Meeting Date: 11/07/25
Work Order Number: 30134
Staff: N. Dobroski
J. Fabel

Staff Report 55

PARTY:

California State Lands Commission

PROPOSED ACTION:

Consider adoption of an Addendum to the Final Environmental Impact Report for the Rincon Phase 2 Decommissioning Project, certified by the Commission as the California Environmental Quality Act (CEQA) Lead Agency on August 29, 2024; and, request delegation of authority for the Executive Officer, or his designee, to solicit offers and negotiate a fair and reasonable price, and award and execute agreements for undertaking the Rincon Decommissioning Project.

BACKGROUND:

Rincon Island and the associated Onshore Facility were constructed in the 1950s and used for oil and gas production. In December 2017, Rincon Island Limited Partnership, the lessee of these lands, quitclaimed (i.e., surrendered) its lease interests after extensive legal action by Commission staff in the U.S. Bankruptcy Court, Northern District of Texas. Thereafter, the Commission, on behalf of the state, pursued decommissioning of the oil and gas related facilities.

Phase 1 of this process included the plugging and abandonment of all 70 oil and gas wells and removal of oil processing facilities and most appurtenant structures at Rincon Island, the Onshore Facility, and an adjacent privately owned parcel known as the Coast Ranch Parcel.[1] Phase 1 activities were completed in June 2021, and the combined Onshore Facility (Onshore Facility parcel and Coast Ranch parcel) is

[1] For nearly 60 years, all oil produced from state leases in the area was processed by equipment located on the privately owned Coast Ranch parcel. A significant amount of the hydrocarbon contamination in that parcel's soil derives from oil produced on adjacent, Sovereign Lands.

currently in "caretaker" status, meaning it does not require a full-time operator for safety or pollution prevention.

Phase 2 involved the development and environmental assessment of a remediation plan to decommission and restore aspects of Rincon Island and the Onshore Parcel. Phase 2 included consideration of the Rincon Phase 2 Decommissioning Feasibility Study (Feasibility Study) that was completed in July 2022. The Feasibility Study provided information from technical studies and public input to inform staff's recommendations to the Commission for a proposed Project to be evaluated in compliance with the California Environmental Quality Act (CEQA) (Item 47, August 23, 2022). A draft EIR was completed and circulated to the public for comment and review in March 2024. The Final EIR (FEIR), including responses to public comments, was released in July 2024, and certified by the Commission on August 29, 2024 (Item 71, August 29, 2024). At that same meeting, the Commission approved the Rincon Phase 2 Decommissioning Project (Approved Project). The Approved Project included: Rincon Island surface facilities removal and remediation of soils within the Island core; decommissioning of the Onshore Pipeline Connections (OPC) within the Project site; and decommissioning of the Onshore Facility under Option 2 (Excavate Contaminated Soil [Dig and Haul] and Pump and Treat Groundwater Remediation).

Regarding the Onshore Facility, the FEIR only evaluated remediation of the state-owned parcel, not the adjacent Coast Ranch parcel which, at the time, was held in private ownership. On August 29, 2024,[2] the Commission approved a legal settlement in which the owners donated the Coast Ranch parcel to the state, along with a monetary settlement to cover a portion of the remediation costs attributable to the private owner.

Now that the Coast Ranch parcel has been donated to the state, staff have developed an Addendum to the FEIR (Exhibit A) that analyzes the remediation of that parcel (the Modified Project) as part of the larger Phase 2 analysis in the FEIR. Adoption of the Addendum would allow the Commission to commence work on Phase 3 of the Rincon Decommissioning Project requiring soliciting and securing a decommissioning contractor. This staff report seeks the authorizations necessary to transition to Phase 3.

[2] See closed session minutes (August 29, 2024)

STAFF ANALYSIS AND RECOMMENDATION:

AUTHORITY:

Public Resources Code sections 6005, 6216, 6301, and 6829.4; California Code of Regulations, title 2, sections 2124, 2902, and 2910; Procurement – Public Works Contracting Method – Public Contract Code sections 10100–10299 (State Contract Act, including §10115 et seq. small business and DVBE requirements), §10295 et seq., and §10430(d); State Contracting Manual, Volume 1, section 4.04(A)(3); State Administrative Manual section 4986.

PROJECT DESCRIPTION:

The Modified Project analyzed in the Addendum would incorporate the 4.91 acres of the former Coast Ranch Parcel (APN 060-0-010-425) into the Onshore Facility boundaries and would include implementation of Option 2: Excavate Contaminated Soil (Dig and Haul) and Pump and Treat Groundwater Remediation (see FEIR Section 2.3.4.2 – Onshore Facility Remediation Options).

Work activities would utilize the same equipment spread and methodology as previously described in the FEIR for Option 2 of the Onshore Facility remediation activities. Contaminated materials would be transported offsite for disposal or recycling (as applicable). The surface grade would be backfilled with clean imported soil (as applicable), and the site would be restored to pre-Project conditions. Further details and a comparison between the FEIR Approved Project and the Modified Project can be found in the Addendum, sections 1.3 and 1.4, attached to this staff report as Exhibit A. No changes are proposed to the FEIR's Approved Project components on Rincon Island and for the Onshore Pipeline Connection.

PUBLIC TRUST AND STATE'S BEST INTERESTS:

Phase 3 of the Rincon Decommissioning Project, as modified by the Addendum, is consistent with the Public Trust and in the State's best interest because it decommissions facilities used for oil and gas production on and offshore of Ventura County, will eliminate potential long-term risk from a release of hydrocarbon contaminated soil, retain the biological diversity associated with Rincon Island and its adjacent marine environment, and prepare Rincon Island and the Onshore Facility for new uses, including but not limited to co-management with sovereign tribal nations, consistent with the Public Trust.

Adoption of an addendum is appropriate when minor technical changes or additions are made to a project, but no new significant environmental impacts are created and no previous impacts become substantially more severe. Adoption of the Addendum acknowledges that the Modified Project meets these criteria and will allow staff to commence Phase 3 of the Rincon Decommissioning Project to remediate and restore state Sovereign Lands for future use and benefit. Upon authorization to solicit bids to conduct that work, staff anticipate engaging in a competitive public works contract process to retain a qualified contractor and start obtaining necessary permits from the Coastal Commission, County of Ventura, and other responsible agencies. Funding for the Modified Project has been appropriated by the Legislature and staff continues to update and coordinate with stakeholders. Staff believe that adoption of the Addendum and authorizing the Executive Officer to solicit bids for Phase 3 of the Rincon Decommissioning Project are in the best interest of the state.

CLIMATE CHANGE:

Please see the staff report for the FEIR for a discussion of climate change effects to the Project Area (Item 71, August 29, 2024).

TRIBAL CONSULTATION:

During preparation of the FEIR, the Commission complied with all AB 52 requirements and contacted the Barbareño/Ventureño Band of Mission Indians, the Coastal Band of the Chumash Nation, the San Luis Obispo County Chumash Council, the Northern Chumash Tribal Council, the Chumash Council of Bakersfield, and the Santa Ynez Band of Chumash Indians.

The Tribal Chair for the Coastal Band of the Chumash Nation and the Santa Ynez Band of Chumash Indians expressed their interest in the Project. On October 26, 2023, the CSLC Tribal Liaison provided the Cultural Resources and Cultural Resources – Tribal sections of the EIR and the Phase I Archaeological Study to Tribal representatives of the Coastal Band of the Chumash Nation and the Santa Ynez Band of Chumash Indians to obtain input.

On October 12, 2022, the CSLC Tribal Liaison received a letter from the Santa Ynez Band of Chumash Indians stating that the Elder's Council requests no further consultation on the Project. On November 22, 2023, CSLC received a response from the Santa Ynez Band of Chumash Indians. They appreciated the cumulative impacts discussion and the ability to collaborate on the Cultural Resources

Management and Treatment Plan, a required component of mitigation monitoring program in the FEIR. The Tribe also requested to have monitors on site during onshore ground disturbance and requested to have their Worker Environmental Awareness Program (both requests incorporated as mitigation measures in the FEIR). The Tribe also expressed optimism that the "smallest footprint for the decommissioning activities occur in order to protect potentially buried portions" of known tribal cultural resources.

At the August 29, 2024 Commission meeting (Item 72), the Commission and the Coastal Band of the Chumash Nation announced a commitment to pursue a co-management framework for the Rincon Island and Onshore Facility locations. The Memorandum of Intent establishes and formalizes the intent of the Commission and the Coastal Band of the Chumash Nation to collaboratively explore developing a co-management framework and agreement to facilitate the stewardship, use, and management of Rincon Island and the Onshore Facility by the Coastal Band of the Chumash Nation following implementation of the decommissioning Project.

On September 19, 2025, staff contacted the Coastal Bands of the Chumash Nation and the Santa Ynez Band of the Chumash Indians about the proposed decommissioning activities on the Coast Ranch parcel (the Modified Project) and the preparation of this Addendum. The Chairman of the Coastal Band requested a meeting to discuss the Modified Project and Addendum, which occurred on October 2, 2025. Staff provided an overview of the Addendum and answered questions about next steps in the decommissioning process. There were no concerns expressed about moving forward with recommended actions for the October Commission meeting. To date, staff has not received any response from the Santa Ynez Band of the Chumash Indians.

CONCLUSION:

For all the reasons above, staff believes adoption of the Addendum and authorization to solicit bids for Phase 3 of the Rincon Decommissioning Project will enhance Public Trust needs and values at this location; is consistent with the common law Public Trust Doctrine; and is in the best interests of the State.

OTHER PERTINENT INFORMATION:

1. This action is consistent with the "Meeting Evolving Public Trust Needs," "Leading Climate Activism," "Prioritizing Social, Economic, and Environmental Justice," "Partnering with Sovereign Tribal Governments and Communities," and

"Committing to Collaborative Leadership" Strategic Focus Areas of the Commission's 2021-2025 Strategic Plan.

2. Pursuant to the Commission's delegation of authority and the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15025), Commission staff prepared an EIR identified as CSLC EIR No. 815, State Clearinghouse No. 2022100043. The EIR was prepared and circulated for public review pursuant to the provisions of CEQA and certified by the Commission together with adoption of a Mitigation Monitoring Program (Item 71, August 29, 2024). However, the FEIR did not include the Coast Ranch parcel in the Project. In October 2025, staff prepared an Addendum to the FEIR for the Modified Project (the attached Exhibit A) to analyze the environmental impacts of incorporating the 4.91 acres of the former Coast Ranch parcel into the Rincon Decommissioning Project within the combined Onshore Facility boundaries and implementing Option 2: Excavate Contaminated Soil (Dig and Haul) and Pump and Treat Groundwater Remediation. Based on substantial evidence and the evaluation contained in the Addendum, no new mitigation measures are required and none of the conditions described in CEQA Guidelines section 15162, subdivision (a), have occurred.

   The Mitigation Monitoring Program previously adopted remains in effect.

3. The activities on the Coast Ranch Parcel involve 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 Modified Project's consistency with the use classification as required by California Code of Regulations, title 2, section 2954 is not applicable.

EXHIBIT:

A. Addendum to the Final Environmental Impact Report, Rincon Phase 2 Decommissioning Project.

RECOMMENDED ACTION:

It is recommended that the Commission:

CEQA FINDING:

Find that the EIR, CSLC EIR No. 815, State Clearinghouse No. 2022100043, and the Mitigation Monitoring Program for the Approved Project were certified and adopted, respectively, by the Commission on August 29, 2024 (Item 71, August 29, 2024), and that the Commission has reviewed and considered the information contained therein and in the Addendum prepared by staff in October 2025. Find that in its independent judgment, the scope of activities to be carried out under the proposed modifications to the Project under this authorization have been adequately analyzed; and that none of the events specified in Public Resources Code section 21166 or State CEQA Guidelines section 15162 resulting in any new or substantially more severe significant impacts has occurred, and therefore, no additional CEQA analysis is required.

Adopt the Addendum to the FEIR and authorize the Modified Project, as described therein, and determine that the Modified Project, as approved, will not have a significant effect on the environment.

PUBLIC CONTRACT FINDINGS:

Find that the services are of limited duration and are of such urgent, temporary, and occasional nature that delay in their implementation under civil service would frustrate their very purpose, as specified in Government Code section 19130, subdivision (b)(10).

Find that small business and disabled veteran business enterprise participation will be encouraged consistent with Public Contract Code sections 10115 et seq. and 10295 et seq.

Find that the Commission, when awarding Public Works contracts, will, to the extent practicable and allowed by law, adopt contract packaging, project phasing, or subcontracting opportunities to facilitate participation by small, micro, or DVBE firms.

Find that the solicitation, evaluation, and award of the contracts will comply with applicable State contracting requirements, including the Public Contract Code, the State Contracting Manual, the State Administrative Manual, and Department of General Services policies and procedures.

PUBLIC TRUST AND STATE'S BEST INTERESTS:

Find that the proposed adoption of the Addendum and approval of the Modified Project is consistent with the Public Trust needs and values at this location; and is in the best interests of the State.

AUTHORIZATION:

Delegate authority to the Executive Officer, or their designee, to solicit offers and negotiate a fair and reasonable price, and award and execute agreements for undertaking Phase 3 of the Rincon Decommissioning Project as described in the Addendum.

Exhibit A

W 30134

State Clearinghouse No. 2022100043

ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT

RINCON PHASE 2 DECOMMISSIONING PROJECT

October 2025

Lead Agency:
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

MISSION STATEMENT

The California State Lands Commission provides the people of California with effective stewardship of the lands, waterways, and resources entrusted to its care based on the principles of equity, sustainability, and resiliency, through preservation, restoration, enhancement, responsible economic development, and the promotion of public access.

CEQA DOCUMENT WEBSITE

www.slc.ca.gov/ceqa/

Geographic Location (Onshore Facility)

Latitude: 34° 20'48" N
Longitude: 119° 25'16" W

Cover Photo: Photo of Rincon Island and the Causeway Looking Southwest from the Shoreline

Document prepared in coordination with:

padre associates, inc.
ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

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LIST OF ABBREVIATIONS AND ACRONYMS

A	AB	Assembly Bill
B	bgs	below ground surface
	BMP	best management practices
C	CEQA	California Environmental Quality Act
	CO_2E	carbon dioxide equivalent
	CO	carbon monoxide
	CSLC	California State Lands Commission
	cy	cubic yards
D	dBA	decibels on the A-weighted scale
E	EIR	Environmental Impact Report
	ESHA	Environmentally Sensitive Habitat Areas
	ESL	Environmental Screening Level
F	FEIR	Final Environmental Impact Report
G	GHG	greenhouse gas
H	HSC	Health and Safety Code
L	LARWQCB	Los Angeles Regional Water Quality Control Board
	Leq	equivalent sound level
	lbs	pounds
M	MM	mitigation measure
N	NO_x	nitrogen oxides
O	OPC	Onshore Pipeline Connections
P	PCH	Pacific Coast Highway
	$PM_{2.5}$	particulate matter with a diameter of 2.5 microns or less
	PM_{10}	particulate matter with a diameter of 10 microns or less
	PRC	Public Resources Code
R	RAP	Remedial Action Plan
	ROC	reactive organic compounds
	ROG	reactive organic gases
S	SBCAPCD	Santa Barbara County Air Pollution Control District
	SCAQMD	South Coast Air Quality Management District
	SCH	State Clearinghouse
	SO_x	sulfur oxides
	S.R.	State Route
	SWPPP	Stormwater Pollution Prevention Plan
	SWRCB	State Water Resources Control Board

T	tph	total petroleum hydrocarbons
V	VCAPCD	Ventura County Air Pollution Control District
	VMC	Visual Modification Class
	VMT	vehicle miles travelled

1.0 INTRODUCTION

1.1 EIR ADDENDUM PURPOSE

The California State Lands Commission (CSLC or Commission), as Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Addendum to the Rincon Phase 2 Decommissioning Project Final Environmental Impact Report (FEIR) (Addendum). The FEIR for the Rincon Phase 2 Decommissioning Project (State Clearinghouse Number [SCH] 2022100043) was certified on August 29, 2024. The Rincon Phase 2 Decommissioning Project was approved by the Commission on August 29, 2024[1] (Approved Project). The Approved Project included: Rincon Island surface facilities removal and remediation of soils within the Island core; decommissioning of the Onshore Pipeline Connections (OPC) within the Project site; and decommissioning of the Onshore Facility under Option 2 (Excavate Contaminated Soil [Dig and Haul] and Pump and Treat Groundwater Remediation).

The State-owned and CSLC-managed Onshore Facility parcel is located adjacent to the (formerly) privately owned Coast Ranch parcel. The Coast Ranch parcel was recently donated to State ownership and will, therefore, be managed by CSLC. Historically, these two parcels were both leased to the same oil companies to facilitate oil and gas production from State lands. The wells and oil facilities were abandoned on the two parcels in 2017. The Coast Ranch parcel is adjacent to and upgradient from the Onshore Facility parcel; the parcels are contiguous, with interacting soils and groundwater. Although not considered a component of the Project in the FEIR because it was privately owned at the time, the Coast Ranch parcel (due to the configuration of the former oil and gas facility) was determined to be a source of contamination to the Onshore Facility parcel.

As identified in Section 6.5.2 (Unresolved Issues) of the FEIR, it was unknown at the time of the FEIR preparation if it would be possible to combine remediation of the Onshore Facility parcel with the adjacent Coast Ranch parcel, because at that time the Coast Ranch parcel was not owned by the State. However, since certification of the FEIR, the CSLC obtained ownership and management responsibility for the Coast Ranch parcel, which will allow for the remediation of both sites. Accordingly, this Addendum to the FEIR addresses the addition of the

[1] See Item 74, August 29, 2024; https://www.slc.ca.gov/ceqa/rincon-phase-2-decommissioning/

Coast Ranch parcel to the Onshore Facility parcel decommissioning (remediation) activities portion of the Rincon Phase 2 Decommissioning Project.

1.2 PROJECT LOCATION AND BACKGROUND

The Coast Ranch parcel and Onshore Facility parcel are located approximately 1.3 miles to the east of Rincon Island within former CSLC Leases PRC 145 and 410, at 5750 W. Pacific Coast Highway (PCH), Ventura (Figures 1-1 and 1-2). The Coast Ranch parcel is 4.91 acres (Assessor's parcel number (APN) 060-0-010-425), and the Onshore Facility parcel is 6.01 acres (APN 060-0-010-435). The combined Onshore Facility area (Coast Ranch parcel and Onshore Facility parcel) is vacant and surrounded by chain link fencing (Figures 1-3 and 1-4). The combined Onshore Facility entrance is from State Route 1 (S.R. 1)/Pacific Coast Highway (PCH)(Figure 1-5).

The combined Onshore Facility was constructed in 1959 and used for oil and gas production. The Commission historically issued leases to oil production companies for this purpose. In December 2017, Rincon Island Limited Partnership, the most recent lessee of these lands, quitclaimed (surrendered) its lease interests (including State Oil and Gas Lease Nos. PRC 145 and 410) to CSLC after becoming financially insolvent. Thereafter, the State of California (State) pursued decommissioning of the onsite oil and gas related facilities.

Phase 1 of this process included the plugging and abandonment of all oil and gas wells and removal of oil processing facilities and most appurtenant structures at the Onshore Facility parcel and the adjacent privately owned Coast Ranch parcel.[2] Phase 1 activities were completed in June 2021, and the combined Onshore Facility is currently in "caretaker" status, meaning it does not require a full-time operator for safety or pollution prevention.

Phase 2 included the development of the Rincon Phase 2 Decommissioning Feasibility Study (Feasibility Study) that was completed in July 2022. The Feasibility Study provided information from technical studies and public input to inform CSLC staff's recommendations to the Commission for a proposed Project to be evaluated in compliance with the California Environmental Quality Act (CEQA) (Item 47, August 23, 2022). A draft EIR was completed and circulated to the

[2] The long standing production facilities on the Coast Ranch parcel were utilized, nearly exclusively, to treat oil and gas produced from state leases PRC 145 and 410.

public for comment and review in March 2024. The FEIR, including responses to public comments, was released in July 2024, and certified by the Commission on August 29, 2024 (Item 71, August 29, 2024).

At the FEIR certification hearing, Option 2 (Excavate Contaminated Soil [Dig and Haul] and Pump and Treat Groundwater Remediation) was selected by the Commission as the method to remediate contaminated soil and groundwater present at the Onshore Facility parcel.

Figure 1-1. Site Location Map

Figure 1-2. Combined Onshore Facility Lease and Parcel Map

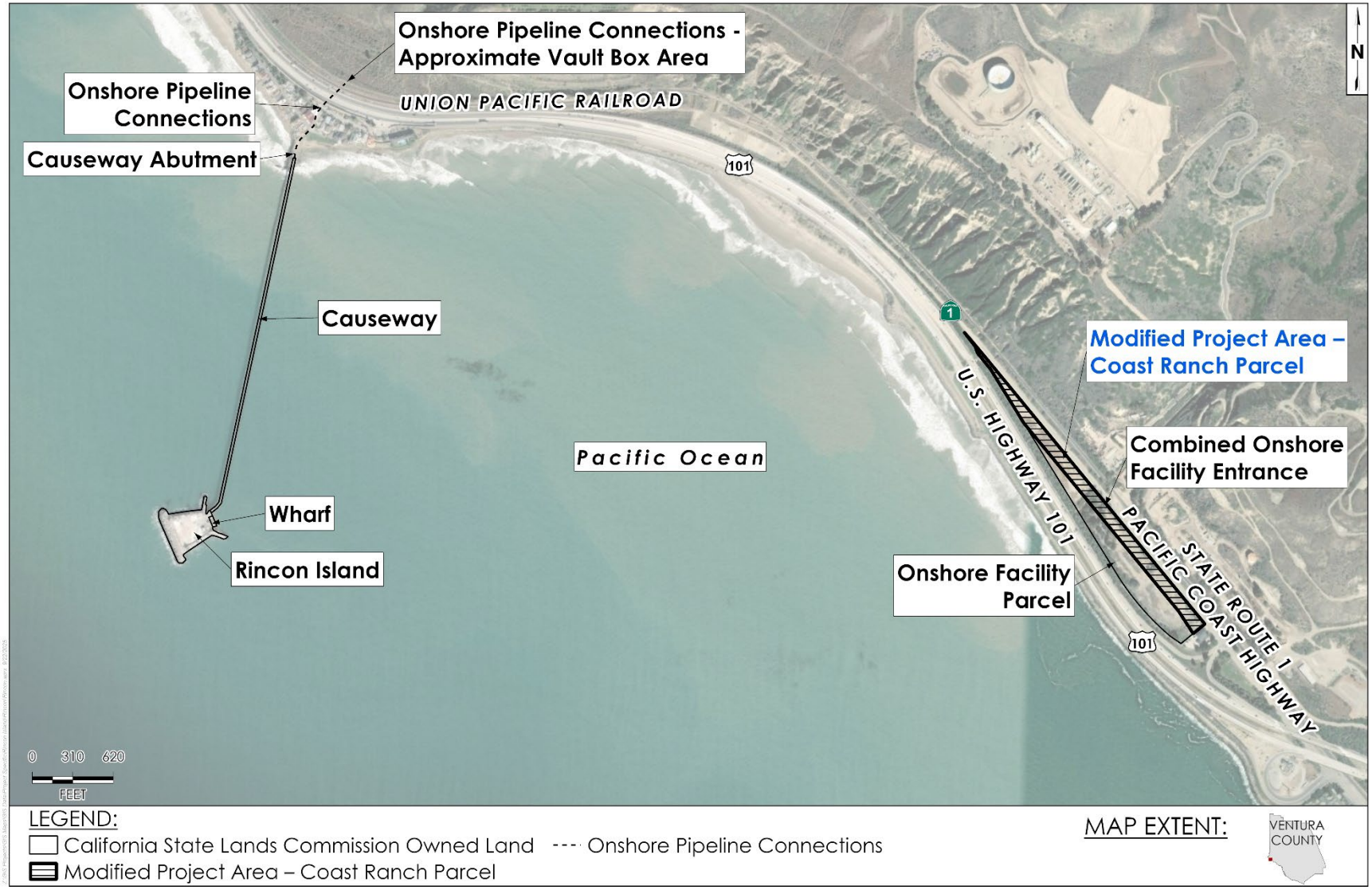

Figure 1-3. Combined Onshore Facility Looking West

Figure 1-4. Combined Onshore Facility Looking East

Figure 1-5. Combined Onshore Facility Entrance from S.R. 1/PCH

1.3 MODIFIED PROJECT

1.3.1 Project Footprint

The Modified Project footprint includes the 4.91 acres of the Coast Ranch parcel (APN 060-0-010-425) (Figure 1-6). Figure 1-7 shows the anticipated excavation areas based on previous site assessment results.

1.3.2 Project Methodology

The Modified Project would include implementation of Option 2: Excavate Contaminated Soil (Dig and Haul) and Pump and Treat Groundwater Remediation (see FEIR Section 2.3.4.2 – Onshore Facility Remediation Options) for the Coast Ranch parcel (APN 060-0-010-425). Inclusion of the Coast Ranch parcel as part of the Rincon Decommissioning activities would eliminate the need for installation of the 750-foot-long steel sheet pile wall along the boundary of the Coast Ranch parcel and the Onshore Facility parcel (as described in FEIR Section 2.3.4.1 – Site Preparation and Remediation Methodologies). Work activities would utilize the same equipment spread and methodology as previously described in the FEIR for Option 2 of the Onshore Facility parcel remediation activities. Contaminated materials would be transported offsite for disposal or recycling (as applicable). The excavated areas would be backfilled with clean imported soil (as applicable), and the site would be restored to pre-Project conditions. Further details are provided below.

Figure 1-6. Modified Project Boundaries

Figure 1-7. Modified Project - Coast Ranch Parcel Excavation Areas

1.3.2.1 Site Preparation

Site preparation would include installation of a mobile office trailer with a dedicated parking area, and construction of a dedicated equipment fueling area with secondary containment. Where present, other infrastructure such as remnant concrete foundations, power poles, pipelines, and miscellaneous appurtenances would be removed to establish a clear working area with no obstructions. Appropriate signage would be installed to direct truck traffic and visitors, as well as to identify hazards within the work area such as open excavation areas.

1.3.2.2 Option 2 Site Remediation

Section 2.3.4 of the FEIR provides information regarding the Onshore Facility parcel remediation, including previous site assessment (chemical analysis of soil and groundwater samples) and planned remediation activities. Option 2, Excavate Contaminated Soil (Dig and Haul) and Pump and Treat Groundwater Remediation, is specifically discussed in Section 2.3.4.2 (FEIR Page 2-38).

Option 2 site remediation would include excavation of the existing contaminated soil and hauling it, as non-hazardous waste, to an offsite disposal facility. For the Modified Project, approximately 16,820 additional cubic yards (cy) of petroleum hydrocarbon-contaminated soil within the Coast Ranch parcel would be excavated to an estimated depth of up to 17 feet below ground surface (bgs). The additional area of disturbance would be approximately 1.56 acres. Due to the depth of soil removal required, sheet pile shoring would be installed at each excavation site to keep the excavation stable and ensure worker safety. Hydrocarbon contaminated soil would be taken to Waste Management (195 W. Los Angeles Avenue, Simi Valley, Ventura County). Clean imported fill material would be brought in from Grimes Rock (3500 Grimes Canyon Road, Fillmore, Ventura County) for backfill and restoration of the excavation area.

If authorized by the responsible permitting agencies (Los Angeles Regional Water Quality Control Board and Ventura County Environmental Health Division), the Option 2 remediation activities would include pump and treat groundwater remediation techniques applied within and downstream of the contamination source zone to remove and treat onsite dissolved-phase petroleum hydrocarbon concentrations in groundwater (see Remediation Methodology within Section 2.3.4.1 of the FEIR for additional detail).

Construction equipment would include an excavator, loader, dozer, hauling trucks, a generator, tanks, hollow-stem auger drilling rig, and support trucks. Hauling trips required in support of Option 2 remediation activities would be for equipment mobilization and demobilization, as well as approximately 1,517, 18-ton capacity dump truck trips for soil removal and another 1,499 truck trips for import of clean soil.

1.3.2.3 Site Restoration and Monitoring

Site restoration would include re-compaction and grading of the clean fill soil brought in to replace the excavated soil. Monitoring of natural reduction of hydrocarbon contamination in groundwater would be conducted quarterly for a period of 1 year following completion of the soil excavation activities.

1.3.3 Construction Schedule

The decommissioning and remediation work at the Coast Ranch parcel would take approximately 134 additional workdays (27 weeks) to complete. Project-related decommissioning activities are planned to be limited to 7 a.m. to 5 p.m. on weekdays only.

Additionally, monitoring of the restoration activities would occur quarterly for one year following completion of soil remediation, requiring four additional workdays.

1.4 COMPARISON OF MODIFIED PROJECT TO APPROVED PROJECT

This Addendum to the FEIR analyzes the Modified Project as described in Section 1.3 (above). This Addendum will be relied upon, in conjunction with the certified FEIR and Project application materials on file, by CEQA responsible agencies for issuance of permits and approvals associated with the Modified Project. The following sections summarize the Approved Project's components compared to the Modified Project. No changes are proposed to the Approved Project's components on Rincon Island or for the Onshore Pipeline Connection.

Table 1-1. Summary of Modified Project Compared to the Approved Project (Combined Onshore Facility Project Area)

Approved Project (Onshore Facility Parcel)	Modified Project (Coast Ranch Parcel)
• Site Preparation	• No changes proposed
• Installation of 750-foot-long steel sheet pile wall to a depth of 20 feet below ground surface (bgs) between the parcel lines	• **No steel sheet pile wall required between the parcel lines**
• Remediation Option 2: Excavate Contaminated Soil (Dig and Haul) and Pump and Treat Groundwater Remediation selected for Project implementation	• No changes proposed
• 7,500 cubic yards of petroleum hydrocarbon-contaminated soil o Excavation Depth 10 feet bgs	• **Additional 16,820 cubic yards of petroleum hydrocarbon-contaminated soil[3]** o **Excavation depth up to 17 feet bgs** o **Installation of sheet pile shoring at each excavation site**
• Remediation of approximately 58,000 gallons of contaminated groundwater	• **Remediation of an additional 178,443 gallons of contaminated groundwater**
• 0.48 acre area of disturbance	• **Additional 1.56 acres of disturbance**
• Pump and treat of contaminated groundwater (if authorized by Los	• No changes proposed

[3] Estimated in-place volume of soil containing TPH (C13-C22) concentrations in excess of the Tier 1 Residential/Unrestricted ESL

Approved Project (Onshore Facility Parcel)	Modified Project (Coast Ranch Parcel)
Angeles Regional Water Quality Control Board and Ventura County Environmental Health Division)	
• Quarterly site monitoring for 1 year	• No changes proposed
• 45 workdays (9 week) construction period	• **Additional 134 workdays (27 weeks) required**
• Construction equipment includes: Excavator, Loader, Dozer, Hauling Trucks, Generator, Tanks, Hollow-stem Auger Drilling Rig, Support Trucks	• No changes proposed
• Removal of 9,360 cubic yards of recycled asphalt aggregate base	• **No additional removal of asphalt aggregate base required**
• 8,250 cubic yards of clean backfill soil	• **Additional 20,182 cubic yards of clean backfill soil**
• 675 trips, 18-ton capacity dump trucks for soil removal • 675 trips, 18-ton capacity trucks for import of clean soil	• **Additional 1,517 truck trips for soil removal** • **Additional 1,499 truck trips for import of clean soil**
• Recyclable materials taken to State Ready Mix (asphalt) (Oxnard) • Non-hazardous petroleum hydrocarbon-contaminated waste taken to Waste Management (Simi Valley) • Clean soil from Grimes Rock (Fillmore)	• No changes proposed

2.0 CEQA ADDENDUM

A subsequent EIR is required for a project only if substantial changes in the project or circumstances require major revisions to an EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects, or if certain new information shows that the project will result in significant new or more severe effects or new or previously infeasible mitigation measures are now feasible and would substantially reduce significant effects (State CEQA Guidelines, §15162)[4].

Specifically, State CEQA Guidelines section 15162, subdivision (a) provides:

"(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project

[4] https://www.califaep.org/statute_and_guidelines.php

proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative."

If some changes or additions are necessary to a previously certified EIR, but none of the conditions described in section 15162 calling for preparation of a subsequent EIR has occurred, then a lead agency or responsible agency shall prepare an addendum (State CEQA Guidelines, § 15164). The CSLC, as the CEQA lead agency and the Project proponent and agency acting on the Project, has prepared this Addendum to analyze the Modified Project activities that occur on State lands or whose potential environmental impacts could affect State lands.

The FEIR concluded that all of the Approved Project's potentially significant environmental impacts would be mitigated to a less than significant level by implementing feasible mitigation measures. The purpose of this Addendum is to analyze whether the Modified Project would cause "new or substantially more severe" significant impacts to the environment or otherwise warrant a subsequent EIR pursuant to State CEQA Guidelines section 15162. As presented in Section 3.0, Environmental Assessment, none of the conditions described in State CEQA Guidelines section 15162 have occurred that would require the preparation of a subsequent environmental document. Consequently, an Addendum is the appropriate CEQA document to analyze and consider the Modified Project.

Circulation of an Addendum for public review is not necessary (State CEQA Guidelines, § 15164, subd. (c)); however, the Modified Project's Addendum must be considered by the Commission in conjunction with the certified FEIR for the Approved Project along with the adopted Mitigation Monitoring Program prior to making a decision on the project (State CEQA Guidelines, § 15164, subd. (d)).

3.0 ENVIRONMENTAL ASSESSMENT

As discussed in Section 2.0, CEQA Addendum, CSLC as the CEQA lead agency has analyzed the Modified Project activities that would occur on State lands or whose potential environmental impacts could affect State lands. Accordingly, the analysis in this Addendum addresses any impacts that increased, decreased, or are unchanged from the Certified FEIR's conclusions and any changes required to mitigation measures.

The Certified FEIR found that based on initial scoping, the Project is not anticipated to impact the following resource areas identified in State CEQA Guidelines Appendix G (Environmental Checklist Form):

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

The Modified Project activities would make no changes to that determination, and therefore these topics are not discussed further in this Addendum.

The following resource areas were analyzed in the Certified FEIR, and could have the potential to be affected by the Modified Project, so are included in this analysis:

- 3.1 - Aesthetics
- 3.2 - Air Quality
- 3.3 – Biological Resources
- 3.4 – Cultural Resources
- 3.5 – Cultural Resources – Tribal
- 3.6 – Geology and Soils
- 3.7 – Greenhouse Gas Emissions

- 3.8 – Hazards and Hazardous Materials
- 3.9 – Hydrology and Water Quality
- 3.10 – Land Use and Planning
- 3.11 – Noise
- 3.12 – Recreation
- 3.13 - Transportation and Traffic
- 3.14 – Utilities and Service Systems
- 3.15 - Wildfire

3.1 AESTHETICS

Section 4.1 (Aesthetics) of the Certified FEIR for the Approved Project found that the Onshore Facility parcel is moderately sensitive in terms of visual sensitivity due to its proximity to U.S. 101 and Pacific Coast Highway (PCH) public viewing corridors. However, it concluded that the temporary use of equipment in this area would not be out of character or create a visual element that would dominate the viewshed (see Impact AES-1: Temporary Effects on Public Views from Decommissioning Activities included in Section 4.1.4 in the FEIR). A noticeable but visually subordinate impact (visual modification class [VMC]-2) would result. However, it was noted within Impact AES-3: Potential for Cumulative Aesthetic Impacts to Public Views, that a cumulative impact could result if simultaneous remediation of the Onshore Facility parcel and the Coast Ranch parcel were to occur.

With the implementation of **MM AES-1a, MM AES-1b,** and **MM AES-1c**, these impacts were determined to be less than significant, by requiring that equipment used for Project activities be returned to the staging areas at the end of each workday and all materials, equipment, and debris be removed from the Project site upon completion of decommissioning activities. Additionally, if required, night lighting would utilize the minimum number of fixtures and intensity necessary to support decommissioning activities, and lighting would be fully shielded to minimize visibility from public viewing areas, wildlife habitats, migration routes, and other sensitive receptors.

Although the Modified Project would require a longer duration to complete remediation and site restoration activities (134 additional workdays or 27 weeks), the equipment requirements on a given workday would be equivalent to that identified in the Certified FEIR for the Approved Project. Additionally, work activities at the Coast Ranch parcel would not occur simultaneously with the Onshore Facility parcel and instead would be spread out over a longer construction period. Further, no additional equipment has been proposed that would intensify aesthetic impacts on a cumulative level.

Consistent with the Approved Project, with the implementation of **MM AES-1a, MM AES-1b**, and **MM AES-1c**, potential impacts on public viewing areas, wildlife habitats, migration routes, and other sensitive receptors would remain less than significant. Therefore, the Modified Project would not generate a new significant

impact to aesthetics from construction activities or substantially increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM AES-1a: Overnight Storage of Equipment**
- **MM AES-1b: Material Removal at Construction Completion**
- **MM AES-1c: Minimize Night Lighting**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MMs AES-1a**, **MM AES-1b**, and **MM AES-1c**.

3.2 AIR QUALITY

Section 4.2 (Air Quality) of the Certified FEIR found that Project-specific and cumulative air quality impacts associated with decommissioning-related air pollutant emissions would be less than significant (see Impact AQ-1: Decommissioning-related Air Pollutant Emissions included in Section 4.2.4 in the Certified FEIR). Nevertheless, mitigation measures **MM AQ-1** was included to further reduce the potential for air quality impacts.

The Modified Project would require heavy equipment and motor vehicle activity associated with the excavation and remediation of contaminated soil on the Coast Ranch parcel and would increase peak day and peak 12-month air pollutant emissions. Table 3-1 provides a summary of peak 12-month period air pollutant emissions for the Modified Project and a comparison to the total emissions in the Certified FEIR and the Santa Barbara County Air Pollution Control District (SBCAPCD) thresholds (see Section 4.2.3, Significance Criteria of the FEIR, for methodology related to application of SBCAPCD thresholds due to the absence of short-term construction-related thresholds of significance by the Ventura County Air Pollution Control District). Please see Appendix A for air pollutant emissions estimates for the Modified Project.

The Modified Project would have greater air pollutant emissions than identified in the Certified FEIR but would not exceed the SBCAPCD thresholds (see Appendix A, Air Quality Spreadsheets). Therefore, air quality impacts would remain less than significant. The Modified Project would not generate a new significant air quality impact or substantially increase the severity of a previously identified air quality impact. Consistent with the Certified FEIR, although the SBCAPCD thresholds are being utilized for analysis, Ventura County Air Pollution Control

District recommendations regarding incorporation of standard construction mitigation measures have been applied since work will occur in Ventura County, and the Modified Project would implement **MM AQ-1** to further reduce the potential for air quality impacts. No new mitigation is required.

Table 3-1. Comparison of Air Pollutant Emissions (Peak 12 Month Period)

Task	NO_x (tons)	ROC (tons)	PM_{10} (tons)	$PM_{2.5}$ (tons)	CO (tons)
Certified FEIR	3.83	0.39	0.15	0.14	2.68
Coast Ranch Parcel Remediation	0.97	0.06	0.03	0.02	0.46
Total (Modified Project)	**4.80**	**0.45**	**0.18**	**0.16**	**3.14**
SBCAPCD Threshold (tons per year)	25	25	--	--	--
New or substantially increased impact?	No	No	No	No	No

NO_x – oxides of nitrogen
ROC – reactive organic compound
PM_{10} – coarse particulate matter less than 10 microns in diameter
$PM_{2.5}$ – fine particulate matter 2.5 microns or less in diameter
CO – carbon monoxide

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM AQ-1: Standard Ventura County Air Pollution Control District Construction Emissions Reduction Measures**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MM AQ-1**.

3.3 BIOLOGICAL RESOURCES

Section 4.3 (Biological Resources) of the Certified FEIR for the Approved Project found that impacts to biological resources at the Onshore Facility parcel would be potentially significant for nesting and breeding birds and roosting monarch butterflies (see Impact BIO-1: Temporary Disturbance to Foraging, Roosting, and

Nesting Birds, Including California Brown Pelican, Osprey, and Double-Crested Cormorant; and Impact BIO-3: Temporary Impacts to Monarch Butterflies at the Onshore Facility parcel included in Sections 4.3.4 in the FEIR) and would contribute to potentially significant cumulative impacts to biological resources (see Impact BIO-6: Cumulative Impacts to Biological Resources included in Sections 4.3.5 in the FEIR).

However, with implementation of **MM BIO-1a**, **MM BIO-1b**, and **MM BIO-3** the Project-specific and cumulative impacts would be reduced to less than significant by requiring avoidance of nesting season or pre-construction nesting surveys, the establishment of nest protection buffers, an environmental awareness training for Project personnel, and pre-construction surveys for roosting monarch butterflies during their overwintering season (October through February).

The conditions at the combined Onshore Facility (Coast Ranch parcel and Onshore Facility parcel) are unchanged since certification of the FEIR; however, an updated biological field survey was completed on January 23 and 24, 2025 (Appendix B), to reestablish baseline conditions with respect to biological resources onsite. The results of the survey confirmed that terrestrial biological resources associated with the Modified Project area are the same as those analyzed in the Certified FEIR. Although the Modified Project would increase the size of the project footprint and duration of activities, including the duration that remediation equipment would be onsite, the level of impact to biological resources would not change as compared to the Approved Project.

Consistent with the Approved Project, the Modified Project would not affect Los Sauces Creek, and all Project activities would avoid the riparian corridor by at least 100 feet or more, which is outside of the disturbance buffer distance designated by the County of Ventura Coastal Area Plan (2022); and so the Modified Project would not have any impact to Environmentally Sensitive Habitat Areas (ESHA). Therefore, the Modified Project would not generate any new significant biological resource impacts or substantially increase the severity of a previously identified impact. No new mitigation is required.

<u>Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:</u>

- **MM BIO-1a: Onshore Facility Nesting Season Avoidance or Pre-Construction Surveys**
- **MM BIO-1b: Environmental Awareness Training**

- **MM BIO-3: Monarch Butterfly Avoidance**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MM BIO-1a**, **MM BIO-1b**, and **MM BIO-3**.

3.4 CULTURAL AND HISTORICAL RESOURCES

Section 4.4 (Cultural and Historical Resources) of the Certified FEIR for the Approved Project found that impacts related to cultural resources during implementation of Option 2 at the Onshore Facility parcel would be potentially significant (see Impact CR-2: Substantial Adverse Change to Previously Undiscovered Cultural Resources During Project Implementation and Impact CR-3: Cumulative Impacts to Cultural Resources) included in Sections 4.4.4 and 4.4.5 in the FEIR).

However, implementation of **MM CUL-1/TCR-1, MM CUL-2/TCR-2, MM CUL-3/TCR-3, MM CUL-4/TCR-4,** and **MM CUL-5/TCR-5** would reduce the project specific and cumulative impacts to cultural resources to less than significant. These mitigation measures require the preparation of a Cultural and Tribal Cultural Resources Management and Treatment Plan, the presence of Cultural and Tribal Cultural Resources monitors during Project activities, worker awareness training, as well as reporting protocols in the event of a cultural resource discovery.

The Modified Project would require an additional 1.56 acres of disturbance resulting in approximately 16,820 cubic yards of soil disturbance from excavation and driving of sheet pile shoring, to a depth of up to 17 feet bgs at the Coast Ranch parcel. This additional soil disturbance would also have the potential to affect unanticipated cultural resources.

No previously recorded cultural resources are present onsite at the Onshore Facility parcel or within the Modified Project area (Coast Ranch parcel). While one previously recorded cultural resource (CA-VEN-241) is located near the combined Onshore Facility, a previous site assessment that included coring of the ground surface confirmed up to 15 feet of artificial fill present onsite (Appendix E – Assessment Reports to the FEIR). Additionally, the archaeological pedestrian survey (including the Coast Ranch parcel area) did not yield any cultural resources within the combined Onshore Facility boundaries.

The Certified FEIR relied upon a Phase I Archaeological Study Report to identify cultural resources in the Project site and analyzed the Approved Project sites' impact areas. This Report concluded that the Approved Project's construction

activities would not impact any cultural resources. The Modified Project is directly adjacent to the Approved Project site and was included in the Phase I Archaeological Study and survey area. Thus, the Modified Project would not generate a new impact on cultural resources.

The Modified Project's depth of excavation could have a potentially significant impact on unanticipated cultural resources or human remains. Consistent with the Approved Project, implementation of **MM CUL-1/TCR-1, MM CUL-2/TCR-2, MM CUL-3/TCR-3, MM CUL-4/TCR-4,** and **MM CUL-5/TCR-5** would reduce the impacts to cultural resources to less than significant. In addition, the Modified Project would be required to properly treat discovered human remains in accordance with applicable laws, including Health and Safety Code (HSC) sections 7050.5-7055 and Public Resources Code (PRC) sections 5097.98 and 5097.99.

Therefore, the Modified Project would not generate a new significant cultural resources impact or substantially increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM CUL-1/TCR-1: Cultural and Tribal Cultural Resources Management and Treatment Plan**
- **MM CUL-2/TCR-2: Cultural and Tribal Cultural Resources Monitoring**
- **MM CUL-3/TCR-3: Cultural and Tribal Cultural Resources Awareness Training**
- **MM CUL-4/TCR-4: Discovery of Previously Unknown Cultural or Tribal Cultural Resources**
- **MM CUL-5/TCR-5: Unanticipated Discovery of Human Remains**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MMs CUL-1/TCR-1** through **CUL-5/TCR-5**.

3.5 CULTURAL RESOURCES – TRIBAL

Section 4.5 (Cultural Resources – Tribal) of the Certified FEIR for the Approved Project found that impacts related to tribal cultural resources during implementation of Option 2 at the Onshore Facility parcel would be potentially significant (see Impact TCR-1: Substantial Adverse Change to Previously Undiscovered Tribal Cultural Resources During Project Implementation and

Impact TCR-2: Cumulative Impacts to Tribal Cultural Resources included in Sections 4.5.4 and 4.5.5 in the FEIR).

However, implementation of **MM CUL-1/TCR-1, MM CUL-2/TCR-2, MM CUL-3/TCR-3, MM CUL-4/TCR-4,** and **MM CUL-5/TCR-5** would reduce the Project specific and cumulative impacts to less than significant. These mitigation measures require the preparation of a Cultural and Tribal Cultural Resources management and treatment plan, the presence of Cultural and Tribal Cultural Resources monitors during Project activities, worker awareness training as well as reporting protocols in the event of a tribal cultural resource discovery.

No previously recorded cultural resources are present onsite at the Onshore Facility parcel or within the Modified Project area (Coast Ranch parcel). While one previously recorded tribal cultural resource (CA-VEN-241) is located near the combined Onshore Facility, a previous site assessment that included coring of the ground surface confirmed up to 15 feet of artificial fill present onsite (Appendix E – Assessment Reports to the FEIR). Additionally, the archaeological pedestrian survey (including the Coast Ranch parcel area) did not yield any tribal cultural resources within the combined Onshore Facility.

The Modified Project would require an additional 1.56 acres of disturbance resulting in approximately 16,820 cubic yards of soil disturbance, to a depth of up to 17 feet bgs at the Coast Ranch parcel. This additional soil disturbance would have the potential to affect unanticipated tribal cultural resources.

As discussed in the Certified FEIR, CSLC complied with all AB 52 requirements and contacted the Barbareño/Ventureño Band of Mission Indians, the Coastal Band of the Chumash Nation, the San Luis Obispo County Chumash Council, the Northern Chumash Tribal Council, the Chumash Council of Bakersfield, and the Santa Ynez Band of Chumash Indians.

The Tribal Chair for the Coastal Band of the Chumash Nation and the Santa Ynez Band of Chumash Indians expressed their interest in the Project. On October 26, 2023, the CSLC Tribal Liaison provided the Cultural Resources and Cultural Resources – Tribal sections of the EIR and the Phase I Archaeological Study to Tribal representatives of the Coastal Band of the Chumash Nation and the Santa Ynez Band of Chumash Indians to obtain input.

On October 12, 2022, the CSLC Tribal Liaison received a letter from the Santa Ynez Band of Chumash Indians stating that the Elder's Council requests no further consultation on the Project. On November 22, 2023, CSLC received a

response from the Santa Ynez Band of Chumash Indians. They appreciated the cumulative impacts discussion and the ability to collaborate on the Cultural Resources Management and Treatment Plan per **MM CUL-1/TCR-1**. The Tribe requested to have monitors on site during onshore ground disturbance as part of **MM CUL-2/TCR-2**. Additionally, they requested to have their Worker Environmental Awareness Program included as part of **MM CUL-3/TCR-3**. The Tribe also expressed optimism that the "smallest footprint for the decommissioning activities occur in order to protect potentially buried portions" of known tribal cultural resources.

At the August 29, 2024 Commission meeting, the CSLC and the Coastal Band of the Chumash Nation announced a commitment to pursue a co-management framework for the Rincon Island and Onshore Facility locations. The Memorandum of Intent establishes and formalizes the intent of the Commission and the Coastal Band of the Chumash Nation to collaboratively explore developing a co-management framework and agreement to facilitate the stewardship, use, and management of Rincon Island and the Onshore Facility by the Coastal Band of the Chumash Nation following implementation of the decommissioning Project.

The Modified Project site is directly adjacent to the Approved Project site and was included in the Phase I Archaeological Study. The Modified Project's depth of excavation could have a potentially significant impact on unanticipated tribal cultural resources or human remains. However, consistent with the Approved Project, **MM CUL-1/TCR-1, MM CUL-2/TCR-2, MM CUL-3/TCR-3, MM CUL-4/TCR-4,** and **MM CUL-5/TCR-5** would be implemented to reduce the impacts to tribal cultural resources to less than significant. In addition, Project personnel implementing the Modified Project would be required to properly treat discovered human remains in accordance with applicable laws, including Health and Safety Code sections 7050.5-7055 and PRC sections 5097.98 and 5097.99.

Therefore, the Modified Project would not generate a new significant impact to tribal cultural resources or substantially increase the severity of a previously identified impact. No new mitigation is required.

On September 19, 2025, CSLC contacted the Coastal Bands of the Chumash Nation and the Santa Ynez Band of the Chumash Indians about the proposed decommissioning activities on the Coast Ranch parcel (the Modified Project) and the preparation of this Addendum. The Chairman of the Coastal Band requested a meeting to discuss the Modified Project and Addendum but does

not object to the Commission moving forward with considering adoption of the Addendum.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM CUL-1/TCR-1: Cultural and Tribal Cultural Resources Management and Treatment Plan**
- **MM CUL-2/TCR-2: Cultural and Tribal Cultural Resources Monitoring**
- **MM CUL-3/TCR-3: Cultural and Tribal Cultural Resources Awareness Training**
- **MM CUL-4/TCR-4: Discovery of Previously Unknown Cultural or Tribal Cultural Resources**
- **MM CUL-5/TCR-5: Unanticipated Discovery of Human Remains**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MMs CUL-1/TCR-1** through **CUL-5/TCR-5**.

3.6 GEOLOGY AND SOILS

Section 4.6 (Geology and Coastal Processes) of the Certified FEIR for the Approved Project found that impacts to geology and soils, including a temporary increase in surface erosion, potential effects to undiscovered paleontological resources, and cumulative impacts would be potentially significant from implementation of decommissioning activities at the Onshore Facility parcel (see Impact GEO-1: Temporary Increase in Surface Erosion During Decommissioning and Soil Remediation Activities, Impact GEO-2: Paleontological Resources, and Impact GEO-5: Cumulative Impacts to Geology and Coastal Processes included in Sections 4.6.4 and 4.6.5 in the FEIR). These impacts would occur due to temporary disturbance of approximately 7,500 cubic yards of soil (within an area of approximately 0.48 acre) for remediation of hydrocarbon contaminated soil. This soil disturbance would have the potential to contribute to surface erosion onsite, and due to the depths of excavation (up to 10 feet bgs) could result in the potential to encounter native soils and related paleontological resources (if present).

However, implementation of **MM GEO-1, MM AQ-1, MM HWQ-1, and MM GEO-2** would reduce project specific and cumulative impacts to less than significant by requiring a Grading and Erosion Control Plan, fugitive dust control measures, a Stormwater Pollution Prevention Plan (SWPPP), and a Paleontological Monitoring

and Mitigation Plan to mitigate erosion and provide paleontological monitoring for excavation depths greater than five feet bgs.

The Modified Project would require an additional 1.56 acres of disturbance, including approximately 16,820 cubic yards of soil disturbance to a depth of up to 17 feet bgs, at the Coast Ranch parcel. This soil disturbance would create a potential increase in short term surface erosion onsite. Additionally, although the combined Onshore Facility is located within an area that includes a large amount of fill, excavation of contaminated material under Option 2 within the Modified Project area would require excavation at depths of up to 17 feet bgs that would have the potential to encounter native soils and related paleontological resources (if present).

As with the Approved Project, **MM GEO-1, MM AQ-1, MM HWQ-1, and MM GEO-2** would be implemented to mitigate the potential for geologic impacts due to sedimentation and runoff and provide paleontological monitoring for excavation depths greater than five feet bgs. Therefore, the Modified Project would not generate a new significant impact related to geology and soils or substantially increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM GEO-1: Grading and Erosion Control Plan**
- **MM AQ-1: Standard Ventura County Air Pollution Control District Construction Emissions Reduction Measures (Fugitive Dust Control)**
- **MM HWQ-1: Storm Water Pollution Prevention Plan**
- **MM GEO-2: Paleontological Monitoring and Mitigation Plan**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MM GEO-1**, **MM AQ-1**, **MM HWQ-1**, and **MM GEO-2**.

3.7 GREENHOUSE GAS EMISSIONS

Section 4.7 (Greenhouse Gas Emissions) of the Certified FEIR found that Project-specific and cumulative impacts associated with decommissioning-related greenhouse gas (GHG) emissions would be less than significant (see Impact GHG-1: Decommissioning-related GHG Emissions included in Section 4.7.4 in the FEIR).

The use of heavy equipment and motor vehicles associated with excavation and remediation of contaminated soil at the Coast Ranch parcel would increase peak 12-month period GHG emissions. Table 3-2 provides a summary of peak 12-month period GHG emissions for the Modified Project in comparison to the Certified FEIR and the 10,000 metric tons carbon dioxide equivalent (CO_2E) threshold developed by the South Coast Air Quality Management District (SCAQMD) (see Section 4.7.3, Significance Criteria of the Certified FEIR, for methodology related to application of SCAQMD thresholds due to the absence of GHG thresholds of significance by the Ventura County Air Pollution Control District). The Modified Project would have greater GHG emissions than identified in the Certified FEIR but would not exceed the SCAQMD threshold (see Appendix A for Air Quality Spreadsheets).

Therefore, Project-specific and cumulative impacts associated with GHG emissions would remain less than significant. The Modified Project would not generate a new significant GHG emissions impact or substantially increase the severity of a previously identified GHG emissions impact. No new mitigation is required.

Table 3-2. Comparison of GHG Emissions (Peak 12 Month Period)

Task	CO_2 (metric tons)	CH_4 (metric tons)	N_2O (metric tons)	CO_2E (metric tons)
Certified FEIR	1,109.9	0.041	0.052	1,125.2
Coast Ranch Parcel Remediation	681.6	0.008	0.062	698.7
Total (Modified Project)	**1,791.5**	**0.049**	**0.114**	**1,823.9**
SBCAPCD Threshold (metric tons per year)	--	--	--	10,000
New or substantially increased impact?	No	No	No	No

CO_2 – carbon dioxide
CH_4 - methane
N_2O – nitrous oxide
CO_2E – carbon dioxide equivalent

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- None Required

3.8 HAZARDS AND HAZARDOUS MATERIALS

Section 4.8 (Hazards and Hazardous Materials) of the Certified FEIR for the Approved Project found that impacts related to hazards and hazardous materials would be potentially significant by creating a potential hazard during the excavation and hauling of hydrocarbon contaminated materials during remediation activities at the Onshore Facility parcel (see Impact HAZ-1: Release of Hazardous Materials During or Following Decommissioning Activities; Impact HAZ-2: Release of Hazardous Materials from Project Equipment and Machinery During Decommissioning Activities, and Impact HAZ-3: Potential Cumulative Hazardous Materials Impacts included in Sections 4.8.4 and 4.8.5 in the FEIR).

However, implementation of **MM HAZ-1a, MM HAZ-1b, and MM HWQ-1** would reduce project specific and cumulative impacts to less than significant by requiring that removal of hazardous materials is conducted in accordance with an approved Remedial Action Plan (RAP) and in accordance with the requirements of the Ventura County Environmental Health Division (VCEHD) and Los Angeles Regional Water Quality Control Board (LARWQCB). Additionally, a SWPPP would be implemented during remediation activities to reduce potential grading impacts to water quality. Further, **MM HAZ-1c** and **MM HAZ-1d** include oil spill response measures intended to minimize potential impacts to the public or environment and safety measures intended to ensure proper handling of materials as well as safety of trucks leaving the combined Onshore Facility area. With the implementation of **MM HAZ-1a, MM HAZ-1b, MM HAZ-1c, MM HAZ-1d**, and **MM HWQ-1**, the impact would be less than significant.

Site assessment activities at the Coast Ranch parcel were conducted during the period from March 23, 2020, through March 29, 2021(Padre 2021, included as Appendix E – Assessment Reports to the FEIR). The scope of services included assessment of soil and groundwater for the presence of petroleum hydrocarbons and associated chemicals of potential concern at the Coast Ranch Project Site (PRCs 145 and 410). The laboratory samples confirmed the presence of total petroleum hydrocarbon (TPH) concentrations that exceed the LARWQCB Maximum Soil Screening Levels for TPH identified as gasoline (C4-C12), diesel fuel (C13-C22), and motor oil (C23-C40) at depths ranging from 2 feet to 17 feet bgs. Additionally, the laboratory analytical results for groundwater

samples collected at the Project site indicated concentrations of TPH identified as diesel fuel (C12-C22) that exceeded the Environmental Screening Level (ESL) Aquatic Habitat Goals Levels for Freshwater Ecotox and Saltwater Ecotox values[5].

The Modified Project on the Coast Ranch parcel would involve the remediation of an additional 1.56 acres, encompassing an additional 16,820 cubic yards of hydrocarbon contaminated soils and a resulting additional 1,517 truck trips to transport this material from the Project site to a waste receiving facility. An additional 178,443 gallons of groundwater would be treated onsite. Although the Modified Project results in an increase in Project duration, excavation area, and resulting hauling trips, no additional equipment is proposed; therefore, the potential for hazardous materials exposure each workday would be similar to that disclosed in the Certified FEIR for implementation of Option 2 at the Onshore Facility parcel. Consistent with the Approved Project, implementation of **MM HAZ-1a, MM HAZ-1b, MM HAZ-1c, MM HAZ-1d**, and **MM HWQ-1** is expected to reduce potential impacts from the Modified Project to less than significant. Therefore, the Modified Project would not generate a new significant impact related to hazards and hazardous materials or substantially increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM HAZ-1a: Remedial Action Plan Implementation**
- **MM HAZ-1b: Hydrocarbon Contaminated Soil Notification(s) and Best Management Practices (BMPs)**
- **MM HAZ-1c: Oil Spill Contingency Plan Implementation**
- **MM HAZ-1d: Hazardous Materials Management and Contingency Plan**
- **MM HWQ-1: Storm Water Pollution Prevention Plan**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MMs HAZ-1a** through **HAZ-1d** and **MM HWQ-1**.

5 https://www.waterboards.ca.gov/rwqcb2/water_issues/programs/ESL/ESL_Tables.pdf

3.9 HYDROLOGY AND WATER QUALITY

Section 4.9 (Hydrology and Water Quality) of the Certified FEIR for the Approved Project found that impacts to water quality and hydrology would be potentially significant due to construction-related erosion and sedimentation impacts during excavation of approximately 0.48 acre at the Onshore Facility parcel, which would require use of equipment onsite for excavation and import and export of dirt (see Impact HWQ-1: Construction-related Erosion and Sedimentation Impacts to Marine and Onshore Water Quality and Impact HWQ-4: Potential for Cumulative Water Quality Impacts included in Sections 4.9.4 and 4.9.5 in the FEIR). Stormwater runoff from areas of exposed soil associated with excavating contaminated soil and placing backfill may degrade surface water quality. The Certified FEIR indicated that the Project could contribute to cumulative water quality impacts associated with stormwater runoff if remediation at the Coast Ranch parcel were to occur simultaneously with the Approved Project. However, with the implementation of **MM HWQ-1,** which requires a SWPPP, the impact would be less than significant.

The Modified Project would increase the Project's disturbance area at the Onshore Facility by 1.56 acres. However, the Coast Ranch parcel remediation would not occur simultaneously with the Onshore Facility parcel, which would eliminate the potential for cumulative impacts onsite. Consistent with the Approved Project, **MM HWQ-1** would require a SWPPP to reduce water quality impacts during construction and excavation. Therefore, the Modified Project would not generate a new significant hydrology or water quality impact from construction activities or substantially increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM HWQ-1: Storm Water Pollution Prevention Plan**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MM HWQ-1**.

3.10 LAND USE AND PLANNING

Section 4.10 (Land Use and Planning) of the Certified FEIR for the Approved Project found that the Project decommissioning activities would have the potential to result in temporary conflicts with State and local policies, including those specified in the California Coastal Act (see Impact LU-1: Temporary

Conflicts with State and Local Policies, and Impact LU-2: Cumulative Impacts of Project Construction included in Sections 4.10.4 and 4.10.5 in the FEIR). Specifically, short-term impacts from construction disturbances such as noise, lighting, air quality impacts, potential disturbance to biological resources, and potential impacts to water quality from sedimentation, pollution, or runoff could result during Project activities. However, consistent with the Approved Project, mitigation measures have been identified to reduce potential impacts to each affected resource area during construction.

Specifically, **MMs AES-1a** through **AES-1c** would require overnight storage of equipment, material removal at the completion of construction, and minimization of night lighting to reduce potential visual impacts to sensitive receptors. **MM AQ-1** includes construction emissions reduction measures to reduce potential impacts to air quality. With respect to biological resources, **MM BIO-1a, MM BIO-1b, MM BIO-2, MM BIO-3,** and **MM BIO-4** would be implemented to reduce potential impacts to nesting birds and monarch butterflies. Additionally, **MMs CUL-1/TCR-1** through **CUL-5/TCR-5** would be implemented to reduce potential impacts to unanticipated cultural/tribal cultural resources if encountered. **MM GEO-1, MM GEO-2,** and **MM HWQ-1** would require development and implementation of a Grading and Erosion Control Plan, Paleontological Monitoring and Mitigation Plan, and SWPPP to reduce potential impacts from construction stormwater runoff and the potential to encounter paleontological resources. **MMs HAZ-1a** through **HAZ-1e** are focused on prevention of hazardous materials release and include implementation of a Remedial Action Plan, Hydrocarbon Contaminated Soil Notifications and best management practices, Oil Spill Contingency Plan, Hazardous Materials Management and Contingency Plan, and Asbestos Abatement Workplan. Potential impacts to recreational users along PCH would be mitigated through implementation of **MM REC-1** that requires a Recreational Site Access and Traffic Management Plan. **MM WF-1a** and **MM WF-1b** include noticing requirements and development and implementation of a Fire Management and Prevention Plan to minimize potential risks related to working near dry brush and wildfires.

The Modified Project is anticipated to have similar impacts to those disclosed within the Certified FEIR with respect to potential conflicts with local land use policies during the additional site remediation activities at the Coast Ranch parcel. Consistent with the Approved Project, **MMs AES-1a** through **AES-1c, MM AQ-1, MMs BIO-1a** through **BIO-4, MMs CUL-1/TCR-1** through **CUL-5/TCR-5, MMs GEO-1** and **M GEO-2, MMs HAZ-1a** through **HAZ-1d, MM HWQ-1, MM REC-1, MMs**

WF-1a and **WF-1b** would be implemented to mitigate the potential for short term impacts during Project construction. The Modified Project would not generate a new significant impact related to land use or increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM AES-1a: Overnight Storage of Equipment**
- **MM AES-1b: Material Removal at Construction Completion**
- **MM AES-1c: Minimize Night Lighting**
- **MM AQ-1: Standard Ventura County Air Pollution Control District Construction Emissions Reduction Measures**
- **MM BIO-1a: Onshore Facility Nesting Season Avoidance or Pre-Construction Surveys**
- **MM BIO-1b: Environmental Awareness Training**
- **MM BIO-3: Monarch Butterfly Avoidance**
- **MM BIO-4: Pre-Activity Western Snowy Plover Survey**
- **MM CUL-1/TCR-1: Cultural and Tribal Cultural Resources Management and Treatment Plan**
- **MM CUL-2/TCR-2: Cultural and Tribal Cultural Resources Monitoring**
- **MM CUL-3/TCR-3: Cultural and Tribal Cultural Resources Awareness Training**
- **MM CUL-4/TCR-4: Discovery of Previously Unknown Cultural or Tribal Cultural Resources**
- **MM CUL-5/TCR-5: Unanticipated Discovery of Human Remains**
- **MM GEO-1: Grading and Erosion Control Plan**
- **MM GEO-2: Paleontological Monitoring and Mitigation Plan**
- **MM HAZ-1a: Remedial Action Plan Implementation**
- **MM HAZ-1b: Hydrocarbon Contaminated Soil Notification(s) and BMPs**
- **MM HAZ-1c: Oil Spill Contingency Plan Implementation**
- **MM HAZ-1d: Hazardous Materials Management and Contingency Plan**
- **MM HWQ-1: Storm Water Pollution Prevention Plan**

- **MM REC-1: Recreational Site Access and Traffic Management Plan**
- **MM WF-1a: Fire Management and Prevention Plan**
- **MM WF-1b: Ventura County Noticing Requirements**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MMs AES-1a** through **AES-1c**, **MM AQ-1**, **MMs BIO-1a** through **BIO-4**, **MMs CUL-1/TCR-1** through **CUL-5/TCR-5**, **MMs GEO-1** and **GEO-2**, **MMs HAZ-1a** through **HAZ-1d**, **MM HWQ-1**, **MM REC-1**, **MMs WF-1a** and **WF-1b**.

3.11 NOISE

Section 4.11 (Noise) of the Certified FEIR for the Approved Project found that Project-specific and cumulative noise impacts would be less than significant (see Impact N-1: Noise Impacts to Sensitive Receptors and Impact N-3: Cumulative Decommissioning Noise in Sections 4.11.4 and 4.11.5 in the FEIR). The Certified FEIR for the Approved Project determined that remediation of approximately 7,500 cubic yards of contaminated soil and replacement with imported clean soil associated with Option 2 at the Onshore Facility parcel would have the potential to generate noise levels during soil excavation activities at approximately 66.3 dBA (decibels on the A-weighted scale) Leq (equivalent sound level) at the nearest sensitive receptor[6] (County Fire Station No. 25), which is approximately 200 feet from the anticipated noise source. However, since Fire Station 25 is located approximately 300 feet from the U.S. Highway 101 centerline, it was concluded that the Approved Project-related noise would not be detectable above background noise levels.

Although the Modified Project would increase the potential excavation area by approximately 1.56 acres to excavate 16,820 cubic yards of soil during an additional 134 workdays, the equipment requirements on any given workday would be equivalent to that identified in the FEIR. Heavy equipment activity at the Coast Ranch parcel associated with contaminated soil removal and remediation would be located at least 300 feet from County Fire Station No. 25 and generate a noise level of 63.5 dBA Leq using the Roadway Construction Noise Model (Appendix C). Therefore, noise levels associated with the Modified Project at the nearest sensitive receptor would be lower than the Approved Project and remain less than significant. Therefore, the Modified Project would

[6] Defined by Ventura County 2040 General Plan (2020) as described in Section 4.11.2 (Regulatory Setting) of the FEIR

not generate new significant noise impacts or substantially increase the severity of previously identified noise impacts. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- None Required

3.12 RECREATION

Section 4.12 (Recreation) of the Certified FEIR for the Approved Project found that Project activities would temporarily interfere with recreational bicycle and pedestrian traffic on PCH during remediation activities at the Onshore Facility parcel (see Impact REC-2: Temporary Interference with Recreational Traffic on Ventura Coastal Trail in Section 4.12.4 in the FEIR). Additionally, the Project would incrementally contribute to cumulative recreational impacts (see Impact REC-4: Cumulative Recreational Impacts in Section 4.12.5 in the FEIR). However, implementation of **MM REC-1** would require the preparation of a Recreational Site Access and Traffic Management Plan that would detail procedures to ensure the safe passage of pedestrians, bicyclists, and motorists along PCH and the entrance of the combined Onshore Facility. With the implementation of **MM REC-1,** the Approved Project's impacts would be less than significant.

The Modified Project would require approximately 134 additional workdays to complete remediation activities at the Coast Ranch parcel within the combined Onshore Facility. As discussed in Section 3.13 (Transportation) below, the Modified Project would include remediation of the Coast Ranch parcel, which would generate an additional 1,517 truck trips associated with transport of contaminated soil to a waste receiving facility, and another 1,499 truck trips associated with import of clean soil. These additional trips would occur over an anticipated timeframe of 134 days. Based on this duration, the Modified Project would add an average of 23 truck trips per extra day of work or 2-3 truck trips per hour of work. These additional truck trips would have the potential to affect recreational users crossing the site entrance along the PCH corridor. Consistent with the Approved Project, implementation of **MM REC-1** would continue to ensure the safe passage of pedestrians, bicyclists, and motorists along PCH, which would reduce potential impacts from construction activities to less than significant.

The Modified Project would not generate a new significant recreational impact or substantially increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM REC-1: Recreational Site Access and Traffic Management Plan**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MM REC-1**.

3.13 TRANSPORTATION AND TRAFFIC

Section 4.13 (Transportation and Traffic) of the Certified FEIR for the Approved Project found that Project-specific and cumulative impacts related to transportation and traffic during the implementation of Option 2 at the Onshore Facility parcel would be less than significant (see Impact T-1: Decommissioning Vehicle Trip Generation and VMT and Impact T-2: Contribution to Cumulative Vehicle Trip Generation and Vehicle Miles Traveled (VMT) in Sections 4.13.4 and 4.13.5 in the FEIR). Specifically, the Approved Project for Option 2 included a total of approximately 1,838 truck trips (export of recycled asphalt base, soil excavation, and backfill with clean soil). Although these activities would generate additional trips on local roadways, CEQA Guidelines Section 15064.3, subdivision(b) only applies to VMT generated by passenger vehicles (automobiles and light trucks) (Governor's Office of Planning and Research 2018). Therefore, VMT generated by Project-related heavy-duty truck trips at the Onshore Facility parcel for the Approved Project did not result in a significant impact. Regardless, **MM REC-1,** requiring a Recreational Site Access and Traffic Management Plan, was included to further reduce potential impacts to transportation and traffic.

The Modified Project would include remediation of the Coast Ranch parcel, which would generate an additional 1,517 truck trips associated with transport of contaminated soil to a waste receiving facility, and another 1,499 truck trips associated with import of clean soil. These additional trips would occur over an anticipated timeframe of 134 days. Based on this duration, the Modified Project would add an average of 23 truck trips per extra day of work. Similar to the Approved Project, these additional trips would be generated by trucks and do not include passenger vehicle trips that would be considered within the VMT analysis. Therefore, the additional trips would not result in a significant impact. However, **MM REC-1** would also be implemented prior to and throughout Project

activities to further reduce potential impacts to transportation and traffic. Therefore, the Modified Project would not generate a new significant transportation impact from construction activities or substantially increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM REC-1: Recreational Site Access and Traffic Management Plan**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MM REC-1**.

3.14 UTILITIES AND SERVICE SYSTEMS

Section 4.14 (Utilities and Service Systems) of the Certified FEIR for the Approved Project found that Project-specific and cumulative impacts related to utilities and service systems, including waste generated from Onshore Facility remediation Option 2, would be less than significant, as the proposed disposal facilities had adequate remaining capacity or permitted throughput to support the approximately 468 estimated truckloads of recycled asphalt base and 675 truckloads of hydrocarbon contaminated soil (see Impact US-1: Generation of Project Waste During Decommissioning Activities and Impact US-2: Cumulative Generation of Waste that Would Affect Waste Receiving Facilities in Sections 4.14.4 and 4.14.5 in the FEIR).

The Modified Project would generate approximately 1,517 additional loads of hydrocarbon contaminated soil over a period of approximately 143 workdays, or an average of approximately 11 loads of waste material per day. Hydrocarbon contaminated soil would be taken to Waste Management (195 W. Los Angeles Avenue, Simi Valley, Ventura County), which is permitted to accept up to 3,000 tons per day of refuse. To ensure the 3,000 tons per day receiving threshold for Waste Management is not exceeded, contaminated soil could be temporarily staged onsite (subject to permit authorization and coordination with applicable agency regulations) and transport to Waste Management would be coordinated directly with them with respect to their receiving capacity to accept waste on a given disposal day. That coordination would ensure that Waste Management has adequate capacity to accept the anticipated volume of waste from the Modified Project.

Therefore, the Modified Project would not generate a new significant impact related to utilities and service systems or substantially increase the severity of a previously identified impact. No new mitigation is required.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- None Required

3.15 WILDFIRE

Section 4.15 (Wildfire) of the Certified FEIR for the Approved Project found that no impacts related to wildfire during the implementation of Option 2 at the Onshore Facility parcel would result (see Impact WF-1: Temporary Increase in Risk to Wildfire During Decommissioning Activities Within an Area Designated as Very High Fire Hazard Severity Zone by CAL FIRE and Impact WF-2: Cumulative Impacts to Potential Wildfire in Sections 4.15.4 and 4.15.5 in the FEIR). This is primarily because the excavation areas are located within the interior of the facility that currently contains a paved and vacant dirt lot. No vegetation or fuel source is present that would provide a wildfire fuel source.

The Modified Project would add an additional 1.56 acres of disturbance. However, this additional excavation area does not require additional equipment, and is just north and contiguous with the Onshore Facility parcel, which is also open space and clear of vegetation.

Therefore, the Modified Project would not generate a new significant impact related to wildfire or substantially increase the severity of a previously identified impact. No new mitigation is required. However, as a further safety precaution, **MM WF-1a** and **MM WF-1b** would be implemented throughout Project activities to further reduce potential impacts from wildfire.

Summary of Mitigation Measures from Certified FEIR to be Implemented During the Modified Project:

- **MM WF-1a: Fire Management and Prevention Plan**
- **MM WF-1b: Ventura County Noticing Requirements**

Please refer to FEIR Appendix K (Mitigation Monitoring Program) for the full text of **MMs WF-1a** and **WF-1b**.

3.16 CUMULATIVE EFFECTS

By aligning the Modified Project construction schedule with the remediation efforts already planned at the Onshore Facility, the Modified Project would eliminate separate construction periods and would result in a more efficient cleanup effort which would only require one mobilization/demobilization of equipment, and would eliminate the need for installation of a 750-foot-long steel sheet pile wall that would have been required prior to the transfer of the Coast Ranch parcel to State ownership. Therefore, the Modified Project reduces the cumulative net construction-related impacts associated with planned improvements at the Onshore Facility.

Further, a review of updated planning lists from the city of Carpinteria (most current lists updated August 2025), county of Ventura (most current list updated August 2025), and the county of Santa Barbara (most current active Project list updated January 2025 and cumulative projects list dated July 2025) did not identify any additional projects that should be considered for cumulative analysis based on project location, type, or anticipated timing. No additional cumulative impacts are expected based on the Modified Project.

4.0 DETERMINATION/ADDENDUM CONCLUSION

As detailed in the analysis presented above, this Addendum prepared by the CSLC, as the lead agency under CEQA, supports the conclusion that the proposed changes (Modified Project) to the previously analyzed Project in the FEIR (Approved Project) would not result in any new significant or substantial increase in the severity of environmental effects. Specifically, the CSLC has determined, based on substantial evidence considering the whole record, that none of the following circumstances exist regarding the Modified Project and the previously certified FEIR:

- Substantial changes proposed in the Project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (State CEQA Guidelines, § 15162, subd. (a)(1)).

- Substantial changes that will occur with respect to the circumstances under which the Project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (State CEQA Guidelines, § 15162, subd. (a)(2)).

- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified by the District (State CEQA Guidelines, § 15162, subd. (a)(3)).

Given that none of the conditions described in CEQA Guidelines section 15162 have occurred, and only minor changes or additions to the previously certified FEIR are necessary, CSLC staff has determined that no subsequent or supplemental EIR is required, and, consistent with CEQA Guidelines section 15164, an Addendum is the appropriate CEQA document for analysis and consideration of the portion of the Modified Project on lands under the jurisdiction of the CSLC.

5.0 ADDENDUM PREPARATION AND RESOURCES

5.1 ADDENDUM PREPARERS

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5.2 REFERENCES

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APPENDIX A

Air Quality Spreadsheets

Rincon Phase 2 Decommissioning
Island Decommissioning

OFF-ROAD SOURCES

Source	Fuel	BHP	Number	Average Hours/Day	Emission Factors: pounds/BHP-hr [1,3]								Pounds/Day								Total	Total English Tons							
					NO_x	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	NO_x	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	Days	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O
Excavator	Diesel	310	2	8	0.00096	0.00012	0.00003	0.00003	0.00093	0.44493	0.000023	0.000011	4.76	0.60	0.15	0.15	4.61	2206.9	0.114	0.056	389	0.926	0.116	0.029	0.029	0.897	429.2	0.022	0.011
Drill rig (dewatering wells)	Diesel	175	0	0	0.00115	0.00014	0.00005	0.00005	0.00328	0.58943	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Grader	Diesel	290	0	0	0.00262	0.00024	0.00009	0.00008	0.00114	0.47565	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Backhoe	Diesel	104	0	0	0.00178	0.00017	0.00008	0.00007	0.00284	0.43052	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Dozer (D8)	Diesel	355	1	8	0.00321	0.00029	0.00013	0.00012	0.00172	0.49864	0.000023	0.000011	9.12	0.82	0.37	0.34	4.88	1416.1	0.065	0.032	186	0.848	0.077	0.034	0.032	0.454	131.7	0.006	0.003
Generator (pumps)	Diesel	50	0	0	0.00129	0.00011	0.00011	0.00010	0.00258	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Vibratory soil compactor	Diesel	74	1	8	0.01245	0.00155	0.00089	0.00082	0.00508	0.43658	0.000023	0.000011	7.37	0.92	0.53	0.49	3.01	258.5	0.014	0.007	172	0.634	0.079	0.045	0.042	0.259	22.2	0.001	0.001
Light plant	Diesel	15	0	0	0.00183	0.00019	0.00002	0.00002	0.00254	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Air compressor (185 cfm)	Diesel	50	0	0	0.00179	0.00014	0.00002	0.00002	0.00235	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Welding machine	Diesel	20	0	0	0.00447	0.00061	0.00021	0.00019	0.00285	0.56383	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Wheeled loader	Diesel	240	1	8	0.00142	0.00015	0.00005	0.00004	0.00093	0.42010	0.000023	0.000011	2.73	0.29	0.10	0.08	1.79	806.6	0.044	0.022	575	0.784	0.083	0.028	0.022	0.513	231.9	0.013	0.006
Crane (mobile)	Diesel	350	1	8	0.00200	0.00019	0.00008	0.00008	0.00107	0.33508	0.000023	0.000011	5.60	0.53	0.22	0.22	3.00	938.2	0.064	0.032	2	0.006	0.001	0.000	0.000	0.003	0.9	0.000	0.000
Concrete pump	Diesel	250	0	0	0.00009	0.00011	0.00001	0.00001	0.00081	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
													29.57	**3.16**	**1.36**	**1.28**	**17.29**	**5626.3**	**0.30**	**0.15**		**3.197**	**0.355**	**0.136**	**0.125**	**2.126**	**815.994**	**0.042**	**0.021**

ON-ROAD SOURCES

On Road Sources	Miles/One-way Trip	Average Daily One-way Trips	Emission Factors, grams/mile [2]								Pounds/Day								Total	Total English Tons							
			NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	Days	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O
Light-duty truck (workers)	20	24	0.15737	0.03421	0.00200	0.00184	1.78040	294.21	0.00882	0.00720	0.1665	0.0362	0.0021	0.0019	1.8840	311.3	0.0093	0.0076	437	0.036	0.008	0.000	0.000	0.412	68.0	0.002	0.002
Heavy-duty truck (structural debris to Std Industries)	23	2.7	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.1633	0.0013	0.0014	0.0014	0.0152	195.9	0.0004	0.0205	23	0.002	0.000	0.000	0.000	0.000	2.3	0.000	0.000
Heavy-duty truck (pavement to State Ready Mix)	26	3.1	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.2119	0.0017	0.0019	0.0018	0.0197	254.3	0.0005	0.0266	20	0.002	0.000	0.000	0.000	0.000	2.5	0.000	0.000
Heavy-duty truck (contaminated soil to WM)	50	10.32	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	1.3568	0.0109	0.0119	0.0114	0.1261	1627.9	0.0035	0.1702	186	0.126	0.001	0.001	0.001	0.012	151.4	0.000	0.016
Heavy-duty truck (clean soil from Grimes Rock)	41	11.16	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	1.2032	0.0096	0.0106	0.0101	0.1118	1443.6	0.0031	0.1509	172	0.103	0.001	0.001	0.001	0.010	124.1	0.000	0.013
Heavy-duty truck (contaminated water to World Oil)	95	2	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.4996	0.0040	0.0044	0.0042	0.0464	599.4	0.0013	0.0627	10	0.002	0.000	0.000	0.000	0.000	3.0	0.000	0.000
									Totals =>		**3.6014**	**0.0637**	**0.0323**	**0.0308**	**2.2032**	**4432.5**	**0.0182**	**0.4384**		**0.2725**	**0.0098**	**0.0025**	**0.0024**	**0.4336**	**351.4**	**0.0026**	**0.0313**
Off-Road & On-Road Source Totals			**33.176**	**3.220**	**1.397**	**1.307**	**19.490**	**10058.8**	**0.3198**	**0.5864**												**3.4698**	**0.3644**	**0.1390**	**0.1271**	**2.5601**	**1167.4**	**0.0448**	**0.0520**

Notes:
[1] Onshore equipment emission factors from OFFROAD 2021 model for Ventura County, year 2024
[2] On-road emission factors from EMFAC 2021 model for Ventura County, year 2024

Greenhouse Gas Emissions Summary

Metric Tons	1042.3	0.040	0.046
CO2E	1042.3	1.117	12.675
Total CO2E			**1056.1**

Rincon Phase 2 Decommissioning
Island Decommissioning - Peak 12 Month Period*

*Defined as removal of pavement and contaminated soil and 114 workdays of backfill with clean soil

OFF-ROAD SOURCES

					Emission Factors: pounds/BHP-hr [1,3]								Pounds/Day								Total	Total English Tons							
Source	Fuel	BHP	Number	Average Hours/Day	NO_x	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	NO_x	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	Days	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O
Excavator	Diesel	310	2	8	0.00096	0.00012	0.00003	0.00003	0.00093	0.44493	0.000023	0.000011	4.76	0.60	0.15	0.15	4.61	2206.9	0.114	0.056	300	0.714	0.089	0.022	0.022	0.692	331.0	0.017	0.008
Drill rig (dewatering wells)	Diesel	175	0	0	0.00115	0.00014	0.00005	0.00005	0.00328	0.58943	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Grader	Diesel	290	0	0	0.00262	0.00024	0.00009	0.00008	0.00114	0.47565	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Backhoe	Diesel	104	0	0	0.00178	0.00017	0.00008	0.00007	0.00284	0.43052	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Dozer (D8)	Diesel	355	1	8	0.00321	0.00029	0.00013	0.00012	0.00172	0.49864	0.000023	0.000011	9.12	0.82	0.37	0.34	4.88	1416.1	0.065	0.032	186	0.848	0.077	0.034	0.032	0.454	131.7	0.006	0.003
Generator (pumps)	Diesel	50	0	0	0.00129	0.00011	0.00011	0.00010	0.00258	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Vibratory soil compactor	Diesel	74	1	8	0.01245	0.00155	0.00089	0.00082	0.00508	0.43658	0.000023	0.000011	7.37	0.92	0.53	0.49	3.01	258.5	0.014	0.007	114	0.420	0.052	0.030	0.028	0.171	14.7	0.001	0.000
Light plant	Diesel	15	0	0	0.00183	0.00019	0.00002	0.00002	0.00254	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Air compressor (185 cfm)	Diesel	50	0	0	0.00179	0.00014	0.00002	0.00002	0.00235	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Welding machine	Diesel	20	0	0	0.00447	0.00061	0.00021	0.00019	0.00285	0.56383	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Wheeled loader	Diesel	240	1	8	0.00142	0.00015	0.00005	0.00004	0.00093	0.42010	0.000023	0.000011	2.73	0.29	0.10	0.08	1.79	806.6	0.044	0.022	486	0.663	0.070	0.023	0.019	0.434	196.0	0.011	0.005
Crane (mobile)	Diesel	350	1	8	0.00200	0.00019	0.00008	0.00008	0.00107	0.33508	0.000023	0.000011	5.60	0.53	0.22	0.22	3.00	938.2	0.064	0.032	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Concrete pump	Diesel	250	0	0	0.00009	0.00011	0.00001	0.00001	0.00081	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
													29.57	**3.16**	**1.36**	**1.28**	**17.29**	**5626.3**	**0.30**	**0.15**		**2.645**	**0.288**	**0.110**	**0.100**	**1.752**	**673.463**	**0.035**	**0.017**

ON-ROAD SOURCES

			Emission Factors, grams/mile [2]								Pounds/Day								Total	Total English Tons							
On Road Sources	Miles/One-way Trip	Average Daily One-way Trips	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	Days	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O
Light-duty truck (workers)	20	24	0.15737	0.03421	0.00200	0.00184	1.78040	294.21	0.00882	0.00720	0.1665	0.0362	0.0021	0.0019	1.8840	311.3	0.0093	0.0076	300	0.025	0.005	0.000	0.000	0.283	46.7	0.001	0.001
Heavy-duty truck (structural debris to Std Industries)	23	2.7	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.1633	0.0013	0.0014	0.0014	0.0152	195.9	0.0004	0.0205	23	0.002	0.000	0.000	0.000	0.000	2.3	0.000	0.000
Heavy-duty truck (pavement to State Ready Mix)	26	3.1	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.2119	0.0017	0.0019	0.0018	0.0197	254.3	0.0005	0.0266	20	0.002	0.000	0.000	0.000	0.000	2.5	0.000	0.000
Heavy-duty truck (contaminated soil to WM)	50	10.32	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	1.3568	0.0109	0.0119	0.0114	0.1261	1627.9	0.0035	0.1702	186	0.126	0.001	0.001	0.001	0.012	151.4	0.000	0.016
Heavy-duty truck (clean soil from Grimes Rock)	41	11.16	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	1.2032	0.0096	0.0106	0.0101	0.1118	1443.6	0.0031	0.1509	114	0.069	0.001	0.001	0.001	0.006	82.3	0.000	0.009
Heavy-duty truck (contaminated water to World Oil)	95	2	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.4996	0.0040	0.0044	0.0042	0.0464	599.4	0.0013	0.0627	10	0.002	0.000	0.000	0.000	0.000	3.0	0.000	0.000
									Totals =>		**3.6014**	**0.0637**	**0.0323**	**0.0308**	**2.2032**	**4432.5**	**0.0182**	**0.4384**		**0.2262**	**0.0070**	**0.0021**	**0.0020**	**0.3013**	**288.2**	**0.0019**	**0.0264**
Off-Road & On-Road Source Totals			**33.176**	**3.220**	**1.397**	**1.307**	**19.490**	**10058.8**	**0.3198**	**0.5864**	**2.8709**	**0.2952**	**0.1121**	**0.1023**	**2.0528**	**961.6**	**0.0366**	**0.0434**									

Notes:

[1] Onshore equipment emission factors from OFFROAD 2021 model for Ventura County, year 2024

[2] On-road emission factors from EMFAC 2021 model for Ventura County, year 2024

Greenhouse Gas Emissions Summary

Metric Tons	858.6	0.033	0.039
CO2E	858.6	0.912	10.584
Total CO2E			**870.1**

Rincon Phase 2 Decommissioning
Onshore Pipeline Connections

OFF-ROAD SOURCES

					Emission Factors: pounds/BHP-hr [1,3]								Pounds/Day								Total	Total English Tons							
Source	**Fuel**	**BHP**	**Number**	**Average Hours/Day**	**NO_x**	**ROG**	**PM10**	**PM2.5**	**CO**	**CO2**	**CH4**	**N2O**	**NO_x**	**ROG**	**PM10**	**PM2.5**	**CO**	**CO2**	**CH4**	**N2O**	**Days**	**NOx**	**ROG**	**PM10**	**PM2.5**	**CO**	**CO2**	**CH4**	**N2O**
Excavator	Diesel	310	1	8	0.00096	0.00012	0.00003	0.00003	0.00093	0.44493	0.000023	0.000011	2.38	0.30	0.07	0.07	2.31	1103.4	0.057	0.028	10	0.012	0.001	0.000	0.000	0.012	5.5	0.000	0.000
Drill rig (dewatering wells)	Diesel	175	0	0	0.00115	0.00014	0.00005	0.00005	0.00328	0.58943	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Grader	Diesel	290	0	0	0.00262	0.00024	0.00009	0.00008	0.00114	0.47565	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Backhoe	Diesel	104	0	0	0.00178	0.00017	0.00008	0.00007	0.00284	0.43052	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Dozer (D8)	Diesel	355	0	0	0.00321	0.00029	0.00013	0.00012	0.00172	0.49864	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Generator (pumps)	Diesel	50	0	0	0.00129	0.00011	0.00011	0.00010	0.00258	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Vibratory soil compactor	Diesel	74	0	0	0.01245	0.00155	0.00089	0.00082	0.00508	0.43658	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Light plant	Diesel	15	0	0	0.00183	0.00019	0.00002	0.00002	0.00254	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Air compressor (185 cfm)	Diesel	50	1	8	0.00179	0.00014	0.00002	0.00002	0.00235	0.35591	0.000023	0.000011	0.72	0.06	0.01	0.01	0.94	142.4	0.009	0.005	5	0.002	0.000	0.000	0.000	0.002	0.4	0.000	0.000
Welding machine	Diesel	20	1	8	0.00447	0.00061	0.00021	0.00019	0.00285	0.56383	0.000023	0.000011	0.72	0.10	0.03	0.03	0.46	90.2	0.004	0.002	10	0.004	0.000	0.000	0.000	0.002	0.5	0.000	0.000
Wheeled loader	Diesel	240	1	8	0.00142	0.00015	0.00005	0.00004	0.00093	0.42010	0.000023	0.000011	2.73	0.29	0.10	0.08	1.79	806.6	0.044	0.022	20	0.027	0.003	0.001	0.001	0.018	8.1	0.000	0.000
Crane (mobile)	Diesel	350	0	0	0.00200	0.00019	0.00008	0.00008	0.00107	0.33508	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Water pump	Diesel	20	1	8	0.00178	0.00010	0.00004	0.00004	0.00221	0.35591	0.000023	0.000011	0.28	0.02	0.01	0.01	0.35	56.9	0.004	0.002	5	0.001	0.000	0.000	0.000	0.001	0.1	0.000	0.000
Concrete pump	Diesel	250	1	8	0.00009	0.00011	0.00001	0.00001	0.00081	0.35591	0.000023	0.000011	0.18	0.22	0.02	0.02	1.62	711.8	0.046	0.023	5	0.000	0.001	0.000	0.000	0.004	1.8	0.000	0.000
													7.00	**0.98**	**0.24**	**0.22**	**7.46**	**2911.4**	**0.164**	**0.080**		**0.046**	**0.006**	**0.002**	**0.001**	**0.039**	**16.3**	**0.0009**	**0.0004**

ON-ROAD SOURCES

			Emission Factors, grams/mile [2]								Pounds/Day								Total	Total English Tons							
On Road Sources	**Miles/One-way Trip**	**Average Daily One-way Trips**	**NOx**	**ROG**	**PM10**	**PM2.5**	**CO**	**CO2**	**CH4**	**N2O**	**NOx**	**ROG**	**PM10**	**PM2.5**	**CO**	**CO2**	**CH4**	**N2O**	**Days**	**NOx**	**ROG**	**PM10**	**PM2.5**	**CO**	**CO2**	**CH4**	**N2O**
Light-duty truck (workers)	20	20	0.15737	0.03421	0.00200	0.00184	1.78040	294.21	0.00882	0.00720	0.1388	0.0302	0.0018	0.0016	1.5700	259.4	0.0078	0.0063	20	0.001	0.000	0.000	0.000	0.016	2.6	0.000	0.000
Heavy-duty truck (structural debris to Std Industries)	23	2	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.1210	0.0010	0.0011	0.0010	0.0112	145.1	0.0003	0.0152	4	0.000	0.000	0.000	0.000	0.000	0.3	0.000	0.000
Heavy-duty truck (concrete from State Ready Mix)	26	2	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.1367	0.0011	0.0012	0.0011	0.0127	164.1	0.0004	0.0171	2	0.000	0.000	0.000	0.000	0.000	0.2	0.000	0.000
Heavy-duty truck (contaminated soil to WM)	50	0	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.0000	0.0000	0.0000	0.0000	0.0000	0.0	0.0000	0.0000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Heavy-duty truck (clean soil from Grimes Rock)	41	0	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.0000	0.0000	0.0000	0.0000	0.0000	0.0	0.0000	0.0000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Heavy-duty truck (contaminated water to World Oil)	95	2	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.4996	0.0040	0.0044	0.0042	0.0464	599.4	0.0013	0.0627	2	0.000	0.000	0.000	0.000	0.000	0.6	0.000	0.000
										Totals =>	**0.8961**	**0.0362**	**0.0084**	**0.0080**	**1.6404**	**1168.1**	**0.0097**	**0.1013**		**0.0023**	**0.0003**	**0.0000**	**0.0000**	**0.0158**	**3.6**	**0.0001**	**0.0002**
Off-Road & On-Road Source Totals			**7.899**	**1.011**	**0.247**	**0.224**	**9.102**	**4079.425**	**0.1735**	**0.1818**												**0.0480**	**0.0059**	**0.0016**	**0.0014**	**0.0547**	**20.0**	**0.0010**	**0.0006**

Notes:
[1] Onshore equipment emission factors from OFFROAD 2021 model for Ventura County, year 2024
[2] On-road emission factors from EMFAC 2021 model for Ventura County, year 2024

Greenhouse Gas Emissions Summary

Metric Tons	17.8	0.001	0.001
CO2E	17.8	0.024	0.149
Total CO2E			**18.0**

Rincon Phase 2 Decommissioning
Onshore Facility Remediation - Option 2 (includes Coast Ranch)

OFF-ROAD SOURCES

					Emission Factors: pounds/BHP-hr [1,3]								Pounds/Day								Total	Total English Tons							
Source	Fuel	BHP	Number	Average Hours/Day	NO_x	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	NO_x	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	Days	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O
Excavator	Diesel	310	1	8	0.00096	0.00012	0.00003	0.00003	0.00093	0.44493	0.000023	0.000011	2.38	0.30	0.07	0.07	2.31	1103.4	0.057	0.028	141	0.168	0.021	0.005	0.005	0.163	77.8	0.004	0.002
Vibratory hammer (excavator mounted)	Diesel	415	1	8	0.00096	0.00012	0.00003	0.00003	0.00093	0.44493	0.000023	0.000011	3.19	0.40	0.10	0.10	3.09	1477.2	0.076	0.038	21	0.033	0.004	0.001	0.001	0.032	15.5	0.001	0.000
Drill rig (dewatering wells)	Diesel	175	1	8	0.00115	0.00014	0.00005	0.00005	0.00328	0.58943	0.000023	0.000011	1.61	0.20	0.07	0.07	4.59	825.2	0.032	0.015	8	0.006	0.001	0.000	0.000	0.018	3.3	0.000	0.000
Grader	Diesel	290	0	0	0.00262	0.00024	0.00009	0.00008	0.00114	0.47565	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Backhoe	Diesel	104	0	0	0.00178	0.00017	0.00008	0.00007	0.00284	0.43052	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Dozer (D8)	Diesel	355	1	8	0.00321	0.00029	0.00013	0.00012	0.00172	0.49864	0.000023	0.000011	9.12	0.82	0.37	0.34	4.88	1416.1	0.065	0.032	60	0.273	0.025	0.011	0.010	0.147	42.5	0.002	0.001
Generator (pumps)	Diesel	50	1	24	0.00129	0.00011	0.00011	0.00010	0.00258	0.35591	0.000023	0.000011	1.55	0.13	0.13	0.12	3.10	427.1	0.028	0.013	90	0.070	0.006	0.006	0.005	0.139	19.2	0.001	0.001
Vibratory soil compactor	Diesel	100	1	8	0.01245	0.00155	0.00089	0.00082	0.00508	0.43658	0.000023	0.000011	9.96	1.24	0.71	0.66	4.06	349.3	0.018	0.009	60	0.299	0.037	0.021	0.020	0.122	10.5	0.001	0.000
Light plant	Diesel	15	0	0	0.00183	0.00019	0.00002	0.00002	0.00254	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Air compressor (185 cfm)	Diesel	50	0	0	0.00179	0.00014	0.00002	0.00002	0.00235	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Welding machine	Diesel	20	0	0	0.00447	0.00061	0.00021	0.00019	0.00285	0.56383	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Wheeled loader	Diesel	240	2	8	0.00142	0.00015	0.00005	0.00004	0.00093	0.42010	0.000023	0.000011	5.45	0.58	0.19	0.15	3.57	1613.2	0.088	0.043	120	0.327	0.035	0.012	0.009	0.214	96.8	0.005	0.003
Crane (mobile)	Diesel	350	0	0	0.00200	0.00019	0.00008	0.00008	0.00107	0.33508	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Water pump	Diesel	20	0	0	0.00178	0.00010	0.00004	0.00004	0.00221	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Concrete pump	Diesel	250	0	0	0.00009	0.00011	0.00001	0.00001	0.00081	0.35591	0.000023	0.000011	0.00	0.00	0.00	0.00	0.00	0.0	0.000	0.000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
													33.26	**3.66**	**1.65**	**1.51**	**25.60**	**7211.5**	**0.365**	**0.178**		**1.177**	**0.128**	**0.056**	**0.051**	**0.835**	**265.6**	**0.0140**	**0.0069**

ON-ROAD SOURCES

			Emission Factors, grams/mile [2]								Pounds/Day								Total	Total English Tons							
On Road Sources	Miles/One-way Trip	Average Daily One-way Trips	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O	Days	NOx	ROG	PM10	PM2.5	CO	CO2	CH4	N2O
Light-duty truck (workers)	20	8	0.15737	0.03421	0.00200	0.00184	1.78040	294.21	0.00882	0.00720	0.0555	0.0121	0.0007	0.0006	0.6280	103.8	0.0031	0.0025	179	0.005	0.001	0.000	0.000	0.056	9.3	0.000	0.000
Heavy-duty truck (structural debris to Std Industries)	23	0	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	0.0000	0.0000	0.0000	0.0000	0.0000	0.0	0.0000	0.0000	0	0.000	0.000	0.000	0.000	0.000	0.0	0.000	0.000
Heavy-duty truck (asphalt from State Ready Mix)	26	20	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	1.3674	0.0110	0.0120	0.0115	0.1271	1640.6	0.0035	0.1715	47	0.032	0.000	0.000	0.000	0.003	38.6	0.000	0.004
Heavy-duty truck (contaminated soil to WM)	50	24.5	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	3.2212	0.0258	0.0283	0.0271	0.2993	3864.8	0.0083	0.4040	179	0.288	0.002	0.003	0.002	0.027	345.9	0.001	0.036
Heavy-duty truck (clean soil from Grimes Rock)	41	24.3	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	2.6198	0.0210	0.0230	0.0220	0.2434	3143.3	0.0068	0.3286	179	0.234	0.002	0.002	0.002	0.022	281.3	0.001	0.029
Heavy-duty truck (sheet pile wall)	105	4	1.19277	0.00956	0.01048	0.01003	0.11083	1431.08	0.00308	0.14960	1.1044	0.0089	0.0097	0.0093	0.1026	1325.1	0.0028	0.1385	15	0.008	0.000	0.000	0.000	0.001	9.9	0.000	0.001
										Totals =>	**8.3683**	**0.0787**	**0.0738**	**0.0706**	**1.4004**	**10077.5**	**0.0245**	**1.0452**		**0.5682**	**0.0056**	**0.0050**	**0.0048**	**0.1085**	**685.0**	**0.0017**	**0.0709**
Off-Road & On-Road Source Totals	**41.624**	**3.742**	**1.723**	**1.585**	**27.002**	**17288.9**	**0.3898**	**1.2236**		**1.7450**	**0.1340**	**0.0615**	**0.0559**	**0.9440**	**950.6**	**0.0157**	**0.0777**										

Notes:
[1] Onshore equipment emission factors from OFFROAD 2021 model for Ventura County, year 2024
[2] On-road emission factors from EMFAC 2021 model for Ventura County, year 2024

Greenhouse Gas Emissions Summary

Metric Tons	848.7	0.014	0.069
CO2E	848.7	0.392	18.944
Total CO2E			**868.1**

Rincon Phase 2 Decommissioning
Air Pollutant and Greenhouse Gas Emissions Totals

	Average Pounds/Day					Total English Tons					Total Metric Tons			
Task	**NOx**	**ROG**	**PM10**	**PM2.5**	**CO**	**NOx**	**ROG**	**PM10**	**PM2.5**	**CO**	**CO2**	**CH4**	**N2O**	**CO2E**
Island Decommissioning	33.18	3.22	1.40	1.31	19.49	3.47	0.36	0.14	0.13	2.56	1042.3	0.040	0.046	1056.1
Onshore Pipeline Connections	7.90	1.01	0.25	0.22	9.10	0.05	0.01	0.00	0.00	0.05	17.8	0.001	0.001	18.0
Onshore Facility Remediation - Option 2 (includes Coast Ranch)	41.62	3.74	1.72	1.58	27.00	1.75	0.13	0.06	0.06	0.94	848.7	0.014	0.069	868.1

Peak Day	**NOx**	**ROG**	**PM10**	**PM2.5**	**CO**
Island decomissioning + Onshore Facility (Option 2 with Coast Ranch)	74.8	7.0	3.1	2.9	46.5

Peak 12-month Period (tons)

Island soil removal + backfill (in part)						2.87	0.30	0.11	0.10	2.05	858.6	0.033	0.039	870.1
Onshore Pipeline Connections						0.05	0.01	0.00	0.00	0.05	17.8	0.001	0.001	18.0
Onshore Facility Remediation - Option 2 (includes Coast Ranch)						1.75	0.13	0.06	0.06	0.94	848.7	0.014	0.069	868.1
Total						**4.66**	**0.44**	**0.18**	**0.16**	**3.05**	**1725.15**	**0.048**	**0.109**	**1756.2**
Onshore Facility Remediation - Option 3 (FEIR project: w/o Coast Ranch)						0.78	0.08	0.03	0.03	0.48	167.17	0.006	0.008	169.41
Onshore Difference (add Coast Ranch)						**0.97**	**0.06**	**0.03**	**0.02**	**0.46**	**681.55**	**0.008**	**0.062**	**698.65**

APPENDIX B

Updated Biological Survey

padre associates, inc.
ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

February 10, 2025
Project No. 2002-7861

MEMORANDUM

Attention: Ms. Nicole Dobroski
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Subject: Biological Survey Results for the California State Lands Commission (CSLC) Rincon Phase 2 Decommissioning Project – Final Environmental Impact Report (FEIR) Addendum

Dear Ms. Dobroski:

Padre Associates, Inc. (Padre) is pleased to provide this Memorandum describing biological survey activities conducted for the Rincon Island Phase 2 Decommissioning Project FEIR Addendum. On January 23, 2025, Ms. Robin Bedard, biologist from Padre, assessed potential environmental constraints and construction-related impacts for the Project area, including the previously defined Onshore Facility and Coast Ranch Parcel considered as part of the FEIR Addendum (Project Site). Survey methodologies were consistent with past survey activities, with special attention paid to the presence or absence and overwinter roosting of monarch butterflies (*Danaus plexippus plexippus*, a federal proposed threatened species). Results for the biological survey can be found below.

Survey Area, Timing, and Personnel

Biological survey activities were conducted at the Project Site during the morning and midday hours of January 23, 2025. The survey was conducted within the fenced and gated CSLC Onshore Facility, with particular focus on the Coast Ranch Parcel being considered within the FEIR Addendum, starting on the northern limits of the work area near Los Sauces Creek and ending on the southern and eastern boundaries of the parcel.

Survey Results

Site and Vegetation Characterization. Vegetation characteristics were largely similar to vegetation observed during surveys conducted in previous years near this location (March 13 and September 8, 2023) (Final Environmental Impact Report for the Rincon Phase 2 Decommissionng Project, 2024 [Rincon FEIR]). A total of 23 plant species were observed during field surveys including 12 native species. Eleven species listed as invasive by the California Invasive Plant Council were observed, which naturally reduces the suitability of the

habitat onsite for native plant and wildlife species. The vegetation communities and cover types observed are described in more detail below.

Arroyo Willow Thickets/Riparian Habitat. Los Sauces Creek transects the Project Site in its northeast corner and includes a riparian corridor composed of arroyo willow thickets (*Salix lasiolepis* shubland alliance). The dominant plant species was arroyo willow (*Salix lasiolepis*) with associate species of giant reed (*Arundo donax*) and lemonade berry (*Rhus intergrifolia*). Additional plant species observed within this community can be found in Table 1 below.

In average to low rain years, Los Sauces Creek provides intermittent (seasonal) water flows from the headwaters in Los Sauces Canyon near Casitas Pass and provides marginal habitat for riparian species within the Project Site. In above average rain years, water flows year-round in Los Sauces Creek. During surveys conducted on January 23, 2025, the creek had a steady flow of water, with the widest and deepest locations measuring approximately 5 feet wide and 1 foot deep. Within the Project Site, the riparian corridor measures approximately 230 feet-long. Directly southwest of the Project Site, Los Sauces Creek enters a culvert beneath U.S. 101, and the drains directly onto a rip-rap armored section of the Pacific Ocean coastline. Directly northeast of the Project Site, Los Sauces Creek transitions into a concrete channel devoid of riparian vegetation; therefore, the riparian habitat in the Project Site has been isolated from the upstream habitat located approximately 1,160 feet to the northeast. This lack of connectivity to a proper upstream creek migration corridor has limited the ability of the Project Site to attract and support many riparian and aquatic species.

Disturbed and Developed Land. The majority of the Project Site is comprised of disturbed and developed land that was previously utilized as part of the Onshore Facility. This area is graded and portions are covered in crushed asphalt, gravel, sand bags, straw wattle, pipes, etc. from previous facility and construction related activities. This area is primarily void of vegetation; However, patches of opportunistic weedy species are present including hottentot fig (*Carpobrotus edulis*), tree tobacco (*Nicotiana glauca*), and summer mustard (*Hirschfeldia incana*). In addition, immature starts of native species like coyote brush (*Baccharis pilularis*) and big saltbush (*Atriplex lentiformis*) were intermittently emergent throughout the disturbed and developed portions of the Project Site.

Ruderal Landscape Community. Along the northeast fence line and the area adjacent to the riparian corridor of Los Sauces creek, native and non-native shrubs and trees are present. Cape honey suckle (*Tecoma capensis*) has been planted and grows along the fence line perimeter of the northeast portion of the Project Site. Scattered tree stands of Monterey cypress (*Hesperocyparis macrocarpa*), red gum (*Eucalyptus camaldulensis*), and spider gum (*Eucalyptus conferruminate*) are present throughout the Project Site, with denser patches near Los Sauces Creek. Small shrubs are present in the understory and along the fence line, including lemonade berry and coyote brush.

Table 1. Vascular Plants Observed at the Project Site

Scientific Name	Common Name	Habit	Family	Wetland Status	Invasiveness Rating	Found in Riparian Corridor
Artemisia douglasiana	Mugwort	PH	Asteraceae	FAC		x
Arundo donax	Giant reed	PG	Poaceae	FACW	High	x
Atriplex lentiformis	Big saltbush	S	Chenopodiaceae	FAC		
Baccharis pilularis	Coyote brush	S	Asteraceae	*		
Baccharis salicifolia	Mule fat, seep-willow	S	Asteraceae	FAC		
Carpobrotus edulis	Hottentot fig	PH	Aizoaceae	*	High	
Conium maculatum	Poison hemlock	PH	Apiaceae	FACW	Moderate	x
Cynodon dactylon	Bermuda grass	PG	Poaceae	FACU	Moderate	
Equisetum arvense	Common horsetail rush	PF	Equisetaceae	FAC		
Eucalyptus camadulensis	Red gum	T	Myrtaceae	FAC	Limited	x
Eucalyptus conferruminata	Spider gum	T	Myrtaceae	*		x
Foeniculum vulgare	Sweet-fennel	PH	Apiaceae	*	Moderate	x
Helminthotheca echioides	Bristly ox-tongue	AH or PH	Asteraceae	FAC	Limited	x
Hesperocyparis macrocarpa	Monterey cypress	T	Cupressaceae	*		
Heterotheca grandiflora	Telegraph weed	PH	Asteraceae	*		
Hirschfeldia incana	Summer mustard	BH	Brassicaceae	*	Moderate	
Laennecia coulteri	Coulter's horse-weed	AH	Asteraceae	FAC		
Myoporum laetum	Myoporum	T	Scrophulariaceae	FACU	Moderate	
Nicotiana glauca	Tree tobacco	S	Solanaceae	FAC	Moderate	
Rhus integrifolia	Lemonade berry	S	Anacardiaceae	*		x
Ricinus communis	Castor bean	S	Euphorbiacea	FACU	Limited	
Salix lasiolepis	Arroyo willow	T	Salicaceae	FACW		x
Tecoma capensis	Cape honey suckle	S	Bignoniaceae	*		

Notes:

Scientific nomenclature follows The Jepson Manual Second Edition (Baldwin et al., 2012), including supplements.

Invasiveness Rating from the online database of the California Invasive Plant Council

Habit Definitions:

AF = annual fern or fern ally
AG = annual grass
AH = annual herb
BH = biennial herb
PF = perennial fern
PG = perennial grass
PH = perennial herb
PV = perennial vine
S = shrub
T = tree

Wetland Status from Arid West 2020 Regional Wetland Plant List:

OBL - Obligate wetland: almost always occurs in wetlands (>99% probability)
FACW - Facultative-Wetland: usually occurs in wetlands (67-99% probability)
FAC - Facultative: equally likely to occur in wetlands or non-wetlands (34-66% probability)
FACU - Facultative-Upland: usually occurs in non-wetlands (1-33% probability)
UPL - Upland: almost always occurs in non-wetlands (>99% probability)
*: not addressed in the wetland plant list, non-wetland species

Wildlife Survey Results. Wildlife observed within the Project Site and its surroundings are characteristic of the region but is limited due to the disturbed condition of the Project Site as well as its restricted access from wildlife migration corridors. Wildlife observed during the survey conducted on January 23, 2025, are described below.

Bird observations included black phoebe (*Sayornis nigricans*), American crow (*Corvus brachyrhynchos*), white-crowned sparrow (*Zonotricha leucophrys*), California towhee (*Melozone crissalis*), spotted towhee (*Pipilo maculatus*), yellow rumped warbler (*Setophaga coronata*), Anna's hummingbird (*Calypte anna*), Allen's hummingbird (*Selasphorus sasin*), hermit thrush (*Catharus guttatus*), American goldfinch (*Spinus tristis*), and lesser goldfinch (*Spinus psaltria*). No active bird nests or breeding bird behavior were observed; However, the trees and shrubs within the Project area, primarily within the riparian corridor of Los Sauces Creek, provide suitable nesting and foraging habitat for migratory birds and raptors protected by the Migratory Bird Treaty Act.

The disturbed nature of the Project Site provides minimal cover or denning opportunities for mammal species. No direct observations of mammals were made on January 23, 2025. However, Botta's pocket gopher (*Thomomys bottae*) burrows were observed as well as a gray fox (*Urocyon cinereoargenteus*) skull; Therefore, presence of these mammal species is assumed.

Although water is normally seasonally available in Los Sauces Creek, the riparian habitat is largely isolated from upstream reaches of the Creek and provides marginal habitat for amphibian species on the Project Site. No amphibians were observed during the January 23, 2025, survey. The Project Site provides minimal cover and prey base for reptile species and observations of reptiles were limited to one (1) side blotched lizard (*Uta stansburiana*).

No fish were observed within Los Sauces Creek during the survey and the Creek provides marginal habitat as flows are not consistent and the habitat is largely isolated from upstream reaches of the Creek. Although Los Sauces Creek is directly connected with the Pacific Ocean, its hardened and culverted construction precludes the presence of any anadromous (e.g., southern steelhead [*Oncorhynchus mykiss*]) or estuarine species (e.g., tidewater goby [*Eucyclogobius newberryi*]).

Monarch Butterfly Survey Results. The Project area is comprised of many red gum and Monterey cypress trees that have historically supported aggregations of monarch butterflies. Monarch butterflies were observed roosting at the Onshore Facility on November 2, 2021, within a Monterey cypress tree, but were not observed onsite during the March 13 or September 8, 2023, field surveys (Rincon FEIR, 2024). During a field survey conducted on January 23, 2025, approximately 20 monarch butterflies were observed flying throughout the Project Site and its surroundings. Monarch butterfly behavior was concentrated around red gum and Monterey cypress trees adjacent to Los Sauces Creek and butterflies were often observed landing on the trees; however, no roosting aggregates of butterflies were observed.

Regardless, the stand of red gum and Monterey cypress trees have historically hosted aggregates of butterflies and continue to provide suitable roosting habitat for monarch butterflies at the Project Site. The Project Site is located between two different coastal overwintering sites along Highway 101: one is located approximately 5 miles north, adjacent to Rincon Creek

(California Natural Diversity Database [CNDDB] Occurrence No. 268; Xerces Society Overwintering Site No. 2803) and the other is approximately 7 miles south near Main Street in the City of Ventura (CNDDB Occurrence No. 294; Xerces Society Overwintering Site No. 3150) (CNDDB 2025) (Xerces Society for Invertebrate Conservation 2025). These overwintering sites were active in 2017 and 2023, respectively. Prior to the January 23, 2025, field survey, Ms. Robin Bedard visited both overwintering sites as reference sites to observe roosts of monarch butterflies; However, no roosting butterflies were observed at either location.

Recommendations

The following proposed avoidance and minimization measures are recommended to avoid and minimize potential impacts to biological resources that may be present at the Project Site.

1. Project-related ground-disturbing activities would be scheduled at the Onshore Facility outside of the February 15 to August 1 nesting season; however, if activities must be scheduled within that timeframe, then pre-construction surveys of bird nesting habitat shall be conducted no more than 7 days prior to the planned start of construction within 500 feet of work areas to identify raptor and passerine nest sites. If an active raptor or passerine bird nest is identified, an appropriate species-specific nest protection buffer shall be delineated by a CSLC-qualified biologist in coordination with the California Department of Fish and Wildlife (CDFW). A pre-construction nesting survey report shall be prepared and submitted to CDFW and CSLC prior to the start of construction that outlines the surveys conducted, nest locations identified, and recommended nest protection buffers. Construction activities shall be prohibited within the established buffers until the young have fledged or the nest is abandoned. If a lapse in Project-related activities occurs for 14 days or longer, another focused survey is required before Project activities can be reinitiated.
2. A CSLC-approved biologist shall conduct environmental awareness training for all Project personnel to familiarize workers with potential special status species and their habitat, applicable regulatory requirements, and measures that must be implemented to avoid or minimize potential impacts to sensitive habitat. Training materials shall be approved by CSLC staff 2 weeks prior to implementation.
3. Prior to any Project-related activities at the Onshore Facility scheduled between October and February, a CSLC-qualified biologist shall survey for monarch butterfly aggregations 2 weeks prior to the start of construction. If monarch butterfly aggregations are observed, a protection buffer shall be delineated by a CSLC-qualified biologist in coordination with CDFW around the roosting area. The protection buffer will remain in place and the aggregation will continue to be monitored every 2 weeks until it is determined the aggregation has dispersed. If an overwintering population becomes established, as indicated by the presence of monarch butterflies in December through February, then the qualified biologist shall document the extent of the roosting area and coordinate with CDFW to establish an appropriate buffer for potential over-wintering and breeding activities.

4. No excavation or other form of ground disturbance activity should occur within the bed and bank of Los Sauces Creek, including the use of wheeled or tracked equipment.
5. Materials that are required to complete the Project should be staged in an upland area where the materials cannot enter Los Sauces Creek.
6. Refueling of equipment should occur at least 100 feet from Los Sauces Creek.

REFERENCES

California Natural Diversity Database (CNDDB). 2025. RareFind application. California Department of Fish and Wildlife.

Final Environmental Impact Report for the Rincon Phase 2 Decommissioning Project (Rincon FEIR). 2024. California State Lands Commission. https://www.slc.ca.gov/ceqa/rincon-phase-2-decommissioning/

Xerces Society for Invertebrate Conservation. 2025. Western Monarch Overwintering Site Viewer. https://westernmonarchcount.org/map-of-overwintering-sites/

APPENDIX C

Noise Calculations

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 02/12/2025
Case Description: Onshore Remediation Option 2 with Coast Ranch

**** Receptor #1 ****

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Fire Station 25	Residential	60.0	60.0	55.0

Equipment

Description	Impact Device	Usage (%)	Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Excavator	No	40		80.7	300.0	0.0
Front End Loader	No	40		79.1	550.0	0.0
Dozer	No	40		81.7	600.0	0.0
Front End Loader	No	40		79.1	800.0	0.0
Compactor (ground)	No	20		83.2	900.0	0.0

Results

	Calculated (dBA)		Noise Limits (dBA) Day		Evening		Night		Noise Limit Exceedance (dBA) Day		Evening		Night	
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Excavator	65.1	61.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Front End Loader	58.3	54.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dozer	60.1	56.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Front End Loader	55.0	51.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Compactor (ground)	58.1	51.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	65.1	63.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A