

**MINUTE ITEM**  
This Calendar Item No. 1  
was approved as Minute Item  
No. 1 by the State Lands  
Commission by a vote of 3  
to 0 at its 3/10/87  
meeting.

MINUTE ITEM

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03/10/87  
W 30026  
Staff

Consideration of Certification of Final EIR/EIS For  
The Coal Oil Point Project, State Oil and Gas Leases  
PRC 208, 308, 309, 3120 and 3242

The following people provided testimony:

Honorable Sheila Lodge  
Mayor of Santa Barbara

Supervisor William Wallace  
Chairman, Board of Supervisors

Honorable Jack O'Connell  
Member of the Assembly

Naomi Schwartz  
Office of Senator Gary Hart

Daniel G. Aldrich, Jr.  
Chancellor, University of California

Dee Heckman  
Isla Vista Community Council

M. V. Scherb  
Rick Management Consultant

Steve Musick  
Local Resident

Prentice Patterson  
ARCO Oil & Gas Company

Teresa Johnson  
Local Resident

Douglas Yates  
Student, UC Santa Barbara

Tatiana Michalenko  
Local Resident

Michael Phinney  
Local Resident

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Scott Day  
Local Resident

Mary Ann Slutsky  
Deputy County Counsel

James F. Case  
Professor, UC Santa Barbara

Richard Zimmier-Faust  
Professor, UC Santa Barbara

Raymond Sawyer  
Professor, UC Santa Barbara

Galen Stucky  
Professor, UC Santa Barbara

Carolyn Leavens  
California Women in Agriculture

Richard Ranger  
ARCO Oil and Gas Company

Thalia Gelus  
ARCO Oil and Gas Company

W. W. Hewston  
CEO, Measurement and Control  
Engineering Co.

Ruth Soadi  
League of Women Voters

Robert Sollen  
Sierra Club

Tracy Costello  
Local Resident

Helen Conway  
Local Resident

\*Robert Klawsner  
Citizens Planning Association

C. B. Anderson  
President, Isla Vista Association

Scott Gordon  
California Public Interest  
Research Group

Janice Keller  
Get Oil Out, Inc.

Robert Serrano  
Local Resident

Erin Lendrihas  
Local Resident

Paul Lee  
Local Resident

Peter Muennig  
Student, UC Santa Barbara

William Pennings  
Student, UC Santa Barbara

Emilio Pozzi  
Student, UC Santa Barbara

Kimberly Coy  
Local Resident

Mark Alling  
Student, UC Santa Barbara

Chris Gallery  
Local Resident

Andrew Bernal  
Local Resident

Dan Zumwinkle  
Student, UC Santa Barbara

Michael Boyd  
Isla Vista Recreation & Park District

Bobbie Rich  
Local Resident

Clement Shute  
Chambers Group, Inc.

Upon motion made by Commission-Alternate Ordway, the Commission unanimously agreed that if the EIR/EIS is certified it would contain the Environmentally Preferred Alternative. Provided however, that on the basis of evidence contained in the record, this alternative does not reflect a project configuration that the Commission is prepared to adopt as the basis for any potential project approval.

Commissioner Gray Davis made a motion to have the meeting at which the Commission will act on the project in Santa Barbara. Motion was defeated by a vote of 2-1.

Upon motion made by Commission-Alternate Ordway and seconded by Commissioner Davis, the Commission unanimously certified the Final EIR/EIS for the Arco Coal Oil Point Project, with the understanding that staff is directed to develop a preliminary study of a method by which the Commission could undertake a comprehensive study regarding future offshore development in State and federal waters.

Attachment: Calendar Item 1.

MARCH 10, 1987  
FILE REF.: W 30026  
STAFF

CALENDAR ITEM

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CONSIDERATION OF  
CERTIFICATION OF FINAL EIR/EIS  
FOR THE COAL OIL POINT PROJECT  
STATE OIL AND GAS LEASES PRC'S 208, 308, 309, 3120 AND 3342

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CALENDAR ITEM 1

CONSIDERATION OF  
CERTIFICATION OF FINAL EIR/EIS  
FOR THE COAL OIL POINT PROJECT  
STATE OIL AND GAS LEASES PRC'S 208, 308, 309, 3120 AND 3242

ARCO Oil and Gas Company (ARCO) has submitted a preliminary development plan for the resumption of development drilling on State oil and gas leases PRC's 208, 308, 309, 3120, and 3242. ARCO is the operator of PRC's 3120 and 3242 under the terms of its agreements with its co-lessee, Mobil Oil and Gas Company.

ARCO seeks the Commission's approval of the placement of additional platforms, pipelines, and other facilities to develop the oil and gas fields contained in its Coal Oil Point Project.

The Commission's meeting on March 10, 1987, is solely for the purpose of deciding whether or not the EIR/EIS for Coal Oil Point should be certified. The material included in this calendar item is limited to a discussion of environmental impacts and suggested mitigation measures which are contained in the final EIR/EIS.

CERTIFICATION PROCESS

According to the California Environmental Quality Act (CEQA), certification of a final EIR/EIS is a separate and distinct action taken by the designated Lead Agency prior to consideration of the specific elements of a proposed project which is subject to the provisions of the Act.

Based upon an agreement between the California State Lands Commission (Commission), the County of Santa Barbara (County), and the U.S. Army Corps of Engineers (Corps), the Commission has been designated Lead Agency for ARCO's Coal Oil Point Project. A copy of the formal Memorandum of Understanding between these agencies is attached as EXHIBIT A. As specified in Section 15090 of the CEQA Guidelines, the Commission, acting as Lead Agency, must certify that:

- "a) The final EIR has been completed in compliance with CEQA; and

- b) The final EIR was presented to the decision-making body of the Lead Agency and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project."

### Procedural Adequacy

The Commission has followed the procedural requirements established by CEQA throughout the production of the EIR/EIS for the Coal Oil Point Project. With respect to other agency involvement, the Commission has actively engaged the various responsible and trustee agencies in the preparation of the EIR/EIS document as well as providing them with an opportunity to review and comment on all drafts throughout the process.

The Joint Review Panel (JRP) consisting of the Commission, the County and the U.S. Army Corps of Engineers (Corps), which supervised the preparation of the EIR/EIS document, was assisted in their work by a special task force of State agencies including the University of California at Santa Barbara (UCSB), the California Coastal Commission, the Department of Fish and Game, the Air Resources Board (ARB), the Department of Parks and Recreation, and the Regional Water Quality Control Board, among others.

The University of California at Santa Barbara played an especially active role on the task force by having representatives attend a majority of the JRP's meetings and reviewing all of the documents prepared during the development of the EIR/EIS.

ARCO's original application for development of the Coal Oil Point Oil Field was deemed complete on May 24, 1984. The contractor, the Chambers Group Inc., was selected by the JRP consisting at that time of the Commission and Santa Barbara County. The contract was awarded on July 9, 1984. The consultant had prepared an administrative Draft EIR for review by the State Lands Commission, County of Santa Barbara, and other interested advisory agencies when ARCO withdrew its application in March of 1985.

ARCO's application for development at Coal Oil Point was resubmitted in September of 1985 and included an additional platform complex (Haven) to develop reserves which had been discovered in the Embarcadero Field. The new ARCO application was deemed complete on December 20, 1985.

At that time, the Corps determined that an Environmental Impact Statement (EIS) was required under the National Environmental Policy Act (NEPA) for the permits it would issue. The Joint Review Agreement was amended to include the Corps as a member of the JRP and to make the document an EIR/EIS.

The draft EIR/EIS was released to the public on September 17, 1986 for a 45 day review period as required by CEQA. Over 400 copies of the draft EIR/EIS were mailed to potential commentors. The official review period ended on November 1, 1986.

To ensure the public had sufficient opportunity to comment on the environmental document, the JRP held public hearings in Ventura County on October 21, 1986 and in Santa Barbara on October 24, 1986.

The final EIR/EIS was made available to the public on January 13, 1987. The final document incorporated over 2,300 comments received from various interested agencies and the public. Copies of this finalizing addendum were sent to all the individuals and government agencies that commented on the draft EIR/EIS and to anyone who requested a copy. Copies were also made available to the public through the UCSB library, Santa Barbara County Library and Santa Barbara County offices among others.

Although CEQA does not require any public review or commenting period on the final EIR/EIS before Commission review and certification, the Commission's regulations require that the final EIR/EIS be made available for public review and comment at least fifteen (15) days before the Commission certifies the final EIR (2 Cal. Admin. Code Section 2906).

In order to provide local residents with additional opportunities to present their opinions on the project, the Commission sought and received a 90 day extension from ARCO to complete the environmental process as provided by Section 21100.2 of the Public Resources Code. Subsequently, two additional hearings were held in Santa Barbara, one on January 13, 1987 to receive public comments on the project and one on January 28, 1987 to receive comments on the final EIR/EIS.

### Analytical Adequacy

The EIR/EIS is a comprehensive analysis of a complex project and alternatives thereto. The project and major alternatives discussed in the document are described in EXHIBIT B.

Section 15121 of the CEQA Guidelines state in part:

"a) An EIR is an informational document which will inform public agency decision-makers and the public generally of the ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which shall be presented to the agency."

Specific standards for the adequacy of an EIR are contained in Section 15151 of the CEQA Guidelines:

"An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

The EIR/EIS prepared for the Coal Oil Point Project is a comprehensive analysis of a complex project which includes a wide variety of project alternatives. It represents almost three years of work and an expenditure of nearly \$4.7 million. The document has been subjected to substantive review by the JRP, the State and Federal agency task force and the public. While the County of Santa Barbara was a party to the JRP, and the UCSB was a task force member active in JRP meetings, they have also made individual comments on the draft EIR/EIS and at the Commission's public hearings.

### CRITICAL ENVIRONMENTAL ISSUES

The EIR/EIS identified potentially significant environmental impacts which would result from the proposed project and alternatives thereto. EXHIBIT C contains a listing of these impacts for the applicant's proposed project:

Class I, significant impacts not mitigable to insignificant levels; and Class II, significant impacts that can be mitigated to insignificant levels. A detailed comparison of the proposed project and alternatives is located on pages S-17 through S-51 of the finalizing addendum to the EIR/EIS.

Based on public comments, both written and at public hearings, the following impacts appear to represent the critical environmental issues of greatest concern. These impacts are discussed in the EIR/EIS in detail. Detailed responses to the comments received at the January 28, public hearing on the final EIR/EIS are contained in EXHIBIT D.

#### A. Systems Safety and Reliability

The EIR/EIS provides a full analysis of the potential accidents associated with the operation of the proposed Coal Oil Point Project, both offshore and onshore. The document presumes that in the event of explosion, fire or release of toxic gas, whether occurring onshore or offshore, there would be potential injury or death to persons within the hazard footprint. The discussion addresses the public concerns raised during the hearing process and focuses specifically on the accidents associated with proposed Platform Heron.

The following categories of accidents were included in the EIR/EIS's analysis:

##### o Fire and explosions at the platform

Fire and explosions at the platform would create hazard footprints around the platforms. These hazard footprints for blast overpressure, flying debris and radiant heat are 300 feet, 1,500 feet and 800 feet respectively from the platform. The EIR/EIS finds that any person within the identified hazard footprints would suffer possible injury or death. However, since the platform is approximately 12,000 feet from the nearest onshore point, the EIR/EIS found that no injuries or death would occur to onshore areas including Isla Vista.

##### o Fire and explosions at Ellwood

Fire and explosions at the Ellwood processing plant would create hazard footprints around the plant. these hazard footprints for blast

overpressure, flying debris and radiant heat are 300 feet, 1,500 feet and 800 feet respectively from the plant. The EIR/EIS finds that any person within the identified hazard footprint would suffer possible injury or death.

o **Release of toxic gas**

From the Platform:

Any release of gas containing toxic hydrogen sulfide or SO<sub>2</sub> from the platform would create a hazard footprint extending 5,280 feet. Lethal concentrations of H<sub>2</sub>S could occur at the platform. However, the lethal effects of this release from the platform would not extend to shore. This estimate is based on very conservative assumptions, specifically that gas containing 3% hydrogen sulfide would be released even though gas containing only 2% hydrogen sulfide is expected to be produced.

From Ellwood:

A release of toxic concentrations of gas from an accident at the Ellwood Oil Processing facility was also addressed. A worst case accident at this facility would expose persons within 1,100 feet of the facility to concentrations of H<sub>2</sub>S of 300 ppm or to 100 ppm of SO<sub>2</sub> at 790 feet from the facility neither of which is a lethal dose. Neither of these worst case accidents at the Ellwood facility would affect Isla Vista. However, the hazard footprint includes portions of Highway 101, the access road to the proposed Hyatt Hotel, and portions of the Sandpiper Golf Course.

The EIR/EIS discusses the need for and components of contingency plans for such facilities. Such plans address emergency response, equipment shutdown, fire control, platform evacuation and notification among other subjects.

o **Ship collisions with platforms**

The EIR/EIS examines ship collisions with platform accidents and well blowouts. These accidents have the potential to cause major oil spills that may reach shore. Although these spills will create significant biological and

recreational impacts, there will be no significant impacts to humans, other than those directly involved in the accident.

#### o Oil spills

The EIR/EIS examines the potential for offshore oil spills and the possible results. Significant environmental damage can result from an oil spill if it is not contained and controlled quickly. Oil spills in themselves though are not a major risk to public safety.

The EIR/EIS concludes that a major oil spill or other systems safety failure would result in significant impacts to streams and surface waters, marine water quality and marine habitats, sensitive vegetation communities, aquatic habitat areas, birds and other wildlife, beaches, the Los Padres National Forest, and other recreational and tourist areas, mariculture and other commercial fishing activities, and UCSB research activities offshore, onshore, and in the Marine Sciences laboratories. Mitigation of these impacts is very limited. Even with the mitigation discussed in the EIR/EIS (oil spill contingency plan, oil spill drills, etc.), the potential of oil spills remains a Class I impact.

#### B. Location of Platform Heron

Many concerns were expressed about the location of Platform Heron. The environmental issues addressed in the EIR/EIS and raised in the hearing were:

- (1) the visual impacts caused by the platform;
- (2) the impacts on the hard bottom marine habitat;
- (3) noise from platform construction and operation;
- and (4) tourism and recreation.

##### 1. Visual

The EIR/EIS identifies the visual impacts of Platform Heron as well as the other proposed platforms. The impact is assessed as significant and unmitigable since it is a major change in the view offshore. Any development offshore will substantially alter the present visual character of the area. As noted in the EIR/EIS, the proposed change to single

platforms instead of two-platform complexes will diminish the impacts, but not reduce the impact to insignificance.

2. Hardbottom Marine Habitat

The EIR/EIS identifies the location of platform Heron as a significant environmental habitat. The proposed platform location is in a "softbottom" and cobble area surrounded by significant rocky features. Scattered rocks in a soft matrix continue to the west for approximately 4000 feet and to the east as far as the boundary of the Oil and Gas Sanctuary. This habitat type is significant and not common in the offshore areas of the Santa Barbara Channel. It provides significant habitat for many marine organisms including commercial species.

The EIR/EIS discusses activities which would affect this habitat. They include platform installation; pipeline installation; drilling discharges; and structural effects of the platform.

3. Noise

The EIR/EIS addresses in detail the issue of noise which would result from construction activities and daily operations on the platforms. Although the subsequent discussion is generally applicable to impacts from all of the platforms, emphasis is placed on the analyses which focused on impacts to UCSB, Isla Vista, and the nearby urban areas.

Noise levels are commonly measured in decibels (db). In order to better understand the impacts discussed in this material, the following list of common noise levels is given to place the discussion of sound measurements in perspective:

<u>Activity</u>	<u>Noise Level</u>
Whispers	30 dB (A)
Quiet Office	40 dB (A)
Average Conversation at 3 feet	65 dB (A)
Noisy Stenographic Room	73 dB (A)
Train passing at 50 feet	90 dB (A)

Noise associated with platform installation will cause adverse impacts at the shoreline. The piledriver used to drive the piles to anchor Platform Heron will, for example, produce a metal to metal clanking sound of approximately 50 dB (A) at the shoreline. This will increase noise levels by approximately 7 dB (A) above the existing background level which is 43 dB (A) during the quietest conditions. This impact is reported as significant and unmitigatable in the EIR/EIS. Other anticipated noises during platform construction are expected to raise the lowest background noise level at the shoreline by no more than 3 dB (A).

Construction of the oil processing facility at Ellwood and onshore pipelines will also cause significant noise impacts. Noise generated during construction of the Ellwood facility will raise levels to 73 dB (A) at the Sandpiper golf course. Onshore pipeline construction will raise noise levels to 87 dB(A) at the same location and offshore pipeline construction will raise noise levels to 70 dB(A).

Operation of the platforms will also cause noise to be heard at the shoreline. This will occur particularly during drilling operations. The noise impact will result from the metal to metal clanking of equipment. Noise levels from this activity will be about 50 dB(A), 7 above the lowest background level. Noise from flaring, approximately 63dB(A), at the platform will diminish to a level below the background noise level at the shoreline (43dB(A)) In addition, ARCO has stated (January 28th hearing) that operational flaring as analyzed in the EIR/EIS will not occur.

The EIR/EIS indicates that general operational noise levels may be reduced by additional mitigation measures such as structural enclosures and the use of equipment buffering materials.

#### 4. Tourism and Recreation

Impacts which may effect tourism and recreation include possible oil spill impacts to recreational facilities and the visual quality of the recreational experience.

The most likely recreational facility to be affected by an oil spill is Isla Vista Beach, the next most likely is Goleta Beach. The most likely time of year for such a spill to reach these beaches is during the summer months when their use is at its maximum.

In addition, Platform Heron would be clearly visible from Isla Vista Beach and Goleta Beach and would contribute to the deterioration of the visual quality of the recreational experience at both.

### C. Commercial Fishing

Commercial fishing is an important activity within the Santa Barbara Channel. Fish species regularly sought in the area are lobster, halibut, sea bass, and the ridge-back prawn, among others.

The EIR/EIS discusses and assesses many impacts on commercial fishing. Impacts on commercial fishing fall into four major categories: (1) the exclusion of fishermen from an area on a temporary basis due to construction of facilities; (2) the exclusion of fishermen from an area on a permanent basis due to the installation of platforms and pipelines; (3) the ongoing operational conflicts between fishing vessels and vessels servicing the platforms; and (4) damage to fishing equipment.

The EIR/EIS identifies significant impacts upon the specific activities of local commercial fishermen. Exclusion of gillnetters and trappers during the peak fishing season and loss of fishing gear were addressed. The Coal Oil Point area is heavily fished by gillnetters from January to March when halibut migrate into the area. Trap fishermen would be affected if construction activity occurred after mid-October when lobster season begins.

Damage and loss of gear during construction are also considered in the EIR/EIS.

In addition, loss or damage to the commercial fishing habitat is also addressed. Disturbance of benthic habitats, or kelp beds, during construction or operation could have significant effects on the productivity and availability of commercial species. Vessels traveling through kelp beds could have considerable effect.

The EIR/EIS also addresses potential impacts on mariculture. A mariculture lease just off Goleta Point could be affected by discharges or oil spills from the project.

Exclusion of fishermen from areas as a result of the placement of platforms is considered an adverse impact. The EIR/EIS also recognizes potential loss of fishing gear or traps due to project vessels traveling outside of designated corridors as a significant impact.

The EIR identified mitigations which would, if adopted, reduce the impact to commercial fishing to insignificance. Scheduling construction activities of pipelines outside of principal fishing seasons in the area, minimizing the construction schedule, using corridors for pipelines and publishing and noticing construction for pipelines in advance will eliminate most of the adverse impacts associated with construction.

Direct compensation to fishermen for loss or damage of fishing gear or equipment is a recommended mitigation.

Other mitigation recommended by the EIR/EIS includes:

- (1) Enforcement of vessel traffic corridors.
- (2) Enforcement of an identified vessel corridor between Ellwood pier and the platforms in order to eliminate or lessen impacts to the kelp beds.
- (3) Restoration of damaged benthic habitats and kelp beds.
- (4) Prevention of the discharge of muds and cuttings.
- (5) Adoption of an Oil Spill Contingency Plan approved by the State Lands Commission.

#### D. Air Quality (Odors, Flaring)

The EIR/EIS contains an extensive analysis of the technically complex subject of air quality. The air quality analysis accounts for approximately one half

of the length of the draft EIR/EIS. In a memorandum to Commission staff dated February 9, 1987, James Boyd, Executive Director of the State Air Resources Board stated:

"We have reviewed the air quality sections of the Final Environmental Impact Report/Statement (EIR/S) prepared for the ARCO Coal Oil Point Project. Based upon our review, we believe the air quality section of the report was prepared with sufficient information to adequately evaluate potential air quality impacts."

Air pollution is a concern in the Santa Barbara-Ventura area because, as identified in the EIR/EIS, the area currently exceeds Federal and State standards for total suspended particulates and oxidants. Under the regulations of the Santa Barbara County Air Pollution Control District, the permitting agency for air quality, a net air quality benefit to the area must be shown or the project will not be approved. A discussion of the extent of the analysis of air quality in the EIR/EIS begins on page 1 of EXHIBIT E.

**E. Noise**

The EIR/EIS addresses in detail the issue of noise resulting from construction and operations on the platforms. These impacts are discussed previously in the section titled Location of Platform Heron.

**F. Offshore Disposal of Muds and Cuttings**

The applicant had originally proposed to dispose of muds and cuttings by direct disposal to the ocean from the platforms. At the Commission's January 28 hearing, ARCO amended their project by agreeing to haul the muds and cuttings away from the proposed Heron platform. This does not address disposal at the other two platform sites.

Three distinct environmental issues have arisen regarding this aspect of the applicant's proposed project:

- i. Toxicity of the muds on marine life;

- ii. Physical destruction of the hard bottom caused by the long term deposition and smothering by the muds and cuttings; and
- iii. Effects upon the University of California Santa Barbara's research and teaching activities, specifically Naples Reef and the seawater intake for the University's marine lab.

The EIR/EIS analyzes these issues based upon the latest available published scientific information including ocean current information supplied by ARCO which was used to demonstrate the direction and movement of ocean currents in the project area.

Although the EIR/EIS discusses several mitigation measures, the most effective in reducing the identified impacts to a level of insignificance is the prohibition against the disposal of muds and cuttings at the platforms.

A detailed discussion of the analysis of muds and cuttings in the EIR/EIS begins on page 1 of EXHIBIT F.

G. Marine Research at UCSB

The EIR/EIS finds that construction and operation of the proposed project could significantly effect the marine research activities of UCSB. Marine research programs could be affected both by a major oil spill and through more subtle forms such as loss of habitat and interference with research programs. While research and teaching activities associated with UCSB marine programs take place throughout the Santa Barbara Channel, there is a concentration of research and teaching activities in the Coal Oil Point area.

Many field studies are in progress in the subtidal and intertidal areas around Coal Oil Point. Field studies typically take several months to years to produce results and, in some cases, studies in a particular area have accumulated many years worth of data. The disruption of such research programs by an oil spill would represent a loss of scientific information and human effort that cannot be calculated. Even if the system recovers fairly

rapidly. the interruption of the studies may be irreparable. Teaching programs which use the nearby intertidal area for field work would also suffer because most of these programs attempt to introduce students to natural ecosystems.

Another serious impact an oil spill could have on University research would be contamination of the seawater system. Several research programs are investigating systems that are extremely sensitive to small changes in the chemical environment which could result from even small amounts of oil entering the system. As is the case for field studies, disruption of a research program or destruction of an experiment represents a loss of effort that is inestimable. According to the EIS/EIS, almost 30 percent of Coal Oil Point oil spills would reach Goleta Point where the seawater intake is located.

There would also be a potential for oil spills affecting the Naples Reef area, a major University research area. University research in this area could suffer Class I impacts caused by disruption from an oil spill.

Drill muds and cuttings discharges associated with the proposed project have the potential to reach either the seawater intake or Naples Reef. In addition, there is potential for a small amount of drilling solids to collect on the reef. University research activities could suffer significant impacts as a result of drill muds reaching Naples Reef.

As previously stated, the most effective mitigation is the prohibition of the disposal of muds and cuttings at the platforms.

#### H. Produced Water

Produced water is the water produced with crude oil from the subsurface reservoir. The water is separated from the crude oil by emulsion breaking chemicals and heat applied during dehydration. This produced water is normally a brine primarily containing sodium chloride, with traces of other materials including ammonia.

The applicant does not propose to discharge produced water directly into the ocean. The Las Flores Canyon oil processing alternative is the only

proposal which would result in produced water, after treatment, being discharged into the ocean through an ocean outfall. Such a discharge would have to comply with conditions specified by the permitting agency and the Regional Water Quality Control Board.

The EIR/EIS analysis for the Las Flores Canyon alternative identifies two significant impacts from the discharge. The analysis indicated possible affects to marine organisms due to long term exposure to regular discharges of this treated by-product. The data base on these sublethal effects is limited and therefore the exact extent of the potential damage is unknown. The analyses also noted that there could be a potential oxygen demand impact which was considered significant. Both of these impacts are eliminated by reinjecting the produced water.

No impacts to Isla Vista from produced water are identified in the EIR/EIS since no produced water would be discharged anywhere near Isla Vista.

#### ENVIRONMENTALLY PREFERABLE ALTERNATIVE

Because the final EIR/EIS concludes that "no project" is the most environmentally preferable alternative, the document also contains an environmentally preferable alternative in order to conform with Section 15126(d)(2) of the CEQA Guidelines which reads:

"If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

The inclusion of this environmentally preferable alternative should not be interpreted to mean that it is preferred by any agency, including the Commission, the consultant or individual. It is included in order to conform to the requirements of the CEQA Guidelines.

The CEQA Guidelines also define the relationship of this alternative and all other analysis within the EIR/EIS to the Commission's decision process. Section 15121 of the CEQA Guidelines states in part:

"(b) While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary by making a statement of overriding consideration under Section 15093."

It is clear from the above language that the Commission is not bound to adopt the stated environmentally preferable alternative merely on the basis of its inclusion in the final document.

#### STAFF RECOMMENDATION

Based upon staff's review of the completed EIR/EIS for the Coal Oil Point Project and in light of the provisions of the California Environmental Quality Act which apply to this project, IT IS RECOMMENDED THAT THE COMMISSION:

1. DETERMINE THAT A FINAL EIR/EIS HAS BEEN PREPARED FOR PROPOSED ACTION BY THE COMMISSION, FOLLOWING EVALUATION OF COMMENTS AND CONSULTATION WITH PUBLIC AGENCIES HAVING JURISDICTION BY LAW, INCLUDING ALL RESPONSIBLE AND TRUSTEE AGENCIES.
2. DETERMINE THAT THE COMMISSION HAS REVIEWED AND CONSIDERED THE FINAL EIR/EIS NO. 401 (SCH. NO. 84011105).
3. CERTIFY THAT A FINAL EIR/EIS NO. 401 (SCH. NO. 84011105) HAS BEEN COMPLETED IN ACCORDANCE WITH CEQA, THE STATE'S EIR GUIDELINES AND THE COMMISSION'S ADMINISTRATIVE REGULATIONS.

EXHIBIT "A"

MEMORANDUM OF UNDERSTANDING, JOINT REVIEW PANEL

JOINT REVIEW AGREEMENT  
FOR PREPARATION OF  
ENVIRONMENTAL IMPACT REPORT  
ATLANTIC RICHFIELD COMPANY  
DEVELOPMENT AND PRODUCTION FACILITIES  
STATE TIDELANDS COAL OIL POINT FIELD

This agreement is entered into this 19 day of October, 1983 by and between the following parties:

State Lands Commission, hereinafter referred to as SLC; and Santa Barbara County, hereinafter referred to as County.

WHEREAS, Atlantic Richfield Company, hereinafter referred to as Arco, has proposed to construct and operate platforms in the Coal Oil Point Field of the State Tidelands, as well as pipelines and onshore processing facilities, hereinafter referred to as the Arco Project, and will apply for the necessary approvals from State and local governmental agencies; and

WHEREAS, portions of the Arco Project may have "substantial adverse impact" (as defined by the California Environmental Quality Act, hereinafter referred to as CEQA), which must be considered by State and local agencies when reviewing and acting on projects pursuant to CEQA and other applicable State laws; and

WHEREAS the parties to this agreement now desire to prepare an environmental document on the proposed Arco Project that includes all relevant information and analysis before acting on the Arco applications; and

WHEREAS, it is in the mutual beneficial interest of all parties to share in the task of preparation of an environmental Study on the Arco Project in order to avoid duplication in staff efforts, to share staff expertise and information already existing, to promote intergovernmental coordination at the local and State levels, and to serve the public interest by producing a more efficient environmental review process;

NOW, THEREFORE, in consideration of the mutual covenants and conditions hereinafter set forth, it is agreed as follows:

1. THE STUDY

Pursuant to this Agreement, an Environmental Impact Report hereinafter referred to as the Study, shall be prepared on the proposed Arco Project, in accordance with CEQA and its Guidelines (CAC 15000 et. seq.) and the Permit Streamlining Act (Chapter 1200, AB 884, Statutes of 1977). The Study shall

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address the impacts on the environment of the proposed Arco Project and alternatives thereto.

## 2. AGENCY PROJECT REPRESENTATIVES AND THEIR DUTIES

A Joint Review Panel shall be composed of one representative or designee from each decision-making agency party to this agreement. The following members of the Joint Review Panel are appointed by their respective agencies:

Randall Moory  
State Lands Commission                      CEQA Lead Agency  
Sacramento, California

Janice Yonekura  
Santa Barbara County Resource Mangement Dept.  
Santa Barbara, California

The successful preparation of the Study requires complete and full communication between all parties involved. It is the duty of the agency project representatives to ensure close consultation throughout the process of preparation of the document. The agency project representatives shall keep each other advised of the developments affecting the preparation of the Study. A representative shall notify the other representative in writing of a change in his or her address or telephone number, or change in agency representative.

To the maximum extent practicable under law and consistent with agency policy, all parties agree to share all relevant information. This agreement to share information shall not apply where any party has received information from Arco which the party has determined to be exempt from the Public Records Act and/or the party has agreed with Arco to protect such information from scrutiny by others. In such an event the information may be shared only with the other parties where Arco has given its consent to distribution of the information as to the other parties. The burden of obtaining such consent will rest with the party requesting the information.

In order to ensure that requests for consultant action are documented and to avoid conflicting requests of the consultants, the Joint Review Panel members shall use the Joint Review Panel meetings as the primary forum for communicating with the consultants. When communication on policy matters with the consultants becomes necessary at other times, such communication shall take place only through the Joint Review Panel Chairperson and shall involve each party to this agreement. (Exchange of technical information between consultant and agency staff shall be allowed but copies shall

be provided to the other parties.)

The State Lands Commission and County shall recover the cost of their participation in the Study and shall bill Arco directly in accordance with their adopted fee schedule.

### 3. RESPONSIBILITIES OF THE JOINT REVIEW PANEL

The Joint Review Panel shall carry out the following duties:

- a) Prepare and circulate the Notice of Preparation as specified in Chapter 1200, Statutes of 1977 as amended;
- b) Determine the format and content of the Request for Proposal (RFP), which shall include responses to the Notice of Preparation of the Study;
- c) Select the consultants who will prepare and complete any necessary studies;
- d) Determine the organization, scope and content of the Study for the Arco Project to ensure that the requirements of state laws are satisfied, and that the statutory findings required of the agencies for their respective decisions on the Arco Project can be made. The draft study shall be prepared without identifying individual agency responsibility or authorship where differing viewpoints are presented;
- e) Determine whether the work performed by the consultant is satisfactory, and, if not, how best to correct the deficiencies in the work;
- f) Conduct noticed public hearings in order to obtain comments on the Draft EIR from all public agencies (including those party to this agreement) and from the general public. Such public hearings shall be held using procedures identified in CEQA and its Guidelines. Public hearings on permit decisions shall be conducted separately by each party to this agreement according to that agency's own rules and regulations; and
- g) Determine the adequacy of the consultant prepared response to comments.

The SLC representative shall be the Chairperson of the Joint Review Panel and shall convene Joint Review Panel meetings periodically. Decisions by the Joint Review Panel members

relative to the Study shall be made by consensus whenever possible. The Study shall comprehensively reflect the concerns of all parties to this agreement and will be accomplished by including all points of view where appropriate. In the event that the Joint Review Panel members cannot reach agreement on a particular issue, the Chairperson shall consider the differing views and shall, after consultation with the County and the Consultant, decide the course of action to be followed.

A task force of State responsible and interested agencies will be formed by the SLC to assist it in its duties as chairperson of the Joint Review Panel and to ensure that concerns of such agencies are considered in: (1) the preparation of the Study; and (2) the consideration of the project by the SLC. Membership of the task force will be determined by the SLC in consultation with the Project Coordinator and shall include, but not be limited to, the CCC, Fish and Game, and the Air Resources Board.

#### 4. PROJECT COORDINATION AND DUTIES

Gordon Duffy, Secretary of Environmental Affairs and State OES Projects Coordinator, hereby appoints the following project coordinator:

John Hunter

It shall be the duty of the project coordinator to assist all participants in maintaining full communication and coordination throughout the preparation of the Study, and to aid the Joint Review Panel in resolving any disputes which arise during the preparation of the Study.

#### 5. ADMINISTRATIVE DUTIES

It shall be the responsibility of SLC to carry out the administrative duties associated with Study preparation, such as contract accounting and public noticing.

#### 6. UPON COMPLETION OF FINAL STUDY

The Joint Review Panel members shall determine the sufficiency of the Study for their respective agencies use as the document required by CEQA. The Joint Review Panel members shall make a recommendation to the agencies party to this agreement as to the sufficiency of the draft Study. After a certification meeting open to the public, the SLC shall then either certify

the Study as final under CEQA or may after consultation with other panel members refer the Study back to the consultant for revision. Santa Barbara County shall, in separate hearings and after the State Lands Commission has certified the EIR as complete, also certify the same document for their decision-making purposes pursuant to CEQA and its Guidelines. Action on permits shall be taken by SLC prior to any permit decision by Santa Barbara County on the Arco Project. Subsequent to certification and action by SLC on the Arco Project, SLC shall file the Notice of Determination with the State Resources Agency pursuant to CEQA. Unless an extension is otherwise previously agreed upon by all parties, this agreement shall expire upon certification of the Study by all agencies party to this agreement.

#### 7. TIME LIMITS

SLC and County are required by AB 884 (Chapter 1200, Statutes of 1977, as amended) to comply with certain time limits. The Joint Review Panel will establish a time table which will ensure compliance with these time limits. It is understood that best efforts will be made by all parties to comply with this timetable.

#### 8. GENERAL AGREEMENTS

The agencies further agree to take whatever further steps they deem necessary, including further agreements or amendments to this Agreement, in order to fulfill the purpose of this Agreement.

It is specifically understood by the parties that this is neither a contractual agreement nor a delegation of their respective responsibilities. Its purpose is to clarify an agreed upon cooperative approach. Any party may, upon notifying the other party, withdraw from the agreement and proceed independently pursuant to CEQA and its Guidelines.

Therefore, the parties hereto have caused this Agreement to be duly executed on the respective dates set forth opposite their signatures.

Claira T. Dedrick  
Executive Officer  
State Lands Commission

Claira T. Dedrick 10/12/83  
Claira T. Dedrick Date

Dianne Guzman, Director  
Resource Management Department  
County of Santa Barbara

Dianne Guzman 10-19-83  
Dianne Guzman Date

AMENDMENT TO JOINT REVIEW  
AGREEMENT FOR PREPARATION OF  
ENVIRONMENTAL IMPACT REPORT/  
ENVIRONMENTAL IMPACT STATEMENT  
ATLANTIC RICHFIELD COMPANY  
DEVELOPMENT AND PRODUCTION FACILITIES  
STATE TIDELANDS COAL OIL POINT FIELD

This amendment to the above-referenced agreement dated October 19, 1983, is entered into this 29<sup>th</sup> day of August 1986 between the State Lands Commission (SLC) and the County of Santa Barbara (County), and the United States Army Corps of Engineers (CORPS).

Atlantic Richfield Company (hereafter referred to as ARCO) has submitted an application for a permit to the CORPS for its Coal Oil Point development. The CORPS has determined that ARCO's project requires the preparation of an Environmental Impact Study (EIS).

The provisions of the California Environmental Quality Act (CEQA) and the National Environmental Quality Act (NEPA) authorize federal and state agencies to cooperate in the preparation of joint environmental analyses.

Therefore, the SLC, County and CORPS agree that the Joint Review Agreement regarding ARCO's project shall be amended as follows:

1. Paragraph 1, The Study, shall read as follows:

Pursuant to this Agreement, a Joint Environmental Impact Report/Environmental Impact Study, hereinafter referred to as "The Study," shall be prepared on the proposed ARCO project, in accordance with CEQA and its supplementary Guidelines (CAC 15000 et. seq.), the Permit Streamling Act (Chapter 1200, Statutes of 1977), and NEPA. The Study shall address the impacts on the environment of the proposed ARCO project and alternatives thereto.

2. Paragraph 2, Agency Project Representatives and their Duties shall be amended to add a CORPS representative as a member of the Joint Review Panel as follows:

Responsible Agent (Clifford Rader)  
U.S. Army Corps of Engineers  
Los Angeles District  
Los Angeles, California

Responsible Agent (Dev Vrat)  
Santa Barbara County Resource  
Management Department  
Santa Barbara, California

3. Paragraph 3, Responsibilities of the Joint Review Panel, shall be amended as follows:

The Joint Review Panel shall carry out the following duties, except that the CORPS shall not participate in items (b) and (c).

3(a) Prepare and circulate the Notice of Preparation as specified in Chapter 1200, Statutes of 1977, as amended, and any notices required under federal law.

3(d) Determine the organization, scope and content of the Study for the Project to ensure that the requirements of state and federal laws are satisfied and that the statutory findings required of the agencies for their respective decision on the Project can be made. The draft study shall be prepared without identifying individual agency responsibility or authorship where differing viewpoints are presented;

3(f) Conduct noticed public hearings in order to obtain comments on the Draft EIR/EIS from all public

agencies (including those party to this agreement) and from the general public. Such public hearings shall be held using procedures identified in CEQA, its accompanying Guidelines, and applicable federal laws and regulations. Public hearings, if required, for permit or authorization decisions shall be conducted separately by each party to this agreement according to that agency's own rules and regulations; and

3(g) Determine the adequacy of the consultant prepared response to comments.

The SLC representative shall be the Chairperson of the Joint Review Panel and shall convene Joint Review Panel meetings periodically. Decisions by the Joint Review Panel members relating to the study shall be made by consensus whenever possible. The Study shall comprehensively reflect the concerns of all parties to this agreement and will be accomplished by including all points of view where appropriate. In the event of dispute among JRP members as to scientific issues relating to the EIR/EIS, the EIR/EIS shall contain conflicting viewpoints. Disputes which relate to procedural issues shall, after the project staff level representatives have exhausted every means of resolution, be submitted to the next higher level of the representative agencies: Commander, Los Angeles District, U.S. Army Corps of Engineers; Executive Officer, State Lands Commission; and Director, Resource Management Department, County of Santa Barbara.

A task force of federal, state and interested responsible agencies may be formed by the SLC to assist it in its duties as chairperson of the Joint Review Panel and to ensure that concerns of such agencies are considered in: (1) the preparation of the Study; and (2) the consideration of the project by the SLC in consultation with the Project Coordinator and shall include but not be limited to, the California Coastal Commission, California Department of Fish and Game, Air Resources Board, U.S. Fish and Wildlife Service, National Marine Fisheries Service, and Environmental Protection Agency.

4. Paragraph 6, UPON COMPLETION OF FINAL STUDY, is amended to read as follows:

The Joint Review Panel members shall determine the sufficiency of the Study for their respective agencies use as the document required by NEPA and CEQA. The Joint Review Panel members shall make a recommendation to their respective agencies party to this agreement as to the sufficiency of the draft Study. After a certification meeting open to the public, the ~~Joint Review Panel~~<sup>SLC</sup> shall then, either certify the Study Final under NEPA and CEQA, or may, after consultation with other panel members, refer the Study back to the consultant for revision. ~~Santa Barbara County shall in separate hearings and, after the Corps and SLC have certified the EIR/EIS as complete, also certify the same document as adequate for their decision-making purposes pursuant to CEQA and its Guidelines.~~ Action on permits shall be taken by SLC prior to any permit decision by Santa Barbara County on the ARCO Project.

Subsequent to certification and action by SLC on the ARCO Project, SLC shall file the Notice of Determination with the State Resources Agency pursuant to CEQA. Unless an extension is otherwise previously agreed upon by all parties, this agreement shall expire upon certification of the Study by all agencies party to this agreement.

5. Paragraph 8, General Agreements is amended to read as follows:

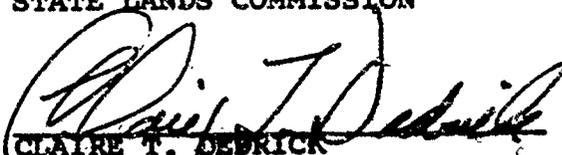
The agencies further agree to take whatever further steps they deem necessary, including further agreements or amendments to this Agreement, in order to fulfill the purpose of this Agreement.

It is specifically understood by the parties that this is neither a contractual agreement nor a delegation of their respective responsibilities. Its purpose is to clarify an agreed upon cooperative approach. Any party may, upon notifying the other party, withdraw from the agreement and proceed independently pursuant to CEQA and its Guidelines and NEPA.

Therefore, the parties hereto have caused this Amendment to be duly executed on the respective dates set forth opposite their signatures.

EXECUTIVE OFFICER  
STATE LANDS COMMISSION

Dated 8/29/86

  
CLAIRE T. DEDRICK  
Executive Officer

RESOURCE MANAGEMENT DEPARTMENT  
COUNTY OF SANTA BARBARA

Dated 12-22-86

*Dianne Guzman*  
\_\_\_\_\_  
DIANNE GUZMAN  
DIRECTOR

CORPS OF ENGINEERS

Dated \_\_\_\_\_

*Daniel Haldo*  
\_\_\_\_\_  
Daniel Haldo  
Lieutenant Colonel  
Corps of Engineers  
Acting District Engineer  
*per*

EXHIBIT "B"

PROPOSED PROJECT AND MAJOR ALTERNATIVES

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II. COAL OIL POINT DEVELOPMENT  
DESCRIPTION OF APPLICANT'S PROJECT  
AND OTHER ALTERNATIVES

The Draft EIR/EIS analyzes the "No Project" alternative, the project as proposed by ARCO, seven alternatives to various aspects of the project as proposed by ARCO and over 250 possible permutations of the project. The project as proposed by ARCO and the seven related alternatives are described below.

PROJECT PROPOSED BY APPLICANT

ARCO proposes to develop a new offshore oil and gas discovery site adjacent to the Santa Barbara coast and the University of California, Santa Barbara and the unincorporated community of Isla Vista. The development involves State oil and gas leases PRC 208, 308, 309, 3120 and 3242 which were issued by the Commission in 1946, 1947, 1964 and 1965.

The applicant proposes either to commingle or segregate the produced oil for processing at Ellwood. Although ARCO favors commingling of its own leases, they have stated they would oppose commingling of its oil with oil from other lessees. Each of these options provides for free water knockout of the oil offshore on each of the platforms and dehydration of the wet oil emulsion to pipeline quality onshore at the existing Ellwood facility. Under the segregated option for each of the five (5) leases, oil production would be segregated on the platforms and processed onshore in separate processing trains. This option as proposed by the applicant would use 5 new pipelines in addition to the existing pipeline for transport of the oil emulsion onshore. The use of fewer new pipelines is feasible. The commingled option as proposed by the applicant would use 2 new pipelines.

The applicant proposes to use three double platform complexes. The double platform complexes are composed of a drilling platform and a production platform connected by a bridge. Each platform component would measure 180 feet by 120 feet and have two (2) decks. The lowest deck would be 50 feet above the water and the top deck would be 25 feet above the lower deck. The drilling derrick mast height would be 250 feet above the water level. The applicant's proposal provides for free water knockout of the oil on the production component of each complex.

The applicant proposes to remove its existing gas processing operation from Ellwood and to process all the sweet and sour gas at a new gas processing facility to be constructed at Las Flores Canyon.

At peak production the three platform complexes proposed by the applicant would produce up to 80,000 barrels of oil per day, up to 60 million cubic feet of associated sour gas per day and up to 90 million cubic feet of sweet gas per day.

#### ALTERNATIVES PROPOSED BY APPLICANT AND EXAMINED BY THE EIR/EIS

At the request of the Commission's staff and Santa Barbara County the applicant submitted engineering designs for seven alternatives to their proposed project. Under all the alternatives described below, the estimated peak production and value of products is the same as for the applicant's proposed project. Under any alternatives which would result in processing at a facility other than Ellwood, the applicant would maintain their existing gas processing facility at Ellwood.

##### 1. Single Platforms

Under this alternative ARCO would construct three single platforms each measuring 180 feet by 180 feet. Each platform would have three decks with the first deck located 50 feet above the water line and the top deck located 60 feet above the lower deck. The drilling derrick mast height would be 295 feet above the water level.

This alternative provides for free water knockout of the oil on each of the platforms and dehydration of the wet oil emulsion to pipeline sales quality onshore at the existing Ellwood facility. The applicant proposes to use 2 new pipelines to bring the oil emulsion onshore.

##### 2. Total Offshore Oil Dehydration

Under this alternative ARCO would construct three double platform complexes. Each production component of the platform complex would measure 130 feet by 205 feet and would have three decks with the first deck located about 50 feet above the water line and the top deck located about 60 feet above the lower deck. The drilling component of the platform complex would measure 120 feet by 180 feet and would have two decks with the first deck located 50 feet above the water line and the second deck 25 feet above the lower deck. The drilling derrick mast height would be 250 feet above the water level.

The applicant's proposal provides for dehydration of the oil to pipeline sales quality on each platform and transport of the dry oil onshore for temporary storage at Dos Pueblos and transport out of Santa Barbara in the Celeron-All American pipeline. The applicant proposes to use 2 new pipelines to bring the oil onshore.

### 3. Commingled Oil Processing at Las Flores Canyon

Under this alternative the applicant proposes to construct a commingled oil processing facility in Las Flores Canyon. The wet oil emulsion would be commingled offshore and transported onshore in 2 new pipelines to landfall at Ellwood and transported from Ellwood in a single pipeline to Las Flores Canyon for final dehydration.

Under this option ARCO proposes to use either double platform complexes or single platforms as discussed above.

### 4. Gas Processing in Venadito Canyon

For this alternative the gas processing facility required by the project is located in Venadito Canyon instead of Las Flores Canyon. For analysis purposes, the design and operation of the facility are assumed to be the same as that in Las Flores Canyon.

### 5. Placement of Oil Pipelines to Las Flores Canyon in Offshore Gas Pipeline Corridor

This alternative would place one to three pipelines (depending upon whether a commingled or segregated system is used) within the same corridor as the proposed gas pipelines to Las Flores Canyon. The offshore pipeline corridor would require expansion in width by 100 to 300 feet for one to three pipelines respectively. This alternative would also assume that the crude oil pipeline between Ellwood and Las Flores Canyon and the Dos Pueblos South storage facility would not be constructed.

### 6. Placement of Gas Pipelines to Shore at Ellwood and then within the Onshore Pipeline Corridor to Las Flores Canyon

This alternative would place the proposed sweet and sour gas pipelines within the offshore pipeline corridor to Ellwood and then overlaid within the oil pipeline corridor to Corral Canyon. An expansion of 100 to 200 feet (30 to 61 m) in offshore corridor from Holly to landfall at Ellwood would be required. It is expected that the onshore portion of the pipeline would be accommodated within the 100-foot wide corridor. This alternative would eliminate the gas pipeline corridor from Haven to landfall at Corral Canyon.

### 7. Oil Storage at Las Flores Canyon

This alternative would eliminate oil storage at Dos Pueblos South but would provide comparable wet and/or

processed crude oil storage at Las Flores Canyon. This storage facility would be located at the proposed Exxon marine terminal tankage area east of Corral Canyon.

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EXHIBIT "C"

LISTING OF CLASS I AND CLASS II ENVIRONMENTAL IMPACTS

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## 4.2 IMPACTS OF THE APPLICANT'S PROPOSED PROJECT

### 4.2.1 Class I Impact Summary

Significant environmental impacts that cannot be mitigated to insignificant levels (Class I) have been identified in almost all technical disciplines, as indicated in the Impact Summary Tables. These impacts include, but are not limited to:

- o Facility damage due to seismic shaking (Geology),
- o Increased sediment loads in streams from erosion (Water Resources),
- o Damage to or disturbance of marine habitat due to construction of offshore platforms and pipelines (Marine Biology),
- o Loss of woodlands, riparian areas, and possibly endangered species due to facility and pipeline construction (Terrestrial and Freshwater Biology),
- o New exceedances and exacerbation of existing exceedances of air quality standards,
- o Disturbance of Native American cultural sites during construction (Cultural Resources),
- o Conversion of agricultural lands to industrial use (Land Use),
- o Visual degradation at viewpoints and beaches along the coastline associated with views of offshore platforms (Visual Aesthetics and Recreation and Tourism),
- o Intermittent impact noise from offshore platform construction and operation which is heard at near shoreline locations (Acoustics),
- o Disruption of Commercial and Sport fishing, and
- o Disruption of research activities at UCSB.

Some of these impacts may be partially mitigated as indicated in the impact summary tables at the end of this Executive Summary, but the residual impacts would still be significant (Class I).

In addition, a potential major oil spill or other systems safety failure could result in significant impacts to human safety, streams and surface waters, marine water quality and marine habitats, sensitive vegetation communities, aquatic habitat areas, birds and other wildlife, beaches, the Los Padres National Forest, and other recreational and tourist areas, mariculture and other commercial fishing activities, and UCSB research activities offshore, onshore, and in the Marine Sciences laboratories. Mitigation of these impacts is very limited.

#### 4.2.2 Class II Impact Summary

Class II impacts have been identified in the areas of Geology, Surface Water, Groundwater Hydrology, Air Quality, Marine Water Quality, Marine Biology, Terrestrial and Freshwater Biology, Cultural Resources, Socioeconomics, Land Use, Visual Aesthetics, Acoustics, Transportation, Recreation and Tourism, and Commercial and Sport Fishing. These impacts include but are not limited to:

- o Possible facility damage due to site-specific soil instability,
- o Creek sedimentation due to construction,
- o Possible overdraft or contamination of aquifers and groundwater basins,
- o Declines in air quality due to construction activities and operation of the oil processing and gas treatment facilities,
- o Alteration of marine water quality from drilling discharges,
- o Disturbance of marine habitats during offshore construction activities and from drilling discharges,
- o Temporary vegetation losses due to pipeline construction,
- o Potential damage to archaeological sites during construction,
- o Population increases creating additional demands for housing and public services,
- o Temporary disruption of agricultural lands during pipeline construction,
- o Disruption of ocean vista along Highway 101 by oil storage facilities,
- o Poor intersection operation during peak traffic hours,
- o Competition for transient accommodations during the construction phase, and
- o Disruption of mariculture and commercial fishing by drilling discharges.

These impacts may be mitigated to levels of insignificance by measures such as prohibiting ocean discharge of drill muds, revegetation programs, and upgrading intersections, as described in the Impact Summary Tables.

EXHIBIT "D"

COMMENTS ON FINAL EIR/EIS AND RESPONSES

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ISSUE: ENVIRONMENTALLY PREFERABLE ALTERNATIVE

1. Comment: (Bill Wallace, Santa Barbara County Board of Supervisors, Page 4 of Transcript)

"The document contains substantial new information and analyses not contained in the draft EIR. This information has not been subjected to public review and comment, with subsequent responses and revisions to the text as required by law."

"In order to provide the legally required public review of this material, we believe the EIR must be recirculated."

"It is not our intent to try to bog this project down in legalese or state requirements, but we believe that the county's position has got to be protected specifically with the environmentally preferred option, set forth in the EIR."

Response: The "environmentally preferable option" is not new. The document indicates not that the alternative is preferred by any agency, consultant, or individual, but only that the alternative is one that is preferable by virtue of fewer and less extensive environmental impacts than other project configurations. This alternative is composed of components all of which were analyzed individually or as part of another alternative in the EIR/EIS.

[Draft EIR/EIS, Vol. I, Sections 4.4, 4.5.1, 4.7, 5.2.1, 5.3.1]

2. Comment: (Bill Wallace, Santa Barbara County Board of Supervisors, Page 5 of Transcript)

"The county's foremost objection to certification of the EIR is raised by the last minute addition of the project alternative designated as environmentally preferred in the EIR. Nothing in this critical section was contained in the draft EIR. The Joint Review Panel, which managed the preparation of the EIR, has had no

opportunity to review the analysis which would justify the selection of the project alternative chosen prior to its addition to the final EIR."

**Response:** The environmentally preferable alternative could not readily have been identified without the benefit of public input on the draft EIR/EIS. Thus, it was not presented until the final document was circulated.

The Joint Review Panel did discuss the alternative in a general way and directed the consultants to identify what they determined to be the combination of project components resulting in the least overall environmental impact. Panel members were consulted from time to time as the alternative was developed. We note that the Santa Barbara County panel members specifically advised the consultants on December 17, 1986 that they did not wish to be involved in the identification of the environmentally preferable alternative.

3. **Comment:** (Bill Wallace, Page 5 of Transcript)

"Final, [sic] our review of the document indicates that the analysis required to reach the EIR's conclusions is either lacking or is seriously flawed. Major elements of the selected project configuration have not been analyzed in more than a superficial manner. The comparative analysis and its deficiencies have likewise not been calculated for public review and comment as required by law."

**Response:** The major components of the environmentally preferable alternative were fully analyzed in the major alternatives section of the EIR/EIS (Section 4). These include: offshore oil processing, single platforms in place of double platform complexes, offshore and onshore pipelines. The environmentally preferable alternative eliminates significant project components that were part of the proposed project -- offshore sour gas pipelines, the onshore sour gas processing facility, and the onshore oil processing facility, all of which account for numerous

significant environmental impacts. While the identified environmentally preferable alternative is a departure from the applicant's project proposal in terms of the configuration of components (and lack thereof), it is made up of components which were all analyzed in the document circulated for public review and comment.

[Draft EIR/EIS Sections 4.4, 4.5.1, 4.7, 5.2.1, 5.3.1]

4. Comment: (Bill Wallace, Page 7 of Transcript)

"We would like to step away from these procedural mistakes, and point out several factual errors in the EIR which must be corrected prior to certification. Virtually all of these comments related to the recommended project alternative. We believe that numerous inconsistencies and errors could have been, and should have been, avoided had the Joint Review Panel reviewed the recommended project alternative prior to publication."

"I think I will submit the rest of our discussions about the project alternative in the written . . ."

Response: The use of the words "recommended alternative" is misleading. The alternative is not recommended; it is merely identified as one method of achieving major project goals in a way that reduces the environmental impacts identified in the draft EIR/EIS and comments thereto.

[Finalizing Addendum, Vol. I, Executive Summary (Section 5), pages S-54t to S-57]

5. Comment: (Bill Wallace, Page 7 of Transcript)

"It is clear that the county objects to the EIR's designation of the preferred project, and to the consideration of any offshore oil processing. We join ARCO in preferring onshore processing, which we believe should be in Las Flores Canyon."

"We also question the designated project alternative for not recommending the removal of Platform Heron. The final EIR says the removal or relocation of the platform would not allow full development of the resource; however, this same criteria [sic] was not used when recommending that sour gas be reinjected, since reinjection is, by its nature, less than full development. Reinjecting the sour gas avoids significant impacts. Removing or relocating platform also avoids significant impacts. The county stresses that Heron should be eliminated to mitigate the significant impacts it will cause."

Response: The designation of the environmentally preferable alternative accounted for the economics of sour gas processing, as compared to oil processing, and for the relative difference in royalty paid on gas versus oil. The most expensive project component, aside from platforms, is the sour gas treatment plant. The percent royalty on gas is small relative to the nearly 50 percent royalty on oil at peak production. It was felt that the marginal economics of sour gas production was sufficient reason for reinjection to be considered even though it would result in less than full development of the resource at the current time. Much of the gas could be recovered in the future if economics or policy favored its development.

[Finalizing Addendum, Vol. I, Executive Summary (Section 5.5); Draft EIR/EIS, Vol. II, Sections 4.5.1 and 5.3.1]

Development of the identified oil resource at Coal Oil Point is the primary purpose for this project. Therefore, while relocation of Heron would reduce impacts (a prospect that is being explored), and elimination of the platform would avoid impacts, the economics of the project, with about 50 percent of its production coming from leases to be developed from the proposed Platform Heron, clearly place the removal of Heron in a different category from the reinjection of sour gas.

Specifically, the feasibility of the proposed project is not dependent on the production of sour gas.

6. Comment: (Janice Keller, GOO, Page 138 of Transcript)

"4. GOO still believes that the environmentally preferred alternative is the no project option; however, realizing political and economic realities, any approved project must include, at the very minimum, the deletion of Platform Heron from the project until such times as future technology will allow recovery of oil from a less sensitive site."

Response: The No Project Alternative is identified as the environmentally superior alternative. CEQA requires that an environmentally preferable alternative be identified in this case.

7. Comment: (Janice Keller, GOO, Page 139 of Transcript: written comments)

"The rationale for the consultant's preferred alternative escapes us. It is clearly more environmentally harmful than even the applicant's proposed project. A full discussion of their "logic," if we can call it that, is in order."

Response: The discussion of the environmentally preferable alternative is provided in the summary of the EIR/EIS. (See responses to Comments 1, 2 and 3 of Supervisor Wallace.)

[Finalizing Addendum, Vol. I, Pages S-54 through S-57]

8. Comment: (Mayor Shiela Lodge, Page 22 of Transcript)

"Second, on a more technical level, I believe that the final EIR is inadequate because the rationale leading to the selection of the environmentally preferred alternative is sketchily presented and has not been circulated for public review and comment. A reader is required to sift back through volumes of material -- and I am sure you

really know that it is voluminous -- of materials searching for details and assumptions that went into the analyses of the various components which have been combined to form this alternative."

**Response:** Sections 4 and 5 of the EIR/EIS contain a full impact analysis of all components described in the environmentally preferable alternative. The summary provides a rationale for the selection of this combination of components to form the environmentally preferable alternative. This discussion is supported by the material contained in Sections 4 and 5. All impacts of each component were presented in the Draft EIR/EIS which was subjected to extensive public review.

[Draft EIR/EIS, Vol. II, Sections 4 and 5]

9. **Comment:** (Mayor Shiela Lodge, City of Santa Barbara (Page 23 of Transcript)

"The recommended scenario is a combination of several alternatives that were reviewed in varying levels of detail in the EIR. Several of the major components chosen, i.e., reinjection of sour gas and offshore processing of sweet gas, were treated as other alternatives and were not fully analyzed."

"On page 5-1 of the draft EIR, it states "If one of the following alternatives is selected by decision makers, it is probable that supplemental environmental analysis will be required after development of a specific project design."

"We do not find any changes or additions to these analyses in the final version of the EIR. How can this be the basis for the selection of these alternatives as environmentally preferable?"

**Response:** The introduction provided for Section 5 was used to generally describe the various alternatives for oil production and processing as well as gas processing.

Components of this alternative were analyzed in the draft EIR/EIS to the detail that engineering or environmental information were available. The reinjection of sour gas alternative is one of the simplest of the alternatives considered, since most of the aspects of the alternative would consist of elimination of components, including onshore and offshore pipelines and onshore gas processing facilities. Since reinjection of gas will be conducted as a portion of normal oil field management, only moderate amounts of on-platform equipment would be required. The environmental analysis in Section 5 provides a full analysis of this alternative which clearly has less environmental impact than the applicant's preferred alternative.

[Finalizing Addendum, Vol. I, pages S-54 to S-57; Draft EIR/EIS, Vol. II, pages 5-1, 5-49 to 5-51]

10. Comment: (Marty Blum, League of Women Voters, Page 85 of Transcript; written comments)

"This is unfortunate since EIS Section 5 contains the bombshell that had been rumored for days, the Environmentally Preferable Alternative, a brand new "other alternative" in lieu of what Section 5 concedes to be the Environmentally Superior Alternative, the No Project Alternative. The new alternative suggested by the consultants (by staff?) calls for offshore processing of all oil produced by the project. (ES 54-57)."

"This is a whole new ball game; we're back to square one. This new "other alternative" is not addressed in the DEIR or in the FEIR except through ES Section 5's oblique reference to Sections 3 & 4 of the FEIR. Such coverage is inadequate."

Response: See responses to Comments 1, 2 and 5 of Supervisor Wallace. The Environmentally Preferable Alternative is not "new" as suggested by the League's comments. Every element of this alternative is analyzed in the Draft EIR/EIS. These elements were combined to form a complete "project"

alternative that could achieve the goals of the proposed project. This alternative was identified as the project configuration that would achieve the major goals of the proposed project with the least environmental impact. The majority of the onshore impacts are eliminated in this alternative while the offshore impacts are increased only marginally. The fact that it was identified as environmentally preferable does not mean that no undesirable environmental impacts would be associated with it.

The No Project Alternative is, in fact, the least environmentally damaging. However, Section 15126d2 of the EIR Guidelines requires the EIR to identify another environmentally preferable one where the No Project Alternative is the superior one environmentally.

[Finalizing Addendum, Vol. I, pages S-54 through S-57; Draft EIR/EIS, Vol. II, Sections 4.4, 4.5.1, 4.7, 5.21, 5.3.1]

11. Comment: (Marty Blum, League of Women Voters, Page 87 of Transcript; written comment)

"Second Reason for Noncertification. The interjection of the "environmentally preferable alternative" into the Final EIR through a casual recommendation in the Executive Summary without addressing its many implications in ensuing narrative and technical appendices compounds the inadequacies of the FEIR, more than justifying your noncertification of the document."

Response: See responses to Comments 1, 2 and 5 of Supervisor Wallace. As noted above, the Environmentally Preferable Alternative is not new. The impacts of each of its components were analyzed in the EIR/EIS. The potential impacts of this alternative are compared to the impacts identified for the proposed project and summarized in the Executive Summary. Despite the suggestion to the contrary, the Environmentally Preferable Alternative was fully analyzed in the EIR/EIS

including "its many implications," which are, by and large, major reductions in the number and extent of physical environmental impacts, especially onshore.

[Finalizing Addendum, Vol. I, pages 8-54 through 8-57]

12. Comment: (Marty Blum, League of Women Voters, Page 88 of Transcript; written comments)

"IN SUMMARY, the Final EIR because of its many inadequacies including those enumerated above does not warrant certification by the State Lands Commission, contents do not address the Johnny-come-lately, last-minute Environmental Preferable Alternative. Contents may well be adequate for other alternatives but without better organization and an understandable, easily followed Reader's Guide such data are too elusive to be viable, not only for the overwhelmed public, but, the League submits, for you decision makers as well."

"How can you in all good conscience certify that the Final EIR has been completed in compliance with CEQA, and that in its present form you will be able to review it and consider information contained therein prior to approving the project within your present time schedule?"

Response: CEQA requires that EIR's be full disclosure documents, and the final report prepared for the ARCO COPP meets this requirement. No information is hidden from the public. All information available was employed and substantial original research done to fill gaps in that information. The complexity of the project and, therefore, the length of the document itself, is evidence that every effort was made to assure that information was developed for the public and decision-makers.

13. Comment: (Robert Sollen, Page 148 of Transcripts:  
written comments)

"I support the county's contention that the impact report cannot be certified in its present form. The introduction of an entirely new and unreviewed "environmentally preferable alternative" is reason enough to delay certification. This new alternative, which includes offshore oil processing, is unacceptable to the county and the applicant, and for good reason. It cannot remain in the report as the policy of the state, county and federal agencies involved without thorough public examination and substantial data to show it is indeed "environmentally preferable." This designation comes from the consultants, we are told, and not from the agencies that this document purports to represent."

Response: See responses to Comments 1, 2 and 3 of Supervisor Wallace. We note, as elsewhere, that the environmentally preferable alternative is not "entirely new and unreviewed." It is made up of components forming a complete project each of which was analyzed in the EIR/EIS. This alternative would substantially reduce the identified physical environmental impacts of the proposed project, especially on shore, while still achieving the major goal of developing the oil reserves off Coal Oil Point.

The unacceptability of offshore oil processing appears to have little to do with environmental impacts. While it is true that processing oil offshore does result in somewhat greater offshore impacts, a fact noted explicitly in the discussion, these impacts are substantially less than those associated with the construction of a similar facility anywhere on shore. The environmentally preferable alternative includes no sour gas processing and, thus, no sour gas offshore pipelines, no sour gas onshore pipelines, and no onshore gas processing plant, all substantial sources of environmental impacts in the proposed project.

[Finalizing Addendum, Vol. I, Executive Summary (Section 4)]

The environmentally preferable alternative does not represent state or county policy, simply because it is presented in the EIR/EIS. CEQA requires the identification of such an alternative if the No Project alternative is environmentally superior. This alternative serves to identify for the public and decision makers a project that results in fewer or less extensive environmental impacts than those associated with the proposed project, but it does not bind the agencies in any way.

[Finalizing Addendum, Vol. I, pages S-54 to S-57]

14. Comment: (Dr. Alice Alldredge, UCSB, pages 57-58 of Transcript)

"The prime goal of an environmentally preferred option at this unique site, should be to provide maximum protection to the marine biological resources which serve as a natural marine laboratory for the university, and to reduce to an absolute minimum chances for any oil spills, no matter how small."

"It is obvious from reading the comments in the draft EIR, and in listening to the testimony at two previous hearings, that it is the impacts on [SIC] the offshore facilities, not the impacts from the onshore one, that are of the greatest concern in this project."

"The consultant's preferred option, regarding offshore processing, appears unjustified, in light of the content of the EIR, itself, and a major conclusion has essentially been drawn with little substantiating analysis."

Response: Although it is true that there would be an increased potential for smaller oil spills, the probability for oil spills such, as occurred in the 1969, would not be increased since these spills are associated with drilling. It should be noted that the environmentally preferable alternative reduces other marine biological impacts including the impacts of oil pipelines to

shore. Additionally, construction of gas pipelines to shore at Las Flores Canyon would not be required, reducing substantial impacts associated with this construction. Therefore, the environmentally preferable alternative would not increase overall marine biological impacts. There would also be a major decrease in onshore impacts associated with gas and oil processing.

(Finalizing Addendum, Vol. I, pages S-54 to S-57]

15. Comment: (Robert Klausner, Citizens Planning Association, Page 175 of Transcript)

"One of the things that we are concerned about is the final document indicating the preferred scenario and we certainly don't believe that the information in the document substantiates the finding that the consultants came up with as having the final scenario as being preferred."

Response: See Response to Comments 1, 2 and 3 of Supervisor Wallace.

ISSUE: SYSTEMS SAFETY

1. Comment: (Michael J. McDermott, Page 166 of Transcript; written comments)

"This EIR has done a very poor job of responding to the Citizen Comment presented on the Draft Report. It is in many respects an Academic farce with no foothold in the real world. The type of System Safety Assumptions contained therein are of a magnitude to rival those that caused the Disasterous Loss of the Shuttle Challenger last year. There is a Tremendous Need for the State Of California to do some REALISTIC INVESTIGATION INTO THE TRUE FACTS OF OFFSHORE SAFETY, before the Dire Consequences of our unpreparedness for Maritime Disasters hits home."

"I would like to present the following information in response to the "Response to Comments By Individuals" presented in the EIR."

"Response #71 Claims that Data for the EIR. was produced "independently of Oil Company Data." This shows a serious lack of understanding of the origins and criginators of most safety data and of the many different pressures on those who generate it. Please reference the attached articles marked #1 & 2 for further Details."

Response: A variety of sources were used to base Design Basis Accidents and assess the probability of occurrence of these accidents. These data were from several independent sources including government agencies, in addition to data supplied by oil companies. The systems safety and reliability sections also projected impacts solely on the consequences of occurrence which is more realistic rather than on probability of occurrence.

[Draft EIR/EIS, Section 4.3.1; Appendix 2, Section 2 and References]

2. Comment: (Michael J. McDermott, Page 166 of Transcript; written comments)

"Response #76. The "Fireboat Recommendation" currently being considered by the County of Santa Barbara is a Seriously Flawed Document that has Not been subjected to citizen comment, and yet the inadequate systems proposed may be all the Maritime Response. Please reference comments to The Santa Barbara County Planning Commission marked #3 for further details."

Response: The EIR/EIS acknowledges the lack of preparedness in the County for major disasters. The remainder of the discussion is not germane to the comment or response in the final document.

[Draft EIR/EIS Vol. II, Pages 4-68, 4-69, Section 4.3.1]

3. Comment: (Michael J. McDermott, Page 167 of Transcript; written comments)

"Response #77. The increased traffic does not consider the magnitude of change from the Use of Alaskan Oil Tankers to offload at Santa Barbara and make use of common carrier pipelines, see article marked #4."

Response: The impacts considered were based on the consequences of a disaster not on the probability. Additional tanker traffic would increase the probability of an occurrence but not the consequences.

[Draft EIR/EIS, Vol. II, pages 4-146 to 4-181, Section 4.1.1;p also, see general Appendix 2, Section 4.2.7]]

4. Comment: (Michael J. McDermott, Page 168 of Transcript; written comments)

"Response #83. World War Two vintage T-2 Tankers currently Sail Close by Coal Oil Point regularly while making down wind approaches to the Exxon O.S.&T. This seems to make no special impression on the

authors. Let us hope they make no Lasting Impression on Offshore Platforms or Local Beaches."

[Draft EIR/EIS, Vol. II, Section 4.3.1.1]

Response: Again, the consequences of a disaster would not change. The document examines the worst case occurrence.

[Draft EIR/EIS, Vol. I, pages 2-4 to 2-5, Section 2]

5. Comment: (Michael J. McDermott, Page 169 of Transcript; written comments)

"Response #91 There has been a Port in operation at Coal Oil Point for some sixty years and yet it has never produced a dime of revenue for the County. The report should of at the very least acknowledged this oversight and the lost revenue as a result, particularly in light of the Sad Story of the city of Richmond, Ca. and Chevron."

Response: The report clearly states that the existing terminal at Coal Oil Point would be closed down with oil transported via pipeline. Potential revenue to the County of Santa Barbara from an existing oil terminal is not an impact associated with the projects analyzed in the EIR/EIS.

[Draft EIR/EIS, pages 2-4 to 2-5, Section 2]]

6. Comment: (Michael J. McDermott, Page 2 of written comments)

"Response #92. The Oil Transportation Policies of the County of Santa Barbara have been a complete failure. Instead of Elimination of tankers they have produced an Interstate Carrier which cannot be denied access to By Alaskan and Other Tankers with Violating FEDERAL RESTRAINT OF TRADE LAWS. See article #4."

Response: Since oil would be transported by pipeline out of the County, no additional tankering

would be associated with the proposed project. Again, this comment is not related to the project analyzed for this EIR/EIS.

[Draft EIR/EIS, pages 2-4 to 2-5, Section 2]

7. Comment: (Michael J. McDermott, Page 2 of written comments)

"Response #94. Speed is one of the many good points demonstrated by the Fireboats used in Tacoma Washington, which has the most advanced Maritime Fire Response System on the West Coast."

Response: Firefighting offshore where access is difficult and subject to greater distances is not comparable to an area within a localized port.

8. Comment: (Janice Keller, GOO, Page 138 of Transcript; written comments)

"5. The whole section on systems safety is non-responsive to the realities of oil and gas production and the needs of the community. In an area as highly populated as Santa Barbara County's South Coast, any type of emergency situation could be devastating. Therefore, this section needs to address the concerns raised by the commentators."

Response: The systems safety and reliability section was prepared with the sensitivity of the project in mind. This section has identified those impacts associated with public safety as well as other system safety considerations.

[Draft EIR/EIS, Vol. II, Sections 4.1.1 and 4.3.1]]

9. Comment: (Janice Keller, GOO, Page 2 of written comments)

"7. ORG-65 - The Response only addresses part of our concern. We would still like to see the issue of the practical limitations on oil spill cleanup included in the Impact Summary Tables."

**Response:** This report fully recognizes the limitations of state-of-the-art oil spill cleanup equipment. Such limitations are implicit in the tables.

[Finalizing Addendum, Vol. I, Executive Summary; Draft EIR/EIS, Vol. II, pages 4-6, 4-7, 4-18, 4-51; Appendix 2, Section 4.2.7.5]

10. **Comment:** (Janice Keller, GOO, Page 3 of written comments)

"25. ORG-92 - GOO strongly disagrees with the document preparers that the hazard footprints adequately display the extent of the potential impacts of catastrophic accidents. Shortsightedness now will lead to loss of life and property in the future."

**Response:** Systems safety impacts were developed by recognized experts in the field and considered on a worst case basis. Thus, the analyses fully reflect the range of catastrophic occurrences. For instance, hazard footprints were calculated using the worst case meteorological assumptions, accident scenarios and concentrations. Hazard footprints associated with sour gas release, assumed full release of materials, worst case meteorological conditions and sour gas containing up to 3 percent H<sub>2</sub>S where 2 percent composition is anticipated.

[Draft EIR/EIS, Vol. II, Section 4.1.1]

11. **Comment:** (Janice Keller, GOO, Page 3 of written comments)

"26. ORG-91 - State-of-the-art mitigation measures and cleanup equipment are antiquated when it comes to discussing oil spills. State-of-the-art is not enough."

**Response:** Oil spill impacts have been subjected to mitigation to the maximum extent feasible.

[Draft EIR/EIS, pages 4-52 to 4-69, Section 3.3.1]

12. Comment: (Roger Lagerquist, Page 147 of Transcript; written comments)

"Now try to imagine the impact from a sour gas blowout on platform Heron at a time when 10,000 residents and 30,000 visitors are crowded into the half square mile area of Isla Vista. This might well be the maximum credible accident. We can only hope the gas will catch fire in the event of such a blowout. According to Sax, "Fatal hydrogen sulfide poisoning may occur even more rapidly than that following exposure to a similar concentration of hydrogen cyanide." The EIR (2.1.3.1) considers only oil spills and the effects of heat, blast and overpressure and ignores toxicity of the gas. The Finalizing Addendum does not correct this oversight."

Response: As explained under the response to Mr. Hal Lopeikin, hazard footprints for fire, explosion and toxic gas release are contained far offshore and would not subject Isla Vista or UCSB to this danger. These footprints were devised using the most conservative (i.e., worst case) assumptions.

13. Comment: (Roger Lagerquist; Isla Vista resident, Page 147 of Transcript)

"The Finalizing Addendum does not correct the oversight of ignoring the toxicity of the gas."

Response: Section 4.3.1 of the draft EIR/EIS as well as Section 4.3.6 of the finalizing addendum analyze this impact. The toxicity of sour gas has been treated in detail in these sections.

[Draft EIR/EIS Vol. II, Sections 4.3.1 and 4.3.6]

14. Comment: (Robert Sollen, Page 152 of Transcript; written comments)

"The report says that there is no more chance of an oil spill off Isla Vista with additional platforms because there already is