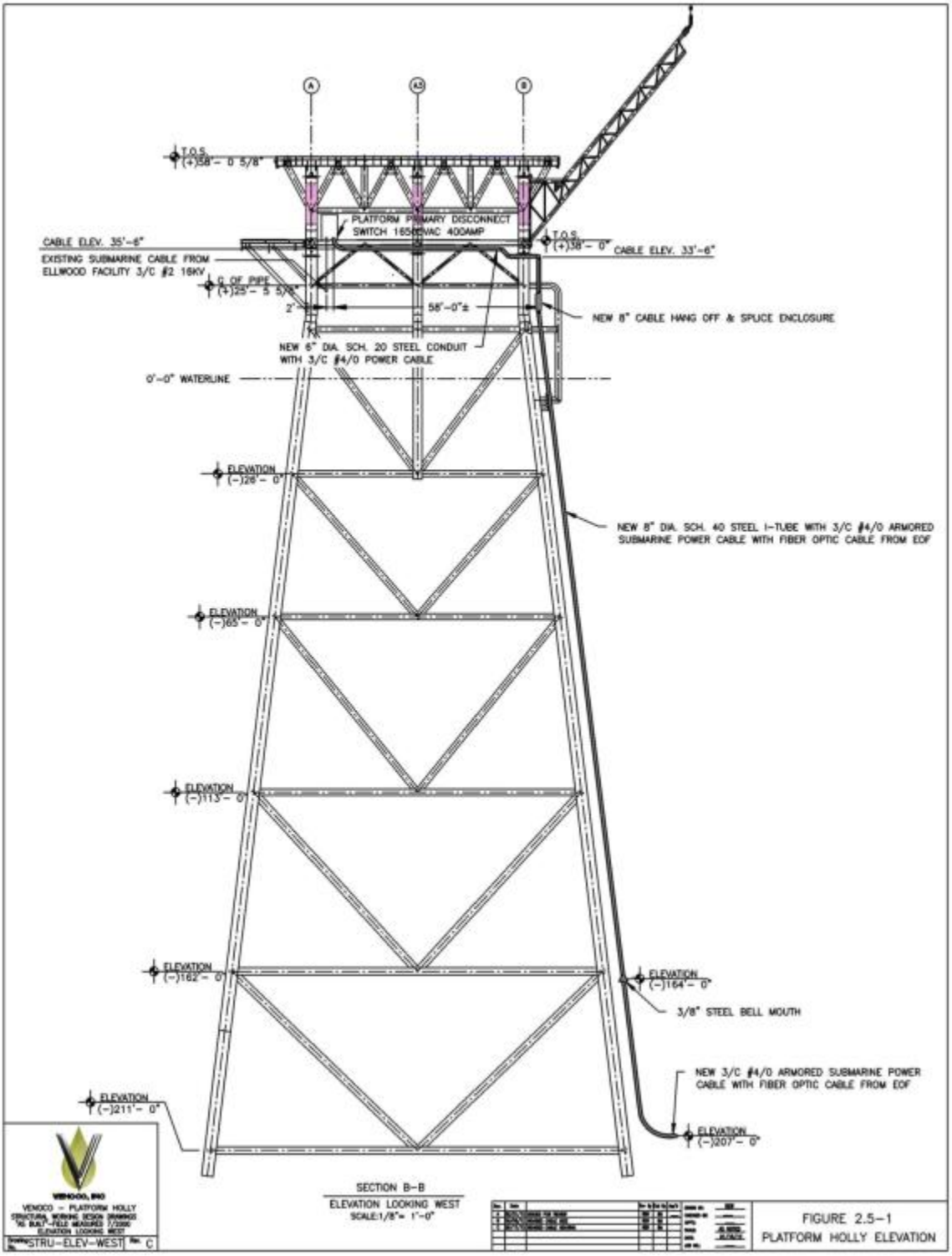


EXHIBIT E
MITIGATION MONITORING AND REPORTING PROGRAM

AUTHORITY

CEQA directs Lead Agencies to adopt, concurrent with adoption of an MND, a program for reporting or monitoring the changes that have been incorporated into the project or that have been made a condition of approval to mitigate or avoid significant environmental effects. This proposed Mitigation Monitoring Program (MMP) has been prepared to provide a summary and discussion of the ways in which the CSLC, as the Lead Agency for the Project, would ensure the measures identified in the MND are implemented, and identifies other agencies potentially having enforcement and compliance responsibilities. While the MMP may identify other public agencies with oversight or permitting jurisdiction, until the mitigation measures (MMs) have been completed, the CSLC would remain responsible for ensuring all measures are implemented in accordance with the MMP. Should the CSLC adopt the MND after considering it together with any comments received during the public review process, it would adopt a final MMP in compliance with CEQA. (See Pub. Resources Code § 21081.6, subd. (a); State CEQA Guidelines, §§ 15074, subd. (d), 15097.)

MITIGATION COMPLIANCE RESPONSIBILITY

Venoco is responsible for successfully implementing all the MMs in the MMP, and is responsible for assuring that these requirements are met by all of its construction contractors and field personnel. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional MMs may be imposed by applicable agencies with jurisdiction through their respective permit processes.

GENERAL MONITORING AND REPORTING PROCEDURES

The CSLC and the environmental monitor(s) are responsible for integrating the mitigation monitoring procedures into the project implementation process in coordination with Venoco. To oversee the monitoring procedures and to ensure the required measures are implemented properly, the environmental monitor assigned must be on site during any portion of project implementation that has the potential to create a significant environmental impact or other impact for which mitigation is required. The environmental monitor is responsible for ensuring that all procedures specified in the MMP are followed.

Site visits and specified monitoring procedures performed by other individuals will be reported to the assigned environmental monitor. A monitoring record form will be submitted to the environmental monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the environmental monitor. A checklist will be developed and maintained by the environmental monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The environmental monitor will note any problems that may occur and take appropriate action to rectify the problems.

MITIGATION MONITORING TABLE

The following mitigation monitoring table lists all mitigation measures identified in Section 3 of the MND. The table lists the following information, by column:

- Potential Impact;
- Mitigation Measure;
- Location;
- Monitoring/reporting action;
- Responsible agency; and
- Timing.

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
Air Quality	**APM-1. Measures to Reduce Dust Emissions from Construction.** Best available control measures shall be implemented to control PM10 generation during construction of the Project, inclusive of: • During construction, water trucks or sprinkler systems will be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption. • Minimize the amount of disturbed area and reduce onsite vehicle speeds to 15 miles per hour or less. • If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than two days shall be covered, kept moist or treated with soilbinder to prevent dust generation.	Onshore Project area	Compliance monitoring	City of Goleta	Throughout construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	• Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads. • After clearing, grading, earthmoving, over-excavation is completed, the disturbed area is paved or otherwise developed so that dust generation will not occur. • The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure. • Prior to any land clearance, the Project Applicant shall include, as a note on a separate informational sheet to be recorded as required by the City of Goleta, these dust control requirements. All requirements shall be shown on grading and building plans.				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	APM-2. Measures to Reduce NOx Emissions from Construction. Diesel emissions shall be reduced during construction by implementation of the following measures: • Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible. • Diesel powered equipment should be replaced by electric equipment whenever feasible. • If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by the Environmental Protection Agency or CARB. • Construction equipment shall be maintained per the manufacturers' specifications. • Catalytic converters shall be installed on gasoline powered equipment, if feasible. • All construction equipment shall be	Onshore Project area	Compliance monitoring	City of Goleta	Throughout construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	maintained in tune per manufacturer's specifications. • The engine size of construction equipment shall be the minimum practical size. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction worker trips should be minimized by requiring carpooling and by providing lunch onsite.				
Geology	**APM-3. Geotechnical Report for Horizontal Directional Drilling (HDD) Installation.** At least 30 days prior to start of HDD construction, Venoco shall submit a site-specific geotechnical report certified by a California registered Geotechnical Engineer to the CSLC staff for review and approval, in consultation with the City of Goleta's Building Official and the Coastal Commission staffs and, if the City of Goleta has the legal authority to require approval of the geotechnical report, subject to that approval by the City of Goleta's Building Official. At a minimum, the report shall include the following information: • Boring logs;	Onshore and Offshore Project areas	Compliance monitoring	CSLC and City of Goleta	Prior to construction

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	• Confirmation of fitness of purpose of the HDD method; • Any other pertinent soil properties and parameters per California Building Code requirements; and • Any geotechnical design recommendations for safe HDD installation including any safeguards to minimize risk of inadvertent release of drilling fluids to the surface, groundwater, or ocean.				
Nighttime lighting	**AES-1 Construction Night Lighting Plan.** Venoco shall prepare, and submit to California State Lands Commission and City of Goleta staffs for approval, a Construction Night Lighting Plan at least 2 weeks prior to construction. The Plan shall include at least the following measures: • Onshore and offshore lighting shall be of low intensity, low glare design, and shall be hooded to direct light downward onto the subject area and prevent spill-over onto adjacent areas. Upward directed exterior lighting is prohibited. • Lighting fixtures shall be kept to the minimum number and intensity needed to ensure construction and worker safety.	Onshore Project area	Compliance monitoring	CSLC and City of Goleta	Throughout construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	• Lighting shall be not directed towards any Environmentally Sensitive Habitat Area or any neighboring properties to the maximum extent feasible.				
Marine wildlife interactions	**BIO-1. Marine Mammal Monitoring. BIO-1** A. A 500-foot (152-meter) Minimum Safety Zone shall be established along the proposed cable alignment. B. Two National Oceanic and Atmospheric Administration Fisheries-approved marine mammal monitors shall be on watch on each Project vessel (cable-lay and support vessels) during offshore horizontal directional drilling (HDD) and cable-laying activities to monitor any marine mammals that enter the established Minimum Safety Zone. In the event a marine mammal approaches within 200 feet during the HDD operation, the monitors shall notify the onsite construction foreman and initiate a cease-work order; the monitors shall have discretion to continue operations if they determine that the mammal is headed away from the HDD construction area. All sightings shall be documented in a monitor logbook. Photographs with a date stamp will also be	Offshore Project area	Compliance monitoring	CSLC	Throughout offshore installation period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	taken as practical and included in the logbook. C. Cable-laying vessel speeds shall be limited to less than 2 nautical miles per hour (knots), with the speed of support vessels moderated to 3 to 5 knots, to minimize the likelihood of collisions with marine mammals and sea turtles. D. Propeller noise and other noises associated with cable laying activities shall be reduced or minimized (through reduction of vessel speed) to the extent possible.				
Terrestrial wildlife interactions and habitat damage	**BIO-2. Onshore Pre-construction Surveys**. A. Pre-construction surveys for special-status species and nesting birds protected under the Migratory Bird Treaty Act and California Fish and Game Code section 3503 shall be conducted by a qualified biologist within 30 days prior to the commencement of Project-related activities. The Project biologist shall recommend if any additional mitigation is necessary to address changes since the original survey was done. In particular, pre-construction surveys should target monarch butterflies, California red-legged frog, tidewater goby, and white-tailed kites as they have high potential to occur within or directly adjacent to the Project area.	Onshore project area	Completed. with results incorporated into MND	CSLC and City of Goleta	Completed

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	Appropriate survey methods and timeframes acceptable to California State Lands Commission (CSLC) staff and the City of Goleta (for resources applicable to City jurisdiction) shall be established to ensure that chances of detecting the target species are maximized, i.e., October through February for monarch butterflies, March through June for nesting birds, or as determined by the consulting qualified biologist. B. If aggregations of monarch butterflies are detected within the adjacent areas, avoidance measures in compliance with the City of Goleta General Plan/Coastal Land Use Plan (City 2009) shall be implemented to ensure that aggregations of monarch butterflies are not disturbed. A minimum of a 100-foot buffer, as measured from the outer extent of the tree canopy, shall be established if monarch butterfly aggregations are detected. Construction activities within the designated buffer of the aggregation shall be halted until monarch butterflies have left the site and the consulting qualified biologist has determined that the resumption of construction shall not adversely				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	affect the monarch butterfly habitat. C. If nesting birds are detected, avoidance measures in compliance with the City General Plan and/or County policies shall be implemented to ensure that nests are not disturbed until after young have fledged. Construction activities within the designated buffer of the nest shall be halted until the consulting qualified biologist has determined that the resumption of construction shall not adversely affect the nest. In the event that other listed species are encountered, consultation with the U.S. Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Game (CDFG) and City of Goleta (when work is within their jurisdiction) must be initiated before continuing with work. D. The results of the preconstruction surveys, including graphics showing the locations of any nests detected, and any avoidance measures implemented for special-status species, shall be submitted to CSLC staff, CDFG, USFWS, and the City of Goleta within 14 days of completion of the surveys to document compliance with applicable State and federal laws.				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	BIO-3. Onshore Biological Monitoring. A. Prior to the start of construction, an Employee Environmental Awareness training program approved by California State Lands Commission (CSLC) staff and the City of Goleta shall be used to train all onsite Project personnel (Applicant employees and contractors) relative to the environmental protection measures of the Project. B. A City of Goleta-approved biological monitor (Project biologist and biological monitors) shall be present during all onshore construction (including during borings) for the portion of the proposed Project located within the jurisdiction of the City of Goleta (the Ellwood Onshore Facility [EOF] Project site and the onshore horizontal directional drilling [HDD] cable alignment). The Project biologist and the Project engineer shall clearly designate "sensitive resource zones" on project maps, construction plans, and at the construction site, consistent with the preconstruction surveys conducted for the presence of sensitive species. Sensitive resource zones are defined as areas where construction	Onshore project area	Compliance monitoring	CSLC and City of Goleta	Throughout onshore construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	would be limited to a 15- to 30-foot corridor, depending on the particular construction requirements, to avoid impacts to special-status biological resources. Similarly, staging and storage areas shall not be placed in areas where sensitive resources are present or nearby, under the direction of the Project biologist. The Project biologist shall ensure the following: 1. Washing of any Project equipment is not allowed near sensitive biological resources. An area designated for washing functions shall be identified on the plans and submitted to the related agencies prior to the Project mobilization. All waste, garbage, and trash created during the Project shall be kept in covered containers and will be removed from the Project site and disposed of in accordance with local and State regulations. 2. Removal of waste occurs as required and does not attract wildlife. 3. Construction personnel do not feed or harass wildlife for the Project duration. 4. Construction occurs during the dry season of the year (i.e., April 15 to November 1) unless an agency-approved erosion control plan,				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	incorporating appropriate best management practices identified in the U.S. Environmental Protection Agency's guidelines for construction site runoff control is in place and all measures therein are in effect. 5. All machinery that cannot be stored offsite, e.g., HDD equipment, shall be stored and fueled only within designated locations approved by the City of Goleta. 6. Disposal of or temporary placement of excess fill or other construction materials are prohibited within 50 feet from the top of the banks for all drainages and other areas known to support special-status species. 7. All HDD work stops and the related plans are properly implemented, under the Project biologists' oversight in the event of a frac-out or construction spill into the Bell Canyon Creek drainage. C. If any special-status species are observed during monitoring, or if Project-related biological resource-focused conditions of approval are violated, the biological monitor shall have the authority to halt construction activities to avoid damaging sensitive resources or violating				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	applicable laws. The Bell Canyon Creek corridor will be inspected during construction at a frequency acceptable to the Project biologist to ensure that possible HDD drilling mud leaks are identified. In the event that a listed species is encountered, authorization from the U.S. Fish and Wildlife Service and California Department of Fish and Game (CDFG), plus the City of Goleta for those portions of the Project located within the jurisdiction of the City of Goleta, must be obtained before continuing with work. If nesting birds are detected, avoidance measures in compliance with the City General Plan and procedures shall be implemented to ensure that nests are not disturbed until after young have fledged. The results of the monitoring, including graphics showing the locations of any nests detected, and any avoidance measures implemented, shall be submitted to the CSLC staff, City of Goleta and CDFG within 14 days of completion of the inspections to document compliance with applicable State and federal laws.				
	BIO-4. Highly Visible Fencing. Limits of work shall be established in the field with highly visible	Onshore project	Compliance Monitoring	CSLC	Throughout construction

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	construction fencing to prevent encroachment into the native habitats adjacent to Project sites. The fencing shall be installed prior to issuance of a development permit. If the fencing is installed during the winter months, it shall be raised to allow for the migration of California red-legged frogs through the Project area. The City of Goleta shall inspect and verify fencing installation for those portions of the proposed Project located within the jurisdiction of the City of Goleta.	area			period
Spill and HDD fluid release	**BIO-5.Spill Response and Horizontal Directional Drilling (HDD) Fluid Release Monitoring and Contingency Plan.** A Spill Response and HDD Fluid Release Monitoring and Contingency Plan (plan) shall be completed and include measures for training, monitoring, worst-case scenario evaluation, equipment and materials, agency notification and prevention, containment, clean up, and disposal of released drilling muds. Preventative measures would include geotechnical investigations to determine the most appropriate HDD depth and drilling mud mixture. The plan shall include, but not be limited to, the following: • The plan shall be submitted to all respective jurisdictions.	EOF Project Site	Compliance Monitoring	CSLC	Throughout HDD construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	• In the event of a frac-out or any incident that affects the Bell Canyon Creek drainage, all work in the area shall cease. • Monitoring of the entry and exit pits after construction shall be conducted to determine that excavated areas are restored to pre-construction contours. • Monitoring by a minimum of two biological monitors shall occur throughout the drilling operations to ensure swift response in the event of a release (frac-out). • Methods for detecting and curtailing the accidental release of that fluid shall be developed and shall be implemented during the HOD operations. Drilling pressures shall be closely monitored so that they do not exceed those needed to penetrate the formation. In addition, the HDD operator shall continuously monitor mud returns at the exit and entry pits to ascertain that mud circulation has not been lost. Spotters shall follow the progress of the drill bit during the pilot hole operation, and reaming and pull back operations. • In the event of loss of circulation, without mud				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	surfacing, the mud engineer shall evaluate the weight and viscosity of the fluid and mix in additives to seal off the crossing hole and regain circulation. Similar analysis of the mud shall be performed if surface releases are observed. Any spills shall be contained to the extent feasible in accordance with approved plans. Containment shall be accomplished through construction of temporary berms/dikes and use of slit fences, straw bales, absorbent pads, straw wattles, and plastic sheeting. Clean up shall be accomplished with plastic pails, shovels, portable pumps, and vacuum trucks. Should the release be onshore in upland or aquatic/creek habitat then the following will be required and presented in more detail in the plan: • Isolate the area with hay bales, sand bags, or silt fencing to surround and contain the drilling mud. • Consult with the City of Goleta, California Coastal Commission (CCC), U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), U.S. Fish and Wildlife Service (USFWS), and California Department of Fish and Game (CDFG)				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	regarding the next appropriate actions among the following: o A mobile vacuum truck will be used to pump the drilling mud from the contained area and recycled to the return pit. o The drilling mud will be left in place to avoid potential damage form vehicles entering the area. In the event of an unanticipated fluid release and subsequent adverse impacts to offshore coastal waters then the following will be required: • Venoco shall immediately erect an isolation/containment environment (underwater boom and curtain). • Venoco shall consult with the California State Lands Commission staff and CCC, CDFG's Office of Spill Prevention and Response, and National Oceanic and Atmospheric Administration Fisheries regarding the next appropriate action among the following: o Monitor the release for 4 hours to determine if the drilling mud congeals. o If drilling mud congeals, take no other action that would potentially suspend				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	sediments in the water column. • If the release becomes excessively large, a spill response team would be called in to contain and clean up excess drilling mud in the water. Phone numbers of spill response teams in the area will be on site.				
	BIO-6. Habitat Restoration Plan In the event of an unanticipated fluid release and subsequent adverse impacts to onshore upland habitat or onshore, native aquatic/creek habitat, a site-specific Habitat Restoration Plan shall be prepared for review and approval by applicable regulatory agencies, including, but not limited to, the CCC, CDFG, and the City of Goleta. If a Habitat Restoration Plan is required, an installation security and a separate performance security shall be immediately posted by the Applicant to the City or County, depending on where the restoration occurs, for (1) tree replacement and mitigation and (2) restoration, whichever applies. The installation security shall be equal to the value of installation and/or replacement of all required items. The performance securities shall be equal to the value of maintenance period of a minimum of 3 years and shall be maintained by the City or County, whichever				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	is responsible for overseeing the restoration/tree replacement, for the required maintenance period of at least 3 years. The installation securities shall be released upon satisfactory installation of planted and/or seeded stock. The performance securities shall be released once the performance standards are achieved, or after a minimum of 3 years.				
	BIO-7. Anchoring Plan. Venoco shall submit a Final Anchoring Plan to California State Lands Commission (CSLC) staff for review and approval at least 2 weeks prior to commencement of Project activities. The Anchoring Plan shall include, at a minimum, the following elements: • A list all of the vessels that will anchor during the Project and the number and size of anchors to be set; • Maps showing the anchoring sites identified during pre-construction surveys to identify anchor seclusion zones and ensure that all anchors shall avoid any rocky habitat, kelp beds, submerged cultural resources, and impacts to recreational and commercial boaters; • Descriptions of navigation equipment that would be used to ensure anchors are	Offshore Project area	Compliance Monitoring	CSLC	Throughout construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	accurately set and of the anchor handling procedures that would be followed to prevent or minimize anchor dragging; and, • A requirement to be included in appropriate contracts for the Project that contractors shall, whenever feasible, use appropriate installation techniques and procedures described in the Plan that will minimize or avoid environmental impacts such as turbidity and anchor scarring.				
	BIO-8. Post-Construction Seafloor Survey and Remediation. Venoco shall perform a post-construction remotely operated vehicle or diver video survey along the length of the completed facility, with voice overlay, to verify the as-laid condition of the cable. The survey shall also provide a graphic record of the work accomplished and confirm seafloor cleanup and site restoration including anchor locations.	Offshore Project area	Compliance Monitoring	CSLC	Post-construction period
Discovery of previously unknown resource	**CUL-1. Construction Monitoring.** Onshore subsurface excavations within the Project area shall be monitored by a qualified archaeologist and a Native American monitor from a culturally affiliated tribe recognized by the Native American Heritage Commission for the Project area. In the event that	EOF Project Site	Compliance Monitoring	CSLC and City of Goleta	During subsurface construction activities.

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	archaeological resources are encountered, work shall be stopped immediately or redirected away from the resources. The California State Lands Commission is the point of contact for unanticipated discoveries and shall be notified immediately to determine further actions that may include recordation, evaluation and data recovery or avoidance through preservation in place. After construction is complete, the Project archaeologist shall prepare a construction monitoring report and submit it to the CSLC, City of Goleta and the Central Coast Information Center.				
	CUL-2. Unanticipated Archaeological Resources. Should any previously unknown archaeological resources be discovered during construction, work will stop within 100 feet of the find until a qualified archaeologist can assess the significance of the find, and, if necessary, develop appropriate treatment measures in consultation with California State Lands Commission (CSLC) staff. If human remains are discovered, there will be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains. Venoco will notify the county coroner immediately in compliance with State Health and				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	Safety Code section 7050.5 and work in the vicinity may not resume until the coroner has made the necessary findings as to origin and circumstances of the death. The CSLC shall also be notified immediately. If the remains are determined by the coroner to be of Native American origin, the coroner will notify the Native American Heritage Commission (NAHC) within 24 hours. The NAHC would then contact the most likely descendant of the deceased Native American, who would make a recommendation on how to treat or dispose of the remains with appropriate dignity as set forth in Public Resources Code section 5097.98.				
	HAZ-1. Preparation of a Critical Operations and Curtailment Plan (COCP). Venoco shall submit a Final COCP to CSLC staff for review and approval at least 2 weeks prior to commencement of Project activities. The COCP shall define the limiting conditions of sea state, wind, or any other weather conditions that exceed the safe operation of offshore vessels, equipment, or divers in the water; that hinder potential spill cleanup; or in any way pose a threat to personnel or the safety of the environment. The COCP shall provide for a minimum ongoing 5-day advance favorable weather forecast during	Offshore Project area	Compliance Monitoring	CSLC	Throughout construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	offshore operations. The plan shall also identify the onsite person with authority to determine critical conditions and suspend work operations when needed.				
Water Quality	**WQ-1 Water Quality/Stormwater Pollution Prevention Plan.** Venoco shall prepare a plan to prevent adverse impacts to nearby waterways and riparian areas associated with construction. The plan shall include, but not necessarily be limited to, a description of Best Management Practices (BMPs), including erosion and sedimentation prevention measures, spill prevention measures, spill containment measures and monitoring requirements. Measures shall include, but not be limited to, such BMPs as hay bales, silt fence, waddles and other measures determined appropriate for erosion control within areas of disturbance. General permit requirements for construction site operators to control waste such as discarded building materials, truck washout, chemicals, litters, etc., and sanitary waste at a construction site are to be observed. The Plan shall be submitted to the City of Goleta for review and comment. In the presence of respective City and County representatives, the Applicant shall review	Onshore Project area	Compliance Monitoring	CSLC	Throughout construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	the Water Quality/Storm Water Pollution Prevention Plan with appropriate contractor personnel.				
Noise	**N-1. Noise Reduction Plan.** The Applicant shall prepare a noise reduction plan, which shall be approved by the City. The Plan shall include, but not be limited to, the following measures: • Notify residents and landowners about the planned construction activities near their residence/land at least one week before construction at that location. • Ensure that construction activities are reduced during the maximum extent feasible during the Holidays. • Ensure that all internal combustion engines are properly maintained and that mufflers, silencers, or other appropriate noise-control measures function properly.				
Traffic	**T-1 Construction Traffic Control Plan.** The Applicant shall prepare, provide funding for, and implement a Construction Traffic Control Plan for approval by the City. The Plan shall include, but not be limited to, the following: • Provide traffic controls when lanes are closed due to construction, e.g., flaggers, detour signs, orange safety cones;	Onshore Project area	Compliance Monitoring	CSLC	Throughout construction period

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	• Provide traffic controls at the EOF driveway and Hollister Road to allow for left-hand turning of project construction traffic in a safe manner, e.g., flaggers; • Provide detours for emergency vehicles; • Provide alternative routes for bicycles and pedestrians, if feasible; • Notify the residents or owners of any properties within 1,000 feet and/or adjacent to the project route of the constructions schedule at least one week before construction in their vicinity; • Provide access to the affected properties during the construction; if access to businesses is not possible during the work hours, provide lost sales compensation; • Monitor for road damage from construction-related activities and compare the affected roads at the end of the construction to the preconstruction conditions; repair any visible construction-caused damage to restore the road to its pre-construction condition or better; • No construction parking will occur in public parking lots (i.e., Haskells Beach and Ellwood/Mesa/Sperling Preserve Lots).				

Table 1. Mitigation Monitoring Program

Potential Impact	Applicant Proposed Measure / Mitigation Measure	Location	Monitoring/ Reporting Action	Agency Responsible	Timing
	• For construction, Venoco shall limit truck deliveries and commuters/personnel to the west Hollister-Highway 1010 on and off ramps and shall not utilize 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.).				