

## 1.0 INTRODUCTION

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1 As Lead Agency under the California Environmental Quality Act (CEQA; Pub.  
2 Resources Code, § 21000 et seq.), the California State Lands Commission (CSLC or  
3 Commission) has prepared this ~~Recirculated Draft Final~~ Environmental Impact Report  
4 (EIR), State Clearinghouse [SCH] No. 2005061013, for the proposed Revised PRC 421  
5 Recommissioning Project (Project). The Project reviewed in this EIR is based on an  
6 application by Venoco, Inc. (Venoco), the lessee and operator of State Oil and Gas  
7 Lease PRC 421 (PRC 421), to:

- 8     · Return oil production from an existing shoreline well (Well 421-2) that was shut-in  
9       in 1994, at the CSLC's direction, by the previous lessee;<sup>1</sup> and
- 10    · Process PRC 421 crude oil emulsion at the Ellwood Onshore Facility (EOF) in  
11      the City of Goleta, instead of on shoreline piers as was the case when the CSLC  
12      assigned the lease to Venoco in 1997.

13 This ~~Recirculated Draft Final~~ EIR replaces a Final EIR that the Commission deferred action  
14 on and directed staff to fully evaluate the Processing PRC 421 Oil at Las Flores Canyon  
15 (LFC) Alternative (Calendar Item 91, April 23, 2014).<sup>2</sup> The EIR is being recirculated  
16 pursuant to State CEQA Guidelines section 15088.5, subdivision (a), because significant  
17 new information has been added to the EIR as summarized in Table 1-1.

### 18 1.1 PROJECT LOCATION AND BACKGROUND

19 The Project would be conducted along the southern coast of California, adjacent to and  
20 within the City of Goleta, Santa Barbara County (Figure 1-1). As proposed by Venoco:

- 21     · Well 421-2 would be recommissioned using an existing pier (Pier 421-2) located  
22       on Haskell's Beach, straddling Goleta and CSLC jurisdictions;
- 23     · Water and gas from crude oil emulsion extracted from Well 421-2 would be  
24       separated at the existing EOF in the City of Goleta;
- 25     · Venoco would decommission a second well (Well 421-1), located on an adjacent  
26       pier (Pier 421-1), which was historically used as a water and gas injection well  
27       during past production of PRC 421; and

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<sup>1</sup> The CSLC directed the previous lessee, Mobil Exploration and Production, Inc. (Mobil) to suspend operations, following an onshore oil spill from a transportation pipeline, pursuant to CSLC regulations (Cal. Code Regs., tit. 2, div. 3, § 2121), which state:

*The lessee shall suspend any drilling and Production operations, except those which are corrective, protective, or mitigative, immediately in the event of any disaster or of contamination or pollution caused in any manner or resulting from operations under a lease. Such drilling and Production operations shall not be resumed until adequate corrective measures have been taken and authorization of resumption of operations has been made by the commission.*

<sup>2</sup> The CSLC previously prepared, but did not certify, a Final EIR (January 2014) based on Venoco's (2013) project description and a Draft EIR (August 2007) based on Venoco's (2004) project description.

**Table 1-1. New Information Added to this Recirculated Draft Final EIR**

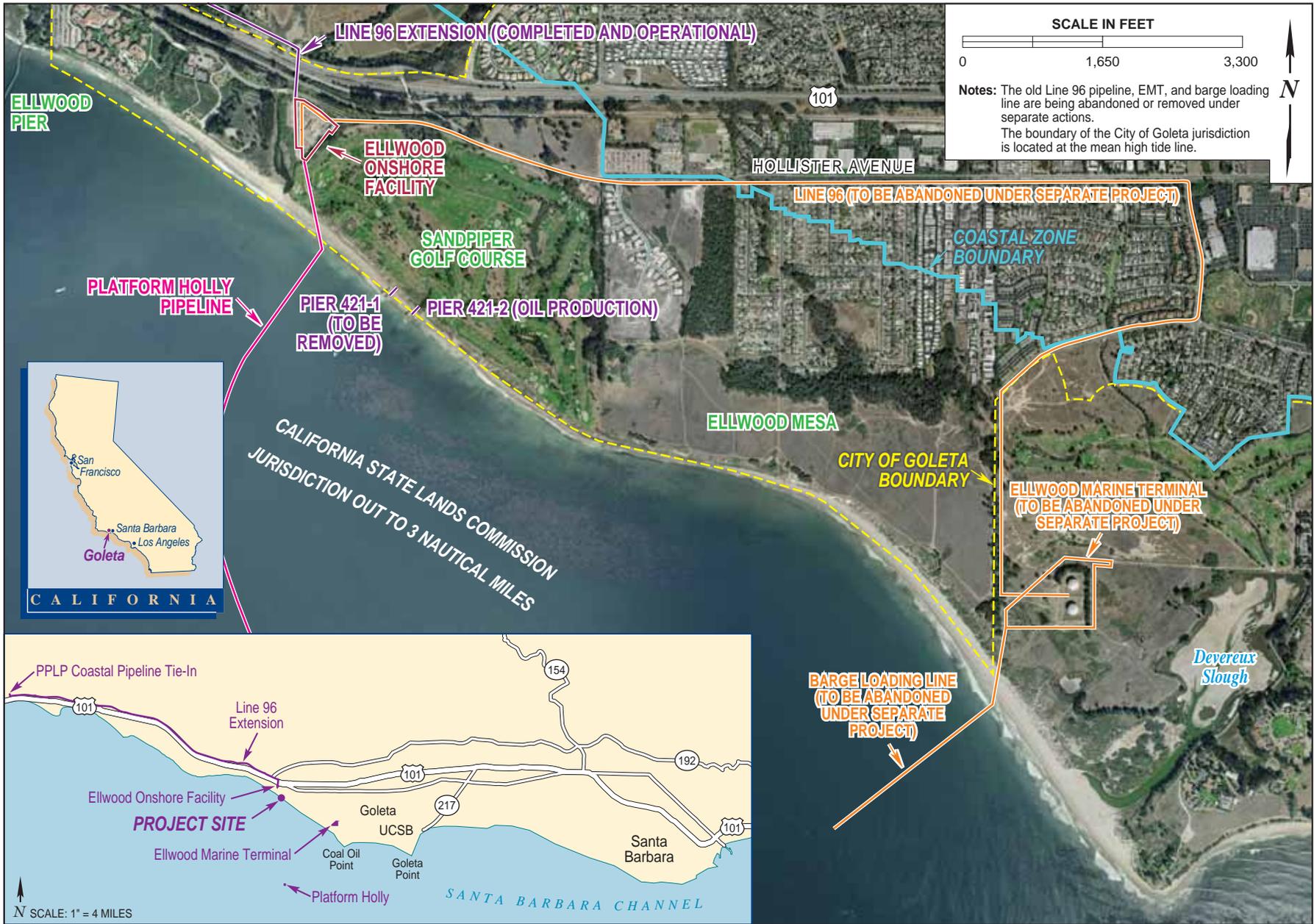
<b>Section 5.0, Project Alternatives Analysis</b>	To facilitate review of the Processing PRC 421 Oil at LFC Alternative, the EIR has been reorganized to combine and discuss all Project alternatives in a new Section 5.0, Project Alternatives Analysis, which includes: <ul style="list-style-type: none"> <li>· Alternatives selection and screening methodology;</li> <li>· Alternatives eliminated from further consideration; and</li> <li>· Impact analyses of each alternative considered.</li> </ul>
<b>Processing PRC 421 Oil at LFC Alternative</b>	This Alternative has been moved from the Alternatives Eliminated from Further Consideration subsection (January 2014 version) to the Alternatives Evaluated in this <del>Recirculated Draft Final</del> EIR subsection (Section 5.3.4).
<b>No Project Alternative</b>	Whereas Venoco's proposed Project includes processing PRC 421 oil at the EOF, the No Project Alternative is redefined as Commission authorization (pursuant to Cal. Code Regs., tit. 2, div. 3, ch. 1, § 2121) that Venoco has taken adequate corrective measures to repair the infrastructure associated with PRC 421, such that Venoco is obligated to resume production and processing of oil from PRC 421 under conditions similar to those in existence in 1994, when the well was shut-in for corrective action. Elements of the No Project Alternative are based on the following: <ul style="list-style-type: none"> <li>· The Commission assigned the PRC 421 lease to Venoco in July 1997, which provides Venoco the legal right to produce the lease (lease originally issued in 1929; see Table 2-1 for lease history).</li> <li>· Under the No Project Alternative, Venoco may produce the lease by processing oil on Pier 421-2 and using Well 421-1 on Pier 421-1 for produced water disposal. This is not a "project" as defined in CEQA section 21065,<sup>3</sup> because the Commission has already issued Lease PRC 421 to Venoco. In contrast, the Commission's discretionary action for the Project evaluated in this EIR covers: moving the location of oil processing from Pier 421-2 to the EOF; abandoning Well 421-1; and decommissioning Pier 421-1.</li> <li>· A "no production alternative," under which Venoco would be prohibited from resuming commercial production of PRC 421, has been added to this EIR as discussed below.</li> </ul>
<b>No Production/Quitclaim State Oil and Gas Lease PRC 421 Alternative</b>	This alternative would require the State to take an affirmative action to terminate and quitclaim PRC 421. Terminating the lease would deny Venoco's contractual right to produce oil from the lease premises; as such, the State would likely be required to pay Venoco for the interest taken.
<b>Vaqueros Reservoir Repressurization</b>	This discussion has been augmented to clarify the issue. The discussion was also moved from the background information in Section 2.0, Project Description (in the January 2014 Final EIR), to Section 4.2, Safety, since repressurization is not a purpose of the Project, but Project implementation may affect repressurization.

<sup>3</sup> CEQA section 21065 defines "Project" as "an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, **and** (*emphasis added*) which is any of the following:

(a) An activity directly undertaken by any public agency.

(b) An activity undertaken by a person which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

(c) An activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies."



Project Location

**FIGURE  
1-1**

- 1       · Venoco would remove Pier 421-1, which was historically used for the processing  
2       and storage of the Well 421-2 product, and would remove the caisson and  
3       facilities that support Well 421-1.

4       Production estimates for PRC 421, based on current projections, are as follows:

- 5       · Estimated production during the first month is 150 barrels of oil per day (BOPD)  
6       due to anticipated repressurization of the reservoir that has likely occurred from  
7       the well having been shut-in since 1994. Instantaneous oil production rate is not  
8       projected to exceed 500 BOPD;
- 9       · After two years, production is anticipated to taper off to approximately 50 BOPD,  
10      matching the well's last 10 years of continuous historical production; and
- 11      · The estimated productive life of PRC 421 is 20 years, which is less than the  
12      production life of Platform Holly estimated at a minimum of 40 years.
- 13      · The State Lease 421 Recommissioning Plan Project Description (Venoco 2013;  
14      Appendix G) details the proposed recommissioning of PRC 421, including  
15      upgrades to Venoco's existing facilities and construction of limited supporting  
16      infrastructure. The Project details are provided in Section 2.0, Project  
17      Description, of this EIR.

## 18    **1.2 PROJECT OBJECTIVE**

19    The State CEQA Guidelines section 15126.6, subdivision (a) requires an EIR to  
20    describe and consider a range of reasonable alternatives to the Project, or to the  
21    location of the Project, which would feasibly attain most of the basic objectives of the  
22    Project. In order to explain the need for the Project, and to guide in development and  
23    evaluation of alternatives, Venoco was asked to define its Project objectives. Venoco  
24    identified the following objective for the Revised PRC 421 Recommissioning Project:

- 25      · To return State Oil and Gas Lease PRC 421 to production and process the  
26      production at the EOF.

## 27    **1.3 OVERVIEW OF THE ENVIRONMENTAL REVIEW PROCESS**

28    CEQA's primary objectives are to:

- 29      · Ensure that the significant environmental effects of proposed activities are  
30      disclosed to decision makers and the public;
- 31      · Identify ways to avoid or reduce environmental damage;
- 32      · Prevent environmental damage by requiring implementation of feasible  
33      alternatives and/or mitigation measures;

- 1     · Make public the reasons for agency approval of projects with significant  
2       environmental effects;
- 3     · Foster multidisciplinary interagency coordination in the review of projects; and
- 4     · Enhance public participation in the planning process. With certain limited  
5       exceptions, CEQA requires all State and local government agencies to consider  
6       the environmental consequences of projects over which they have discretionary  
7       authority before taking action on those projects. It establishes both procedural  
8       and substantive requirements that agencies must satisfy to meet CEQA's  
9       objectives. In accordance with these requirements, the CSLC, as the Lead  
10      Agency with decision-making authority over the Project, determined that the  
11      Project could result in significant environmental impacts and that an EIR was  
12      required to analyze the Project and feasible Project alternatives.

13 As described in the State CEQA Guidelines, an EIR is a public information document  
14 that assesses potential environmental effects of a proposed project and identifies  
15 mitigation measures and alternatives to the project that could reduce or avoid potentially  
16 significant environmental impacts (State CEQA Guidelines § 15121, subdivision (a)).  
17 Other key requirements include developing a plan to implement and monitor the  
18 success of the identified mitigation measures, and carrying out specific noticing and  
19 distribution steps to maximize public involvement in the environmental review process. It  
20 is not the purpose of an EIR to recommend either approval or denial of a project.  
21 Consistent with CEQA requirements, the CSLC has engaged in a good faith,  
22 reasonable effort towards full public disclosure of the potential effects of Venoco's  
23 proposed Project.

24 Prior to any decision on whether and how to recommission PRC 421, the CSLC must  
25 certify that:

- 26     · The EIR has been completed in compliance with CEQA;
- 27     · The EIR was presented to the CSLC in a public meeting and the CSLC reviewed  
28       and considered the information contained in the Final EIR prior to taking action  
29       on approval of the proposed Project; and
- 30     · The EIR reflects the CSLC's independent judgment and analysis (State CEQA  
31       Guidelines § 15090).

32 In addition to disclosing the environmental effects, CEQA requires that a Lead Agency  
33 (1) avoid or reduce significant effects to the extent feasible (Pub. Resources Code, §  
34 21002) and (2) prepare written findings of fact for each significant environmental impact  
35 identified in the document upon certification of the EIR and prior to approval of the  
36 Project (State CEQA Guidelines § 15121, subdivision (b)). The possible findings are  
37 (see State CEQA Guidelines § 15091):

- 1       · The Project has been changed (including adoption of mitigation measures) to
- 2       avoid or substantially reduce the magnitude of the impact;
- 3       · Changes to the Project are within another agency’s jurisdiction and have been or
- 4       should be required by that agency; or
- 5       · Specific economic, legal, social, technological, or other considerations make the
- 6       mitigation measures or alternatives identified in the EIR infeasible.

7 Under CEQA, if the CSLC finds that the above-specified considerations make identified  
 8 mitigation measures or alternatives infeasible, and as a result, implementation of the  
 9 Project would result in the occurrence of one or more significant effects, the CSLC  
 10 would only be allowed to approve recommissioning of PRC 421 if it prepares a written  
 11 statement that the Project’s environmental benefits (including economic, legal, social,  
 12 technological, or other region- or statewide benefits) outweigh the unavoidable adverse  
 13 environmental effects. This statement of “overriding considerations” must be supported  
 14 by the specific reasons and evidence in the record for making such a determination.

15 State CEQA Guidelines section 15124, subdivision (d) requires that an EIR contain a  
 16 statement within the project description briefly describing the intended uses of the EIR.  
 17 The State CEQA Guidelines also indicate that the EIR should identify the ways in which  
 18 the Lead Agency and any responsible agencies would use the document in their  
 19 approval or permitting processes. Agency roles and intended uses of the EIR are as  
 20 follows. The CSLC is the CEQA lead agency responsible for preparing this EIR. A Joint  
 21 Review Panel (JRP), composed of staffs of the CSLC, City of Goleta, and California  
 22 Coastal Commission, and chaired by CSLC staff, was formed to oversee the EIR  
 23 process. The EIR will be used by the CSLC to consider the environmental impacts  
 24 associated with the Project and Project alternatives and to assist the CSLC in making its  
 25 decision to approve or deny the Project. As noted in Section 1.3.1 below, other State  
 26 and local agencies will use the EIR in their decision-making processes and to support  
 27 consideration of issuance of any Project-related permits and approvals.

28 **1.3.1 Responsible and Coordinating Agencies/Permitting**

29 In addition to action by the CSLC, the proposed Project would require the following  
 30 permits and approvals from reviewing authorities and regulatory agencies:

City of Goleta <sup>a, b</sup>	EOF Development Plan Revision to 08-134-DP and Conditional use Permit Development Plan and Conditional Use Permit for the portion of the Project outside of the EOF
Santa Barbara County Air Pollution Control District (APCD)	Modification to current production limit for SL-421 <u>Execution of a Health Risk Assessment (HRA)</u> (Other APCD rule-required plans may also need to be developed or modified)

California Coastal Commission <sup>a</sup>	Coastal Development Permit
California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR)	<u>Notice of Intention to Rework Well 421-2</u> <u>Submittal of Abandonment and Restoration Plan</u> <u>Review and approve proposed plugging and abandonment operations for Well 421-1</u>
California Department of Fish and Wildlife (CDFW), Office of Spill Prevention and Response	Approval of updates by Venoco of its Oil Spill Contingency Plan and South Ellwood Field Emergency Action Plan (EAP)
State Regional Water Quality Control Board (RWQCB)	Section 401 Water Quality Certification National Pollutant Discharge Elimination System (NPDES) permit
<u>U.S. Army Corps of Engineers</u>	<u>Department of the Army Permit</u>

<sup>a</sup> Prior permits issued for emergency repair work on the PRC 421 piers (Final Development Plan 05-132-DP; 04-EMP-001; E-01-013-G; 2004015765-JCM) cannot be modified since they do not allow oil production to resume.

<sup>b</sup> A revised Development Plan from the City of Goleta is required for those portions of the Project that involve onshore facilities above the Mean High Tide line, such as those portions of the piers, access road, pipelines, and changes involved at the EOF.

## 1 1.3.2 Public Participation

2 On July 24, 2014, the CSLC has prepared-released a new Recirculated Draft EIR to  
3 allow the public and agencies the opportunity to comment on the currently proposed  
4 Project, alternatives (including the LFC Processing Alternative), associated  
5 environmental impacts and recommended mitigation measures. Appendix A provides  
6 the distribution list of ~~this document~~ the Recirculated Draft EIR. Following the public  
7 comment period on the Recirculated Draft EIR, which ended September 24, 2014, this  
8 Final EIR was prepared.

## 9 Scoping

10 On March 26, 2013, pursuant to CEQA section 21080.4 and State CEQA Guidelines  
11 section 15082, subdivision (a), the CSLC issued a Notice of Preparation (NOP) for the  
12 proposed Project to responsible and trustee agencies and other interested parties.  
13 Through the NOP, the CSLC solicited both written and verbal comments on the EIR's  
14 scope during a 30-day comment period and provided information on a forthcoming  
15 public scoping meeting. The CSLC held two public and agency scoping meetings in  
16 Goleta, California on April 3, 2013, to solicit verbal comments on the scope of the EIR.  
17 Transcripts of the meetings are provided in Appendix B. Written comments in response  
18 to the NOP were received from the following:

State Agency	· DOGGR
Local/Regional Agency	· City of Goleta · County of Santa Barbara Planning and Development, Energy Division · County of Santa Barbara Office of Emergency Management · Santa Barbara County APCD

Tribal Members	· Barbareño/Ventureño Band of Mission Indians
Non-Governmental Organizations	· California Center for Public Policy · Environmental Defense Center (EDC) · League of Women Voters of Santa Barbara · Natural Resources Defense Council (NRDC)
Individuals	· Ingeborg Cox, MD · Richard Whited

1 **Public Comment on ~~this~~ the July 2014 Recirculated Draft EIR**

2 This In July 2014, the Recirculated Draft EIR ~~is being~~ was distributed to Federal, State,  
3 and local agencies and to interested community organizations and individuals ~~who may~~  
4 ~~wish~~ to review and comment on the report. Because the CSLC ~~is recirculating~~  
5 recirculated the entire Draft, only comments on ~~this~~ the Recirculated Draft EIR ~~will be~~  
6 were accepted (State CEQA Guidelines § 15088.5, subdivisions (f)(1) and (3)).  
7 Comments received on the 2013 Draft EIR were responded to in the January 2014 Final  
8 EIR, and ~~are~~ were incorporated where appropriate in ~~this~~ the Recirculated Draft EIR; all  
9 comments (including comments submitted on the Draft EIRs released in 2007 and  
10 2013) are maintained as part of the administrative record.

11 ~~Fourteen~~ written comments ~~may be~~ letters ~~were~~ submitted to the CSLC during the 60-  
12 day public review period. ~~Verbal and written comments on this for the~~ Recirculated Draft  
13 EIR ~~will also be accepted at a~~ (July 24 through September 24, 2014). Four speakers  
14 gave oral comments at two noticed public meetings ~~that will be scheduled during the~~  
15 ~~public review period~~ the CSLC staff held in the City of Goleta on September 15, 2014.

16 **Preparation of the Final EIR**

17 All comments received ~~will be~~ during the 60-day public review period, which are  
18 addressed in a Part II, Response to Comments, section of a new of this Final EIR, ~~which~~  
19 along with ~~any~~ changes to the text and analysis in this document in strikeout-underline  
20 format ~~will~~ constitute the Final EIR for the Project (see Part II, Response to Comments).

21 **EIR Information and Repository Sites**

22 Placing the CEQA document in “repository” sites can be an effective way of providing  
23 ongoing information about the Project to a large number of people. This document is  
24 available at four repository sites in the Project vicinity and at CSLC offices in Long  
25 Beach and Sacramento (see Table 1-2).

**Table 1-2. EIR Repository Locations**

Goleta Branch Library 500 N. Fairview Ave. Goleta, CA 93117-1797 (805) 964-7878	Santa Barbara Public Library 40 E. Anapamu St. Santa Barbara, CA 93101 (805) 962-7653
City of Goleta, Planning & Environmental Review Attn: Anne Wells 130 Cremona Dr., Ste. B Goleta, CA 93117 (805) 961-7546	County of Santa Barbara Attn: Kevin Drude 123 E. Anapamu St. Santa Barbara, CA 93101 (805) 568-2287
California State Lands Commission Attn: Steve Curran 200 Oceangate, 12 <sup>th</sup> Floor Long Beach, CA 90802 (562) 590-5266	California State Lands Commission Attn: Eric Gillies 100 Howe Ave., Suite 100-South Sacramento, CA 95825 (916) 574-1897

## 1 1.4 PURPOSE AND SCOPE OF THE EIR

2 The purpose of this EIR is to identify the significant impacts on the environment of  
3 Venoco's Project, to identify alternatives to the Project, and to indicate the manner in  
4 which those significant effects can be mitigated or avoided (Pub. Resources Code, §  
5 21002.1, subd. (a)). The CSLC has prepared this EIR in accordance with CEQA and the  
6 State CEQA Guidelines to document the CSLC's evaluation of the potential for  
7 environmental impacts associated with implementation of Venoco's proposed  
8 recommissioning of PRC 421. The EIR is intended to provide the CSLC with information  
9 required to exercise its jurisdictional responsibilities with respect to the Project, which  
10 will be considered at a separately noticed public meeting of the CSLC.

### 11 1.4.1 Study Area Boundary

12 The study area for this EIR has been established in two tiers of scope and is described  
13 in detail in Sections 2.0, Project Description, and 5.0, Project Alternatives Analysis. The  
14 detailed study area (see Figure 1-1) covers the immediate onshore and near-shore  
15 areas of the Ellwood coast that would be subject to direct impacts (e.g., production on  
16 Pier 421-2, removal of Pier 421-1, trenching along the access road, and tie-in to existing  
17 facilities) and the area most susceptible to an oil spill from Project operation and oil  
18 transport, which is the Ellwood Coast zone within and surrounding PRC 421 and the  
19 Project-related oil transport pipeline to the tie-in point for the recently constructed Line  
20 96 pipeline. The secondary study area is associated with the pipeline corridor stretching  
21 north and west of the detailed study area to Las Flores Canyon (LFC) that was  
22 described in the Line 96 Modification Project Final EIR (Line 96 EIR) (Santa Barbara  
23 County 2011) and that would be used to transport production from the proposed Project.

1 **1.4.2 Baseline and Future Conditions**

2 Baseline conditions are defined as the existing physical setting that may be affected by  
3 the proposed Project (State CEQA Guidelines § 15125, subdivision (a)). Specifically,  
4 baseline conditions are the local and regional physical environmental conditions in the  
5 vicinity of the proposed Project, as they exist at the time the NOP was published. This  
6 environmental setting constitutes the baseline physical conditions by which the CSLC  
7 will determine whether or not impacts from the proposed Project and alternatives are  
8 significant. The impacts of the proposed Project are defined as changes to the  
9 environmental setting that are attributable to Project components or operations.

10 The CEQA also requires an EIR to discuss the cumulative impacts of a project when the  
11 project's incremental effect is "cumulatively considerable" (State CEQA Guidelines  
12 § 15130). A cumulative impact is an impact that is created through a combination of the  
13 project being analyzed in the EIR and other projects in the area causing related  
14 impacts. Section 3.0, Cumulative Impacts Methodology, defines the applicable  
15 geographic scope of the cumulative analysis ("Cumulative Projects Study Area"), and  
16 lists future planned and approved projects to be included in the cumulative environment.

17 Information sources for Venoco's existing operations include the NOP for this EIR  
18 (CSLC 2013), the Ellwood Marine Terminal EIR (CSLC 2009), the Line 96 EIR (Santa  
19 Barbara County 2011), Venoco's 2013 application and drawings (Appendix G), and site  
20 visit inspections and assessments by the CSLC and other agencies. Local planning  
21 documents prepared by the University of California, Santa Barbara, Santa Barbara  
22 County, and the City of Goleta were also reviewed. Online information and Geographic  
23 Information System resources were used to the extent feasible. Baseline environmental  
24 conditions for the outer coast are incorporated by reference from numerous previous  
25 documents with a short summary, as pertinent for the applicable environmental  
26 discipline sections. Previous documents include: environmental analyses prepared for  
27 the Channel Islands National Marine Sanctuary; biological surveys conducted by the  
28 CDFW, U.S. Fish and Wildlife Service, National Oceanic and Atmospheric  
29 Administration, and U.S. Geological Survey; environmental studies prepared by Santa  
30 Barbara County, Venoco, and the Bureau of Ocean Energy Management (formerly U.S.  
31 Minerals Management Service); and numerous peer-reviewed journal articles.

32 Existing baseline conditions for Venoco's proposed Project include: Venoco's lease  
33 being in full force and effect; existing Project infrastructure as recently modified; and no  
34 production from PRC 421 since 1994, other than depressurization activities in 2001 to  
35 relieve well-head pressure. Potential impacts of recommissioning PRC 421 are  
36 generally analyzed in the context of environmental conditions existing at the time the  
37 NOP was released for the Project (March 2013). Existing infrastructure includes Wells  
38 421-1 and 421-2, which are installed on separate concrete caissons, and supporting  
39 surf zone piers located below the bluffs south of Sandpiper Golf Course; a 1,300-foot  
40 access road and seawall along the toe of the bluff; and a 6-inch buried pipeline within

1 the access road linking these facilities to supporting oil transportation infrastructure in  
 2 the Project vicinity. As described in Section 2.1, existing Project infrastructure has been  
 3 subject to a major repairs and improvements in 2001, 2004, and 2010-2011. The  
 4 proposed Project would also integrate, use, and upgrade some of the existing Ellwood  
 5 area oil facilities, primarily for the onshore pipeline transport of emulsion from Well 421-  
 6 2 and monitoring of the Project (see Figure 1-2 and Table 2.23).

7 Existing Ellwood area oil facilities include the EOF and the Line 96 pipeline extension to  
 8 the Plains All American Pipeline, L.P. (PAAPLP) Coastal Pipeline, located west of LFC,  
 9 which began operating in 2012. Line 96 is an 8.5-mile-long, 6-inch-diameter onshore  
 10 pipeline that allows all Ellwood area oil production from Platform Holly (and potentially  
 11 from PRC 421) to be shipped to market via pipeline. Completion of Line 96 has allowed  
 12 cessation of barging from the Ellwood Marine Terminal (EMT), which was formerly the  
 13 initial mode of oil transport from the EOF, and the pending decommissioning of both the  
 14 EMT and most of the existing Line 96 segment connecting the EOF to the EMT.

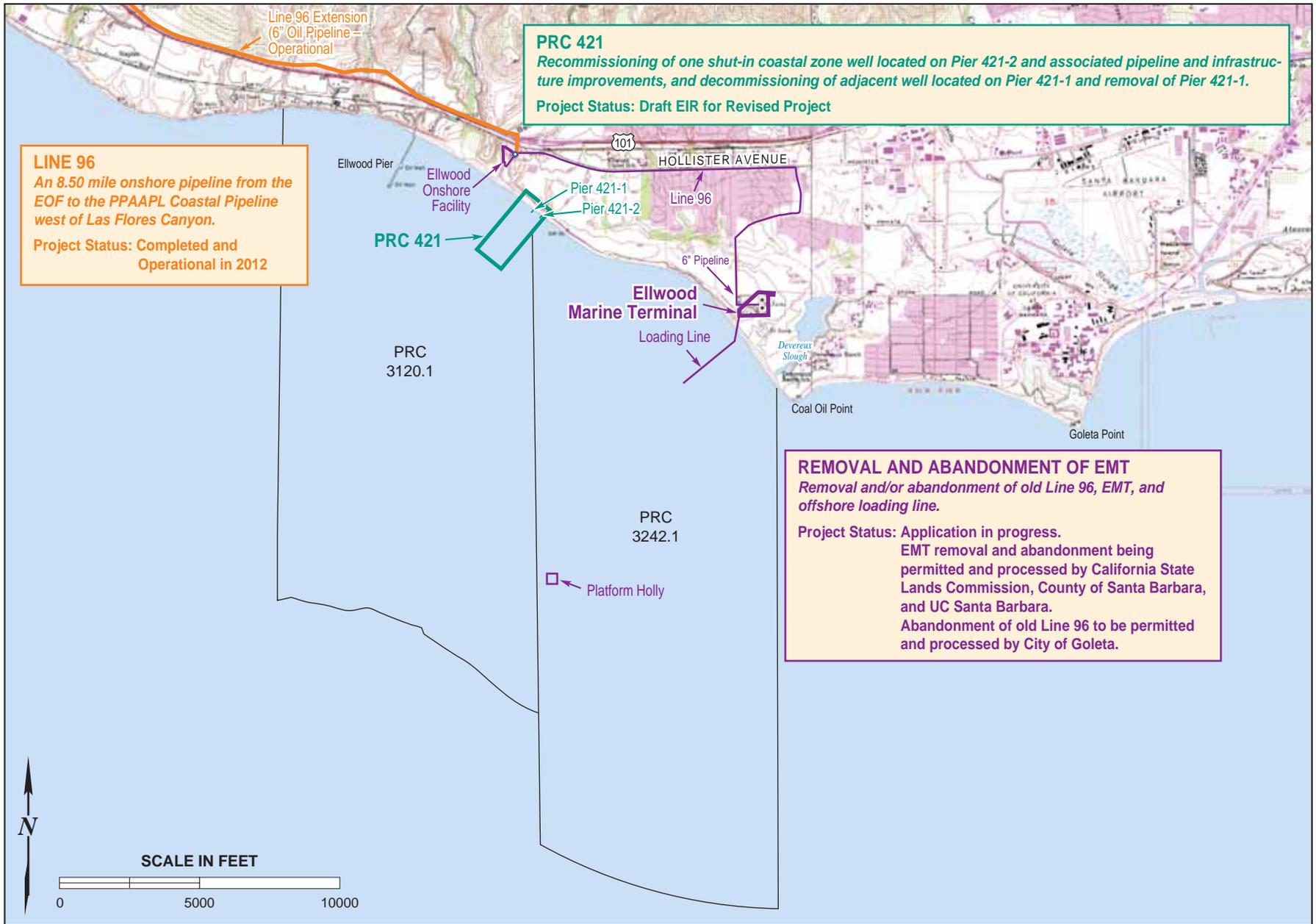
15 Planned Project activities that will be compared to baseline conditions include  
 16 improvements such as the modifications and upgrades at Pier 421-2 to allow resumed  
 17 oil production, installation of the proposed pipeline and power cables along the access  
 18 road, and supporting control devices at the EOF described further in Section 2.3.4.

19 As discussed in detail in Section 2.4, the emulsion from Well 421-2 extracted as part of  
 20 the proposed Project would be transported via an onshore pipeline to the EOF, where it  
 21 would be processed. The oil would then be transported via the Line 96 pipeline to the  
 22 PAAPLP Coastal Pipeline west of LFC. Since Pier 421-1 will not be needed for the  
 23 proposed Project, the well on the pier would be abandoned and the pier infrastructure  
 24 removed following approval of an Abandonment and Restoration Plan (see Section 2.6).

### 25 **1.4.3 Impacts of Proposed Project and Summary of Alternatives Evaluated**

26 This EIR identifies the potential environmental impacts of the Project on the existing  
 27 environment and indicates if and how those impacts can be avoided or reduced by  
 28 mitigation measures and/or Project alternatives. As described in Section 4.0,  
 29 Environmental Impact Analysis, the following resource areas would not be impacted by  
 30 the Project: Agriculture and Forestry Resources and Population and Housing. The  
 31 Project would have a potentially significant impact on the following resources.

<ul style="list-style-type: none"> <li>· Geological Resources</li> <li>· Safety</li> <li>· Hazardous Materials</li> <li>· Air Quality and Greenhouse Gases</li> <li>· Hydrology, Water Resources, and Water Quality</li> <li>· Marine Biological Resources</li> <li>· Terrestrial Biological Resources</li> <li>· Land Use, Planning, and Recreation</li> </ul>	<ul style="list-style-type: none"> <li>· Public Services</li> <li>· Transportation and Circulation</li> <li>· Noise</li> <li>· Aesthetic/Visual Resources</li> <li>· Cultural, Historical, and Paleontological Resources</li> <li>· Energy and Mineral Resources</li> <li>· Socioeconomics and Environmental Justice</li> </ul>
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1 Pursuant to State CEQA Guidelines section 15126.6, an EIR must describe and  
2 evaluate a range of reasonable alternatives that would feasibly attain most of the  
3 Project's basic objectives, and would avoid or substantially lessen any of the significant  
4 impacts of the Project as proposed. The State CEQA Guidelines also state that the  
5 range of alternatives required to be evaluated in an EIR is governed by the "rule of  
6 reason" (§ 15126.6, subd. (f))—that is, an EIR needs to describe and evaluate only  
7 those alternatives necessary to permit a reasoned choice and to foster informed  
8 decision making and public participation.

9 Eight alternatives, listed below, were considered infeasible or had no greater  
10 environmental benefits over the proposed Project and were eliminated from further  
11 consideration (see Section 5.0, Project Alternatives Analysis):

- 12 . Drilling from the EOF;
- 13 . Drilling from Platform Holly;
- 14 . Condensed Production Schedule;
- 15 . Offshore Oil Processing on Platform Holly;
- 16 . Transportation of Production By Truck;
- 17 . Recommissioning Using Historic Production Methods;
- 18 . No Production Alternative with Pressure Testing; and
- 19 . Alternative Energy Sources.

20 The following four alternatives are fully analyzed in Section 5.0, Project Alternatives  
21 Analysis:

- 22 . No Project;
- 23 . No Production/Quitclaim State Oil and Gas Lease PRC 421;
- 24 . Reinjection at Platform Holly; and
- 25 . Processing PRC 421 Oil at Las Flores Canyon.

#### 26 **1.4.4 Organization of the EIR**

27 Including this Introduction, the EIR is presented in eight sections as shown below.

- 28 . **Section 2 – Project Description** describes the proposed Project, its location,  
29 layout and facilities, and presents an overview of its operation and schedule.
- 30 . **Section 3 – Cumulative Impacts Methodology** identifies the projects that were  
31 analyzed for their potential cumulative effects.
- 32 . **Section 4 – Environmental Impact Analysis** describes existing environmental  
33 conditions, Project-specific impacts, and mitigation measures (MMs) associated  
34 with the various environmental issue areas, and evaluates the cumulative  
35 impacts of the proposed Project. .

- 1     · **Section 5 – Project Alternatives Analysis** describes the alternatives screening  
2 methodology, alternatives rejected from full consideration, alternatives carried  
3 forward with impact analyses.
- 4     · **Section 6 – Other Required CEQA Sections and Environmentally Superior**  
5 **Alternative** addresses other required CEQA elements including significant and  
6 irreversible environmental and growth-inducing impacts, comparison of the Project  
7 and alternatives, and identification of the environmentally superior alternative.
- 8     · **Section 7 – Mitigation Monitoring Program (MMP)** presents the MMP.
- 9     · **Section 8 – Report Preparation Sources and References** lists the persons  
10 involved in preparation of the EIR and the reference materials used.

11 The EIR also contains 10 appendices.

- 12     · **Appendix A** – contains the EIR distribution list of agencies/organizations and  
13 individuals that will receive a copy of the EIR.
- 14     · **Appendix B** – includes a copy of the NOP, copies of all comment letters  
15 received in response to the NOP, and an index where comments are addressed  
16 in the Recirculated Draft EIR (if applicable).
- 17     · **Appendix C** – includes a technical review of safety concerns related to the  
18 proposed Project, including repressurization of the reservoir.
- 19     · **Appendix D** – includes air quality and greenhouse gas emission calculations.
- 20     · **Appendix E** – contains a technical review of dispersant use in spill response.
- 21     · **Appendix F** – includes a listing of Best Management Practices (BMPs) specific  
22 to the Project that would reduce potential environmental impacts.
- 23     · **Appendix G** – includes Venoco’s revised Project Description for the PRC 421  
24 Recommissioning Project with detailed drawings.
- 25     · **Appendix H** – includes MMs from the Line 96 EIR (Santa Barbara County 2011)  
26 related to the oil pipeline associated with proposed PRC 421 operations.
- 27     · **Appendix I** – includes impacts and MMs from the Line 96 EIR (Santa Barbara  
28 County 2011) relevant to the construction of the oil emulsion pipeline to LFC as  
29 part of the Processing PRC 421 Oil at LFC Alternative.
- 30     · **Appendix J** – includes a summary of the monitoring reports from the  
31 construction of the Line 96 pipeline.
- 32     · **Appendix K** – includes a summary of the historic improvements made at the  
33 **EOF.**
- 34     · **Appendix L** – provides a history of wetland mitigation performed for impacts  
35 **caused by the PRC-421 access road.**