

III. Discussion of Environmental Evaluation

Section II

A-2, 3: Some temporary disturbance of the soil and minor changes in the ground surface will result from the pipeline construction and trenching onshore and through the surf zone. These impacts will be minor and of short duration.

B-1: Some air emissions will be generated by onshore construction machinery, lay barges and marine vessel activity. This impact to air quality will be of temporary duration.

S-1, 4: There will be impacts to the existing biota and any existing kelp beds by the construction for the period of time to construct and lay the pipeline. These impacts will be of limited duration and recolonization of the areas will occur. Any blasting in the water may require permitting and/or coordination with Fish and Game Commission.

F-1; G-1: There will be an increase in ambient noise and light levels in proximity to the tug and lay barge and welding equipment. This impact should be minor and of short duration.

M-1, 5; S-1: Additional water borne traffic will be temporarily generated between the onshore facility and the well heads during the construction of the pipeline. This activity will impact usage and navigation on the coastal waters.

The pipeline laying activities will be governed by rules and regulations of the U.S. Coast Guard so as to minimize interference with fishing, boating and hazards to navigation. The installation activities will be restricted to area immediately around the pipelaying boat or barge and will be of brief duration. Recreational boating in the pipeline laying area will be restricted and controlled by Coast Guard regulation for the duration of the project.

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ATTN JOHN ENGLISH
315 CAMINO DEL REMEDIO
SANTA BARBARA, CA 93110

RESOURCES MANAGEMENT DEPARTMENT
ATTN PHIL OVERYNDER
ENERGY DIVISION
123 E. ANAPAMU ST.
SANTA BARBARA, CA 93101

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REGIONAL MANAGER
245 W. BROADWAY, SUITE 350
LONG BEACH, CA 90802

DEPT. OF FISH & GAME
ATTN: ROLE E. HALL
MARINE RESOURCES REGION
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SACRAMENTO, CA 95814

DEPT. OF JUSTICE
ATTN: M. GREGORY TAYLOR
3980 WILSHIRE BLVD.
LOS ANGELES, CA 90010

OFFICE OF PLANNING & RESEARCH
ATTN: CHRIS GOUGHIN
1400 10TH STREET
SACRAMENTO, CA 95814

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HONORABLE JACK O'CONNELL
MEMBER OF THE ASSEMBLY
35TH DISTRICT
CALIFORNIA STATE LEGISLATURE
STATE CAPITOL
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50 HIGUERA ST
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DISTRICT
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LONG BEACH, CA 90802

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714 P STREET, ROOM 430
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UNIVERSITY OF CALIFORNIA
AT SANTA BARBARA
ATTN CHANCELLOR'S OFFICE
CHAPPLE HALL
SANTA BARBARA, CA 93106

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ATTACHMENT 1

COMMENTS TO INITIAL STUDY
AND RESPONSES

DEPARTMENT OF FISH AND GAME
CALIFORNIA COASTAL COMMISSION
COUNTY OF SANTA BARBARA
U.S. FISH AND WILDLIFE SERVICE

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Memorandum

To : Ms. Susan Livenick
State Lands Commission
245 West Broadway, Suite 425
Long Beach, California 90802

Date: November 26, 1984

DATE	NOV 30 1984
3 DJE	<i>[Signature]</i>
CFB	
ADW	<i>[Signature]</i>
RGF	
4 [Signature]	
W40442	

Susan - if they don't help, why not have revegetated immediately? Why wait 2 years?

From : Department of Fish and Game

MRR-LB

Subject: Notice of Consultation/Preparation for Well Completion, Installation of Flowlines and Production of Gas, Shell California Production Inc. P.R.C. 2920.1, Santa Barbara County. W40442, SCH 84101008.

We have reviewed the Initial Study for the completion of two previously approved wells, installation of flowlines and the production of gas. We believe that a Negative Declaration, which includes appropriate mitigation measures to offset potential impacts, would be appropriate.

The Initial Study identifies the major project impacts to both marine and terrestrial habitats and provides some mitigation measures which will be included in the proposed project. These measures will provide mitigation for most project impacts. However, with respect to marine and terrestrial habitats we have additional concerns.

Although the 1983 winter storm and warm water conditions caused an extensive reduction in kelp beds in the Molinc area, recovery of those kelp beds has been observed. The pulling of flowline bundles through recovering or established kelp beds would impact this resource. We therefore recommend that the project be conditioned to provide for a pre-project survey of the area to establish kelp densities and a survey upon project completion be completed to determine the magnitude of kelp loss, if any. If there is no kelp loss, or it is insignificant as determined by a review of survey results by Department personnel, then no additional surveys or measures will be required. However, if the loss of kelp is judged to be significant then a survey of the area should be conducted two years after project completion to determine if kelp has returned to pre project densities. If the kelp has not returned to pre project densities then Shell California Production Inc. should revegetate the impacted area.

With regards to the onshore pipeline route, the following conditions would eliminate or reduce potential project impacts to terrestrial and aquatic habitats.

- a) Any loss of riparian vegetation within the pipeline corridor should be avoided. If riparian vegetation is lost it should be replaced with native species.

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- b) No construction activities within Arroyo Hondo creek should be undertaken during the nesting season.
- c) A notification pursuant to Fish and Game Code Section 1603 must be submitted to the Department prior to the initiation of construction activities within Arroyo Hondo. We believe that all of our concerns can be addressed within an agreement with the Department.

Should you have any questions please contact Rolf Mall, Environmental Services Supervisor. His phone number is AT35 8-835-5155 or (213) 590-5155.

Sincerely,


John L. Baxter
Regional Manager
Marine Resource Region

cc: Office of Planning and Research,
1400 Tenth Street
Sacramento, CA 95814

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State of California ~~DEPARTMENT OF LANDS AND NATURAL RESOURCES~~
George Deukmejian, Governor

California Coastal Commission
SOUTH CENTRAL COAST DISTRICT
735 State Street, (805) 963-6871
Balboa Building, Suite 612
Santa Barbara, CA 93101

December 6, 1984

Office of Planning and Research
Attn: Chris Goggin
1400 10th Street
Sacramento, CA 95814

Susan Livenick
State Lands Commission
245 West Broadway, Suite 425
Long Beach, CA 90802

RE: Comments on Initial Study, Shell Molino Flowlines, Santa Barbara County

Dear Ms. Goggin:
Ms. Livenick:

The following are Coastal Commission staff comments on the Shell Molino Flowline Initial Study. We hope these comments will assist you in the review of the coastal and environmental issues raised by the proposed project. We understand that the proposed project consists of installing flowlines from two offshore gas wells through the Arroyo Hondo Creek Channel beneath the railroad tracks and Highway 101, and then east to the Shell Molino Canyon gas processing facility. A pipeline construction staging area will be established in an avocado grove within Molino Canyon on the landward side of Highway 101. In an effort to assist reviewing agencies and the public, quoted portions of referenced documents should be included as a xeroxed appendix. The comments are listed as follows:

OCEANOGRAPHY/WATER QUALITY page 18,20

What is the basis and justification for the conclusion that the proposed activities will have no significant effect on oceanographic parameters in the Molino area? Does this statement include the fact that Shell is proposing to discharge significant quantities of waste water into Molino Creek which drains into the ocean? How much waste water will be discharged? Why were impacts on water quality determined to be minor? Should an ocean discharge monitoring program be required as appropriate mitigation?

MARINE AND TERRESTRIAL BIOLOGY page 20,21,

Marine Setting

Santa Barbara County Coastal Plan includes a set of adopted Environmentally Sensitive Habitat Area (ESHA) maps which locate and designate such habitat for special protection in Coastal Plan policies. Such identification for kelp beds should be noted in the document. Has a biological survey been conducted with remote controlled vehicles to create accurate maps and

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photographs along the pipeline alignment? Have the kelp beds along the proposed pipeline alignment been surveyed to determine the length, width, and density of the beds? Will blasting with explosives be required to create the pipeline trench? If so what are the effects on marine life including kelp?

What are the adverse effects of less than catastrophic events such as pipeline or wellhead leaks, or potential leaks caused by vessel anchors? Where and in how many locations will the automatic and manual shutoff valves be installed? Are they adequate to mitigate adverse impacts on marine and terrestrial habitats?

What are the construction vessel impacts on the ocean floor, kelp beds, and marine life? Are vessel route plans, debris removal, and the recontouring of ocean floor necessary as mitigation measures? Consistent with Coastal Act and County Coastal Plan consolidation policies, what is the potential to consolidate offshore gas pipelines as short and long term mitigation measures to reduce impacts on marine habitat? Pipeline consolidation would be most effective in the nearshore kelp bed areas.

Terrestrial Setting page 22,23

The document notes a concern that the project needs to avoid the spring breeding season for sensitive fauna. What are these species and their significance? Are they rare and endangered? Specifically when is their prime and general breeding season? It is important to balance this concern with the need to avoid the high rainfall and commercial fishing seasons. In order to evaluate the significance of this breeding season additional information is necessary.

Project construction will remove the vegetation cover in the avocado grove and along a portion of the creek bed and create the potential for significant erosion and sedimentation into the creek and marine environment. What are the quantities and adverse impacts created by the sediment load? The riparian corridor along Molino Creek is identified as an ESHA area. It is important to note that although habitat along the creek may have been disturbed in the past it can be restored. Mitigation number 2 should exclude mechanized construction equipment and storage from the riparian habitat area.

CULTURAL RESOURCES page 23,24,25

What is the relative cultural significance of SBA-1151? Terrestrial mitigation measure number 2 notes that cut trees will be left in the ground to decompose. Will the planting of new trees and the removal of the decomposing roots have the potential to impact buried cultural resources? Should an archaeological monitoring program during tree planting and removal be required as a mitigation measure?

SOCIOECONOMICS page 25,26

What and where are the existing ocean floor obstructions in the project vicinity? Can these be mitigated to enhance the commercial fishing viability for trawlers and trappers? What types of commercial fishing occur in the area and have the commercial fisherman been asked when they fish the area? When are their legal seasons and when are they most likely using the waters in the project vicinity? What mitigation measures can mitigate the adverse impacts? The attached general policy statement on conflicts between the commercial fishing and oil and gas industries may help in defining these

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impacts. How much and what is the significance of recreational boating restrictions to be imposed by the Coast Guard during pipeline construction?

LAND USE AND COASTAL POLICIES page 26,27

Coastal Plan policies need to be listed and analyzed relative to the project in the text of this document. Recreational uses and revised attendance records for the State Parks need to be included. What is the size of the beach area at low and high tides? The rocky intertidal areas in the vicinity of the project site need to be identified and mapped per Coastal Plan policy 9-1 page 120.

The proposed onshore pipeline and creation of the staging area will also require a coastal development permit from the County which is appealable to the Coastal Commission. Pipeline installation and wellhead connections offshore require a coastal development permit from the Coastal Commission.

VISUAL RESOURCES page 27,28

Revegetation of the onshore pipeline route along visible areas should be required as a mitigation measure. Will project construction occur at night? Are there any impacts on residents and visitors from night lighting and construction noise?

CONTINGENCY PLANNING AND EMERGENCY RESPONSE page 29

The emergency response procedures should be included as an appendix to this document. What is the effectiveness of these response procedures in dealing with potential emergencies during various weather and sea conditions?

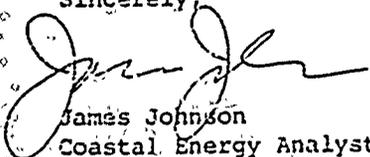
EFFECTS JUDGED NOT TO BE SIGNIFICANT page 30

What are the projected petroleum by products (NGL, LPG, sulphur) generated by the Molino Plant? What are the respective quantities? What are the cumulative impacts and numbers of such truck transportation from existing and proposed gas plants along the highway 101 corridor? What is the likelihood that a NGL/LPG pipeline will be constructed in the project vicinity to an appropriate market destination? Are those cumulative impacts significant and should an NGL/LPG be required as a mitigation measure?

Does the project propose any helicopter activity during construction? If so how can it be mitigated?

Thank you for the opportunity to provide comments on this document. Should you have any questions please call.

Sincerely,


James Johnson
Coastal Energy Analyst

cc: Mary Ann Scott
John Hallett

jj

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STATE LANDS COMMISSION

245 WEST BROADWAY, SUITE 425
LONG BEACH, CALIFORNIA 90802
TELEPHONE:



File Ref.: W 40442

December 31, 1984

James Johnson
Energy Division
California Coastal Commission
735 State Street
Santa Barbara, CA 93101

Dear James:

Thank you for your comments on the recent Initial Study (SCH# 84101008) on the SCPL Molino field gas well completion and flowline installation. Attached are responses to your comments. I hope these responses are of some use to you in your own review of the project.

I want to thank you for your courteous and cooperative attitude during this review. Please call me if I can be of help.

Very truly yours,

SUSAN R. LIVENICK
Associate Mineral
Resources Engineer

SRL:vn

Attachment

ADDED 01/30/85

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RESPONSE TO CALIFORNIA COASTAL COMMISSION COMMENTS

Oceanography/Water Quality

1. Basis and Justification for the conclusion of no significant effect on oceanographic parameters-

Response: Because the project facilities offshore will be located subsea, they are not susceptible to conditions of seastate which can affect some offshore operations, (platform operations for instance). Nor are there any effects or changes that the activity would cause to parameters such as tides, currents, or waves.

2. Does statement of no impact include consideration of proposed discharge of significant quantities of waste water into Molino Creek which drains into the ocean? How much wastewater will be discharged? Why were impacts determined to be minor?

Response: The discharge of wastewater from the Molino Gas Plant is to Canada de la Huerta, and is governed by an existing NPDES permit issued by the Regional Water Quality Control Board. The quantity of effluent discharged to the environment (which is limited to 50,000 gallons per day) and pollutant limits established for the discharge will not be exceeded by the proposed activity. The discharge permit establishes effluent limits which will protect water quality and meet regional goals. Thus no significant adverse impact from the discharge will occur.

As part of the recent NPDES permit renewal, the Regional Water Quality Control Board has required SCPI to cease discharging effluent to the Canada de la Huerta and to utilize an ocean outfall. SCPI is presently in the process of permitting two of the abandoned flowlines for use as outfalls. The Regional Board is reviewing operating parameters and dispersion characteristics of the proposed outfall to ensure that ocean plan water quality standards will be met. Effluent discharge will continue to be limited to 50,000 gallons per day.

3. Should an ocean discharge monitoring program be required as appropriate mitigation?

Response: The permit process for the outfall is being handled as a separate action, since such action would be required whether or not the proposed activity is permitted (ie. SCPI could produce gas from existing well #5). Any requirements for discharge monitoring will be established by the Regional Board as a result of their action to permit the outfall.

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Marine and Terrestrial Biology

1. Marine Setting: Kelp beds should be noted as an Environmentally Sensitive Habitat.

Response: The LCP does designate kelp beds as an environmentally sensitive habitat.

2. Has a biological survey of the pipeline alignment been conducted? Have the kelp beds been surveyed to determine the length, width, and density of the beds?

Response: Subsea surveys along the flowline alignment have been conducted by SCPI. A synopsis of the survey results concerning kelp is given in a 12-4-84 letter to SCPI from Westec Services, which is attached for your information. The bulk of the kelp occurs between 600 and 2500 feet from shore. Thus, the substantial portion of the kelp bed (macrocystis) will not be affected by excavation of flowlines through the shore zone.

3. Will blasting with explosives be required to create the pipeline trench? If so what are the effects on marine life including kelp?

Response: SCPI has evaluated the trenching area and believes that the pipeline trenching can be completed without the use of explosives.

4. What are the adverse effects of less than catastrophic events such as pipeline or wellhead leaks? Where and how many locations will the automatic and manual shutoff valves be installed? Are they adequate to mitigate adverse impacts?

Response: SCPI has a preventive maintenance program which makes pipeline or wellhead leaks highly unlikely. Automatic and manual shutoff valves are located throughout the system and will shut the system in for even the most minor shift in pressure. The resource is a sweet gas not a crude oil. Therefore, the only impact from a leak would be minor air quality impact from the fugitive release. However, it should be emphasized that the system will shut in for even minor leaks which makes an impact very temporary in nature and insignificant.

5. What are the construction vessel impacts on the ocean floor, kelp beds, and marine life? Is mitigation required?

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Response: SCPI will minimize any anchor scarring from construction vessels by limiting the number of vessel movements to three. Construction vessels will not anchor in the kelp beds and pipelines will be consolidated when pulled through the kelp beds to minimize long term impacts. The State Lands Commission will require SCPI to lower and raise the anchor with a vertical motion in order to minimize drag. After the construction, SCPI will survey the area for debris and scarring. SCPI will remove all debris from the project area. If the specific areas of anchor scar remain, which may create a problem for the fishing industry, SCPI will recontour the particular area.

Terrestrial Setting

1. What are the species of breeding birds and their significance? Are they rare or endangered? Specifically when is their breeding season?

Response: The specific species found in the area are listed in Appendix C of the Development Plan Application. As noted in that Appendix, none of the species are considered to be rare or endangered. The breeding season is variable, depending on weather conditions, in terms of both the overall season and the peak of the season. General patterns vary according to the Santa Barbara County Natural History Museum. It is estimated that the season would run roughly from May to July with a peak in the month of June in the project area.

2. What are the quantities and adverse impacts created by the sediment load from increased erosion? The riparian corridor along Molino Creek (Sp.) is identified as an ESH area. Mitigation 2 should exclude mechanized construction equipment and storage from the riparian area.

Response: There will be no increased erosion or sedimentation from the project. The avocado grove is not presently protected with a ground cover. Stability in the grove will be maintained by leaving the root systems in place. Other than the removal of one small willow tree in the Arroyo Hondo Creek there will be no vegetation removal that would lead to increased erosion. Further, the willow will be cut back to ground level to retain the rock system and allow regeneration to prevent erosion. As noted in the Development Plan, the only activity planned in the ESH area is the placement of roller supports to keep the pipe during its pull, off the creek bottom thereby reducing impact. Mechanized equipment and storage will be contained in the upper reaches of the staging area which maintains a 75 foot buffer from the ESH area. The one tree will be cut off in such a manner that it will re-sprout.

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Cultural Resources

1. What is the relative significance of SBA-1151? Will the planting of new trees and the removal of the decomposing roots have the potential to impact buried cultural resources? Is an archaeological monitoring program required during tree planting and removal?

Response: SBA-1151 is a site of significance to the Chumash Indians. However, it is not located within the project area and, as noted in the Initial Study, has been disturbed during the recent relocation of Highway 101.

There are no trees proposed for removal or planting. The avocado trees will be cut just above ground level and the root systems left in place. This will avoid any subsurface disturbance. No monitoring program is therefore necessary.

Socioeconomics

1. What and where are the existing ocean floor obstructions in the project vicinity?

Response: SCPI has removed the wellheads below the mud line on four of the five existing wells. This has been done in accord with Department of Oil and Gas Regulations. The fifth well is temporarily shut in but SCPI intends to bring it back on line in the future. The flow bundles for the four abandoned wells have been left in place and presently support various types of marine life. The fifth flow bundle is being used to bring production from the remaining well to shore.

2. Can these be mitigated to enhance the commercial fishing? What types of fishing occur in the area? What are the legal seasons?

Response: SCPI works closely with the fishing industry to avoid conflicts of use. The lease area is primarily used for lobsters, crabbing and halibut. The industry is used to the sub sea completions and should not be adversely impacted by the installation of the two new wells. The season closed for halibut fishing is March 14 to June 16; for crab, is July to November; and for lobster, is March 15 to October 15. State Lands will require that SCPI notify commercial fishermen, in a manner consistent with the geophysical notice procedure, of its activities on tide and submerged lands.

3. How much and what is the significance of recreational boating restrictions to be imposed by the Coast Guard during pipeline construction?

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Response: SCPI and its contractors will comply with all Coast Guard regulations regarding vessel warning system (lights) and notice to mariners procedures. These have served in the past to minimize any potential conflicts with recreational boating. Further, the procedure for pulling the pipelines is designed to reduce the time on site for construction equipment. Total construction time is 15 days per well, a significantly shorter period than the recently approved Phillips program on the adjoining lease.

Visual Resources

1. Revegetation of the onshore pipeline route along visible areas should be required as a mitigation measure. Will project construction occur at night? Are there any impacts on residents and visitors from night lighting and construction noise?

Response: SCPI intends to hydroseed the onshore pipeline right-of-way after construction is completed to accelerate the revegetation process.

Night construction will be required during the 15 day period needed to pull the pipeline into place. Lighting will be required on the beach and at the southern end to the staging area to allow the 900 foot sections to be welded together and to the skid (a one time beach weld).

The lighting will not be visible from the highway (either west or east bound lanes). There is only one resident in the project area, the ranch manager for the Hollister property. His house is screened from the staging area by dense vegetation in the Arroyo Hondo Creek bed. The structure is approximately 200 yards away from the location where the sections will be welded together which will mitigate the minimal noise of the operation.

Effects Judged Not to be Significant

1. What are the project petroleum by products generated by the Molino plant? What are the respective quantities?

Response: The proposed project involves the construction of flowlines; the processing of the gas has already been approved. The facility will generate 500-750 barrels per day of condensate products (i.e. propane, butane, and natural gasoline). These will be removed by four trucks per day. This is sweet gas resource; there will be no sulfur generated.

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SCPI is aware of the sensitivity of the County and State regarding the transportation of these products by truck. As such, SCPI would participate in the Chevron study assessing the feasibility of a pipeline to transport the product.

2. Does the project propose any helicopter activity during construction? If so, how can it be mitigated?

Response: There will be approximately four trips per day during construction. This is not considered to be a significant impact and therefore does not require mitigation.

Land Use and Coastal Policies

1. Coastal Plan Policies need to be listed and analyzed relative to the project.

Response: Additional Coastal Plan Policies relative to the activity have been analyzed in response to comments of the County of Santa Barbara. Analysis of these additional policies shows that the activity does not conflict with these policies. A copy of the responses to the County is attached for your information.

2. Recreational uses and revised attendance records for the State parks need to be included.

Response: Statistics for Gaviota State Park

Size: 2775 acres
Uses: 59 campsites, day use picnic, fishing pier, boat launch
Attendance: 200,000 persons during peak user months of June, July and August. Expansion of facilities is planned.

Statistics for Refugio State Beach

Size: 155 acres
Uses: 85 campsites, 48 picnic units, sanitation station, snack shop and parking for 100 cars.
Attendance: 203,000 visitors annually 1978-82. A 40 acre expansion is currently planned.

Statistics for El Capitan State Beach

Size: 133 acres
Uses: 147 campsites, 81 picnic units, 2.7 miles of trails, laundry, restroom and shower facilities, store, and utilities. Swimming, surfing, and fishing are popular uses.
Attendance: 307,000 visitors annually 1978-1982. A possible 200 acre expansion is planned.

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3. What is the size of the beach area at low and high tide?

The size of the beach at low and high tide has been estimated by SCPI to be approximately 0.9 acres at high tide and approximately 1.3 acres at low tide. The area included in that estimate is the useable portion of the beach from the railroad trestle south to the tide line and that portion located within the east and west embankments of the canyon. The canyon is about 260 feet wide at the beach and there is a distance of about 150 feet from the railroad trestle to the mean high tide line.

4. Rocky intertidal areas should be mapped as per Coastal Plan Policy 9-1.

Response: Rocky intertidal areas exist west of the Arroyo Hondo beach area. The State Lands Commission will require mapping of these areas, prior to construction, as a condition of project approval.

5. The proposed onshore pipelines and creation of the staging area require a Coastal Development Permit from the County of Santa Barbara. The pipeline installation and wellhead connections offshore require Coastal Development Permit from the Coastal Commission.

Response: Comment acknowledged

Contingency Planning and Emergency Response

1. Emergency response procedures should be included as an appendix to the Initial Study.

Response: Like much of the other pertinent information in the Initial Study, the emergency response procedures are lengthy and have been incorporated by reference. In addition to the emergency response procedures described in the SLC 1984 EIR, the Molino Gas Plant operates under an existing federal spill prevention control and countermeasure plan which was recently revised in November of 1982. This plan specifies procedures for safe operation of the gas plant and subsea wellheads and also identifies response procedures to be followed in the event of an emergency offshore or onshore. A copy of the plan has been submitted to the County of Santa Barbara and will be submitted to the Coastal commission if requested.

2. What is the effectiveness of these response procedures in dealing with potential emergencies during various weather and sea conditions?

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Response: Emergency response procedures currently in practice are considered very effective in dealing with emergencies. Subsea wellheads will have two control lines which can be manually activated from the Molino plant, or will automatically shut in the well should there be a loss in operating pressure resulting from a pipeline break, wellhead break, or other accident. Steps taken to insure adequate blowout prevention include frequent inspection and activation of emergency shut in systems, and 24-hour surveillance of well flow and pressure behavior. Furthermore, the resource being produced is sweet gas, not crude oil.

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Santa Barbara County

RESOURCE MANAGEMENT DEPARTMENT

Energy Division

9861 02 001

Director
Dianne Guzman, AICP

RECEIVED
STATE LANDS COMMISSION

January 25, 1985

Dwight Sanders
State Lands Commission
1807 13th Street
Sacramento, CA 95814

Dear Mr. Sanders,

Enclosed please find a proposed addendum to the Negative Declaration for Shell California Production, Inc.'s Proposed Well Completion and Flowline Installation Project. This addendum includes the State Lands Commission's responses to Santa Barbara County's comments on the Initial Study prepared for this project. We request that this information be included, as an addendum, to the certified Negative Declaration. With this addendum, we concur with the State Lands Commission finding that a Negative Declaration is appropriate for this project.

Sincerely,



Mary Ann Scott
Project Manager

MA:jas
2183e

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Addendum to Negative Declaration
Shell California Production, Inc.'s
Proposed Well Completion and Flowline Installation Project

I. Clarifications and Additions to Project Description

A. Design capacity

1. The Shell Molino gas plant, permitted by Santa Barbara County in 1963, has a design capacity of 43 mmcf although it has processed as much as 48 mmcf.

B. Onshore Flowline Alignment

1. SCPI had initially intended to use an existing 3-foot diameter culvert and had described that plan to the State Lands Commission. However, SCPI has changed its plans due to the recent re-construction of Highway 101. A new boring under the highway will be required because the existing culvert is no longer accessible.

C. Onshore Flowline Installation

1. The main construction corridor will be 25 to 30 feet wide. At two or three selected sites, it will be necessary to expand the work area to a width of approximately sixty feet to allow for pipe and equipment storage. The width of the main disturbance will be approximately fifteen feet, i.e. pipe trench and excavated backfill storage.
2. Personnel and equipment access to the beach is planned to be through an existing 12-foot wide culvert below State Highway 101. Access to the beach area will only be required during the pulling and final positioning of flowline work period which is estimated to be about six days per flowline bundle.
3. No blasting will occur either onshore or offshore during construction of the proposed pipelines.
4. Approximately 157,000 gallons of water will be needed for construction and hydrostatic testing of the pipelines. The water for hydrotesting the completed pipelines will be furnished from SCPI's water well at the Molino Gas Plant. The hydrostatic test water will be treated to remove settleable solids and oil and grease at the Molino Gas Plant by pumping it through a gravity separator. In the unlikely event that such treatment will not bring the water into compliance with the NPDES discharge permit, it will be shipped to the Casmlia waste disposal facility via tanker truck.

D. Personnel transportation and material requirements

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1. There will be approximately two helicopter trips per day during the offshore well completion.
2. Employee vehicles used during construction will park, to the maximum extent feasible, in the parking lot at the Molino gas plant. Additional parking will be near the staging area, adjacent to the ranch house and other areas as needed.
3. The facility will generate 500-750 barrels per day of condensate products (i.e. propane, butane, and natural gasoline). Four to six truck trips per day will be required to remove these materials.
4. The tires of all vehicles will be sprayed before they enter the construction staging area to prevent the contamination of the orchard by the fungus Phytophthora cinnamomi, which causes root rot in avocados. The treatment planned is to spray the tires with either a copper sulfate solution, ten percent chlorine solution, or ethyl alcohol. Spraying will be done in the pasture area before vehicles enter the orchard. Use of the ethyl alcohol solution is preferred since it is effective (according to the County Agricultural Commissioners office) and does not present a risk to wildlife should it drain into the creek.

E. Waste materials and emissions

1. Approximately 80 cubic yards of excess earth will be generated by the boring through Highway 101. No other earth material will be waste. Welding and pulling of pipe will generate little if any waste. The contractor selected to perform the flowline installation will be responsible for disposal of solid waste generated during project construction. The contractor will hire a commercial waste hauler to dispose of the waste. This construction activity will only generate Class II materials. The waste will be taken to a solid waste transfer station in Santa Barbara for eventual disposal in a Class II sanitary landfill such as the Tajiguas landfill. The contractor will be required to dispose of solid wastes in a manner that is consistent with County regulations.

II. Clarifications and Additions to Environmental setting, Impacts and Mitigations

A. Geotechnical-environmental impacts

1. The typical method for maintaining separation between topsoil and lower soil horizons during excavation is to produce two spoil piles along side the trench. The topsoil layer is removed first and placed on one side of the trench centerline. Then the lower horizons are

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removed and placed on the opposite side of the trench or on the same side in an adjacent pile. This technique is not feasible or necessary in all cases. The topsoil layer may not be thick enough to feasibly remove it with standard equipment. The technique will not be of any advantage during excavation through the recently reconstructed highway embankment, since this is recent fill with virtually no topsoil. The steep slope on the western end of the flowline presents technical difficulties in excavation, and trying to separate the soil will be difficult if not impossible to accomplish. A large portion of the pipeline alignment is under an existing dirt road (i.e. from the gas plant generally south and east to the steep slope) and thus, in the roadbed, the technique will not be advantageous. The vegetated part of the alignment south of the Highway is the prime candidate for separating and replacing the topsoil during excavation. This measure has been included as part of the preliminary landscape plan as a positive measure that could be implemented where practical. However, the precise locations for implementation are best left to the discretion of the landscape architect who will finalize and approve the landscape plan.

The soil and seed stabilizer envisioned is a plastic netting which is anchored onto the slope to hold seed and soil in place. Such plastic netting has recently proven slightly more effective than jute mats in aiding reestablishment of vegetation on graded slopes. It may also be less costly to use and maintain. With jute mats or the plastic netting, and with the sand bags, erosion potential on the steep slope should be adequately mitigated.

2. The onshore pipeline route up the ridge line has been selected because it is not vulnerable to land slides. In the 21 years that this pipeline route has been used, no sliding has occurred in this corridor. In the gully area immediately north, much thicker, unconsolidated soils and water from precipitation have collected, lubricating these soils and causing them to slide or slump. On the ridge, where neither thick soils nor water collects, this is not a problem. The geotechnical concern on the ridge line is erosion. SCPI has proposed extensive erosion control measures such as discussed above.

B. Oceanography/Water Quality

1. The discharge of wastewater from the Molino Gas Plant is to Canada de la Huerta, and is governed by an existing NPDES permit issued by the Regional Water Quality Control Board. The quantity of effluent discharged to the environment (which is limited to 50,000 gallons per day) and pollutant limits established for the discharge will not be

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exceeded by the proposed activity. The discharge permit establishes effluent limits which will protect water quality and meet regional goals. Thus no significant adverse impact from the discharge will occur.

As part of the recent NPDES permit renewal, the Regional Water Quality Control Board has required SCPI to cease discharging effluent to the Canada de la Huerta and to utilize an ocean outfall. SCPI is presently in the process of permitting two of the abandoned flowlines for use as outfalls. The Regional Board is reviewing operating parameters and dispersion characteristics of the proposed outfall to ensure that ocean plan water quality standards will be met. Effluent discharge will continue to be limited to 50,000 gallons per day.

C. Marine and Terrestrial Biology

1. No state or federal listed or proposed rare, threatened, or endangered species of wildlife are known to occur in the Arroyo Hondo riparian area. This conclusion is based on a review of literature, including the results of an Audubon field visit to Arroyo Hondo conducted in the Spring of 1984. It should be pointed out that the California Brown Pelican and the Peregrine Falcon are listed species which would fly by, but not utilize, the area.

A total of 13 species of plants considered to be rare and endangered or threatened by the California Native Plant Society were searched for throughout the activity area. None of these species were found. It is not likely that any of these species occur within the study area due to the disturbed nature of the area.

2. The vegetation on the beach side of Highway 101 is severely disturbed, having been impacted by highway construction, tidal debris, and highway litter. The existing vegetation includes Hottentotfig, Coyote bush and Arroyo willow. Under the railroad trestle, there is a single young Monterey cypress tree. The stream in Arroyo Hondo is contained within a concrete culvert south of the highway to beyond the point where the existing vegetation occurs. Overall, this community contains little that could be defined as representative of riparian habitat and the area is essentially void of riparian associated wildlife.
3. Disturbance of the riparian habitat in the extreme southern portion of the staging area will involve the removal of one willow tree which will be sawed off near ground level. Disturbance will also include temporary installation of mechanical pipeline rollers, construction noise and human presence.

4. South of the highway, the disturbance will include brush clearing between the highway embankment and the sandy beach along the alignment in preparation for excavation. This is a disturbed habitat and due to its location, minimal slope, and species composition it should reestablish itself within a season with minimal restoration effort. Restoration techniques for this area will include:

- Replacement of the top soil horizon.
- Disking of the surface layer of the backfill after compaction, and
- Replanting of any willow scrubs with cuttings from other willows in the area.

In addition, the small Monterey cypress tree in this area will be avoided. A portion of the beachside highway embankment will also be trenched for flowline installation. After backfilling, this area will be hand seeded with the similar assortment of grasses and forbs used recently by Caltrans and then raked.

5. Removal of the avocado trees in the orchard should not result in an erosion problem of any greater magnitude than currently exists since the orchard does not presently have any ground cover. The avocado trees are not effective at reducing erosion potential.
6. All disturbed areas will be revegetated. Revegetation plans include soil and seed stabilizer which is a plastic netting anchored onto the slope to hold seed and soil in place. Such plastic netting has recently proven slightly more effective than jute mats in aiding reestablishment of vegetation on graded slopes. It may also be less costly to use and maintain. With either jute mats or plastic netting, and the sand bag technique described, erosion potential on the steep slope should be adequately mitigated. The precise locations for the techniques will be determined by the landscape architect who will finalize and approve the landscape plan.

D. Cultural Resources

1. Cultural resources field work included a thorough walk over survey of: 1) the entire SCPI ownership in Carada de La Huerta, 2) the entire flowline alignment from gas plant to shore (except the boring), and 3) the Arroyo Hondo staging area and vicinity. The scatter of historic and prehistoric material that had been perviously noted in the southern portion of the orchard has been interpreted to have been deposited as a result of natural and manmade movement of soils during highway construction and orchard leveling. Because of the scatter of historic and prehistoric debris mentioned above, the existence of historic and prehistoric sites in the immediate area, and the fact the Arroyo Hondo Canyon floor is a prime location

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for a prehistoric encampment, there is a good possibility that a buried deposit exists under the staging area. This site(s) is estimated to be 9 feet deep.

2. The significance of the prehistoric and historic resources at the staging area has not been fully assessed. However, the proposed action will involve no excavation in the portion of the staging area suspected to contain a subsurface deposit. Since SCRI will use existing ROW's, which have been previously disturbed, it is unlikely that artifacts will be found.

E. Socioeconomics

1. A relatively small workforce is required to construct the proposed facilities: 20 to 25 persons for a 60-day period. This workforce alone is unlikely to have a significant impact on the socioeconomic factors of population growth, housing availability, employment or income in the local area of Santa Barbara County. However, if the construction should overlap with other major projects in the County (e.g. the Chevron project), this project could contribute to a significant cumulative socioeconomic impact. It is recommended as a mitigation measure that this project be subject to socioeconomic monitoring to document the source of the the workforce and purchase of materials.

F. Land Use of Coastal Policies

1. Consistency and adherence of all applicable Santa Barbara County policies is required of the proposed project. Additional Local Coastal Plan (LCP) policies which are applicable to this project include policies dealing with Environmentally Sensitive Habitats (e.g. LCP 2-11, 9-1, 9-32, 9-38, 9-40 and 9-41); recreation, particularly access (e.g. LCP 7-2, 7-3, 7-18); pipelines (e.g. LCP 3-2, 6-9, 6-14, 6-15, 6-16, 6-17, 6-18 and 6-19), and air quality (e.g. LCP 11-1). These policies are summarized in the following.

Policy 2-11: This policy requires regulation of development adjacent to Environmentally Sensitive Habitat Areas to protect these areas.

Policy 3-2: This policy requires designing shoreline construction so as to preclude adverse impacts on shoreline and supply and interference with lateral beach access. This policy applies to the landfall at Arroyo Hado.

Policy 6-9: This policy requires the preparation of an emergency response plan.

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- Policy 6-14: This policy regulates the placement of pipelines in the Coastal Zone. Surveys, revegetation, and restoration plans are required.
- Policy 6-15: This policy prohibits use of herbicides during pipeline construction and restricts the soderasty of soil.
- Policy 6-16: This policy requires that pipeline be sited and constructed in such a manner as to inhibit erosion.
- Policy 6-17: This policy states that pipelines should be sited to avoid important coastal resources.
- Policy 6-18: For pipelines passing through habitat areas, the segment shall be isolated by automatic shut-off valves.
- Policy 7-2: This policy mandates an easement to allow vertical access to the beach for any development between the first public road and the ocean.
- Policy 7-3: This policy mandates lateral easements along the base of the coastal bluffs.
- Policy 7-18: This policy state that expanded opportunities for access and recreation shall be provided along the gaviota coast and specifies Arroyo Hondo as an area where vertical access shall be acquired.
- Policy 9-1: This policy required (1) that the proposed project is in conformity with the stream corridor Environmentally Sensitive Habitat Area (ESHA) protection policies, and (2) that the development plan show the precise location of the ESHA.
- Policy 9-32: This policy requires that the pipeline be sited to avoid significant rocky points and intertidal areas.
- Policy 9-40: This policy states that if riparian plant species are removed, revegetation with local native plants is required.
- Policy 9-41: This policy required minimal construction and grading impacts in stream corridors.
- Policy 11-1: This policy states that the provision of the Air Quality Attainment Plan shall apply to the Coastal Zone.

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
24000 Avila Road
Laguna Niguel, California 92677

DATE	DEC 27 1984
DJE	
CPE	
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Enc.	
FILE:	07-25.1

W40442

December 17, 1984

Ms. Susan Livenick
California State Lands Commission
245 W. Broadway, Suite 425
Long Beach, California 90802

Re: Shell California Production Inc. - Molino Field Well and
Production - State Lease PRC-2920.1

Dear Ms. Livenick:

The Fish and Wildlife Service (FWS) provides the following comments in response to a Notice of Consultation/Preparation dated November 2, 1984 (NOC/P-11/2/84) and a recent telephone conversation (November 28, 1984) between Donald J. Everitts and this office's OCS Coordinator. We provide these comments in compliance with our public trust responsibilities and with provisions of the Fish and Wildlife Coordination Act (16 U.S.C. et seq.).

FWS would like to state that this office has neither received or commented on the two previous State Lands Commission certified EIRs referenced in the NOC/P-11/2/89 as SCH79101011 and SCH83110901. We would appreciate receiving copies in order to complete our files. We would also appreciate having copies of any additional OCS documents for the southern California coast sent to the above address to the attention of the OCS Coordinator, Mr. John Wolfe.

Recommendations

In order to avoid unnecessary impacts to fish and wildlife resources, we offer the following suggestions:

Water from a desalinization unit should be used as a hydrostatic testing fluid rather than groundwater from offshore or onshore formation waters. We understand that if hydrostatic testing fluid becomes contaminated it will be treated properly and discharged in compliance with provisions of NPDES permits and any stipulations from the San Luis Obispo Regional Water Quality Control Board.

The proposed use of the "pull barge" technique for pipelaying is preferred. However, it is not clear to us what the width of the construction area will be and what the associated impacts will be. If blasting occurs, and pipelines

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are buried through the surf zone and the surge zone in water depths to 15 fathoms, we recommend incorporation of these conditions:

1. In laying the pipeline, no trenching or blasting shall occur within 200 feet of any existing kelp bed or previously documented kelp habitat.
2. During pipeline installation, all assembly barges shall be anchored outside of any kelp beds with a buffer zone of twice the distance of anchor swing radii.
3. Prior to any detonation of charges, the area will be cleared of marine mammals and birds to the satisfaction of a California Department of Fish and Game (CDFG) observer. Special emphasis shall be given to the protection of listed Federal and State endangered species, including the California brown pelican, California least tern, and American peregrine falcon.
4. Each offshore detonation will be preceded by a small charge designed to frighten away fish from any nearshore and intertidal habitats in the blasting areas.
5. All onshore and offshore construction and staging areas will be clearly defined and restricted to minimal areas to avoid impacting kelp beds, riparian, and coastal sage scrub habitats. Offshore pipeline construction shall be restricted to a maximum of 50 feet in width, onshore pipeline construction to less than 30 feet, and onshore staging area to less than one acre in either avocado orchards or grazing lands.
6. Shell California Production, Inc. (SCPI) will notify FWS, CDFG, and National Marine Fisheries Service (NMFS), in writing, prior to commencement of any pipeline laying in shallow nearshore and intertidal waters.
7. SCPI will have pre- and post-construction surveys conducted by qualified marine biologists during the pipelaying construction phase offshore, and by a qualified wildlife biologist and botanist for the onshore pipeline construction. Reports will include photos and assessments of habitat values impacted by short-term, long-term, and cumulative effects of development, including an analysis of residual impacts noted in the NOC/P from the 1963 construction. SCPI shall incur the expenses associated with the hiring of qualified biologists and the preparation, distribution, and coordination of reports with FWS, CDFG, NMFS, and other concerned agencies.

Based on results of the post-construction survey, concerned agencies may establish that mitigation is required to offset losses of damaged terrestrial and aquatic resources. Any mitigation measures shall be developed and implemented in coordination with FWS, CDFG, and NMFS staffs and shall be at the expense of SCPI.

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8. Pipelines shall be designed and installed without any projections that will either snare or potentially damage sport and commercial fishing gear.
9. Loss of raptor roosting and/or nesting trees shall be replaced by erecting at least two nesting platforms and two roosting poles with perching crossbraces on an interim basis until replacement trees are of suitable size for raptor uses. Location of structures shall be determined after pre-construction surveys and onsite meetings with CDFG and FWS biologists.

We request that these stipulations be incorporated into any permit issued for this proposed project. We request a copy of any permits issued. If you have any questions concerning our comments, please contact John Wolfe or me at (714) 831-4270.

Sincerely yours,



Nancy M. Kaufman
Field Supervisor

cc: Shell California Production Inc., Anaheim CA
CDFG, Reg. 5, Long Beach, CA (Attn: K. Lal)
CDFG, MRR, Long Beach, CA (Attn: D. Nitsos)
CDFG, Goleta, CA (Attn: J. Davis)
NMFS, Terminal Island, CA (Attn: R. Hoffman)
CCC, Santa Barbara, CA (Attn: J. Johnson)
County of Santa Barbara, Energy Div., CA (Attn: S. Maves)

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3

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STATE LANDS COMMISSION

245 WEST BROADWAY, SUITE 425
LONG BEACH, CALIFORNIA 90802
TELEPHONE: (213) 590-5201



File Ref.: W 40442

January 25, 1985

Nancy Kaufman
Fish and Wildlife Service
Ecological Services
24000 Avila Road
Laguna Niguel, CA 92677

Dear Ms. Kaufman:

Thank you for your comments, dated December 17, 1984 and received December 27, 1984, on our Initial Study (SCH #84101008) on the completion of and installation of pipeline bundles from wells on the ocean floor of State Oil and Gas Lease PRC 2920 to the Molino Gas Processing Plant in Santa Barbara County. Unfortunately, because the public review period for the Initial Study closed on December 10, 1984, we must consider your comments as responding to the Negative Declaration rather than to the Initial Study.

The 1980 and 1984 EIRs were sent to FWS in Sacramento at the time they were published. We suggest that you request a transfer of these documents to your office. Alternately, we will be happy to reproduce copies of the document for you at your expense. The Laguna Niguel office has been added to our current CEQA mailing list.

You have suggested that water from a de-salinization unit be used for hydrostatic testing. As of this date, no adverse impact associated with SCPL's use of ground water for the testing program has been identified. The testing program is a limited, one-time event and extraction of ground water for the program is not expected to have any significant or long term effect on the water table.

You have asked about the width of the actual construction zone in the offshore. The "sled" will clear a path approximately seven feet wide, and any disturbance will occur within that seven foot wide swath.

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You have suggested a number of conditions which relate to blasting within the surf and surge zone. SCPI is laying the pipelines immediately adjacent to existing pipelines, and has recently surveyed the corridor. It appears that blasting will not be necessary and, thus, that conditions on blasting will not be necessary.

You have also suggested restrictions on other construction activities. Offshore, the construction corridor will be significantly less wide (seven feet) than the 50 foot width you have suggested. Onshore, certain technical considerations control the minimum areas required for the project. By and large, the onshore construction zone will lie within the 30 feet you have suggested; however the route crosses complex terrains and the use of sound engineering and construction techniques is of primary importance. In at least three areas, it will be necessary for SCPI to use a considerably wider corridor in order to turn equipment and to stack pipe. Finally, the project cannot be staged from a one acre site. SCPI proposes to conduct it's activities within the minimum practical area. All staging and construction activities will be conducted on previously disturbed lands. Where the pipeline must be pulled through a narrow area of riparian habitat, rollers will be used so that there is no physical contact with the habitat.

You have requested that SCPI contact FWS, NMFS and CDFG prior to commencement of activity in nearshore waters. The CDFG is the responsible State agency and SCPI is being conditioned to be required to work closely with CDFG on the project. We will inform SCPI that you have requested that FWS and NMFS be informed.

You have requested pre and post-construction surveys of both onshore and offshore pipeline routes, followed by extensive reports on impact to habitat. In this case, we have incorporated the measures requested by the CDFG into the project. These measures involve surveying of the kelp beds and, if necessary as determined by CDFG, replanting of the kelp beds. Extensive surveying of onshore habitat has already been conducted by SCPI and it's consultant and the project has been designed so that no sensitive habitat will be impacted. The County of Santa Barbara and the State Lands Commission, in approving the project, are requiring erosion control and re-vegetation measures on all disturbed areas. The County, additionally, will require post-construction monitoring under its LCP. All identified impacts to habitat will be mitigated by the requirements of the SLC, the County of Santa Barbara and the CDFG.

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You and other agencies have requested that subsea pipelines be designed and installed without projections. The engineering design of the pipelines does take this into account, and the subsea pipelines will be without obstruction.

Finally, you have requested measures to mitigate the loss of raptor roosting and nesting habitat. In fact, no raptor roosting or nesting habitat will be impacted by the project and these mitigation measures are unnecessary. Additionally, before construction can commence, CDFG must give approval that avian nesting will not be impacted.

Thank you for your participating in the public review process. Please contact Susan Livenick at (213) 590-5201 or Dwight Sanders at (916) 322-7827 if you have further comments.

Very truly yours,

SUSAN R. LIVENICK
Associate Mineral
Resources Engineer

SRL:vn

cc: Jim Ragland, SCPI

ADDED 01/30/85

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ATTACHMENT 2

COMMENTS TO NEGATIVE DECLARATION
AND RESPONSES

DEPARTMENT OF FISH AND GAME
CALIFORNIA COASTAL COMMISSION
CITY OF SANTA BARBARA
DEPARTMENT OF CONSERVATION

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OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO, CA 95814

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January 28, 1985

Dwight E. Sanders
State Lands Commission
1807 13th Street
Sacramento, CA. 95814

Subject: Well Completion and Construction of Flowlines to Gas Plant
SCH #84101008

Dear Mr. Sanders:

The State Clearinghouse submitted the above named proposed Negative Declaration to select state agencies for review. The review period is closed and the comments of the individual agency(ies) is(are) attached. If you would like to discuss the concerns and recommendations in their comments, please contact the staff from the appropriate agency(ies).

You may formally respond to the commenting agency(ies) by writing to them, including the State Clearinghouse number on all such correspondence. You should attempt to resolve any concerns of the state agencies before taking further action on the project. Once you have responded to the comments, state review of your draft environmental document will be complete.

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources as well as with the County Clerk. Please contact Mark Boehme at (916) 445-0613 if you have any questions about the environmental review process.

Sincerely,

John B. Ohanian
Chief Deputy Directorcc: Resources Agency
Attachment

ADDED 01/30/85

CALENDAR PAGE	241.31
ANSWER PAGE	538

Memorandum

Date : January 22, 1985

To : 1. Projects Coordinator
Resources Agency

2. State Lands Commission
1807 - 13th Street
Sacramento, California 95814
Attn: Dwight E. Sanders, Chief
Division of Research and Planning

From : Department of Fish and Game

Subject: Proposed Negative Declaration for Shell California Production, Inc.'s Proposed Well Completion and Flowline Installation Project, State Oil and Gas Lease PRC 2920, Molino Area, Santa Barbara County. SCH 84101008

The Department has reviewed the document for the completion of two previously approved wells, and installation of offshore and onshore flowlines to transport produced gas from the well sites to an upgraded onshore processing plant. The document provides mitigation measures which will be adopted by the Commission to either mitigate or eliminate potential project impacts to marine and terrestrial resources. These measures as proposed will, for the most part, provide mitigation for potential project impacts. The discussion sections on page three of the proposed Negative Declaration pertaining to Marine Biology should be modified to clarify the intent of the mitigation measure.

Therefore, we recommend that the first sentence of the first Paragraph under the Discussion section on page three be modified as follows, "... recommend that SCPI revegetate disturbed kelp".

This would clarify the discussion section to state that SCPI and not the Department will be responsible for kelp bed revegetation.

With this modification, we would have no objection to the adoption of a Negative Declaration for the proposed project.

Should you have any questions regarding our comments and recommendation please contact Rolf Mall, Environmental Services Supervisor, Marine Resources Region, 245 West Broadway, Suite 350, Long Beach, California 90802. The phone number is ATSS 8-635-5155 or (213) 590-5155.

Jack C. Farnell
for Jack C. Farnell
Director

ADDED 01/30/85

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State of California - Governor's Office

to U-1687

1311 Broadway
San Francisco, California 94109
(415) 774-0333

Page 1
January 15, 1985

Dwight E. Sanders, Chief
Division of Research and Planning
State Lands Commission
1807 13th Street
Sacramento, CA 95811

RE: Comments on Proposed Negative Declaration Shell Molino Flowlines, Santa Barbara County

Dear Mr. Sanders:

Thank you for your staff's December 31, 1984 response to our comments on your initial study (SCL-841011000) for the Shell California Production Inc. Molino gas well completion and flowline installation. Those comments will be very useful during our review of the project.

We request that you incorporate the information contained in your response to our comments in the appropriate locations of your proposed negative declaration such as the project description, impact analysis, proposed mitigation measures, and marine and coastal policy sections. In addition we would like to reiterate our request that referenced sections of the previous EIR should be listed as an appendix to the document and a listing of relevant Santa Barbara County Coastal Plan policies with a brief analysis should be included in the document. We believe that with the inclusion of this information, and your response to the other issues raised by the County of Santa Barbara, your proposed negative declaration can be certified as an accurate and complete environmental document.

Thank you for the opportunity to provide comments on this document and the cooperation extended by your staff. Should you have any questions please call either myself or James Johnson in our Santa Barbara office at (805) 963-6971.

Sincerely,

Joe Nicholson, Acting Manager
Energy & Coastal Resources Division

cc: Susan Livenick
Mary Ann Scott
John Hallett

ADDED 01/30/85



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CITY OF SANTA BARBARA

COMMUNITY DEVELOPMENT DEPT
Redevelopment • Environmental Review
Planning • Zoning • Building • Housing



1235 CHAPALA STREET
P.O. DRAWER P-P
SANTA BARBARA, CA 93102
(805) 963-1663

FILED
JAN 30 1985

January 24, 1985

Dwight D. Sanders
State Lands Commission
1807 13th Street
Sacramento, CA 95814

RE: Proposed Negative Declaration #378, Shell/Molino Well Completion,
Santa Barbara County

Dear Mr. Sanders:

I have reviewed the proposed Negative Declaration (ND) and submit the following comments:

1. It is my understanding that several substantive comments on the Initial Study were submitted by Santa Barbara County, the Coastal Commission and the Department of Fish and Game. It appears that none of the comments were incorporated into the ND even though specific environmental issues were addressed. These should be addressed in the Final ND. As Lead Agency, the Commission is required to do this so that Responsible Agencies have an adequate document for their purposes.
2. It is unclear why the text of the ND lists "mitigations" under several subject areas when no potential significant impacts were identified. There also appears to be no connection between the potential effects listed in the environmental checklist and the discussion of mitigations.
3. There is no discussion of the environmental effects associated with the actual processing of gas at the plant. Since the plant's operation is a function of the proposed wellheads and flow lines then the ND needs to address any applicable consequences.
4. Page 15 states that all environmental effects associated with wellhead completion and flow line construction were assessed in the SLC 1980 EIR.

ADDED 01/30/85

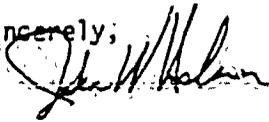
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Dwight D. Sanders
January 24, 1985 Page 2

Have all mitigations adopted by the Commission and Responsible agencies been incorporated into this ND? If they have not, then there would appear to be some outstanding environmental issues that need to be addressed.

My concern for the adequacy of this ND lies in the fact that it will be the environmental document used by both the County and the Coastal Commission. There seems to be some deficiencies in the document that need correction before the project can proceed. Thank you for the opportunity to comment.

Sincerely,



John W. Helmer
Coastal Energy Specialist

cc: Santa Barbara County
Coastal Commission

ADDED 01/30/85

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OFFICE OF PLANNING AND RESEARCH

100 TENTH STREET
SACRAMENTO, CA 95814



(916/445-0613)

5861-03
U.S. MAIL
JAN 30 1985

January 29, 1985

Dwight E. Sanders
State Lands Commission
1807 13th Street
Sacramento, CA. 95814

Subject: Well Completion and Construction of Flowlines to Gas Plant
SCH # 84101008

Dear Mr. Sanders:

The enclosed comments on your draft environmental documents were received by the State Clearinghouse after the end of the state review period. We are forwarding these comments to you because they provide information or raise issues which may assist you in project review.

To ensure the adequacy of the final document you may wish to incorporate these additional comments into the preparation of your final environmental document.

Sincerely,

John B. Ohanian
Chief Deputy Director

enclosure

cc: Resources Agency

ADDED 01/30/85

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12-11-85

THE CALIFORNIA DEPARTMENT OF CONSERVATION

Dwight E. Sanders
State Lands Commission
1207 13th Street
Sacramento, California 95816

Date: January 29 1985

Subject: SOG 84101013

RECEIVED
JAN 29 1985

OFFICE OF PLANNING, RESEARCH
& RESEARCH

Department of Conservation—Office of the Director
(916) 227-2097

The Department of Conservation's Division of Oil and Gas has reviewed the proposed Negative Declaration for Shell California Production, Inc.'s proposed Well Completion and Plugging Installation Project. The following comments are offered for your consideration:

Within our area of responsibility, the Department agrees with the finding of the State Lands Commission that this project does not have the potential to cause significant adverse environmental impacts provided the operator complies with the Division's regulations.

The following is to inform you of primary responsibilities of the Division of Oil and Gas with respect to this project.

The Division of Oil and Gas is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and abandonment of wells for the purpose of preventing (1) damage to life, health, property, and natural resources; (2) damage to underground and surface water suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable programs for the purpose of increasing the ultimate recovery of oil and gas.

The scope and content of information that is germane to the Division's responsibility are contained in Sections 3000 et seq. of the PRC and administrative regulations under Title 14, Chapter 4 of the California Administrative Code.

Written approval from the State Oil and Gas Supervisor is required prior to drilling, reworking, injecting into, plugging, or abandoning any well. The operator's notice of intent to perform any well operation is reviewed on an engineering and geological basis.

ADDED 01/30/85

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The Division must be notified to witness or inspect all operations specified in the approval of any notice. This includes tests and inspections of blowout-prevention equipment, reservoir and freshwater protection measures, and well-plugging operations.

In addition to filing a notice to drill a new well, the operator must have a bond on file with the Division before drilling is allowed to begin. The purpose of the bond is to secure the State against any expenses that the State may incur in obtaining operator compliance with applicable laws, regulations, and orders of the State Oil and Gas Supervisor.

If you have any questions, please contact Ken Henderson at the Division of Oil and Gas district office in Santa Maria. The address is 301 W. Church Street, P.O. Box 227, Santa Maria 93454; phone (805) 925-2685.

Diane E. Shell
Deputy Director

cc: Ken Henderson, Division of Oil and Gas, Santa Maria
Bob Reid, Division of Oil and Gas, Sacramento

ADDED 01/30/85

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545

RESPONSE TO DEPARTMENT OF FISH AND GAME

It is the intent of the mitigation measure regarding the project's impacts on kelp to require SCPI to revegetate the impact area. This responsibility is not assigned to the California Department of Fish and Game.

RESPONSE TO CALIFORNIA COASTAL COMMISSION

By this attachment your comments are made part of the Negative Declaration for SCPI Flowline Installation (SCH No. 84101008). We do not believe, however, that the physical attachment of the cited EIR sections to the Negative Declaration is necessary for two reasons: (1) the appropriate sections are incorporated by reference as provided by law and the EIR Guidelines; and (2) the cited documents were widely distributed and are readily available to public agencies and interested parties via area libraries. Finally, please note the material from the County of Santa Barbara in Attachment 1 regarding Coastal Plan policies.

RESPONSE TO CITY OF SANTA BARBARA

- (1) You are correct in that Santa Barbara County, the Coastal Commission and the Department of Fish and Game submitted comments on the Initial Study. The staff of the State Lands Commission responded specifically to each of the comments by letters dated December 28, 1984, December 31, 1984 and December 31, 1984, respectively. As you have stated, specific environmental issues (from received comments) were addressed. All comments to the Initial Study and their responses, as well as all comments to the ND and their responses, are Attachments 1 and 2 to the proposed ND to be considered by the Commission.
- (2) As stated on page 2 of the proposed Negative Declaration:

"This proposed negative declaration references: (1) in terms of the Initial Study, only those potential environmental impacts which may occur as a result of or during the conduct of the well completion or flow line installation activities as proposed by the applicant; and (2) mitigation measures incorporated into the proposed project to avoid potentially significant effects." (emphasis added)

See also Section 15070(b)(1) of the State EIR Guidelines for further clarification.

The checklist is but one part of the Initial Study; see also (1) above quoted.

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- (3) The gas plant is currently under permit to the County of Santa Barbara and the processing of the gas from this proposed project will be covered within the parameters of the existing permit. See page 17 of the Initial Study.
- (4) Again, please refer to number (2) above. If all potentially significant effects had not been "mitigated" by changes in the proposed project, the Commission could not make the proposed finding: "determine that the project, as revised and approved, will not have a significant effect on the environment."

RESPONSE TO DEPARTMENT OF CONSERVATION

Comment acknowledged.

ADDED 01/30/85

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Memorandum

Department of Fish and Game
245 W. Broadway, Suite
Long Beach, CA 90802
ATTN: John L. Baxter

Date : December 31, 1984

File No.: W 40442

STATE LANDS COMMISSION
245 West Broadway, Suite 425 - Long Beach, CA 90802

Telephone: ATSS

Response to Comments

Subject: Notice of Consultation/Preparation for Well Completion,
Installation of Flowlines and Production of Gas, Shell
California Production, Inc. P.R.C. 2920.1, Santa Barbara County.
W 40442, SCH# 84101008

Thank you for your recent comments on the above-referred project. You have requested that the project be mitigated to include measures to protect marine and terrestrial habitats. Commission staff has incorporated your recommendations, as mitigative measures, into the project and will condition approval of the project on meeting your concerns.

Specifically, you have requested pre- and post-construction surveys of the kelp areas to determine kelp density and kelp loss. In addition, if kelp loss is significant, you have requested a survey two years after construction to evaluate kelp recovery and, if needed, revegetation following that survey.

Because SCPI has recently (summer '84) completed a survey of the kelp bed, we are not requiring a additional pre-construction survey. However, all the post-construction activities you have recommended have been incorporated into the project.

Additionally, you have requested replanting of disturbed riparian habitat, seasonal restriction on activity within the Arroyo Hondo Creek bed and notification of the Department pursuant to Fish and Game Code 1603. All these have been incorporated into the proposed project.

Thank you for your interest in the project.

Susan R. Livenick
SUSAN R. LIVENICK
Associate Mineral
Resources Engineer

SRL:cg

ADDED 01/30/85

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