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Established in 1938

October 4, 2022

SCH # 2022100043
CSLC File Ref: W30134

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING

NOTICE IS HEREBY GIVEN that the California State Lands Commission (CSLC), as lead agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR), and that CSLC staff will hold two sessions of a public scoping meeting (one in person and one hybrid) pursuant to CEQA and the State CEQA Guidelines for the project listed below.[1]

Project Title: Rincon Phase 2 Decommissioning Project

Proponent: California State Lands Commission

Project Location: Rincon Island and causeway are located approximately 3,000 feet offshore of Punta Gorda in Ventura County, approximately 7 miles northwest of the city of Ventura, California. The Onshore Facility consists of an approximately 6.0-acre parcel owned by the State located 1.3 miles to the east of Rincon Island at 5750 W. Pacific Coast Highway, Ventura (see Figure 1 in the Attachment).

Meeting Information: Thursday, October 20, 2022. Sessions begin at **2 PM** and **6 PM**.

2 PM	**6 PM**
Carpinteria City Hall, 5775 Carpinteria Ave, Carpinteria, CA **(In person only)**	Carpinteria City Hall, 5775 Carpinteria Ave, Carpinteria, CA Via Zoom at: https://us02web.zoom.us/j/87111485778?pwd=ZFNGT0ljTk1CVFlQc1plNFJJaTgzdz09 or by **Phone**: 833 548 0282 (Toll Free) then enter Webinar ID: 871 1148 5778 **Passcode**: 559964

[1] CEQA is in Public Resources Code section 21000 et seq.; the State CEQA Guidelines are in California Code of Regulations, title 14, section 15000 et seq. The public scoping meeting will be held pursuant to CEQA (§ 21083.9, subd. (a)(2)) and the State CEQA Guidelines (§§ 15082, subd. (c), and 15083).

The CSLC staff has prepared this Notice of Preparation (NOP) to solicit public and agency comments, in writing or at the public meeting, as to the scope and content of the environmental analysis, mitigation measures, and alternatives to include in the EIR. Applicable agencies will need to use the EIR when considering related permits or other Project approvals. This NOP, along with additional background information and the Project Description included in the Attachment, is available online at www.slc.ca.gov (under the "Information" tab and "CEQA" link).

Written comments must be received or postmarked by November 4, 2022.[2] Please send your comments at the earliest possible date to:

Cynthia Herzog Senior Environmental Scientist California State Lands Commission 100 Howe Avenue, Suite 100-South Sacramento, CA 95825	**Email:** CEQA.comments@slc.ca.gov (Subject Line: **Rincon Phase 2 Decommissioning Project NOP Comments**) **Phone:** (916) 574-1310

PROJECT SUMMARY

The proposed Project would include remediation of the Onshore Facility, removal of Rincon Island's remaining surface structures, removal of the Island's well bay concrete deck and contaminated soil, backfill of the Island with clean soil, decommissioning of onshore pipeline connections, and improvement of the State Coastal Conservancy parcel adjacent to the causeway landing (abutment).

PUBLIC SCOPING MEETING

For those not attending in person, each session of the public scoping meeting will also be conducted using the online meeting platform Zoom. You may join by entering the web link listed above for the session you would like to join, or by dialing in by telephone at the number listed above. The Zoom meeting links will also be available on the CSLC's website at www.slc.ca.gov (under the "Information" tab and "CEQA" link). You may join from a desktop computer, laptop, mobile device, or telephone. Staff recommends that you test out your device, internet connection, and Zoom app compatibility well before attempting to join the meeting.

The CSLC staff will begin each session of the scoping meeting noticed above with a brief presentation on the proposed Project. The material presented at both sessions will be the same. Two sessions are scheduled for the convenience

[2] Pursuant to State CEQA Guidelines section 15103, Responsible and Trustee Agencies shall provide a response to an NOP within 30 days after receipt of the notice.

of the attendees. After each presentation, staff will receive comments on the potential significant environmental issues that should be included in the EIR, until all persons present who wish to provide oral comments have done so, at which time staff will close the session. Each session will be recorded, and all oral comments will be summarized in a scoping memo. A 3-minute time limit on oral comments may be imposed. No Commission action on the Project will occur at these sessions; any such action will occur at a separate noticed public meeting after the EIR has been finalized.

IMPORTANT NOTES TO COMMENTERS

1. If you submit written comments, you are encouraged to submit electronic copies by email to CEQA.comments@slc.ca.gov and write **"Rincon Phase 2 Decommissioning Project NOP Comments"** in the subject line of your email.
2. Before including your mailing or email address, telephone number, or other personal identifying information in your comment, please be aware that the entire comment - including personal identifying information - may become publicly available, including in the EIR and posted on the Internet. The CSLC will make available for inspection, in their entirety, all comments submitted by organizations, businesses, or individuals.
3. If you represent a public agency, please provide the name, email address, and telephone number for the contact person in your agency for this EIR.
4. If you require a sign language interpreter or other reasonable accommodation for a disability, as defined by the federal Americans with Disabilities Act and California Fair Employment and Housing Act, in order to participate in the scoping meeting, please contact the CSLC staff person listed below at least 5 days in advance of the meeting to arrange for such accommodation.
5. Please contact the CSLC staff person listed in this NOP at cynthia.herzog@slc.ca.gov or (916) 574-1310 if you have any questions.

Signature:  Date: October 4, 2022

Cynthia Herzog
Senior Environmental Scientist

ATTACHMENT
PROPOSED PROJECT DESCRIPTION

Rincon Phase 2 Decommissioning Project

1.0 PROJECT BACKGROUND AND LOCATION

In December 2017, Rincon Island Limited Partnership, quitclaimed (transferred) its lease interests (State Oil and Gas Lease Nos. PRC 145, PRC 410, and PRC 1466) to the California State Lands Commission (CSLC) after becoming financially insolvent. Thereafter, the State of California (State) pursued decommissioning of the oil and gas related facilities and final disposition of Rincon Island.

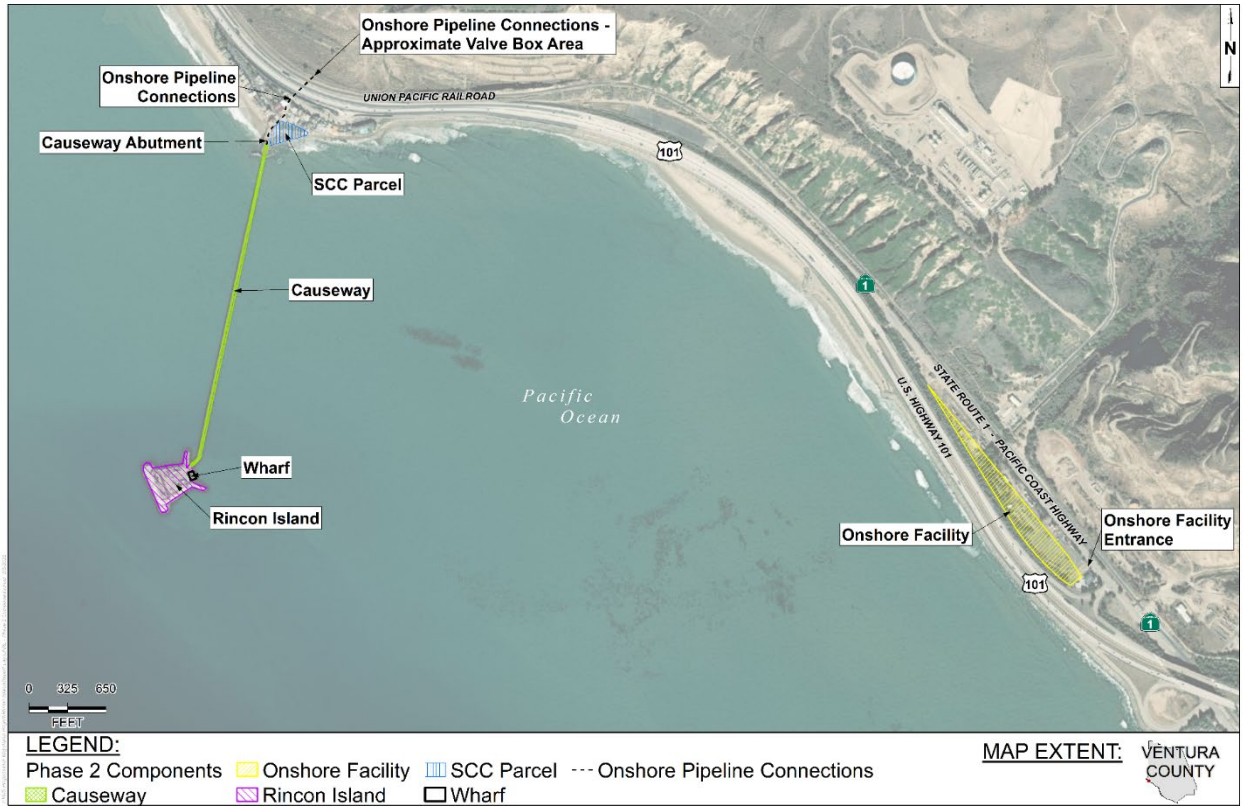
Phase 1 of this process included the plugging and abandonment of all oil and gas wells and removal of surface equipment at Rincon Island, the Onshore Facility (State Parcel), and the adjacent privately owned Coast Ranch Parcel. Phase 1 activities were completed in June 2021. Phase 2 of the Rincon decommissioning effort includes the development of a Feasibility Study (which was completed on July 22, 2022), and analysis under the California Environmental Quality Act (CEQA).

Rincon Island is located approximately 3,000 feet offshore of Punta Gorda in Ventura County, approximately 7 miles northwest of the city of Ventura, California. Rincon Island is located immediately offshore of the community of Mussel Shoals and approximately 0.5 mile south of the community of La Conchita. The Island is located in approximately 55 feet of water. A causeway, or access pier, connects the Island to the coast. A State Coastal Conservancy (SCC) Parcel, included in the decommissioning analysis, is located just east of the causeway landing/abutment within Assessor's Parcel Number 060-0-090-425.

The Onshore Facility consists of a 6.01-acre parcel owned by the State located 1.3 miles to the east of Rincon Island at 5750 W. Pacific Coast Highway, Ventura. Rincon Island and the Onshore Facility were previously connected by a pipeline system, until they were disconnected as part of the well plugging and abandonment process (see Figure 1).

The CSLC is the CEQA lead agency and will analyze the environmental effects of the entire proposed Project. Certain Responsible Agencies (see Section 3.0 below) will have discretionary authority over the Project as a whole.

Figure 1. Phase 2 Area and Facilities



2.0 PROJECT DESCRIPTION

2.1 Project Objectives

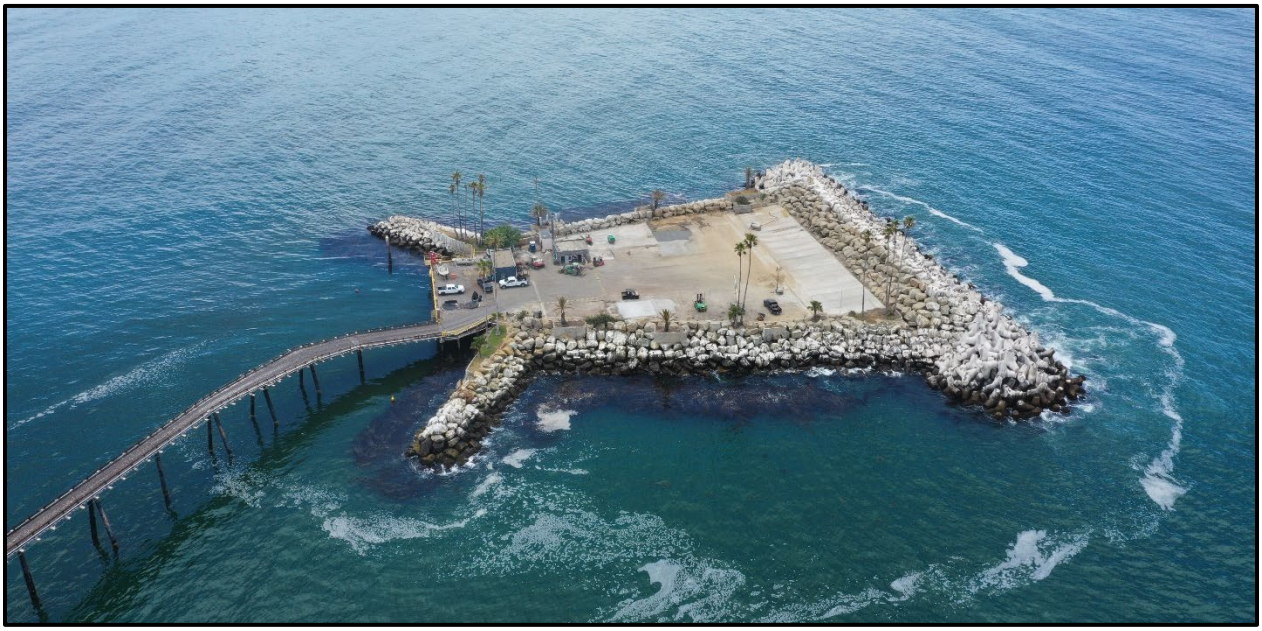
The objectives for the Rincon Phase 2 Decommissioning Project are to:

- Prepare Rincon Island and the Onshore Facility for lease for new uses consistent with the Public Trust
- Retain the biological diversity associated with Rincon Island
- Remediate contamination at Rincon Island and the Onshore Facility
- Decommission the pipelines previously used for oil and gas production and transportation
- Improve public access conditions on the SCC parcel

Based on a Feasibility Study of potential project alternatives (Link to Feasibility Study), the proposed Project would require the least number of decommissioning tasks and would result in fewer temporary impacts associated

with demolition and remediation activities compared to alternatives. Specifically, the existing visual character of Rincon Island (Figure 2) and the causeway would remain unchanged. Retention of Rincon Island would protect the existing biological diversity (terrestrial and marine) that use the structure. Remediation of hydrocarbon-contaminated soil and interstitial water at Rincon Island, and soil and groundwater at the Onshore Facility, would remove any long-term risk of exposure to the existing community or environment. Rincon Island and the Onshore Facility would be available for lease for new uses consistent with the Public Trust. The pipelines previously used to transport oil and gas produced from State lands would be decommissioned. Proposed improvements at the SCC Parcel could reduce future erosion and increase recreational opportunities.

Figure 2. Aerial View of Rincon Island Following Completion of Phase 1 (2021)



2.2 Project Decommissioning

The proposed Project includes retention of Rincon Island and the causeway, as well as removal of Rincon Island surface structures, well bay concrete deck, pavement and contaminated soil (which would then be backfilled with clean soil). In addition, the onshore pipeline connections would be decommissioned, contaminated soil at the Onshore Facility would be remediated, and erosion protection, public access, and native revegetation improvements would be made on the SCC Parcel. The proposed Project does not include any

modifications to the causeway abutment and protective revetment or improvements or repairs to the existing causeway.

Project components include:

- Remediate the Onshore Facility
- Retain Rincon Island and the causeway
- Remove Rincon Island's surface structures, well bay concrete deck, pavement and contaminated soil, and backfill with clean soil
- Decommission Onshore Pipeline Connections
- Conduct erosion protection, public access, and native revegetation improvements on the SCC Parcel

2.2.1 Onshore Facility Decommissioning

The Onshore Facility is a 6.01-acre parcel owned by the State. All buildings, equipment, and materials have previously been removed from the Onshore Facility site, and the site surface currently consists of bare dirt and the recycled asphalt aggregate base. Initial site assessments were performed at the Onshore Facility (Padre 2021b), including groundwater and soil sampling and monitoring. The laboratory analytical results indicate the presence of petroleum hydrocarbons at concentrations greater than environmental screening levels in soil and groundwater resulting from historical petroleum hydrocarbon production and processing activities performed at and in the vicinity of the Onshore Facility.

Remediation of the Onshore Facility would include removal of the approximately 2.80 acres of recycled asphalt aggregate base material spread across much of the Onshore Facility to a depth of 2.5 feet (anticipated to include approximately 9,360 cubic yards). The recycled asphalt aggregate base material would be excavated to the underlying native soil and transported to an offsite disposal or recycling facility that accepts non-hazardous petroleum hydrocarbon-contaminated waste.

In addition, remediation of approximately 0.48 acre of petroleum hydrocarbon-contaminated soil would take place to a depth estimated at 12 feet below ground surface (bgs) (anticipated to include approximately 7,500 cubic yards). This level of remediation would bring the site contamination to screening levels acceptable for unrestricted public use, which require the maximum extent of

remediation, but the level of remediation could vary depending on the anticipated future use. The contaminated soil would be excavated and transported to an offsite disposal or recycling facility that accepts non-hazardous petroleum hydrocarbon-contaminated waste. The surface grade would be backfilled with clean imported soil to establish positive surface drainage. The final site restoration and revegetation plan would consist of applying a native hydroseed to the disturbed areas of the site.

Remediation Methods

An engineered grading plan would be prepared for submittal to the County of Ventura to obtain a grading permit for the excavation and backfill activities at the Onshore Facility. Import fill materials would be graded and compacted in-place to a minimum of 90 percent relative compaction. Equipment used for backfilling and compaction includes trucks, front end loaders, excavators and potentially dozers, graders or roller compactors.

The petroleum hydrocarbon-contaminated soil and asphalt would be excavated using standard commercial excavation equipment (e.g., hydraulic excavator, front-end loader, track-mounted dozer). The excavation area sidewalls would be sloped to provide safe access for the excavating equipment to excavate the vertical and lateral extent of petroleum hydrocarbon-contaminated soil. Groundwater dewatering wells would be installed around the excavation area. The extracted petroleum hydrocarbon-contaminated groundwater would be processed through a series of settling tanks, bag filters, and granular activated carbon vessels to meet the requirements to discharge into the County of Ventura-operated wastewater system.

The excavated petroleum hydrocarbon-contaminated soil would be placed into trucks and transported to an offsite disposal or recycling facility that accepts non-hazardous petroleum hydrocarbon-contaminated waste. Verification soil samples would be collected from the excavation area on a grid pattern with approximately 25 feet between sample locations. The soil samples would be chemically analyzed for the presence and concentration of petroleum hydrocarbons.

Once complete, the dewatering wells would be removed, and the excavation area would be backfilled to match surrounding grade with clean soil from a source located in Ventura County. The surface area would be graded with

clean soil to establish positive drainage from the disturbed area. Once the excavation activities were considered complete, hydroseed composed of a native seed mix would be applied to the disturbance areas of the site.

Alternative remediation methods, such as bioremediation (the use of microorganisms to consume and break down environmental pollutants), are currently being assessed and will be discussed as alternative options.

2.2.2 Island Surface Structure Removal

Three buildings remain on Rincon Island, including the Operator's Building, Electrical Building, and Communications Building. These buildings and their foundations would be removed as part of demolition activities. The location of each building is shown below in Figure 3. Details of each building are listed below:

- The Operator's Building is a concrete masonry unit (CMU) building that includes an office, tool room, storage room, restroom, and a locker room. An underground septic tank is also associated with the Operator's Building, which would be removed.
- The Electrical Building is a CMU building that contains electrical equipment such as transformers, switchgear, conduits, and cables. Some of the electrical equipment is owned by Southern California Edison (SCE).
- The Communications Building is a prefabricated, trailer-mounted building containing cellular communications equipment. A cell phone antenna tower is attached to the north wall of the Communications Building. Both the tower and the building would be removed.

Figure 3. Rincon Island Surface Structures

Decommissioning Methods

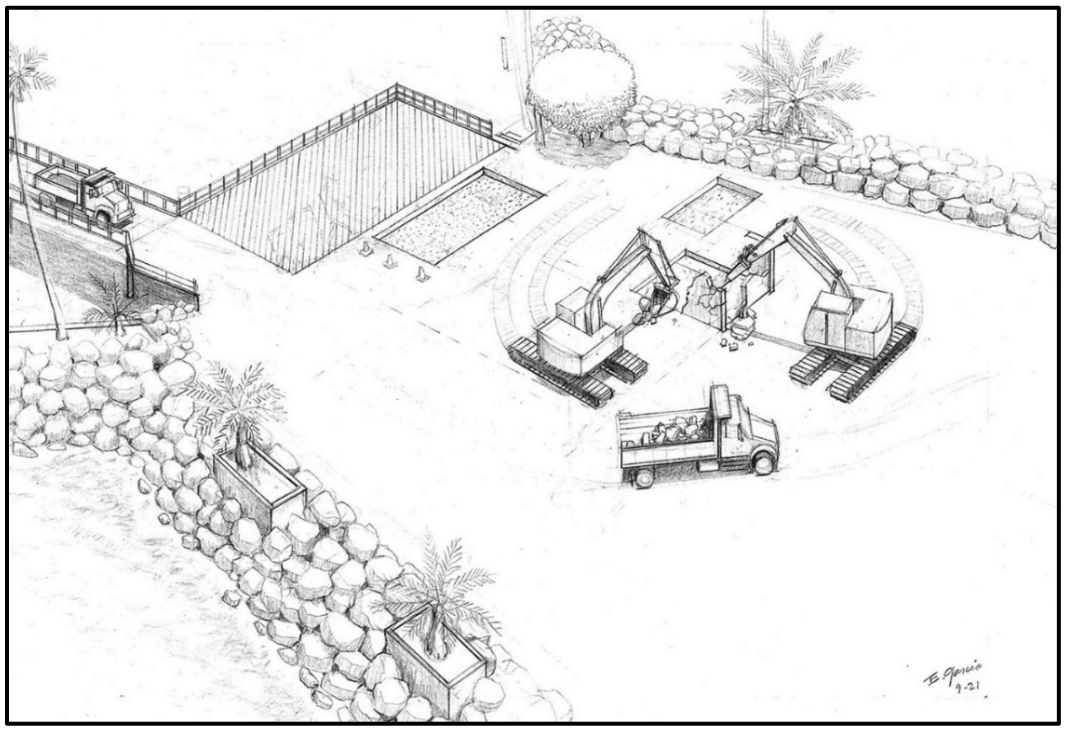
The Operator's Building, including the foundation and associated underground septic tank, would be demolished using excavators equipped with hydraulic claw, cutter, and breaker attachments, as well as buckets for moving material (Figure 4). Prior to demolition, any remaining underground septic tank waste would be pumped out, and the tank removal would be coordinated through the Ventura County Environmental Health Division, Technical Services Department (Ventura County 2022). Front-end loaders would be used to assist with materials handling. The debris would be loaded onto trucks and transported offsite for disposal.

The electrical equipment within the Electrical Building would be disconnected by electricians, and SCE would be provided access to remove SCE-owned equipment. Electrical equipment would be loaded onto trucks using truck-mounted cranes, forklifts, or similar lifting equipment and transported offsite for recycling or disposal. Once electrical equipment has been removed, the Electrical Building and its foundation would be demolished using excavators and front-end loaders, and the debris would be loaded onto trucks and transported offsite for disposal.

A Driltek report (*Rincon Island Discussion of Preparation for Caretaker Status*, Driltek, 2020) indicates that both the Operator's Building and the Electrical Building have non-friable asbestos containing material (ACM) in the roofing materials and parapet walls. A Cal/OSHA-Certified Asbestos Consultant would prepare an Asbestos Abatement Work Plan, which would include procedures for removal and handling of ACM, waste labeling and waste manifest requirements, transportation requirements, and acceptable disposal facilities prior to removal of these materials.

Assumptions for decommissioning work include the understanding that the company that owns and operates the cell phone tower and Communications Building (Sprint/T-Mobile) would also demobilize their equipment. The cell phone tower would most likely be disassembled and loaded onto a truck or trailer using a truck-mounted crane, and a truck would be used to tow the mobile building.

Figure 4. Illustration of Island Surface Structures Demolition



2.2.3 Island Well Bay Concrete Deck and Pavement Removal

The concrete deck that was constructed over the well bay at the completion of Phase 1 activities would be demolished and removed. This activity would be performed in conjunction with the removal of the Island pavement. The location

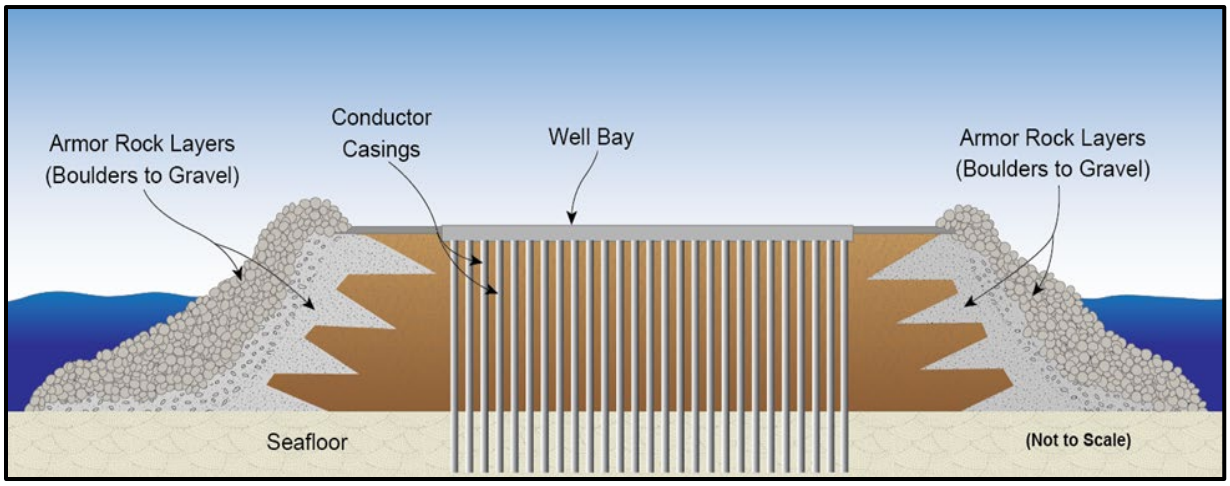
of the well bay is depicted below in Figure 5 and in the cross-section illustration provided in Figure 6.

The well bay currently consists of a 3-inch-thick concrete deck poured over clean soil that was backfilled around the previously plugged and abandoned conductors that are filled with cement. The well bay wall and original deck were removed during Phase 1 activities.

The concrete and steel debris would be transported to an offsite recycling or disposal facility. Any contaminated soil remnants surrounding the conductors would be removed and verification soil samples would be collected for laboratory analysis. The well conductor casings would remain in place.

Figure 5. Rincon Island Well Bay Area

Figure 6. Rincon Island Cross Section (Illustration)



The asphalt pavement over the remainder of the internal Island would also be demolished and removed. This activity would be performed in conjunction with the removal of the concrete deck (Figure 7).

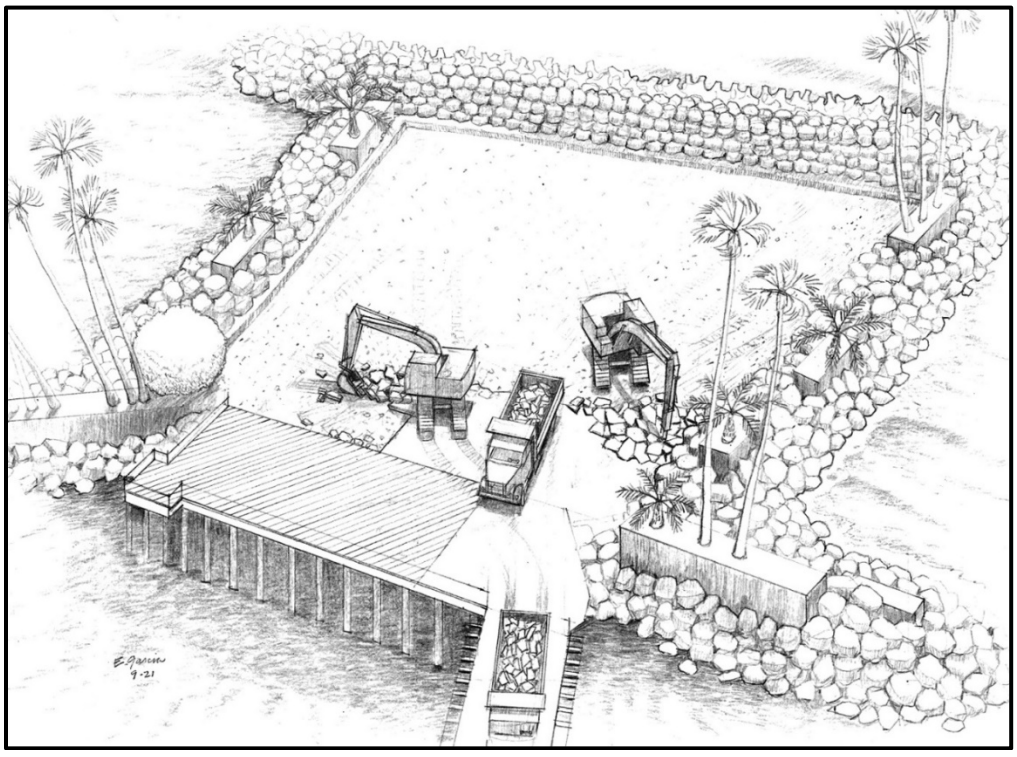
Figure 7. Rincon Island Paved Area

Decommissioning Methods

The well bay concrete deck would be demolished using excavators equipped with hydraulic claw, cutter, shear, and breaker attachments, as well as buckets for moving material. A front-end loader may be used to assist with materials handling. The debris would be loaded onto trucks and transported offsite for recycling or disposal.

The remaining asphalt pavement would be removed using excavators equipped with hydraulic claw, cutter, and breaker attachments, as well as buckets for moving material. Front-end loaders and vacuum trucks, as feasible, would be used to assist with materials handling. The asphalt debris would be loaded onto trucks and transported over the causeway offsite for recycling or disposal (Figure 8).

Figure 8. Illustration of Island Pavement Removal

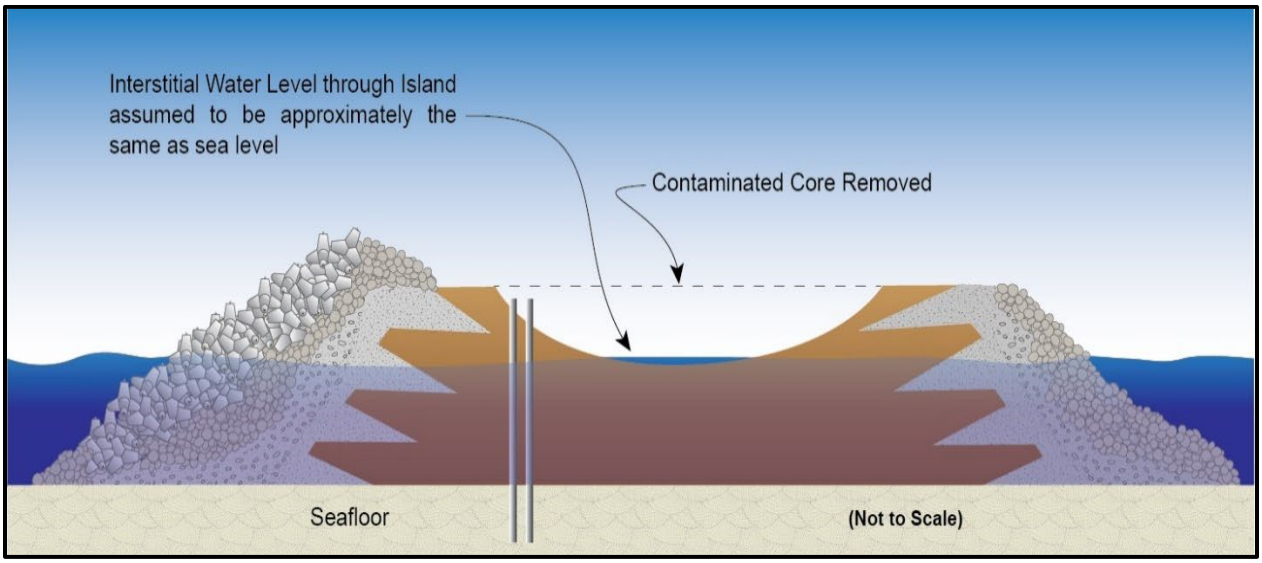


2.2.4 Contaminated Soil Removal

After the concrete deck has been removed to facilitate access to the contaminated soil and interstitial water in the Island core (Figure 8), the

contaminated sand, gravel, and water would then be removed and shipped offsite for disposal to approved offsite disposal or recycling facilities (Figure 9, see decommissioning methods below). This would include approximately 9,605 cubic yards of existing hydrocarbon-contaminated sand and gravel in the Island's core (including a mix of artificial fill of fine to coarse-grained sand and gravel).

Figure 9. Schematic of Contaminated Soil and Interstitial Water Removal



Decommissioning Methods

The petroleum hydrocarbon-contaminated soil would be excavated using standard commercial excavation equipment (e.g., hydraulic excavator, front-end loader, track-mounted dozer) (Figure 10). Removal of interstitial water using absorbent booms and vacuum trucks would be limited to isolated pockets where petroleum hydrocarbons may be observed, as feasible. Excavation of the petroleum hydrocarbon-contaminated soil and interstitial water would continue until the presence of petroleum hydrocarbons is not detected using a field portable handheld photoionization detector, as well as visual and olfactory[3] observations. The remaining clean fill materials would be sampled and chemically analyzed to confirm adequate removal of petroleum hydrocarbon-contaminated soil and interstitial water.

[3] Relating to sense of smell

Petroleum hydrocarbon-contaminated soils would be loaded onto trucks and transported over the causeway to an offsite disposal or recycling facility that accepts non-hazardous petroleum hydrocarbon-contaminated waste. Due to causeway weight limits, smaller loads may be transported from Rincon Island to the onshore facility for staging, and then loaded onto other trucks for subsequent transportation to the landfill in larger loads, resulting in fewer trips.

Once all contaminated soil has been removed, the excavation would be backfilled and compacted using clean soil (Figure 11). Equipment used for backfilling and compaction includes trucks, front end loaders, excavators and potentially dozers, graders, or roller compactors.

Figure 10. Illustration of Contaminated Soil Removal

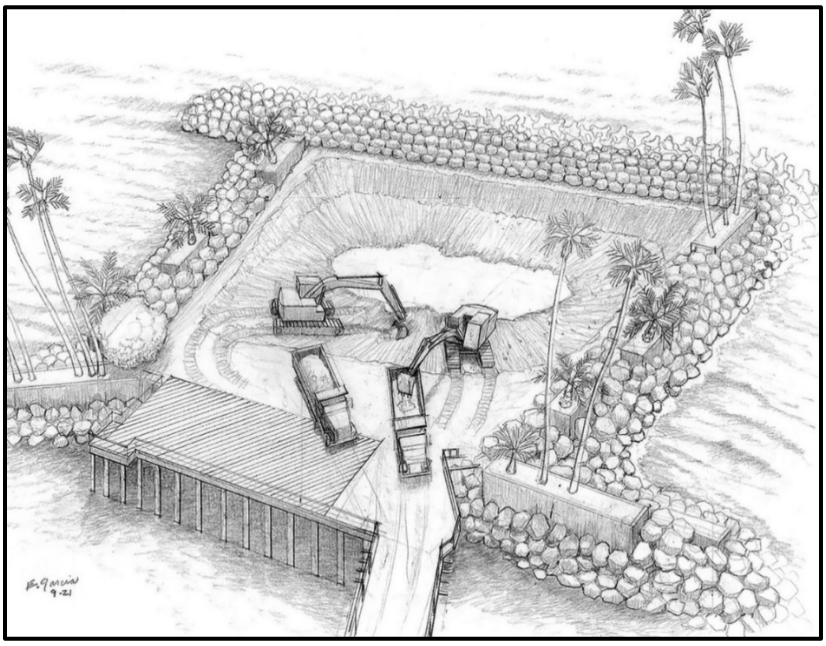
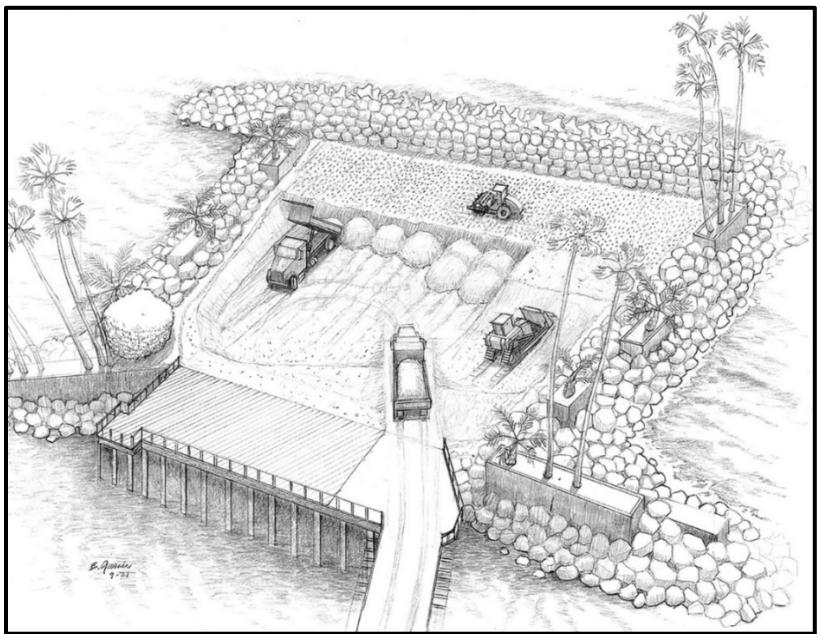


Figure 11. Illustration of Island Backfill and Compaction



2.2.5 Onshore Pipeline Connections Decommissioning

The existing 6-inch-diameter gas pipeline and the 6-inch-diameter oil pipeline, from their terminations at the causeway abutment to the valve box located on the northeast side of the Union Pacific Railroad right-of-way, would be decommissioned (Figure 12). The 6-inch-diameter gas pipeline and the 6-inch-diameter oil pipelines were previously removed from the causeway and are currently terminated with caps at the abutment. Both pipelines proceed north from the abutment under Ocean Avenue, then cross underneath Highway 101 and the adjacent railroad track to an underground concrete vault located on the north side of the railroad track. Both pipelines are installed within a 30-inch-diameter steel pipe casing that passes beneath the freeway and the railroad. The oil pipeline terminates at the concrete vault where it formerly connected to a separately owned oil pipeline. The gas pipeline continues north and east of the vault, connecting to the nearby privately owned DCOR oil and gas processing facility, as well as the Onshore Facility. The pipelines terminating at the Onshore Facility were capped and the remainder of the pipelines on the Onshore Facility were removed during Phase 1.

Figure 12. Onshore Pipeline Connections

Decommissioning of the pipelines would include cleaning and flushing the pipelines from the abutment to the concrete valve vault to remove any potential contaminants, filling the pipelines with cement slurry from the abutment to the southern end of the casing, removing the pipelines from the 30-inch-diameter casing north to the concrete vault, and then filling the casing with cement slurry. The decommissioning of the concrete vault and the gas pipeline that continues north of the vault are not part of the proposed Project.

Decommissioning Methods

The first step in the decommissioning process for the onshore pipelines is to pig and flush the pipelines. Spherical or bullet-shaped foam "pigs" along with water and cleaning agents would be inserted into the pipeline and pushed from one end to the other with pumped water or compressed air. A water sample would be obtained and sent to a state-certified laboratory to ensure the total petroleum hydrocarbon (TPH) levels in the pipeline are less than 15 parts per million (ppm). Additional pigging and flushing runs would be performed until test results indicate that the TPH concentration within the pipeline is less than 15 ppm. Wastewater generated by pigging and flushing would be collected in

vacuum trucks or temporary storage tanks. Wastewater may be tested and treated onsite and then transported offsite for disposal. This step assumes that the pipeline conditions (integrity and strength) would support pigging and flushing between the abutment and the concrete vault.

The ends of the casing would be excavated, and the pipelines would be cut on each end of the casing and pulled out from the casing. The pipelines would also be excavated and removed from the northern end of the casing to the outer wall of the concrete vault. Removed pipeline sections would be cut into pieces, loaded onto trucks, and transported to a disposal facility. This step assumes that the southwest end of the casing beneath the freeway and railroad can be accessed from Ocean Avenue, the northern end of the casing can be accessed at the valve box or somewhere near the valve box and the railroad right-of-way, and that the pipelines are not currently grouted into the casing and can be removed from the casing.

The ends of the remaining pipeline buried under Ocean Avenue would temporarily be welded shut in preparation for cementing the void between the pipeline and the casing. Temporary plates and pipe inlets/outlets (flanges) would also be welded to the ends of the empty 30-inch-diameter casing in preparation for venting the pipes and filling the casing with cement.

Cement slurry would be either mixed on-site or pre-mixed and trucked to the site in cement trucks. A trailer mounted concrete pump would be used to pump the cement into the pipelines and casing through hoses attached to the temporary flanges. The cement slurry would be allowed to cure, then the temporary flanges would be cut off and half-inch-thick steel plates would be welded onto the pipeline and casing ends to complete the pipeline abandonment.

The excavations would be backfilled and compacted using native soils where feasible, supplemented with imported fill if required. Pavement would be repaired, and the worksite would be restored to the original condition.

Anticipated equipment includes excavators equipped with buckets, hydraulic grapple, shear and roller compactor attachments, front-end loaders, vacuum trucks, cement trucks, cement mixer, temporary tanks, water pump, air compressor, cement pump, welding machine, temporary piping, pig launchers and pig receivers. Temporary shoring and traffic control measures may be required depending on the location and depth of burial at the casing ends.

2.2.6 SCC Parcel Improvements

The SCC Parcel is identified as Ventura County Assessor's Parcel No. 060-0-090-425, south of the Mussel Shoals community adjacent to Breakers Way, and east of the causeway landing/abutment. The gross area includes approximately 36,105 square feet (0.83 acre). The parcel is included within Lot 67, however the adjacent parcel within the lot (060-0-090-125) is not included in the SCC Parcel Improvement(s) area. Approximately 60 percent of the parcel is above the mean high tide line (Everest 2014). The site is currently occupied by interspersed native and non-native ground cover/vegetation, informal walking paths, a statue, and wooden bench on the back of the parcel, and includes a portion of a partially riprap-armored beach cove. The beach area transitions from a low bluff that can drop several feet during certain times of the year when sand levels are lowest, restricting access to and along the narrow cobble and sand beach. The proposed improvements include erosion prevention, public access, and native revegetation restoration.

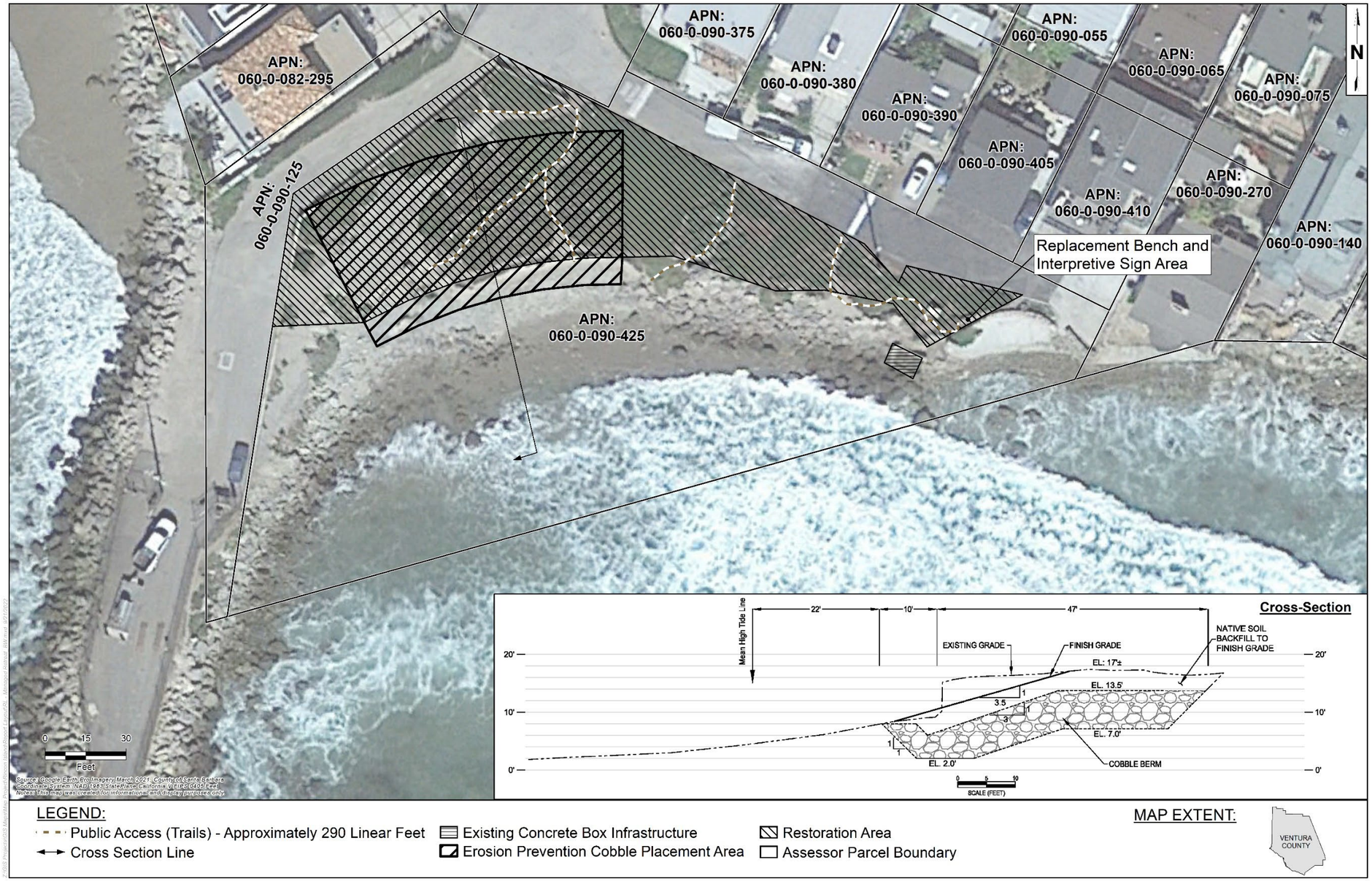
SCC parcel improvements would include an erosion prevention design that would add cobble along the portion of the shoreline that is currently unarmored in order to slow natural erosional processes. The design would include import of compatible cobble fill within the existing gap in the riprap armament that exists on either side of the shoreline within the parcel. In addition, a stairway would be installed to provide improved access to the beach, and other recreational improvements including a replacement bench and educational signage would be included.

Following removal of the non-native vegetation, a portion of the upland area would be excavated (approximately 3,800 cubic yards) in order to place a cobble back berm (Figure 13). Soil removed would be temporarily stockpiled to replace native soil cover over the cobble back berm. Following placement of the cobble, this area would be backfilled with approximately 3.5 feet of the original native soil and revegetated with native plants as described below. Excess soil would be balanced onsite as feasible, but as a worst-case-scenario, 2,500 cubic yards would need to be trucked away for disposal.

This cobble back berm would transition to connect into the new cobble fill placed further down on the beach within the gap and would provide additional stability to that fill. The profile of the cobble would mimic a natural grade from the upland vegetated portion of the parcel down to the beach and intertidal

area (Figure 3-13). The design premise is taken from a successful project (Surfers Point, CDP Permit Amendment 4-05-148-A1 and A-4-SBV-06-037-A1) in Ventura County (CCC 2020). Approximately 2,500 cubic yards (4,300 tons) of cobble would be required to complete the cobble back berm and fill in the existing gap area, for a linear distance of approximately 50 feet (of which approximately 40 feet would be covered with native soil and revegetated). This cobble would be imported to the site using dump trucks and placed with two excavators on the beach. The excavators would also be utilized to demolish portions of an existing concrete box (former infrastructure) that is present along the eastern extent of the shoreline. If the entire structure cannot be removed, each of the remaining concrete walls would be demolished to 5 feet below the existing cobble line and backfilled using native material onsite to ensure that they would not become re-exposed.

Figure 13. Proposed Erosion Prevention Design



Revegetation of the upland portion of the parcel adjacent to Breakers Way and Ocean Avenue on the SCC parcel (approximately 0.33 acre) would be conducted using native plants intended to promote biodiversity and reduce erosion. Existing non-native vegetation would be replaced with native plants/seed mix to create a uniformly covered area. Revegetation would require approximately 2 weeks to complete. Following the initial planting, bi-weekly watering and maintenance for approximately 1 year would be included to ensure the new plantings become established.

Existing walking/access pathways would be improved with crushed rock or other appropriate surface to allow for percolation and drainage to remain unchanged. A short stairway would be installed at the termination of one of these pathways to provide safer access to the beach from the low bluff drop-off area. A concrete or composite bench would replace the existing wooden bench at the overlook area. An interpretive sign would be included at the lookout area that would provide the opportunity for public outreach (possible topics include, but are not limited to, tribal cultural history in the area, biological resources along this portion of the coast, or the history of the former Rincon Island facility).

2.3 Construction Schedule

The anticipated timing for completion of the proposed Project is estimated to require approximately 653 days (approximately 2 years), to complete. It is important to note that at this time, no anticipated start or finish date can be predicted, as timing would be dependent upon selection of the proposed Project or alternative, completion and certification of the EIR, and associated permitting timeframes.

2.4 Construction Staging Area, Equipment, Public Access to Beaches

Construction equipment and materials are likely to be staged within the fenced causeway abutment entrance or on Rincon Island during the remaining Island soil and interstitial water contamination removal, or within the upper SCC Parcel area during the SCC parcel improvements. Equipment will be staged within the existing fenced Onshore Facility during the proposed remediation activities.

2.5 Public Access

Every attempt will be made to keep the beach areas adjacent to the Project sites open for public access, to the extent it is safe to do so. During SCC parcel activities, limited temporary beach access restrictions would be necessary. Access to the beach in the areas surrounding the decommissioning activities would be interrupted during structure and contaminated soil removal on the Island. 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 near the causeway abutment to prevent unfettered public transit through the Project site.

2.6 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, a traffic management 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.

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

Local & Regional	County of Ventura Ventura County Air Pollution Control District
State	California Coastal Commission California Department of Fish and Wildlife Los Angeles Regional Water Quality Control Board State Historic Preservation Office
Federal	U.S. Army Corps of Engineers U.S. Fish & Wildlife Service

	National Oceanic and Atmospheric Administration – National Marine Fisheries Service U.S. Coast Guard
Tribal	Proposed Project activities will be coordinated with local tribes consistent with the CSLC's Tribal Consultation Policy adopted in August 2016.

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, including the Rincon Feasibility Study. 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

Examples of Possible Alternatives

The identification and refinement of project alternatives will continue during the preparation of the EIR. Alternatives may include those identified during the early stages of the Feasibility Study analysis, alternatives that address potentially significant impacts identified in the EIR analysis, as well as alternatives identified during the public scoping period. The following provides a summary of alternatives currently under consideration.

Reefing Alternative

The remaining structures and pavement on Rincon Island, and the contaminated soil, including the well bay area, would be removed and replaced with clean fill (based on the results of the soil assessment activities, the depth of contaminated soil stops just below the depth of interstitial water in isolated areas) to an elevation and condition consistent with use of the

remaining island structure as habitat for wildlife species. The well bay conductors, surrounding perimeter rock and tetrapods, as well as the submerged Island would be left intact. Under the Reefing Alternative, the causeway, wharf, abutment and protective revetment are intended to be removed in their entirety with pilings removed to 5 feet below the seafloor. The Onshore Facility would be remediated and left in a condition acceptable for future Public Trust-consistent use, the SCC Parcel would be improved, and the Onshore Pipeline Connections would be disconnected.

Partial Causeway Removal

The remaining structures and pavement on Rincon Island, and the contaminated soil, including the well bay area, would be removed and replaced with clean fill (based on the results of the soil assessment activities, the depth of contaminated soil stops just below the depth of interstitial water in isolated areas). The well bay conductors, surrounding perimeter rock and tetrapods, as well as the submerged Island would be left intact. The Island wharf, abutment and protective revetment would remain untouched, but a length of the causeway would be removed, along with associated pilings to 5 feet below the seafloor. The remaining causeway would be reconfigured to provide a stable and safe "pier" structure. The Onshore Facility would be remediated and left in a condition acceptable for future public use, the SCC Parcel would be improved, and the Onshore Pipeline Connections would be disconnected.

Abutment and Revetment Retention

The remaining structures and pavement on Rincon Island, and the contaminated soil, including the well bay area, would be removed and replaced with clean fill (based on the results of the soil assessment activities, the depth of contaminated soil stops just below the depth of interstitial water in isolated areas). The well bay conductors, surrounding perimeter rock and tetrapods, as well as the submerged Island would be left intact. The Island wharf and the abutment and protective revetment at the landward end of the causeway would remain untouched, but the causeway would be completely removed, along with associated pilings to 5 feet below the seafloor. The Onshore Facility would be remediated and left in a condition acceptable for future public use, the SCC Parcel would be improved, and the Onshore Pipeline Connections would be disconnected.

No Project (as required by CEQA)

The Rincon Phase 2 facilities would not undergo any modifications, including the remediation of Rincon Island or the Onshore Facility.

In addition to these Alternatives, two options will be considered for SCC Parcel improvements, and several remediation options will be discussed for the Onshore Facility.

Options considered for the SCC parcel would include:

- Native Revegetation. No additional cobble or riprap would be added to the site. Existing non-native vegetation would be removed by hand and replaced with native plants/seed mix; existing walking/access pathways would be improved; a short stairway would be installed; the existing bench would be replaced; and an interpretive sign would be included at the lookout area.

- Riprap Along Parcel Frontage. This option would add riprap to the remaining unarmored section of beach (an area of approximately 130 feet [40 meters] in length), in addition to the actions described in the Native Revegetation option.

Options for remediation of the Onshore Facility could include bioremediation or capping of some areas of contamination rather than excavation.

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 proposed Project is not anticipated to significantly impact the following environmental factors identified in State CEQA Guidelines Appendix G (Environmental Checklist Form).

- Agriculture and Forestry Resources
- Energy
- Mineral Resources
- Population and Housing
- Public Services

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, mitigation measures, and alternatives that should be included in the EIR.

Environmental Topic	Anticipated Analysis of Proposed Project Impacts
Aesthetics	The analysis will examine proposed Project impacts resulting from visual impacts from several representative viewpoints. Temporary 2-year decommissioning activities would likely result in negligible impacts to existing visual character.
Air Quality/GHG	The analysis will examine emissions of criteria air pollutants and dust generated from decommissioning activities. The analysis will examine proposed Project emissions of greenhouse gases resulting 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 the effects of 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 proposed 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; therefore, this resource was not identified as requiring further analysis based on initial scoping.
Geology and Coastal Processes	The analysis will examine potential decommissioning impacts primarily associated with the potential for soil erosion and natural coastal processes, including nearshore sediment transport and surf break disrupton.
Hazards and Hazardous Materials	The analysis will examine proposed 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 erosion and sedimentation inducement, groundwater, and marine water quality.

Environmental Topic	Anticipated Analysis of Proposed Project Impacts
Land Use and Planning	The analysis will examine the County's General Plan and Local Coastal Program for applicable policies and standards as it relates to the decommissioning.
Mineral Resources	There are no known non-oil and gas mineral resources on the site, and it is anticipated the proposed Project would not affect access to nearby resources; therefore, this resource was not identified as requiring further analysis based on initial scoping.
Noise	The analysis will examine proposed Project impacts to ambient noise levels resulting from decommissioning activities.
Population and Housing	The proposed Project is temporary and would not require a change in the number of employees and would require only short-term decommissioning activities. The proposed Project would neither induce substantial population growth in the area nor displace any people or housing units; therefore, this resource was not identified as requiring further analysis based on initial scoping.
Public Services	The proposed Project is temporary and would not likely result in substantial demand for law enforcement, fire protection, and other public services; therefore, this resource was not identified as requiring further analysis based on initial scoping.
Recreation	The analysis will examine proposed Project impacts to recreational activities, including surfing, and beach access during and after decommissioning activities.
Transportation and Traffic	The analysis will examine proposed Project decommissioning impacts to transportation and public access to roads and highways.
Utilities and Service Systems	The proposed Project is temporary and would not result in additional demand for water, wastewater treatment, or solid waste disposal services in excess of current capacities; therefore, this resource was not identified as requiring further analysis based on initial scoping.
Wildfire	The analysis will examine proposed Project impacts on wildfire. Although a portion of the proposed Project area is located offshore, the Onshore Facility is located in a high fire hazard severity zone as identified by CalFire and vegetation surrounds the site.

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. The EIR will include a discussion of cumulative 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

The proposed Project does not include the removal of Rincon Island and the causeway, which may be affected by future sea level rise. The analysis will include the potential long-term effects of sea level rise and coastal processes on the existing structures.

4.3.4 Commercial and Recreational Fishing

A wide variety of fish and shellfish species are commercially harvested in the proposed 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 proposed Project would have the potential to disproportionately affect environmental justice communities and Native Nations, as well as the Project's consistency with the CSLC Environmental Justice Policy.