

**STAFF REPORT
01**

A 37
S 19

02/04/20
PRC 3913.1
C. Hudson

**CONSIDER ADOPTION OF A MITIGATED NEGATIVE DECLARATION,
ADOPTION OF A MITIGATION MONITORING PROGRAM, AND AMENDMENT OF
A GENERAL LEASE – RIGHT-OF-WAY USE**

LESSEE:

California Resources Petroleum Corporation

AREA, LAND TYPE, AND LOCATION:

Sovereign land located in the Pacific Ocean, near Emma Wood State Beach, Ventura County.

AUTHORIZED USE:

Maintenance of two offshore non-operational 12-inch-diameter seawater intake pipelines and one offshore non-operational 12-inch-diameter outfall pipeline.

LEASE TERM:

- Initial term: 4 years, beginning January 31, 2016.
- Amended to extend the lease term to January 30, 2021.

CONSIDERATION:

\$19,967 per year with an annual Consumer Price Index adjustment.

PROPOSED AMENDMENT:

The following sections of the lease are proposed to be amended:

Section 1, Basic Provisions:

- Lessee is authorized to proceed with the removal of the two offshore non-operational seawater intake pipelines and one non-operational outfall pipeline as described in the Mitigated Negative Declaration (CSLC's MND No. 801), and the Mitigation Monitoring Program (MMP) as provided in Exhibit C. The Project anticipates removal of all improvements from the Lease Premises.
- Consideration: Lessee shall be relieved of its obligation under the Lease to pay \$19,967 annual rent beginning on the first anniversary of the Lease following verification by the Executive Officer or

STAFF REPORT NO. 01 (CONT'D)

designee of the removal of all improvements from the Lease Premises.

Section 2, Special Provisions:

- Upon Lessee's demonstration to the Executive Officer's or designee's satisfaction of the successful removal of all improvements from the Lease Premises, this Lease shall terminate upon the execution of a quitclaim deed by Lessee and the written acceptance of said quitclaim by the Executive Officer or designee.
- In the event that removal of all or any portions of any improvements proves to be infeasible, Lessee agrees to submit an application and minimum expense deposit to request a lease for the improvements that remain in place.
- At least thirty (30) days prior to start of on-site work, Lessee shall provide the following for Lessor's review:
 - A final set of engineering design drawings "as issued for construction," certified (stamped, signed, and dated) by a California registered Civil/Structural engineer, showing details of the proposed decommissioning Project with key control points referenced to the California Coordinate System 1983 revision (CCS83) and vertical profile data with elevations referenced to Mean Lower Low Water (MLLW) datum, if applicable, or other applicable vertical datums such as the National Geodetic Vertical Datum of 1929 (NGVD 29), and the North American Vertical Datum of 1988 (NAVD 88). The lease boundaries shall be delineated on the drawings.
 - A Project Work and Safety Plan as described in Project Execution Plan named "Grubb Lease Intake and Outfall Decommissioning Project," Revision 6, October 2019.
 - All applicable permits, including but not limited to the California Coastal Commission and California Department of Transportation. If permitting agency meeting schedules do not allow Lessee to secure any permit 30 or more days prior to start of work, then Lessee shall provide permits as soon as received, but in no case less than 7 days before start of work.
- At least fifteen (15) days prior to start of on-site work, a Local Notice to Mariners shall be submitted to the U.S. Coast Guard. A

STAFF REPORT NO. 01 (CONT'D)

copy of the published Notice is to be filed by the Lessee with the State Lands Commission office.

- All construction activities shall be carried out in accordance with all applicable safety regulations, permits, and conditions of other involved agencies.
- Lessee shall require the contractor(s) to maintain a logbook during construction operations conducted under the Lease to keep track of all debris and objects of any kind that fall into the water. The logbook shall include the type of debris, date, time, and location to facilitate identification and location of debris for recovery and site clearance verification. All waste material and debris created by Lessee shall be promptly and entirely removed from the Lease Premises and lands subject to Lessor's jurisdiction.
- Within 60 days of Project completion, Lessee shall provide to Lessor:
 - A set of "as-built" drawings, certified (stamped, signed, and dated) by a California registered Civil/Structural engineer, showing all design changes or other amendments to the construction as originally approved.
 - A post-construction written narrative report confirming Project completion with discussion of any significant field changes or modifications to the approved design or execution plan, and providing details of any extraordinary occurrences such as spill incidents, critical operations curtailment, accidents involving serious injury or loss of life etc. In addition, it shall include a post-construction underwater/seafloor survey of the Lease Premises to provide a graphic record including videograph with voice overlay and photographs confirming seafloor cleanup and site restoration.

All other terms and conditions of the lease shall remain in effect without amendment.

STAFF ANALYSIS AND RECOMMENDATION:

Authority:

Public Resources Code sections 6005, 6216, 6301, 6501.1, and 6503;
California Code of Regulations, title 2, sections 2000 and 2003.

STAFF REPORT NO. 01 (CONT'D)

Background:

On August 9, 2016, the Commission authorized a 4-year General Lease – Right-of-Way Use to California Resources Petroleum Corporation (Lessee) for two offshore non-operational 12-inch-diameter seawater intake pipelines, extending 680 feet and 630 feet in length and one offshore non-operational 12-inch-diameter outfall pipeline, extending 500 feet in length ([Item C38, August 9, 2016](#)). The short-term lease was intended to give the Lessee time to determine if it was going to reuse or decommission the pipelines. On December 6, 2019, the Commission authorized an amendment of lease to extend the lease term by 1 year to allow time to prepare an Initial Study/Mitigated Negative Declaration for the proposed Intake/Outfall Structures Decommissioning Project (Project) that includes full removal of the improvements located within Lease No. PRC 3913.1 ([Item 25, December 6, 2019](#)). The current lease term will end January 30, 2021.

The Lessee has applied to the Commission to amend Lease No. PRC 3913.1 for full removal of the intake and outfall pipeline structures and appurtenant facilities within the lease premises to fulfill the existing lease requirement and to quitclaim the lease following satisfactory Project completion. The offshore pipelines, constructed in 1967, were used to supply water to the Grubb Oil Field processing plant adjacent to the lease premises. Portions of the pipelines are non-operational and would require replacement for continued use.

California Environmental Quality Act:

The Commission is the lead agency for the Project pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) and conducted an Initial Study to determine if the Project may have a significant effect on the environment (State CEQA Guidelines, § 15063). Although the Initial Study identified several potentially significant impacts to Aesthetics, Biological Resources, Cultural Resources, Cultural Resources – Tribal, Hazards and Hazardous Materials, Hydrology and Water Quality, Recreation, Transportation, and Utilities and Service Systems, mitigation measures were proposed and agreed to by the Applicant prior to public review that would avoid or mitigate the identified potentially significant impacts “to a point where clearly no significant effects would occur” (State CEQA Guidelines, Cal. Code Regs., tit. 14, § 15070, subd. (b)(1)). Consequently, the Initial Study concluded that “there is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment” (State CEQA Guidelines, § 15070, subd. (b)(2)), and a Mitigated Negative Declaration (MND) was prepared.

STAFF REPORT NO. **01** (CONT'D)

Pursuant to the Commission’s delegation of authority and the State CEQA Guidelines (Cal. Code Regs., tit., § 15025), staff prepared an MND identified as CSLC MND No. 801, State Clearinghouse No. 2019120471. The Initial Study and MND were circulated for a 33-day public review period from December 19, 2019, to January 21, 2020, and staff received ~~two~~ [three](#) comment letters that are summarized below with staff responses.

California Department of Transportation (Caltrans)

Comment	Response
The Applicant will need to submit a Construction Traffic Management Plan that should include the identified components. An encroachment permit will be required from Caltrans.	Caltrans approved Encroachment Permit No. 07-19-6-US-2696 on January 9, 2020, which included approved traffic control plans. Further consultation and coordination will occur with Caltrans staff per the permit conditions.
Stormwater run-off is a sensitive issue for Ventura County and discharge onto State Highway facilities requires a stormwater management plan.	The Project will not discharge stormwater onto State Highway facilities. Section 3.11.1.2 of the MND describes the nearby (not within the Project area) stormwater infrastructure and notes that the closest beach outfall is 320 feet downcoast from the vault, outside of the Project’s footprint. Any stormwater run-off will comply with the Project’s Encroachment Permit conditions.

Solimar Beach Colony Homeowner’s Association / Coalition to Save the Rincon [and Faria Beach Homeowner’s Association](#)

Comment	Response
Concern that vault and offshore pipeline removal would result in adverse impacts to beach width and sand accretion.	Noble Consultants-G.E.C., Inc. was retained to evaluate any existing coastal process impact from the offshore pipelines and vault structure segments as well as potential impacts associated with their removal. The existing

STAFF REPORT NO. **01** (CONT'D)

	<p>structures create negligible, if any, sand retention upcoast or downcoast from the Project site. Offshore pipeline and vault structure facility removal would have the same level of negligible, if any, change to sand accretion and associated beach width. For further supporting information, please see the technical memorandum provided in Exhibit D.</p>
<p>Commenter observes that sand deposition was drastically altered following the Seacliff offramp construction and Mobile Seacliff Oil Piers removal and connects those observations to the concern that offshore pipeline and vault removal will further reduce sand deposition.</p>	<p>The Seacliff offramp was constructed as part of the Highway 101 realignment in the 1970s. Potential coastal process impacts related to that development and associated concerns regarding the Oil Piers decommissioning were part of the California Coastal Commission's (CCC) permit proceedings. As part of the Coastal Development Permit for the Oil Piers decommissioning, the CCC required 5 years of monitoring, starting in 1998, to observe adjacent shoreline changes. Padre Associates, Inc., through their contractor Noble Consultants, Inc., produced a final report in 2003 and concluded that the pier structures were not acting in any significant capacity as semi-permeable groins to trap sand and that wave climate and sediment supply were more significant factors affecting beach width for the studied area (north of the Project).</p> <p>In addition, the larger Rincon Parkway Reach is described in BEACON's Coastal Regional Sediment Management Plan (Noble 2011) as the most fortified section</p>

STAFF REPORT NO. 01 (CONT'D)

	of coastline within the entire Santa Barbara Littoral Cell. It is armored almost the entire length with seawalls or revetments, and the report notes that the past highway encroachments have significantly affected coastal shoreline processes and have resulted in narrow to non-existent beaches.
Concern with the Project having extended periods of nighttime Project lighting.	Limited periods of nighttime lighting could occur during the offshore pipeline recovery, which would be not more than 15 days. Mitigation Measure AES-1 ensures that any nighttime lighting used directs the source downwards onto the Project area. There would be minimal, if any, illumination that would traverse to the closest residence.
Requested pre-Project and post-Project drawings.	Exhibit D includes photographs and figures that depict both the pre-Project (existing) conditions and the contour of the post-Project rock revetment conforming to the existing rock revetment along Pacific Coast Highway.

Tribal Cultural Resources

In keeping with its tribal coordination practices and pursuant to the Commission’s Tribal Consultation Policy, staff also separately notified the ten California Native American Tribes identified by the Native American Heritage Commission (NAHC) as regionally affiliated of the availability of the MND for public comment. The NAHC also provided a Native American contact list that Commission staff used for outreach and coordination. While no Tribes with geographical or cultural affiliation in Ventura County submitted written requests to the Commission for notification of CEQA projects pursuant to AB 52, Commission staff contacted the Tribal Chairpersons identified by the NAHC to ensure the Tribes had an opportunity to provide meaningful input on the proposed Project.

On August 28, 2019, Commission staff provided a notice of the Project to all Tribes on the NAHC list. Commission staff did not receive any responses from the Tribal representatives identified in the NAHC’s

STAFF REPORT NO. 01 (CONT'D)

February 25, 2019 letter. At the time of this staff report was published, Commission staff had not received any comments from the Tribes or been informed of any Tribal cultural resources within or adjacent to the Project area.

Conclusion

Based upon the Initial Study, the MND, and the comments received in response thereto, there is no substantial evidence supporting a fair argument that the Project will have a significant effect on the environment. (Cal. Code Regs., tit. 14, § 15074, subd. (b).) The documents and other material which constitute the record of the proceedings upon which this conclusion is based are in the custody of the Commission's Division of Environmental Planning and Management at its Sacramento offices at 100 Howe Avenue, Suite 100-South.

A Mitigation Monitoring Program has been prepared in conformance with the provisions of CEQA (Pub. Resources Code, § 21081.6), and is contained in Exhibit C, attached.

Public Trust and State's Best Interests Analysis:

Project activities within the lease premises consist of constructing a temporary equipment access ramp, removing two offshore non-operational 12-inch-diameter seawater intake pipelines and one offshore non-operational 12-inch-diameter outfall pipeline, and removing two 6-foot by 6-foot by 1-foot concrete lattice structures at the offshore end of each of the intake pipelines. Staff believes full removal of the offshore facilities is in the State's best interest, because while it may cause some temporary loss of access during removal, it will result in full restoration of the lease premises to its natural state consistent with the obligations of the Lessee under the lease terms, elimination of any ongoing liability from any facilities left, and restoration of public beach access for long-term recreational uses.

The temporary staging area consists of setting up equipment along the southern shoulder of the Pacific Coast Highway and outside the lease premises. The Project anticipates short-term road closures of the eastbound bicycle and vehicle lane and temporary rerouting of eastbound traffic into the center divider. This is in accordance with the California Department of Transportation's pre-approved Traffic Control Plan; temporary recreational warning signs will be posted on-site for recreational visitors. Residents will be notified in advance in writing of the proposed Project activities, scheduling, and hours of construction.

STAFF REPORT NO. 01 (CONT'D)

As part of the initial staging, a temporary equipment access ramp will be constructed across the existing armor rock seawall, partially outside the lease premises, to provide equipment access to the beach area within the lease premises.

The proposed offshore work includes a dive support vessel (DSV) anchored over the terminus of the pipelines. Divers will cut and remove the intake lattice structures from each intake pipeline by using a guillotine saw. Once the intake lattice structures have been cut, the structures will be winched vertically to the surface and recovered onboard the DSV.

The proposed removal for the remaining offshore pipelines consists of mounting a winch on top of the existing onshore concrete vault and pulling the pipelines to shore. Once the pipelines are pulled to shore, each pipeline will be cut into small sections for trucking off-site to an approved recycler or disposal facility. The removal operations will take place during the winter and spring months of 2020 to allow the pipelines an opportunity to become more exposed by seasonal storm conditions.

However, it is possible that the pipeline segments from the surf zone may not be fully recovered by winching to shore. In this case, the Project alternative method consists of using the anchored offshore DSV and divers to cut the remaining offshore pipelines into manageable segments and to lift them vertically to the DSV using an onboard winch or crane. If the remaining pipeline sections are on the ocean side of the surf zone, divers will expose the pipelines using a jet pump and then rig the exposed sections for pulling to the vessel. If the remaining sections are located on the landward side of the surf zone, an excavator will be used during a period of extreme low tide to expose the remaining segments and rig the sections to the beach using the vault mounted winch.

Onshore Project activities, outside of the lease premises, consist of demolition and removal of an existing concrete vault with its internal ancillary structures, abandonment-in-place of a 36-inch-diameter casing holding three internal pipelines (to be removed, if feasible, or grouted if not) and filling the casing between the onshore side of the beach vault and the valve box located within the Grubb Oil Field property.

Onshore decommissioning equipment will temporarily impact beach parking along the shoulder of PCH and will temporarily prevent public access to this portion of the beach. Public access and parking areas on both sides of the Project will still be accessible. Construction is proposed to begin the first quarter of 2020, once the Lessee acquires all permits

STAFF REPORT NO. 01 (CONT'D)

associated with the Project. Project activities are anticipated to last approximately 73 days from the start of construction.

The proposed Project would not alienate the State's fee simple interest or permanently impair public rights. The lease requires the lessee to insure the lease premises and indemnify the State for any liability incurred as a result of the lessee's use and decommissioning activities. The lease requires the payment of annual rent to compensate the people of the State for the occupation of public land with an annual Consumer Price Index adjustment as specified under the lease.

Environmental Justice:

According to California Office of Environmental Health Hazard Assessment (OEHHA 2019) California Communities Environmental Health Screening Tool (CalEnviroScreen) data (June 2018), the Project site scores in the 55th to 60th percentile on cumulative community environmental health burdens, meaning that 40 to 45 percent of all census tracts in California have greater population vulnerability and/or environmental burdens. The existing pollution burden for this tract is in the 85th percentile, with impaired water, pesticides, hazardous waste, solid waste, cleanup sites, and drinking water as factors with the highest scores. This tract, with a population of 941, has a population characteristics (vulnerability) score in the 36th percentile, which represent biological traits, health factors, or socioeconomic community components that could result in increased pollution vulnerability. The relatively low population characteristics score is derived in part from the low unemployment score, the lowest out of all the California census tracts (meaning that the population has a relatively good level of employment). In addition, the population is 79 percent white/non-minority and has fairly low scores for public health concerns such as asthma and cardiovascular emergencies (i.e., heart attacks).

Project decommissioning activities will occur for 73 days during the first quarter of 2020. Work has been scheduled to avoid the summer season and thus minimize potential public access impacts for Solimar Beach users. Regardless, although the Project site will be closed to the public during decommissioning activities, continued Solimar Beach access will be maintained east and west of the excavation areas.

The Project site is located in a census tract with a moderate CalEnviroScreen environmental burden score. The Project will have only temporary, minor effects on air quality factors and traffic. The census tract's population characteristics indicate low vulnerability to pollution, and

STAFF REPORT NO. 01 (CONT'D)

the Project activities will not exacerbate the existing impaired water, pesticides, hazardous waste, solid waste, cleanup sites, and drinking water burdens. The proposed Project is thus not anticipated to create new burdens or add to existing pollution burdens felt by a vulnerable community, with no anticipated factors that will put any of the nearby populations at risk from this Project.

Climate Change:

The California Ocean Protection Council updated the State of California Sea-Level Rise Guidance in 2018 to provide a synthesis of the best available science on sea-level rise projections and rates. Commission staff evaluated the “high emissions,” “medium-low risk aversion” scenario to apply a conservative approach based on current emission trajectories, the Project location, and the nature of the Project’s decommissioning activities. The Santa Barbara tide gauge was used for the projected sea-level rise scenario, and the Project site could see up to 0.4-foot sea-level rise by 2030, 1 foot by 2050, and 2.0 to 3.1 feet by 2100 (Ocean Protection Council 2018). The range in potential sea-level rise indicates the complexity and uncertainty of projecting these future changes—which depend on the rate and extent of ice melt—particularly in the second half of the century.

Sea-level rise as a function of global climate change is not expected to have any effect on the Project because offshore pipelines will be completely removed, underground onshore pipelines will be removed or abandoned in place, and the shoreline vault structure will be removed to 5 feet below ground surface. Riprap will be replaced in the former vault area, consistent with the existing armored structure on either side, to continue to provide shoreline protection from sea-level rise. Additional background information on climate change and sea-level rise is provided in Section 5.1 of the MND.

Conclusion:

For the reasons stated above, staff believes the lease amendment to allow for full removal and restoration of the offshore seawater intake and outfall pipelines related to the Grubb Oil Field processing plant may have minimal impacts to certain Public Trust values because the Project limits public access on the beach during construction activities within a small construction area. Public access and parking are located on both sides of the Project area to minimize potential public access impacts in the use of Public Trust resources. Overall, the Project activities are short-term and will have very little interference with Public Trust needs and values at this location, at this time, and for the foreseeable term of the lease as

STAFF REPORT NO. **01** (CONT'D)

amended. Full removal of the offshore facilities will result in restoration of public beach access for long-term recreational uses and therefore is in the best interests of the State.

OTHER PERTINENT INFORMATION:

1. Approval or denial of the amendment to the lease is a discretionary action by the Commission. Each time the Commission approves or rejects a use of sovereign land, it exercises legislatively delegated authority and responsibility as trustee of the State's Public Trust lands as authorized by law. Upon expiration or prior termination of the lease, the lessee has no right to a new lease or to renewal of any previous lease.
2. This proposed action is consistent with Strategy 1.1 of the Commission's Strategic Plan to deliver the highest levels of public health and safety in the protection, preservation, and responsible economic use of the lands and resources under the Commission's jurisdiction.
3. This activity involves lands which have NOT been identified as possessing significant environmental values pursuant to Public Resources Code section 6370 et seq.; however, the Commission has declared that all lands are significant by nature of their public ownership (as opposed to environmentally significant). Since such declaration of significance is not based upon the requirements and criteria of Public Resources Code section 6370 et seq., use classifications for such lands have not been designated. Therefore, the finding of the Project's consistency with the use classification as required by California Code of Regulations, title 2, section 2954 is not applicable.

APPROVALS OBTAINED

Union Pacific Railroad
U.S. Army Corps of Engineers, Los Angeles District
California Department of Transportation

FURTHER APPROVALS REQUIRED:

California Coastal Commission

EXHIBITS:

- A. Land Description
- B. Site and Location Map
- C. Mitigation Monitoring Program
- D. Technical Memorandum from Noble Consultants-G.E.C., Inc., on Coastal Processes

STAFF REPORT NO. 01 (CONT'D)

RECOMMENDED ACTION:

It is recommended that the Commission:

CEQA FINDING:

Find that the MND, CSLC MND No. 801 (December 2019), State Clearinghouse No. 2019120471, was prepared for this Project in compliance with the provisions of CEQA, that the Commission has reviewed and considered the information contained therein and in the comments received in response, and that the MND reflects the Commission's independent judgment and analysis.

Adopt the MND and determine that the Project, as approved, will not have a significant effect on the environment. The documents and other material which constitute the record of the proceedings upon which this conclusion is based are in the custody of the Commission's Division of Environmental Planning and Management at its Sacramento offices at 100 Howe Avenue, Suite 100-South.

Adopt the Mitigation Monitoring Program, as contained in the attached Exhibit C.

PUBLIC TRUST AND STATE'S BEST INTERESTS:

Find that the proposed decommissioning Project will not substantially interfere with the public rights to navigation or with the common law Public Trust Doctrine and is in the best interests of the State.

AUTHORIZATION:

1. Authorize the amendment of Lease No. PRC 3913.1, a General Lease – Right-of-Way Use, to allow removal of two offshore non-operational 12-inch-diameter seawater intake pipelines and one offshore non-operational 12-inch-diameter outfall pipeline, and appurtenant facilities under the Intake/Outfall Structures Decommissioning Project.
2. Authorize, upon Lessee's demonstration to the Executive Officer's or designee's satisfaction of the successful removal of all improvements from the lease premises, termination of this Lease by Lessee's execution of a quitclaim deed and the written acceptance of the quitclaim by the Executive Officer or designee.

EXHIBIT A

PRC 3913.1

LAND DESCRIPTION

A 600 foot wide strip of tide and submerged land lying in the bed of the Pacific Ocean, Santa Barbara Channel, near Seacliff, Ventura County, California, lying 300 feet on each side of the following described centerline and more particularly described as follows:

BEGINNING at a point on the southwesterly right-of way of the State Highway (U.S. 101) which bears South 15°45'25" East, 3517.37 feet from USC&GS triangulation station "JACK", said triangulation station having coordinates of N(Y)=303664.98' and E(X)=1586815.40; thence South 36°08'10" West 1000.00 feet to the point of termination.

Sidelines of said strip to be lengthened or shortened so as to terminate on the ordinary high water mark of the Pacific Ocean.

EXCEPTING THEREFROM any portion lying landward of the ordinary high water mark of the Pacific Ocean.

BASIS OF BEARING is CCS27, Zone 5

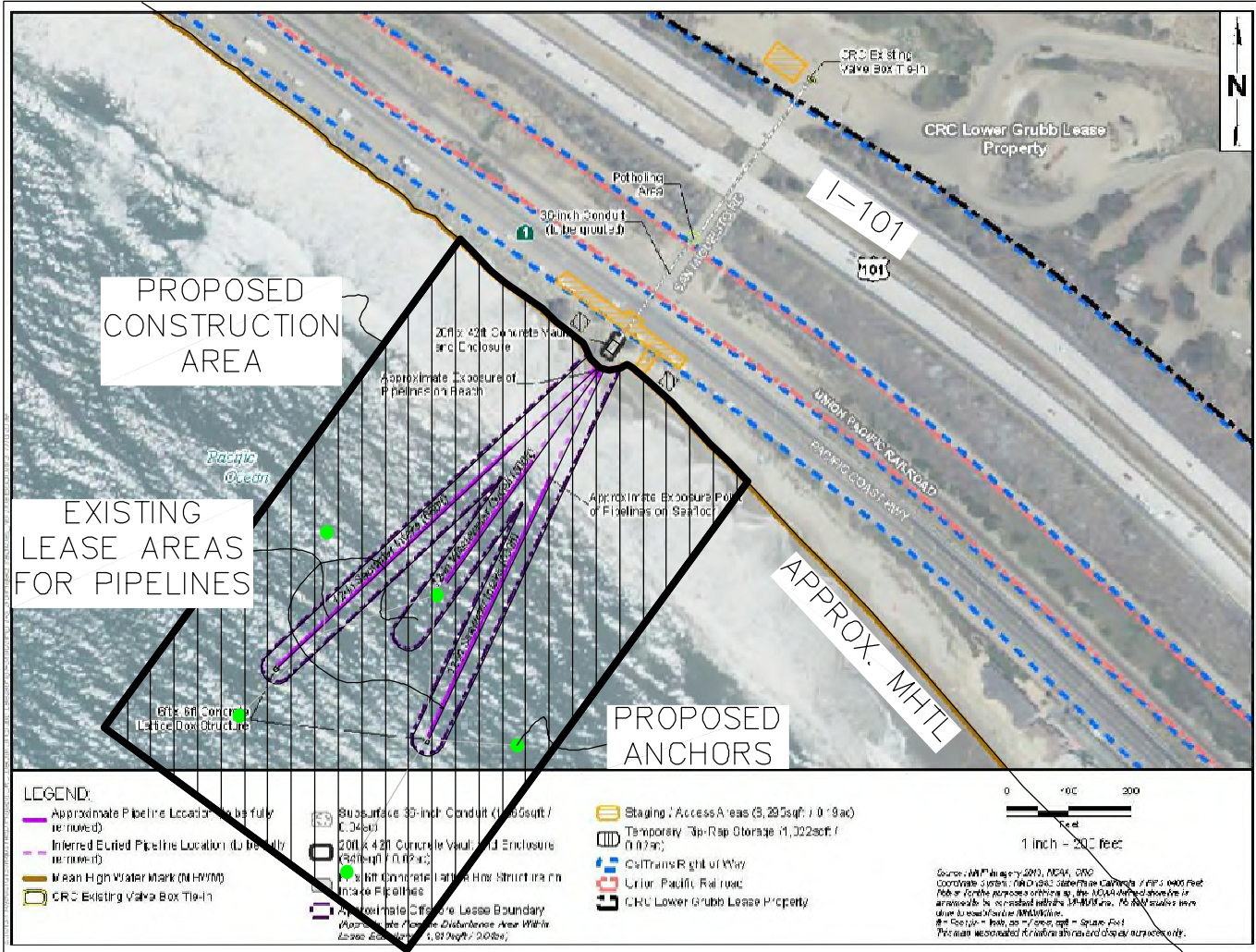
END OF DESCRIPTION

PREPARED 12/13/19 BY THE CALIFORNIA STATE LANDS COMMISSION BOUNDARY UNIT.



NO SCALE

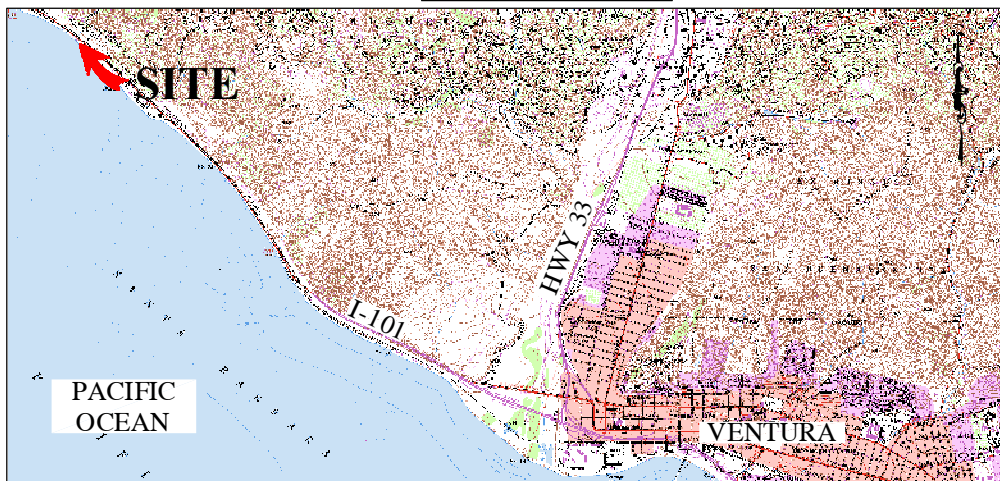
SITE



Santa Barbara Channel, near Ventura

NO SCALE

LOCATION



MAP SOURCE: USGS QUAD

Exhibit B

PRC 3913.1
 CALIFORNIA RESOURCES
 PETROLEUM CORPORATION
 GENERAL LEASE -
 RIGHT-OF-WAY USE
 VENTURA COUNTY



MJF 12/13/19

This Exhibit is solely for purposes of generally defining the lease premises, is based on unverified information provided by the Lessee or other parties and is not intended to be, nor shall it be construed as, a waiver or limitation of any State interest in the subject or any other property.

EXHIBIT C
CALIFORNIA STATE LANDS COMMISSION
MITIGATION MONITORING PROGRAM

Grubb Lease (PRC 3913.1) Intake/Outfall Structures Decommissioning Project
(State Clearinghouse No. 2019120471)

The California State Lands Commission (Commission or CSLC) is the lead agency under the California Environmental Quality Act (CEQA) for the Grubb Lease (PRC 3913.1) Intake/Outfall Structures Decommissioning Project (Project). In conjunction with approval of this Project, the CSLC adopts this Mitigation Monitoring Program (MMP) for implementation of mitigation measures (MMs) for the Project to comply with Public Resources Code section 21081.6, subdivision (a) and State CEQA Guidelines sections 15074, subdivision (d) and 15097.

The Project authorizes California Resources Corporation (CRC or Applicant) to decommission Project-related facilities located within Lease No. PRC 3913.1 in accordance with the terms and conditions of its existing CSLC Lease No. PRC 3913.1.

PURPOSE

It is important that significant impacts from the Project are mitigated to the maximum extent feasible. The purpose of an MMP is to ensure compliance and implementation of MMs; this MMP shall be used as a working guide for implementation, monitoring, and reporting for the Project's MMs.

ENFORCEMENT AND COMPLIANCE

The Commission is responsible for enforcing this MMP. The Project Applicant is responsible for the successful implementation of and compliance with the MMs identified in this MMP. This includes all field personnel and contractors working for the Applicant.

MONITORING

CSLC staff may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as necessary. Some monitoring responsibilities may be assumed by other agencies, such as affected jurisdictions (County of Ventura). The CSLC or its designee shall ensure that qualified environmental monitors are assigned to the Project.

Environmental Monitors. To ensure and confirm implementation and success of the MMs, an environmental monitor must be on site during all Project activities with the potential to create significant environmental impacts or impacts for which mitigation is required. Along with CSLC staff, the environmental monitor(s) are responsible for:

- Confirming that the Applicant has obtained all applicable agency reviews and approvals
- Coordinating with the Applicant to integrate the mitigation monitoring procedures during Project implementation
- Ensuring and confirming that the MMP is followed

The environmental monitor shall immediately report any deviation from the procedures identified in this MMP to the Commission staff or its designee. The Commission staff or its designee shall approve any deviation and its correction.

Workforce Personnel. Implementation of the MMP requires the full cooperation of Project personnel and supervisors. Many of the MMs require action from site supervisors and their crews. To facilitate successful implementation, relevant mitigation procedures shall be written into contracts between the Applicant and any contractors.

General Reporting Procedures. A monitoring record form shall be submitted to the Applicant, and once the Project is complete, a compilation of all the logs shall be submitted to the Commission staff. The Commission staff or its designated environmental monitor shall develop a checklist to track all procedures required for each MM and shall ensure that the timing specified for the procedures is followed. The environmental monitor shall note any issues that may occur and take appropriate action to resolve them.

Public Access to Records. Records and reports are open to the public and would be provided upon request.

MITIGATION MONITORING TABLE

Table C-1 presents the mitigation measures and monitoring for the following environmental disciplines: Aesthetics; Biological Resources; Cultural Resources; Cultural Resources – Tribal; Hazards and Hazardous Materials; Hydrology and Water Quality; Recreation; Transportation, and Utilities and Service Systems. All other environmental disciplines were found to have less than significant or no impacts; therefore, they are not included in the table. The table lists the following information, by column:

- Potential Impact
- Mitigation measure (full text of the measure)
- Location (where impact occurs and where MM should be applied)
- Monitoring/reporting action (action to be taken by monitor or Lead Agency)
- Timing (before, during, or after construction, during operation, etc.)
- Responsible party (entity responsible to ensure MM compliance)
- Effectiveness criteria (how the agency can know if the measure is effective)

Table C-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure (MM)	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Aesthetics						
Create a new source of substantial light or glare	MM AES-1: Nighttime Illumination Shielding. Project lighting shall be as low an intensity as allowed by safety requirements and located, designed, and equipped to provide shielding and minimize glare from light sources and diffusers, and to minimize halo and spillover effects.	Offshore and Onshore	Observe nighttime lighting position for compliance	Lighting glare minimized	CRC, L123, ¹ and CSLC	During any nighttime work
Biological Resources						
Marine Wildlife Interactions	MM BIO-1: Marine Wildlife Contingency and Training Plan Implementation. The Project Marine Wildlife Contingency and Training Plan (MWCTP) shall be implemented during all offshore Project activities. A Marine Wildlife Monitor (MWM) shall be present on the offshore Project vessel during transit and within the Marine Study Area to monitor designated avoidance zones and have the authority to halt Project activities that may impact marine wildlife. As specified in the MWCTP, the following shall be implemented throughout the Project: <ul style="list-style-type: none"> • A pre-activity environmental orientation would be conducted for all Project personnel. • Vessel-based monitoring for marine wildlife would be performed by a trained MWM during all offshore Project activities including anchoring and active pipeline recovery activities. 	Offshore	Final MWCTP submitted to CSLC no less than 14 days prior to the start of offshore work activities for review/ approval Signatures of trained employees for compliance Daily observation reports	Marine wildlife avoided during vessel transit and offshore decommissioning activities	CRC, L123, and CSLC	Prior to and throughout offshore Project activities

¹ L123 = Longitude 123 (Applicant’s expected contractor)

Potential Impact	Mitigation Measure (MM)	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	<ul style="list-style-type: none"> If lighting is required for work in low-light conditions, then specific impact avoidance measures would be implemented as necessary: lighting would be low intensity, directed downward, and green lighting will be used (when possible) to reduce attraction to lights and equipment. The MWM would record daily observations on monitoring forms and prepare a daily report as required by regulatory and resource agencies. A Project completion technical report would be prepared and provided to the appropriate agencies, if requested. 		Project completion report submitted to CSLC and any other requested agency			
Terrestrial or Marine Wildlife Exposure	Implement MM HAZ-1: Oil Spill Response and Contingency Plan (see below)					
Sensitive Species or Habitats	MM BIO-2: Environmental Awareness Training. The approved biological monitor(s) shall be responsible for conducting an environmental awareness training for all Project personnel to familiarize workers with surrounding common and special-status species and their habitats, applicable regulatory requirements, and measures that must be implemented to avoid or minimize potential impacts to biological resources.	Onshore	Signatures of trained employees for compliance	Sensitive Species Avoidance	CRC, L123, and CSLC	Prior to the start of onshore work activities and as needed for new personnel accessing the Project site
Sensitive Species or Habitats	MM BIO-3: Onshore Biological Pre-activity Surveys and Monitoring. A qualified biological monitor shall survey the onshore work area for sensitive species or other wildlife that may be present no more than 24 hours prior to the commencement of Project activities. In addition, the biological monitor will provide daily biological clearance prior to the start of work and shall	Onshore	Observation reports	Sensitive Species Avoidance	CRC, L123, and CSLC	Prior to the start of onshore work and throughout onshore Project activities

Potential Impact	Mitigation Measure (MM)	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	always be on site during Project operations. If at any time during Project decommissioning any wildlife species are observed within the Project area, work around the animal's immediate area shall be stopped until the animal leaves on its own volition or work shall be redirected to an area within the Project site that would not impact these species. Work would resume once the animal is clear of the work area. In the unlikely event special-status species are injured or killed by Project-related activities, the qualified biological monitor would stop work and notify CRC, CSLC, and consult with the appropriate agencies to resolve the impact prior to re-starting work in the area.					
Sensitive Species or Habitats	MM BIO-4: Delineation of Work Limits. Prior to the start of the Project, the onshore decommissioning area perimeters shall be clearly flagged to ensure heavy equipment and vehicles stay within the permitted disturbance area and footprints shall be the minimum extent necessary for equipment staging and activity. Natural areas outside of the work zone shall not be disturbed. Designated equipment staging and fueling areas shall also be delineated at this time.	Onshore	Onsite monitor to verify	Sensitive Species Avoidance	CRC, L123, and CSLC	Prior to the start of and throughout onshore Project activities
Sensitive Species or Habitats	MM BIO-5: Marine Safety and Anchoring Plan Implementation. CRC shall implement the Project Marine Safety and Anchoring Plan during offshore activities in order to reduce potential impacts to hardbottom substrate.	Offshore	Implementation of Project Marine Safety and Anchoring Plan	Avoid potential impacts to offshore hardbottom substrate	CRC, L123, and CSLC	Throughout offshore Project activities
Cultural Resources and Cultural Resources Tribal						
Unknown Cultural Resources	MM CUL-1/TCR-1: Discovery of Previously Unknown Cultural or Tribal Cultural Resources. Prior to ground-disturbance, the Applicant shall contact culturally-affiliated tribes	Offshore and Onshore	Pre-Project training for contractors of cultural and	Reduced potential impacts to unknown	CRC, L123, and CSLC	Prior to and throughout Project activities

Potential Impact	Mitigation Measure (MM)	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	<p>and retain a culturally-affiliated tribal monitor if requested. The Applicant shall also retain a qualified archaeologist to, jointly with any requested culturally-affiliated tribal monitor, train construction staff to be able to identify potential cultural resources. In the event that potential cultural or tribal cultural resources are uncovered during Project implementation, all earth-disturbing work within 100 feet of the find shall be temporarily suspended or redirected until an approved archaeologist and tribal monitor, if retained, has evaluated the nature and significance of the discovery. In the event that a potentially significant cultural or tribal cultural resource is discovered, CRC, CSLC, and any local, state, or federal agency with approval or permitting authority over the Project that has requested/required notification shall be notified within 48 hours. The location of any such finds must be kept confidential and measures shall be taken to secure the area from site disturbance and potential vandalism. Impacts to previously unknown significant cultural or tribal cultural resources shall be avoided through preservation in place if feasible. Damaging effects to tribal cultural resources shall be avoided or minimized following the measures identified in Public Resources Code section 21084.3, subdivision (b), if feasible, unless other measures are mutually agreed to by the lead archaeologist and culturally-affiliated tribal monitor that would be as or more effective. A treatment plan, if needed to address a find, shall be developed by the archaeologist and, for tribal cultural resources, the culturally-affiliated tribal monitor, and submitted to CSLC staff for review and approval prior to implementation of the plan. If the</p>		<p>tribal cultural resource sensitivity</p> <p>Training documented to CSLC staff</p> <p>Onsite qualified archaeologist and tribal monitor (if requested) to verify</p> <p>Compliance reports as well as notification and follow-up correspondence between agencies and CRC if resources are encountered</p> <p>Document any reported finds including retention of any associated archaeological reports</p>	<p>cultural resources</p>		

Potential Impact	Mitigation Measure (MM)	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	<p>archaeologist or tribe determines that damaging effects on the cultural or tribal cultural resource would be avoided or minimized, then work in the area may resume.</p> <p>Title to all abandoned shipwrecks, archaeological sites, and historic or cultural resources, and tribal cultural resources on or in the tide and submerged lands of California is vested in the state and under CSLC jurisdiction. The final disposition of archaeological, and historical, and tribal cultural resources recovered on State lands under CSLC jurisdiction must be approved by the CSLC.</p>					
Unknown Human Remains	<p>MM CUL-2/TCR-2: Unanticipated Discovery of Human Remains. If human remains are encountered, all provisions provided in California Health and Safety Code section 7050.5 and California Public Resources Code section 5097.98 shall be followed. Work shall stop within 100 feet of the discovery, and both an archaeologist and CSLC staff must be contacted within 24 hours. The archaeologist shall consult with the County Coroner. If human remains are of Native American origin, the County Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of this determination, and a Most Likely Descendent shall be identified. No work is to proceed in the discovery area until consultation is complete and procedures to avoid or recover the remains have been implemented.</p>	Offshore and Onshore	Notifications/ Consultations with County Coroner, and NAHC (if applicable)	Reduced impacts to human remains (if found)	CRC, L123, and CSLC	Throughout Project activities
Hazards and Hazardous Materials						
Risk of Water or Soil Contamination	<p>MM HAZ-1: Oil Spill Response and Contingency Plan Implementation. The Project Oil Spill Response and Contingency Plan</p>	Offshore and Onshore	OSRCP documentation, including	Reduced risks of water or soil contamination	CRC, L123, and CSLC	Prior to and throughout Project

Potential Impact	Mitigation Measure (MM)	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	(OSRCP) shall be implemented during all Project activities in the event of a release of oil or contaminants. The OSRCP delineates prevention measures including daily inspection of equipment, refueling at designated stations, and secondary equipment containment for equipment to prevent spills. Additionally, the onshore and offshore work sites shall maintain onsite response equipment to clean up minor spills. In the event of a major spill (greater than five barrels) the OSRCP requires CRC to utilize an independent oil spill response contractor (Marine Spill Response Corporation) to provide secondary cleanup.		emergency agency notification Onsite spill response team to verify CSLC approved monitor to ensure compliance			activities
Risk of Water or Soil Contamination	MM HAZ-2: Hazardous Materials Management and Contingency Plan Implementation. The Project's Hazardous Materials Management and Contingency Plan shall be implemented during all Project activities which includes identification of appropriate equipment fueling and maintenance areas, testing for potential hazardous materials prior to facility demolition and/or removal, daily equipment inspection schedule, a spill response plan, and maintenance of on-site spill response supplies.	Offshore and Onshore	HMMCP documentation, including lab report results to CSLC for standing water in vault Inspections and testing (if necessary) for asbestos and lead based paint. Lab report results to CSLC	Reduced risks of water or soil contamination	CRC, L123, and CSLC	Prior to and throughout Project activities
Hydrology and Water Quality						
Risk of Water or Soil Contamination	Implement MM HAZ-1: Oil Spill Response and Contingency Plan Implementation (see above) Implement MM HAZ-2: Hazardous Materials Management and Contingency Plan Implementation (see above)					

Potential Impact	Mitigation Measure (MM)	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
Recreation						
Interaction with Offshore Recreational Vessels	<p>MM REC-1: Advanced Notice to Mariners. All offshore operations shall be described in a Local Notice to Mariners to be submitted to the U.S. Coast Guard at least 15 days prior to decommissioning activities. The Notice shall include:</p> <ul style="list-style-type: none"> •Type of operation (i.e., dredging, diving operations, construction). <ul style="list-style-type: none"> • Location of operation, including latitude and longitude and geographical position, if applicable. • Duration of operation, including start and completion dates (if these dates change, the U.S. Coast Guard needs to be notified). • Vessels involved in the operation. • VHF-FM radio frequencies monitored by vessels on the scene. • Point of contact and 24-hour phone number. • Chart Number for the area of operation. 	Offshore	Publication of Notice	Reduction of potential impact to offshore recreational vessels	CRC and L123	15 days prior to vessel departure to offshore Project area
Transportation						
Onshore Traffic Impacts	<p>MM T-1: Traffic Control Plan. Prior to commencement of onshore Project activities, a Traffic Control Plan shall be submitted to the CSLC, Ventura County Transportation Commission, and Caltrans for review and approval. It shall include measures such as appropriate signage, traffic cones, and flaggers to reduce potential hazards to motorists, bicyclists, pedestrians, and workers during the Project. Additionally, it shall specify that trucks (delivery, hauling and transportation trucks) shall be scheduled outside the a.m. and p.m. peak</p>	Onshore	Documentation within compliance monitoring sheets	Minimized risks associated traffic congestion as well as vehicle, bicycle, and pedestrian conflicts	CRC, L123, and CSLC	Prior to Onshore Project activities

Potential Impact	Mitigation Measure (MM)	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Party	Timing
	periods (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.) to the extent feasible to minimize local roadway congestion.					
<i>Utilities and Service Systems</i>						
Appropriate Waste Handling	Implement MM HAZ-2: Hazardous Materials Management and Contingency Plan Implementation (see above)					

JN 806-05

Padre Associates, Inc.

Grubb Lease Intake/Outfall Structures Decommissioning Project

To: Jennifer Leighton
 From: Chia-Chi Lu, Ph.D., P.E., D.CE.
 Date: January 23, 2020
 RE: Assessment of Potential Coastal Processes Impact after Removal of Shoreline Vault Facility
 Cc: Simon A. Poulter

This memorandum summarizes our professional assessment of vault structure removal and reuse the onsite riprap stones to construct a continuous shore protective structure. This assessment focuses solely on the potential coastal processes impact, if any, resulting from the proposed removal of the vault structure under the Grubb Lease intake/outfall structures decommissioning project. The project is located approximately 4.4 miles northwest of Ventura, California and approximately 1.3 miles east-southeast of Pitas Point in Ventura County, as shown in Figure 1.



Sources: Base Map from Google Earth dated 8/12/2018 and Vault Facility layout from CSLC, 2019¹

Figure 1. Location Map

The entire vault segment with a footprint of 20 feet by 42 feet includes a vault approximately 20 feet by 14 feet long that is a reinforced concrete and steel sheet pile structure set in the armor rock seawall between the Pacific Coast Highway (PCH) and the intertidal zone. The two intake pipelines and one outfall pipeline were originally connected to the seaward side of the vault. A 36-inch-diameter pipeline casing consisting of three pipelines exits the vault on the landward side of the vault (see Figure 1). The vault contains water pumps, piping, two levels of grating, and other ancillary equipment. The complete decommission procedure of this vault facility consists of:

- Remove all equipment and appurtenances from inside the vault,
- Remove the entire vault structure down to 5 feet below the existing beach contours and leave the remaining 7 feet in place, and
- Reuse the existing onsite riprap stones that are placed around the perimeter of the vault structure to construct a revetment that is tied into the existing upcoast and downcoast revetments and form a continuous shore protective revetment.

The neighboring property owners have raised a concern whether the removal project can potentially result in sand loss at Solimar Beach. Therefore, our professional service is to perform a review of the existing beach conditions and assess the consequence that may result from complete removal of this vault facility that is replaced with a shore protective revetment.

Existing Beach Condition

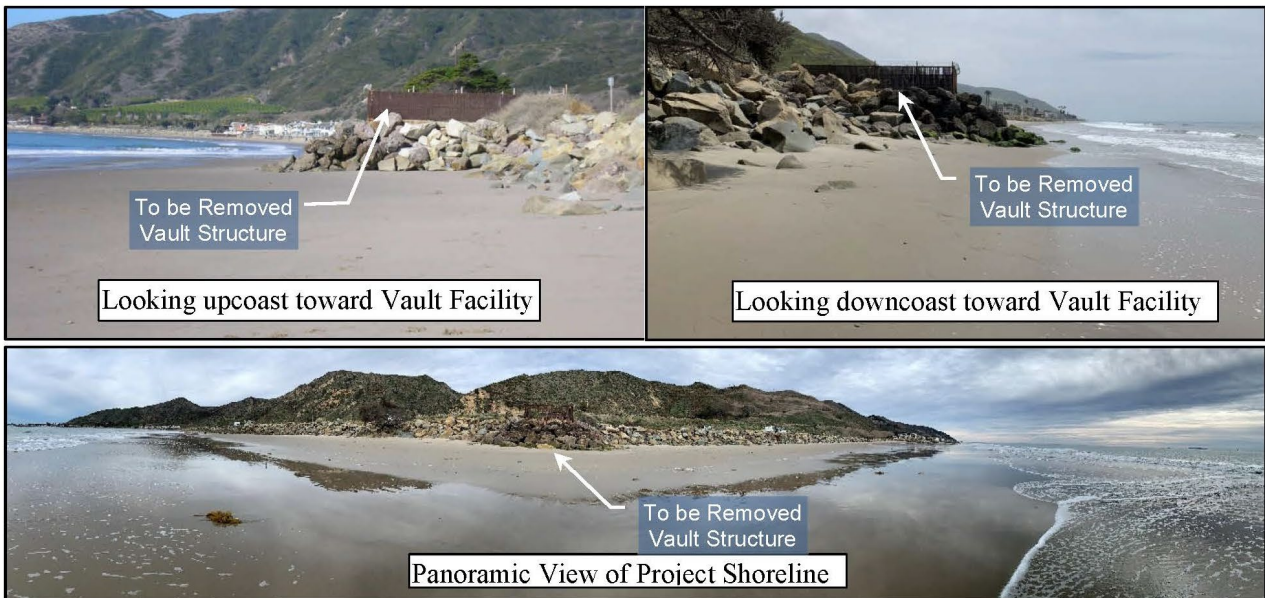
The shoreline segment along the project area is located within a sand-limited littoral cell. The alongshore sand transport direction can either be from northwest or southeast. Winter sand profiles are typically more depleted than summer profiles, as sands are carried offshore beyond the surf zone during the winter months and stored in a bar formation. During the summer months, the beach widens and reforms as sands from the offshore bar return. This phenomenon is the consequence of seasonal wave climate. The offshore sand movement is induced by the stormy high waves in the winter, while the reverse trend occurs due to the low-height longer-period swells that are commonly observed in the summer months. Since it is a limited sand shoreline reach, there exists no abundant sand on beach even during the summer months. Figure 2 and Figure 3 illustrate the beach conditions that are observed in four different seasons. Figure 2 shows the beach conditions in July (summer) and January (winter), while Figure 3 exhibits the shoreline condition in April (spring) and November (fall).

The vault facility that has a dimension of 20 feet in alongshore length and 42 feet in cross-shore distance mimics a shore-perpendicular structure, which can entrap sand moving from upcoast or downcoast. The sand entrapment would create a localized effect that may deprive sand moved toward the downcoast beach. However, since the seaward encroachment is only 20 feet or so, compared to the adjacent revetment alignment, the entrapment effect is minimal. Review of historical photographs from Google Earth between 2003 and 2019 indicates that little change for the shoreline segment adjacent to the vault facility. This implies that the presence of the vault structure has little impact on sand movement within the project shoreline segment.

Figure 4 illustrates different degrees of the sand entrapment effect that is induced by various shore-perpendicular structures. The top aerial photograph clearly shows that the effect by the vault structure is not noticeable because there exists no discontinuity of the water line (red dashed line) within upcoast and downcoast segment. Rather, the observed pockage beach is created by the presence of the cross-shore revetment located downcoast. The bottom photograph demonstrates that if a sand entrapment effect occurs, the discontinuity of the water line (red dashed lines) between the updrift and downdrift segment will be visible as is evident at Dockweiler Beach, Los Angeles County. The photograph

shows the distinct features resulting from the sand entrapment effect by the two groins. Therefore, in our professional opinion, alongshore sand entrapped by the existing vault facility, if any, is negligible.

The vault facility also includes three severely degraded intake/outfall pipelines that have a diameter of 12 inches and extend to offshore, as shown in Figure 5. The pipelines laid on beach are buried underneath the sand layer most of the time (see Figures 2 and 3). Therefore, its impact on coastal processes within the project area is minimal. The pipelines can be exposed during and immediately after individual winter storms (see Figure 5). After a storm passes by, the eroded beach recovers and the pipelines will once again be buried. The photograph shown in Figure 5 was taken on January 21, 2019 immediately after a major storm that was recorded on January 17-18, 2019. Even during the short pipeline-exposed period, the impact on sand movement and alongshore currents is typically localized and negligible from a regional perspective of sand movement.



Notes: Photos taken in July 2018 (top) and January 2020 (bottom)
Source: Padre Associates, Inc.

Figure 2. Observed Ground Beach Conditions



Sources: Aerial photo from Google Earth taken on 4/14/2017 (top) and 11/19/2018 (bottom)

Figure 3. Shoreline Condition in Spring and Fall



Sources: Base Map from Google Earth dated 8/12/2018 (top) and 3/14/2018 (bottom)

Figure 4. Example Sand Effects by Shore-Perpendicular Structure



*Notes: Photos taken in January 2019
Source: Padre Associates, Inc.*

Figure 5. Severely Degraded Pipelines

Impacts by Proposed Removal of Vault Facility

After removal of the vault facility and reuse of onsite riprap stones to construct a revetment segment that is tied into the existing adjacent revetments (see red lines in Figure 3), sand will then be able to be transported alongshore freely in either direction (upcoast and downcoast) without any potential blockage. However; as previously stated, based on review of historical aerial photographs and documentation at the project site, the existing vault and pipelines currently only induce negligible sand retention of alongshore sand movements, if any. Removal of the vault structures would allow free alongshore sand transport without any entrapment within the project area. The downdrift shoreline segment such as Solimar Beach may potentially benefit from freer sand movement. It should be noted that the impact induced by the existing vault structure is considered negligible and the potential benefit on the downcoast shoreline segment from structure removal may be limited. The existing beach profile or shoreline reconfiguration at the project site are expected to remain unchanged.