# ATTACHMENT
# PROJECT DESCRIPTION

## PRC 421 Decommissioning Project

## 1.0 PROJECT BACKGROUND AND LOCATION

The existing facilities at the former Oil and Gas Lease PRC 421 include two piers and caissons, Pier 421-1 and Pier 421-2, on State tidelands and submerged lands as well as the upland access road and revetment below the bluffs marking the southern limit of the Sandpiper Golf Course in the city of Goleta, California (Figure 1). The original oil and gas lease (Lease No. 89) was issued in 1929, terminated and renewed under PRC 421 in 1949, and subsequently reassigned several times with the last assignment to Venoco, Inc. (Venoco) in 1997, but later quitclaimed to the State of California in 2017 (see below). The two existing PRC 421 piers and associated access road and pipelines are the last remaining structures associated with the prolific oil development of the Ellwood Oil Field[3] that occurred along the Ellwood Coast from the late 1920s to the 1990s. The Ellwood Oil Field, which was discovered by Barnsdall Oil Company in 1928, is approximately 4 miles long and 0.5 mile wide, and trends east-west along the shoreline just south of the Sandpiper Golf Course. The immediate Project vicinity supported numerous onshore and offshore wells from the 1930s through the 1950s, along with substantial supporting infrastructure. Peak production from the entire Ellwood Oil Field reached nearly 49,000 barrels of oil per day (BOPD) in 1930. Remnants of this infrastructure still exist today, including multiple capped wells, the old timber seawall which lines portions of the Ellwood Coast, and the surf zone production piers of PRC 421.

Construction of the PRC 421 piers began in 1928; Pier 421-1 was completed in November 1929 and Pier 421-2 was completed in April 1930. A total of nine wells were drilled within PRC 421 into the Vaqueros Reservoir (a portion of the Ellwood Oil Field), which is the source of oil produced from PRC 421. Production peaked from the associated wells in 1931, at nearly 628,000 barrels of oil per year (Figure 2-1).

By the mid-1950s, more than half of the offshore wells in the Ellwood Oil Field were plugged and abandoned. On PRC 421, all but two wells were plugged and abandoned. The two that remained were Well 421-2, a producer, and Well 421-1, which was converted in 1973 to an injection well for produced water from

[3] The Ellwood Oil Field pertains to the field developed from onshore accessed sites (e.g., oil piers) and not the South Ellwood Field that is developed offshore from Platform Holly.

the 421-2 well. Ellwood area oil facilities continued to be operated and developed, with active development occurring in the Ellwood area into the 1990s. By the end of 1993, Well 421-2 became the only producing well in the Ellwood Oil Field. Well 421-1 had not produced oil since 1972. Mobil Exploration and Producing, Inc. (Mobil) was the lessee at that time, having acquired the lease from Atlantic Richfield Company (ARCO). In 1997, Mobil sold the lease and the Ellwood facilities, including the piers, Ellwood Marine Terminal (EMT), Ellwood Onshore Facility (EOF), and Platform Holly to Venoco.

**Figure 1. Project Location**


In April 2014, the California State Lands Commission (CSLC) certified the Environmental Impact Report (EIR) and authorized Venoco's PRC 421 Recommissioning Project to return PRC 421 to oil production from the existing Well 421-2 and process the crude oil emulsion at the EOF. The project was never implemented.

In March 2016, Venoco filed for Chapter 11 Bankruptcy to reorganize. In April 2017, Venoco again filed for bankruptcy and subsequently began liquidation of its assets which included quitclaiming its oil and gas leases back to the State.

Lease PRC 421 and the associated two wells and pier structures were among the assets turned over to the State. The wells were shut-in (non-productive) at the time the State took control of them.

In 2019, the two wells, 421-1 and 421-2, were successfully plugged to the surface under the direction and supervision of the CSLC and the California Geologic and Energy Management Division (CalGEM) in compliance with regulatory specifications. The approved plugging was completed to the extent that cement was placed in both wells to just below surface, but final abandonment still requires the remaining conductor pipe to be removed. With the plugging and abandonment of the last two wells remaining in the oilfield, the piers, caissons, and associated pipelines have no further use. The existing access road and supporting revetment would continue to be used for decommissioning activities and would be removed following decommissioning of the piers, caissons, and pipelines. These deteriorating structures now represent a physical coastal obstruction, a potential public safety hazard, and a potential environmental hazard represented by the known presence of hydrocarbon-impacted soil and fill contained within the pier caissons. The removal of these structures will be a significant public benefit, will allow full use of the beach coastline by the public, and will eliminate an existing threat to public safety and the environment.

By statute, CSLC has jurisdiction, in the Project area, over tidelands and submerged lands, waterward of the mean high tide line. Although the CSLC is the CEQA lead agency and will analyze the environmental effects of the entire Project, CSLC will undertake that portion of the Project within its jurisdiction. Certain Responsible Agencies (see Section 3.0 below) will have discretionary authority over the Project as a whole as well as authority to undertake components of the Project that lay landward of the mean high tide line.

## 2.0 PROJECT DESCRIPTION

### 2.1 Project Objectives

The objectives for the PRC 421 Decommissioning Project are to:

- Fully remove the piers, caissons, and remaining portions of the wells (the riser pipe from the top of the cement plug and wellheads) above the bedrock located approximately 19 feet below the surface grade
- Decommission and remove the two pipelines beneath the access road
- Remove the access road and supporting rock revetment

- Plug and abandon in place the remaining pipelines beneath the golf course back to the tie-in points just outside of the EOF
- Restoration of the beach area to conditions similar to the surrounding area and appropriate for safe public access and use

## 2.2 Project Facilities

The primary facilities associated with PRC 421 occupy approximately 11,600 square feet that includes two piers and caissons on State tidelands and submerged lands below the bluffs at the southern limit of Sandpiper Golf Course (Figure 1). The two piers, Pier 421-1 and Pier 421-2, are built with vertical steel piles with overlying horizontal steel I-beams and wood timber decking and are approximately 325 feet apart. Each is approximately 80 feet in length. Pier 421-1 is approximately 40 feet in width and pier 421-2 is approximately 30 feet in width. The piers provide access and support for two wells within separate concrete caissons. Each caisson is a concrete and sheet pile, sand-filled structure, approximately 68 feet wide, 42 feet deep, and 20 feet tall above mean sea level (msl). In addition to the sand fill, each caisson also contains a number of various old steel piles, wood timbers, metal debris, concrete stem walls, and concrete footings that supported the original derrick and other structures through the years.

A dirt and gravel road originating near the EOF provides vehicle access to the two shoreline piers at PRC 421. This road was part of a more extensive service road that was originally built to connect at least 11 individual oil piers and nearly 50 oil wells with onshore services and oil production facilities. The access road, located entirely on property owned by the Sandpiper Golf Course, currently extends in a southerly direction from the EOF for 600 feet across Sandpiper Golf Course and then turns southeast and extends approximately 1,300 feet along the base of the bluff to the PRC 421 piers. The segment of the access road along the base of the bluff is protected by a rock revetment. Two existing pipelines, one 6-inch-diameter and one 2-inch-diameter, connect PRC 421 wells to the now abandoned Line 96 (the oil line that historically connected the EOF to the EMT) at a tie-in located just outside of the EOF. Neither of these pipelines have been used since 1994. The access road and the pipelines are located within easements granted to Venoco by the property owners of the Sandpiper Golf Course. Since Venoco's bankruptcy, the CSLC has been overseeing all operation and systems safety of the EOF and has maintained and enhanced the access road to facilitate PRC 421 well abandonments.

**Figure 2. PRC 421 Piers and Caissons**

## 2.3 Project Decommissioning

The decommissioning includes the complete removal of the piers and caissons back to the existing seawall, removal of both well casings and welding a plate on the well at the bedrock, removal of the access road, and the decommissioning and subsequent removal of the two pipelines that extend from the piers area, beneath the road up to the golf course to the EOF. The pipelines beneath the golf course to the EOF would be abandoned-in-place. The existing pier abutment within the road as well as the supporting infrastructure which supports the road and foot of the cliff would be removed.

Project components include:

- Removal of soil and fill inside both caissons down to the existing bedrock, including all interior debris (buried timber, steel, and concrete support structures)
- Cutting and removal of well casings down to existing bedrock elevation and installation of a final welded well cap
- Removal of both caissons' external sheet pile and concrete walls including concrete footings
- Full removal of both pier structures and supports to the bedrock interface
- Decommissioning and removing the pipelines beneath the access road
- Removal of the access roadway and supporting revetment

- Flushing, grouting, and abandonment in place of the 2-inch and 6-inch pipelines beneath the golf course pipeline corridor to the EOF
- Final site restoration

Caisson Fill Soil

The soil within both caissons is known to have elevated levels of hydrocarbon contamination. Based on the soil testing, most, if not all, of the soil to be removed during the 421-1 and 421-2 pier decommissioning project would be chemically profiled, transported and disposed. Laboratory analysis to date indicates the soil fill can be disposed of under Non-hazardous Materials Manifests. Additional sampling and analysis would be required to verify Non-Hazardous conditions at the time of removal to determine the final disposition. The volume of soil estimated for disposal from inside the two caissons is approximately 3,550 cubic yards (gross volume). The total resulting volume may be less depending on the volume of the internal structures (concrete and steel), and other debris within each caisson.

Potential for Oil Release to the Surrounding Environment

Proper care, planning, and appropriate precautions would be necessary during the soil removal process to ensure the protection of the marine and terrestrial environments in the area surrounding the project. Wells 421-1 and 421-2 are plugged and incapable of flow. An accidental release of oil-impacted soil during the decommissioning of caissons 421-1 and 421-2 could occur, resulting from caisson wall failure during demolition, from potential wave or seismic damage to the structure that prematurely exposes impacted soil to the environment prior to removal, or from an accidental spillage of these impacted soils during soil removal and transport. Additionally, the 6-inch former production pipeline, may contain residual crude oil (although this is unknown). This pipeline will be flushed with clean water prior to decommissioning and removal.

All of these sources would result in only a limited amount of oil (likely less than one barrel in volume) and if occurred, would likely be less than the sheens observed from the nearby natural seeps. Desorbed oil from a release of hydrocarbon impacted soil would likely manifest itself as a sheen on the water, rather than measurable amounts of free-phase crude oil. Numerous seeps are present in the offshore and nearshore area proximal to the Project site. A small seep has been observed in the tidal zone near the southwest corner of the 421-2 caisson. These seeps commonly result in oil sheens and small oil blobs in the areas surrounding the seep. These natural seep conditions have been intermittently observed on

the beach and in the ocean water near the project site and are likely to continue during the Project execution and afterward.

It is currently unknown if there are any contaminated sediments along the pipeline routes within the access road and would need to be investigated.

### 2.3.1 Removal of PRC 421-1 and 421-2 Structures

The following outlines the major steps in the process of removing the pier and caisson structures on the beach.

- Remove fill within Well Cellars
- Remove about 10 feet of conductor and temporary cap well
- Remove caisson fill
- Cut well casing and weld final plug and abandonment cap at bedrock
- Demolish caissons
- Remove pier structures
- Recycle and dispose of soils and materials
- Beach site restoration

Removal of the structures would require, in part, working within tide windows that allow for the most efficient and safe operations that minimize risk and impacts to personnel, the public and to the environment. This would require consideration of operations occurring in both daylight and nighttime hours that best accommodate the tides, hours of possible beach closure, and other logistical, environmental, and safety concerns.

Before any decommissioning work, a bubble test on both wells would be completed under the guidance of CalGEM. A bubble test is a standard procedure during final well plug and abandonment (P&A) operations by which the well casing is filled with clean water and is monitored for the presence of gas bubbles. State CalGEM representatives witness and certify the test, verifying the well is properly sealed. Once verified as sealed, both well risers would be cut near the base of the cellars and a temporary welded or bolted flange cap would be installed to prevent fill from entering the well casing during the removal of remaining soil within the caisson. A final welded cap would be installed following the removal of all caisson soil and cutting of the remaining well casing riser, at or below the bedrock interface.

All structures and debris to be removed would be evaluated for the presence of hazardous materials, including polychlorinated biphenyls (PCBs), metals,

polycyclic aromatic hydrocarbons (PAHs), benzene, toluene, ethylbenzene, xylene, asbestos, and other oil-related byproducts.

### 2.3.2 Pipeline and Access Road Decommissioning

The pipelines through the golf course easement are in common trenches with pipelines servicing Platform Holly offshore. To avoid potential damage to these in-service pipelines and to minimize disturbance to the golf course, the two pipelines would be flushed, filled with grout or another approved material, and abandoned in-place. The pipelines in the access road below the bluff would be removed to a point that does not disrupt the ongoing use of the golf course. When the access road and supporting revetment is no longer needed to support decommissioning activities, this infrastructure would be removed.

### 2.3.3 Beach Access

A temporary beach access ramp will be constructed near the gate along the access road (Figure3). Seasonal considerations must be given for conditions like seasonal high tides and summertime high sand deposits. A secondary beach access point is located along Hollister Avenue 0.2 mile west of the EOF. An access road traverses north to south along the eastern property line of the Bacara Resort and is maintained for emergency vehicle use. This access point would be used to access the beach for constructing the temporary beach access ramp.

**Figure 3. Beach Access Location**


### 2.3.4 Construction Schedule and Tides

Decommissioning activity is estimated to extend over approximately 6 months. Work is anticipated to begin in Spring 2022 and extend through the Summer/Fall 2022 during the high sand deposits of the summertime. Most decommissioning

tasks would take place between 7:00 AM and 7:00 PM, 5 to 6 days per week, for operations that would be completed from the pier and road level. The work windows for the caisson walls removal would be dictated by the low tide events allowing heavy equipment access to the beach. Some flexibility would be needed regarding the hours of operation to allow for nighttime and/or weekend work due to the progression of tides and other factors such as during critical operations. The caisson removal from the beach may require a 6- to 7-day work week to take proper advantage of tide cycles.

Low tide events change daily and progress on average 30 minutes each successive day. As such, timing of decommissioning of the caissons would change daily. The average low tide duration for beach access where the caissons are completely out of the ocean is approximately 4 hours. The caissons can be accessed with heavy equipment at tides heights of 1 foot and below during the later winter/early springtime and tides under 2 feet during the late summer/early fall, based on field observations. Tide heights at or below the 2-foot level allow equipment to work on the caisson from the beach and time to safely retreat back to the access road, keeping equipment out of the ocean water.

### 2.3.5 Construction Staging Area, Equipment, Public Access to Beaches

Construction equipment and materials are likely to be staged in an existing easement area located immediately adjacent to the EOF western fence line. The Bacara emergency watercraft access road could also be utilized for staging of equipment and bins along its length as it has in previous projects. An existing 30-foot by 30-foot helipad and area surrounding it at the south end of the EOF may also be available as an additional staging area for vehicles, materials, and/or emergency equipment. Temporary construction fencing and delineation signs currently isolate the identified wetland located immediately north of the entrance to Pier 421-2 and serve to protect the wetland from construction activities. Similar fencing can be placed along Bell Canyon Creek riparian habitat corridor and other sensitive habitat areas.

### 2.3.6 Public Access

Every attempt will be made to keep the beach area open for public access, to the extent it is safe to do so. During caisson soil removal and wellhead removal activities, limited temporary beach access restrictions would be necessary. Access to the beach in the areas surrounding the decommissioning activities would be interrupted during pier removal and caisson demolition. Proper

scheduling, agency and public notifications, and posting of access limitations would be made in advance to inform the public of construction operations and possible temporary closures. During potentially hazardous activities, safety personnel would be stationed on each side of the pier to prevent unfettered public transit through the project site.

### 2.3.7 Standard Practices

Standard safety and environmental practices would be implemented throughout the decommissioning phase of the proposed project. The approved contractor would implement site-specific construction mitigation plans, safety plans, traffic minimization plan, equipment refueling plans, and habitat protection plans, among other site-specific plans. These plans will develop the standard practices and operational procedures necessary for protection of the environment, personnel, and the public.

### 2.3.8 Oil Spill Response Capability and Emergency Response Equipment

Initial response oil spill containment equipment would be located onsite. This would include a fully equipped spill response trailer including items which may include bales of sorbent pads, boom, sweep, and oil snares; Komara Disc Skimmer with power pack and hoses; 55-gallon drums for waste; drum liners and plastic bags; plastic sheeting; decontamination pools with brushes; assortment of hand tools and PPE; traffic cones and delineators; and light plants. The spill response trailer would be manned by two spill response trained personnel during all phases of soil removal from the caissons, the removal of both well risers, and for any operations requiring heavy equipment on the beach such as the removal of the caisson walls and the removal of any pier piles. All other decommissioning activities would require contractors to provide spill kits on site for smaller spills associated with equipment use such as fuel or hydraulic fluid releases of limited quantity.

In addition to the above measures, CSLC Contract Operator, Beacon West Energy, operates under a comprehensive Oil Spill Contingency Plan (OSCP) that covers operations for the PRC 421, Platform Holly, and EOF facilities. The OSCP is approved by the California Department of Fish and Wildlife Office of Spill Prevention and Response and Santa Barbara County Office of Emergency Management. The OSCP details response procedures, training and drills for the covered facilities, spill response capabilities, and Incident Command Structure. An amendment to the OSCP will be developed to address the Project-specific conditions.

### 2.3.9 Truck Trips for Materials Removal

The removal of fill and structural material from the site will require the use of a variety of trucks including vacuum trucks, bin transport trucks, half-round dump trucks and flatbed trailers, to facilitate the recycling and disposal of the different materials that comprise the 421 pier structures and caissons and the access road. Approximately 500 truck trips from the site have been estimated based on the volume of materials that make up the pier structures. It is anticipated that several hundred additional truck trips would be required for the removal of the access road and revetment.

### 2.3.10 Restoration and Cleanup

After completion of all decommissioning and remediation as required and set forth in the Action Plan, the beach would be restored according to an approved Site Restoration Plan. All surplus construction materials and equipment would be removed from the project site and the lay down area.

## 3.0 PERMITS AND AGENCY COORDINATION

In addition to the action by the CSLC, the Project may require permits and approvals from other reviewing authorities and regulatory agencies that may have oversight over aspects of the proposed Project activities, including, but not limited to, those listed in Table 1.

**Table 1. Potential Responsible, Coordinating, and Consultation Agencies/Entities**

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|---|---|
| **Local & Regional** | City of Goleta<br>County of Santa Barbara Environmental Health Services<br>Santa Barbara County Air Pollution Control District |
| **State** | California Coastal Commission<br>California Department of Wildlife, Office of Spill Prevention and Response<br>California Central Coast Regional Water Quality Control Board<br>California Geologic Energy Management Division<br>State Historic Preservation Office |
| **Federal** | U.S. Army Corps of Engineers<br>U.S. Fish & Wildlife Service<br>National Oceanic and Atmospheric Administration – National Marine Fisheries Service<br>U.S. Coast Guard |

| | |
|---|---|
| **Tribal** | Project activities will be coordinated with local tribes consistent with the CSLC's Tribal Consultation Policy adopted in August 2016 (see www.slc.ca.gov). |

## 4.0 SCOPE OF THE EIR

Pursuant to State CEQA Guidelines section 15060, the CSLC staff conducted a preliminary review of the proposed Project and determined that there is a potential for significant impacts resulting from the proposed Project. A preliminary list of environmental issues to be discussed in the EIR is provided below. Additional issues may be identified at the public scoping meeting and in written comments as part of the CEQA process. The CSLC invites comments and suggestions on the scope and content of the environmental analysis, including the significant environmental issues and mitigation measures that should be included in the EIR.

The CSLC uses the following designations when examining the potential for impacts.

| | |
|---|---|
| **Potentially Significant Impact** | Any impact that could be significant, and for which feasible mitigation must be identified and implemented. If any potentially significant impacts are identified but cannot be mitigated to a less than significant level, the impact would be *significant and unavoidable*; if any potentially significant impacts are identified for which feasible, enforceable mitigation measures are developed and imposed to reduce said impacts to below applicable significance thresholds, the impact would be *less than significant with mitigation*. |
| **Less than Significant Impact** | Any impact that would not be considered significant under CEQA relative to the applicable significance threshold, and therefore would not require mitigation. |
| **No Impact** | The Project would not result in any impact to the resource area considered. |
| **Beneficial Impact** | The Project would provide an improvement to the associated environment in comparison to the baseline information. |

The estimations of impact levels used for this NOP are based solely on preliminary documents. Impact levels may change and additional impacts may be identified during preparation of the EIR as more information is obtained.

## 4.1 Alternatives Analysis

State CEQA Guidelines require an EIR to:

> *…describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives* (§ 15126.6).

The State CEQA Guidelines also require that the EIR evaluate a "no project" alternative and, under specific circumstances, designate an environmentally superior alternative from among the remaining alternatives. The EIR will:

- Identify alternatives based on the environmental analysis and information received during scoping
- provide the basis for selecting alternatives that are feasible and that would reduce significant impacts associated with the proposed Project
- provide a detailed explanation of why any alternatives were rejected from further analysis
- evaluate a reasonable range of alternatives including the "no project" alternative

## 4.2 Currently Identified Potential Environmental Impacts

A preliminary list of environmental issues to be discussed in the EIR is provided below. Based on initial internal scoping, the Project is not anticipated to impact the following environmental factors identified in State CEQA Guidelines Appendix G (Environmental Checklist Form).

- Agricultural and Forestry Resources
- Mineral Resources
- Wildfire
- Energy
- Population and Housing

Additional issues may be identified at the public scoping meeting, and in written comments, as part of the CEQA process. The CSLC invites comments and suggestions on the scope and content of the environmental analysis, including the significant environmental issues and mitigation measures that should be included in the EIR.

| Environmental Topic | Anticipated Project Impacts |
|---|---|
| Aesthetics | The analysis will examine Project impacts resulting from visual impacts from several representative viewpoints. The removal of the relic oil and gas infrastructure is anticipated to have a beneficial impact in the immediate area. |
| Agricultural and Forestry Resources | There are no agricultural or forestry resources within or near the Project area. |
| Air Quality | The analysis will examine emissions of criteria air pollutants and dust generated from decommissioning activities. |
| Biological Resources | The analysis will examine potential decommissioning impacts (e.g., permanent loss or temporary disturbance to vegetation and wildlife habitat). The analysis will also examine proposed Project activities on federally or State-listed species or other sensitive species; conflicts with any local policies on biological resources; and any conflicts with local, regional, or State habitat conservation plans. |
| Cultural Resources | The analysis will examine Project impacts to historic and architectural resources due to ground disturbance during decommissioning. |
| Cultural Resources – Tribal | In accordance with Assembly Bill 52 and CEQA requirements, the analysis will address the presence of and impacts to tribal cultural resources in consultation with Native American Tribes. |
| Energy | The proposed Project does not anticipate the potential for wasteful, inefficient, or unnecessary consumption of energy resources. |
| Geology and Soils | The analysis will examine potential decommissioning impacts primarily associated with the potential for soil erosion and impacts to the bluff. |
| Greenhouse Gas Emissions | The analysis will examine Project emissions of greenhouse gases resulting from decommissioning activities. |
| Hazards and Hazardous Materials | The analysis will examine Project hazards and hazardous materials resulting from decommissioning activities (e.g., waste management and potential for accidental release of a hazardous material). |
| Hydrology and Water Quality | The analysis will examine potential decommissioning-related impacts to drainage and flooding conditions, erosion and sedimentation inducement, and marine water quality. |
| Land Use and Planning | The analysis will examine the City's General Plan and applicable policies and standards as it relates to the decommissioning. |
| Mineral Resources | There are no known mineral resources on the site, and it is anticipated the Project would not affect access to nearby resources. |
| Noise | The analysis will examine Project impacts to ambient noise levels resulting from decommissioning activities. |
| Population and Housing | The Project is temporary and would not require a change in the number of employees and would require only short-term demolition activity for removal of the two piers and caissons. The Project would neither induce substantial population growth in the area nor displace any people or housing units. |

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|---|---|
| Public Services | The Project is temporary and would not likely result in substantial demand for law enforcement, fire protection, and other public services. |
| Recreation | The analysis will examine Project impacts to recreational activities and beach access during and after decommissioning activities. |
| Transportation and Traffic | The analysis will examine Project decommissioning impacts to transportation and public access to roads and highways. |
| Utilities and Service Systems | The Project is temporary and would not result in additional demand for water, wastewater treatment, or solid waste disposal services in excess of current capacities. |
| Wildfire | The Project area is in the incorporated community of Goleta and is not located in a high fire hazard severity zone as identified by CalFire. |

## 4.3 Special Impact Areas and Other Commission Considerations

### 4.3.1 Cumulative Impacts

The State CEQA Guidelines require an analysis of cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." A cumulative impact is created through a combination of the project being analyzed in an EIR and other projects in the area causing related impacts.

### 4.3.2 Growth-Inducing Impacts

Although not expected to be an impact with this proposed Project as provided in Population and Housing above, CEQA does require a discussion of the ways in which a proposed project could foster economic or population growth in the project's vicinity. The EIR will contain a discussion of the potential growth-inducing impacts of the proposed Project.

### 4.3.3 Climate Change and Sea-Level Rise

Although the proposed Project will remove the pier and caisson infrastructure and not be affected by future sea-level rise, the analysis will include the potential long-term effects of sea-level rise and coastal processes with the removal of the structures, pipelines, access road, and revetment.

### 4.3.4 Commercial and Recreational Fishing

A wide variety of fish and shellfish species are commercially harvested in the Project area; therefore, the analysis will include potential impacts to commercial and recreational fishing.

### 4.3.5 Environmental Justice

Though not required by CEQA, the EIR will examine whether the Project would have the potential to disproportionately affect area(s) of high minority population(s) and low-income communities, as well as the Project's consistency with the CSLC environmental justice policy.