

## **6.0 OTHER REQUIRED CEQA SECTIONS AND ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

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1 As lead agency under the California Environmental Quality Act (CEQA), the California  
2 State Lands Commission (CSLC) has prepared this Environmental Impact Report (EIR)  
3 to evaluate the potential significant environmental effects associated with the Revised  
4 PRC 421 Recommissioning Project (Project). The Project proposes to return State Oil  
5 and Gas Lease PRC 421 (PRC 421) to production and process PRC 421 crude at the  
6 Ellwood Onshore Facility (EOF), instead of on a shoreline pier as occurred prior to  
7 1994. The State CEQA Guidelines<sup>1</sup> state in part that an EIR shall:

- 8 • Identify and focus on the significant environmental effects of a proposed project  
9 (Guidelines § 15126.2, subd. (a));
- 10 • Describe any significant impacts, including those that can be mitigated but not  
11 reduced to a level of insignificance (Guidelines § 15126.2, subd. (b));
- 12 • Identify significant irreversible environmental changes that would be caused by a  
13 proposed project should it be implemented (Guidelines § 15126.2, subd. (c));
- 14 • Identify any growth-inducing impacts of a proposed project such as the ways in  
15 which the proposed project could foster economic or population growth, or the  
16 construction of additional housing, either directly or indirectly, in the surrounding  
17 environment (Guidelines § 15126.2, subd. (d)); and
- 18 • Identify the environmentally superior alternative (Guidelines § 15126.2, subd.  
19 (e)(2)).

20 These elements are discussed in Sections 6.1 through 6.4, below.

### **6.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED**

23 Section 4.0, Environmental Impact Analysis, of this EIR focuses on the significant  
24 environmental impacts anticipated as a result of the Project and identifies mitigation  
25 measures to reduce impacts. State CEQA Guidelines section 15126.2, subdivision (b),  
26 requires that an EIR describe any significant impacts that cannot be avoided, even with  
27 the implementation of feasible mitigation measures. The majority of significant  
28 unavoidable impacts (i.e., impacts that cannot be reduced to a level of insignificance)  
29 associated with the proposed Project relate to accidental release of crude oil from Well  
30 421-2 during extraction activities or from onshore pipelines during transport. The Project  
31 would also incrementally increase the volume of oil transported through the Line 96  
32 pipeline from the EOF to the Plains All American Pipeline L.P. (PAAPLP) Coastal  
33 Pipeline west of Las Flores Canyon (LFC). This increase in oil shipped through this

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<sup>1</sup> The State CEQA Guidelines are found in California Code of Regulations, Title 14, section 15000 et seq.

1 pipeline would incrementally increase the probability of spills to the environment as  
 2 compared to pipeline operation without the Project. As detailed in Section 4.0, an  
 3 accidental release of crude oil would result in significant impacts to:

- 4 • Safety;
- 5 • Water Quality;
- 6 • Marine and terrestrial water quality;
- 7 • Marine and terrestrial biological resources;
- 8 • Land use, planning and recreation;
- 9 • Public services; and
- 10 • Aesthetics/visual resources.

11 Table 6-1 provides a list of the Significant and Unavoidable impacts.

12 **Table 6-1. Summary of Significant and Unavoidable Impacts Due to the Project**

EIR Section	Impact No. and Impact
Safety (Section 4.2)	<ul style="list-style-type: none"> <li>• <b>Impact S-4:</b> Potential for Release of Oil or Hazardous Materials from Pier 421-2</li> <li>• <b>Impact S-6:</b> Increased Amount of Oil or Hazardous Materials Potentially Released or Fire from Oil Transfer in Line 96</li> <li>• <b>Impact S-7:</b> Increased Processing of Oil and Gas at the EOF</li> </ul>
Water Quality (Section 4.5)	<ul style="list-style-type: none"> <li>• <b>Impact WQ-3:</b> Oil Spill Impacts to Surface and Marine Water Quality</li> <li>• <b>Impact WQ-4:</b> Cumulative Impacts to Marine Water Quality</li> </ul>
Marine Biological Resources (Section 4.6)	<ul style="list-style-type: none"> <li>• <b>Impact MBIO-4:</b> Oil Spill Impacts to Marine Resources</li> <li>• <b>Impact MBIO-5:</b> Oil Spill Impacts to Commercial and Recreational Fishing</li> <li>• <b>Impact MBIO-7:</b> Cumulative Impacts of an Oil Spill on Marine Resources</li> </ul>
Terrestrial Biological Resources (Section 4.7)	<ul style="list-style-type: none"> <li>• <b>Impact TBIO-2:</b> Oil Spill Impacts to Terrestrial Biological Resources</li> <li>• <b>Impact TBIO-3:</b> Cumulative Impacts to Terrestrial Biological Resources</li> </ul>
Land Use, Planning, and Recreation (Section 4.8)	<ul style="list-style-type: none"> <li>• <b>Impact LU-1:</b> Conflicts with Goleta General Plan/Coastal Land Use Plan and underlying Coastal Act Policies</li> <li>• <b>Impact LU-2:</b> Oil Releases Could Affect Recreational Activities</li> <li>• <b>Impact LU-3:</b> Oil Releases from Pier 421-2 or Pipelines Could Affect Sensitive Area Resources and Raise Consistency Issues with Adopted Policies</li> <li>• <b>Impact LU-4:</b> Cumulative Impacts of Potential Project-Related Oil Spills on Area Land Use and Recreational Uses</li> </ul>
Public Services (Section 4.9)	<ul style="list-style-type: none"> <li>• <b>Impact PS-1:</b> Adequacy of Fire Response</li> </ul>
Aesthetics/Visual Resources (Section 4.12)	<ul style="list-style-type: none"> <li>• <b>Impact VR-2:</b> Visual Effects from Accidental Oil Spills</li> </ul>

13 Mitigation measures are identified that would reduce the frequency and consequences  
 14 of spills; however, the inherent risk of spills to the environment as a result of the Project  
 15 would not be reduced to a less than significant level. The Project as proposed would

1 also require new or upgraded support facilities to accommodate processing of PRC 421  
2 oil at the EOF; however, the EOF is operating as a nonconforming use pursuant to City  
3 of Goleta Municipal Code and processing at the EOF requires City approval.

4 Due to these Significant and Unavoidable impacts, CSLC approval of the Project would  
5 require a Statement of Overriding Considerations prepared by CSLC, stating the  
6 specific reasons to support its action, in compliance with section 15093 of the State  
7 CEQA Guidelines.

8 **6.2 SIGNIFICANT IRREVERSIBLE CHANGES WHICH WOULD BE CAUSED BY**  
9 **THE PROJECT SHOULD IT BE IMPLEMENTED**

10 State CEQA Guidelines section 15126.2, subdivision (c), states that significant  
11 irreversible environmental changes that would be involved with a proposed project may  
12 include the following:

- 13 • Uses of non-renewable resources during the initial and continued phases of the  
14 project, which would be irreversible because a large commitment of such  
15 resources makes removal or non-use thereafter unlikely;
- 16 • Primary impacts and, particularly, secondary impacts which commit future  
17 generations to similar uses; and
- 18 • Irreversible damage, which may result from environmental accidents associated  
19 with the project.

20 The purpose of the Project is to resume the extraction of crude oil and a limited amount  
21 of gas by returning PRC 421 to production by improving existing infrastructure. Thus,  
22 the Project, by definition, involves development of and production from non-renewable  
23 resources. Implementation of the Project would also involve the consumption of some  
24 non-renewable and locally limited natural resources (i.e., fossil fuels consumed remotely  
25 to supply Project energy consumption). However, the Project's main goal is to  
26 accommodate development of non-renewable oil resources through existing  
27 infrastructure. In the context of local, regional, and global energy production and  
28 consumption, the proposed use and production of non-renewable fossil fuels associated  
29 with the Project would not be considered a large commitment for the use of such  
30 resources, but would incrementally contribute to the continued use of and reliance upon  
31 such non-renewable resources. No new facilities are proposed. Modifications to existing  
32 Well 421-2 and improvements to supporting equipment including the pipeline that  
33 connects PRC 421 to the EOF are proposed. However, these modifications would allow  
34 extraction at PRC 421, which is an action that is consistent with historical production  
35 from this facility. As such, no large-scale new impacts associated with the Project  
36 commit future generations to similar uses; the facilities and uses already exist.

1 Finally, while the Project would only contribute a minor increase in oil production and  
2 consumption, it would continue the trend of reliance on non-renewable fossil fuel  
3 consumption with the Project's contribution to associated local and larger scale  
4 environmental impacts, such as global warming as discussed in Air Quality and  
5 Greenhouse Gases (Section 4.4).

6 The Project could result in oil spills that have the potential to create irreversible impacts  
7 to environmental resources. Potential impacts can be reduced through use of adequate  
8 design and operating procedures and effective emergency response plans specifying  
9 staffing and equipment needs. However, the potential remains for significant impacts as  
10 a result of a Project-related oil spill.

### 11 **6.3 GROWTH-INDUCING IMPACT OF THE PROPOSED PROJECT**

12 State CEQA Guidelines section 15126.2, subdivision (d), states that growth-inducing  
13 impacts of the proposed Project must be discussed in the EIR. In general terms, a  
14 project may induce spatial, economic, or population growth in a geographic area if it  
15 meets any one of the four criteria identified below:

- 16 • Removal of an impediment to growth (e.g., establishment of an essential public  
17 service or the provisions of new access to an area);
- 18 • Economic expansion or growth (e.g., changes in revenue base or employment  
19 expansion);
- 20 • Establishment of a precedent-setting action (e.g., an innovation, a change in  
21 zoning, or general plan amendment approval); or
- 22 • Development or encroachment in an isolated area or one adjacent to open space  
23 (i.e., being different from an "infill" type of project).

24 Should a project meet any one of the criteria listed above, it can be considered growth  
25 inducing. The impacts of the proposed Project are evaluated below with regard to these  
26 four growth-inducing criteria.

27 The Project would not remove an impediment to growth or result in the establishment of  
28 an essential public service, and it would not provide new access to an area previously  
29 inaccessible. The Project would not result in increased employment in the area. No  
30 increase in personnel is proposed as part of the Project. The operational activities would  
31 result in an increase in the revenue base for the State of California and the Santa  
32 Barbara County via oil and gas royalties sharing. However, economic growth associated  
33 with the Project is not considered to be significant.

34 The Project would not establish a precedent-setting action that could lead to growth nor  
35 would it develop or encroach in an isolated area or one adjacent to open space. The  
36 piers at PRC 421, originally constructed in 1928, are a legal non-conforming use. The

1 wells on the piers are located below the mean-high-tide line and consequently are under  
2 the jurisdiction of the CSLC; therefore, City of Goleta or Santa Barbara County zoning  
3 designations do not apply. Development of open space is considered growth-inducing  
4 when it encroaches upon urban-rural interfaces or in isolated localities. All surface  
5 Project activities would be limited to the footprint of existing developed facilities.  
6 However, should the project be permitted to use processing at the EOF, the policy  
7 modifications required to accommodate this option may also be viewed as an  
8 adjustment to recent policy direction. Thus, this action may have limited potential to  
9 establish or reverse precedents and possibly require amendments to or revised  
10 interpretations of general plan policies and zoning ordinance provisions. However, the  
11 proposed Project would not foster economic or population growth, or the construction of  
12 additional housing in the surrounding environment. Accordingly, the Project is not  
13 considered to be growth-inducing.

#### 14 **6.4 COMPARISON OF PROPOSED PROJECT AND ALTERNATIVES AND** 15 **ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

16 State CEQA Guidelines section 15126.6, subdivision (e)(2), states, in part, that an EIR  
17 shall identify an environmentally superior alternative among the other alternatives “*if the*  
18 *environmentally superior alternative is the ‘No Project’ alternative*” (emphasis added).  
19 Table 6-2 compares the proposed Project impacts with those of the alternatives. In  
20 addition, Table 6-3 provides a summary of additional environmental impacts for the  
21 Processing PRC 421 Oil at Las Flores Canyon Alternative that are beyond the scope of  
22 impacts relative to the Project and other alternatives. Based on the analysis contained  
23 within the EIR, the CSLC has determined that the proposed Project is the  
24 Environmentally Superior Alternative.

##### 25 **6.4.1 Proposed Project**

26 Under the proposed Project, Well 421-2 would be recommissioned and the water and  
27 gas from crude oil emulsion extracted from Well 421-2 would be transported to the EOF  
28 for processing. Venoco would decommission Well 421-1 and would remove Pier 421-1  
29 and the caisson and facilities that support Well 421-1. This alternative would require no  
30 processing or separation equipment to be installed at Pier 421-2.

31 Similar to the No Project Alternative, under which PRC 421 would return to production  
32 with processing on Pier 421-2 as it occurred prior to 1994, the proposed Project would  
33 address the potential, significant risk associated with the potential for repressurization of  
34 the Vaqueros Reservoir to cause releases of oil at the sites of historic subsea wells,  
35 which were abandoned under antiquated standards, or from a natural seep (see Section  
36 4.2.1, Safety, for a discussion of reservoir repressurization). With the PRC 421 wells  
37 currently shut in, CSLC staff engineers are unable to pressure test the reservoir (a  
38 process that requires temporary oil production). Because the reduction of reservoir

1 pressure and processing of 421 oil onshore instead of over water would reduce the risk  
2 of oil spills in the ocean and surf zone, and because decommissioning of Well 421-1  
3 and removal of its associated pier would improve aesthetics/visual resources and  
4 enhance public access, the proposed Project is environmentally superior compared to  
5 the alternatives discussed below.

#### 6 **6.4.2 No Project Alternative**

7 This alternative would have greater environmental impacts when compared to the  
8 proposed Project, as oil produced from PRC 421 would be processed in the shore zone  
9 on Pier 421-2 instead of at the EOF, thus resulting in greater environmental impacts  
10 related to surf zone accidental spills. Further, under this alternative, Pier 421-1 would  
11 not be removed and the well on Pier 421-1 would be returned to service as a water and  
12 gas injection well using existing injection equipment to reinject and dispose of water and  
13 gas that are separated from the gross fluid produced out of Well 421-2. This alternative  
14 would result in fewer environmental benefits related to aesthetics when compared to the  
15 proposed Project, as Pier 421-1 would not be removed. Impacts to Marine Biology,  
16 Water Quality, Safety, and Land Use, Planning and Recreation would remain significant  
17 with this alternative, and would be substantially increased in severity due to the location  
18 of the separation-processing component of the Project in a vulnerable location in the  
19 shore zone environment where it would be exposed to wave action and other potentially  
20 damaging conditions.

21 By retaining the separation process at Pier 421-2 rather than moving it to the EOF as  
22 proposed, this alternative would increase activity and equipment required on Pier 421-2  
23 and would result in the potential for releases from separation equipment on the pier.  
24 While the amount of oil that could be released is relatively small, the creation of this  
25 potential hazard is important given the immediate proximity of highly sensitive coastal  
26 resources such as Tecolote Creek, Devereux Slough, nearby kelp beds, and  
27 recreational uses. This alternative would also be less consistent with adopted City of  
28 Goleta land use policy as it would result in separation or processing of oil in the surf  
29 zone. Because processing would occur on Pier 421-2, there would be an increased risk  
30 of an oil spill in the surf zone and this alternative would not substantially reduce or avoid  
31 any of the impacts identified for the proposed Project. Furthermore, Pier 421-1 would  
32 not be removed and Well 421-1 decommissioned. Therefore, this alternative would not  
33 be environmentally superior to the proposed Project.

#### 34 **6.4.3 No Production/Quitclaim State Oil and Gas Lease PRC 421 Alternative**

35 This alternative would avoid all Project-related construction and operational impacts  
36 compared to the proposed Project. However, this alternative is not environmentally  
37 superior because of the potential, significant risk that oil may be released into the

1 coastal environment under the conditions stated below (see the reservoir  
2 repressurization discussion in Section 4.2.1, Safety).

- 3 • The PRC 421 wells are immediately and permanently shut in. Prior to  
4 abandonment of the wells, CSLC reservoir engineers do not pressure test the  
5 reservoir (a process that requires temporary oil production).
- 6 • The PRC 421 reservoir repressurizes over time.
- 7 • Reservoir pressurization causes oil to leak at the sites of historic wells  
8 abandoned under antiquated standards or from a natural seep.

#### 9 **6.4.4 Reinjection at Platform Holly Alternative**

10 The Reinjection at Platform Holly Alternative is essentially the same as the No Project  
11 Alternative described above with the only difference being that produced water would  
12 not be injected in Well 421-1, but piped to Platform Holly for reinjection. Similar to the  
13 proposed Project, Pier 421-1 would be decommissioned since the well would not be  
14 used for water injection. Because processing would still occur on Pier 421-2, there  
15 would be a continued risk of an oil spill in the surf zone and this alternative would not  
16 substantially reduce or avoid any of the impacts identified for the proposed Project;  
17 therefore, similar to the alternative above, this alternative would not be environmentally  
18 superior to the proposed Project.

#### 19 **6.4.5 Processing PRC 421 Oil at Las Flores Canyon Alternative**

20 This alternative would have greater environmental impacts when compared to the  
21 proposed Project due to construction and operation of 9.7 miles of new pipeline from the  
22 EOF to the Receiving Station in LFC. In addition, construction and operation of up to 1.5  
23 acres of new oil processing facilities at LFC would be required and would result in  
24 additional environmental impacts. While the construction-related impacts for the new  
25 pipeline and processing facility would be short term, they would be substantially more  
26 severe compared to the limited construction impacts associated with the Project.

27 Under this Alternative, potential operational impacts would also incrementally increase.  
28 The new pipeline system would require the use of three-phase operation (i.e.,  
29 oil/gas/water emulsion). This would require a pressure-based, rather than volumetric,  
30 leak detection system, which would in turn decrease leak detection capabilities and  
31 increase the probability of a larger-sized spill if the pipeline ruptured or leaked.  
32 Additionally, operation of new facilities at LFC would introduce potential impacts  
33 associated with spills or releases from the 1.3-mile-long portion of pipeline and new  
34 processing facility in LFC into and along Corral Canyon Creek that would not occur  
35 under the proposed Project.

1 The potential for a release of oil or hazardous materials from Pier 421-2 would be  
2 similar to the Project and would remain significant and unavoidable since this alternative  
3 would still entail production of oil at this location; however, potential impacts would be  
4 incrementally increased due to the presence of four chemical tanks ranging from 55 to  
5 350 gallons being present on Pier 421-2 as such tanks could be damaged or subject to  
6 other causes of leaks. The Project-related significant and unavoidable impacts  
7 associated with operation of Line 96 would be similar to operation of the new three-  
8 phase pipeline and oil processing facility at LFC. However, these risks would be greater  
9 than they would be for operation of Line 96 since the leak detection system would not  
10 be as reliable for three-phase pipeline operation. Although this alternative would reduce  
11 the risk of an environmental release or fire related to increased processing at the EOF,  
12 the addition of new facilities at LFC would result in increased risk of an environmental  
13 release or fire at this location.

14 Impacts to Safety, Water Quality, Marine Biology, Terrestrial Biology, Public Services,  
15 Aesthetic/Visual Resources, and Land Use, Planning and Recreation would remain  
16 significant and unavoidable under this alternative. These impacts are mostly related to  
17 the potential of an environmental release of oil or hazardous materials during operation  
18 and the resulting impacts to the environment. These potential impacts would be more  
19 severe due to the increased risk of an environmental release under this alternative and  
20 the increased area in which such a release could occur. Construction of this alternative  
21 also has the potential to result in additional significant and unavoidable impacts to water  
22 quality and to marine and terrestrial biological resources due to a release of drilling  
23 fluids during horizontal directional drilling for construction of the new EOF to LFC  
24 pipeline. The addition of new facilities in an area that is underserved for fire protection  
25 would continue to result in a significant and unavoidable impact; however, the impact  
26 under this alternative would be greater since there would be additional facilities  
27 constructed within the fire service area. By moving oil processing from the EOF to LFC,  
28 this alternative would increase Land Use impacts related to use of redundant facilities  
29 and potential exposure of Corral Canyon Creek and other Gaviota area streams to  
30 increased risk of spills more severe than under the Project. In addition, while Land Use  
31 impacts related to expanding processing of oil at the EOF and conflicts with the City's  
32 General Plan Policy LU 10.1 would be reduced, recommissioning oil production at PRC  
33 421 and potential impacts to coastal waters would result in continued inconsistencies  
34 with LU 10.4 and this impact would remain significant and unavoidable under this  
35 alternative. Because this alternative would introduce new environmental impacts and  
36 increase the severity of others, and result in many similar significant and unavoidable  
37 impacts to those that would occur under the proposed Project, this alternative would not  
38 be environmentally superior to the proposed Project.

**Table 6-2. Summary of Environmental Impacts for Proposed Project and Alternatives**

Impact	Impact Class <sup>2</sup>				
	Proposed Project	No Project	Quitclaim Alternative	Reinjection at Platform Holly	Processing PRC 421 Oil at LFC <sup>3</sup>
<b>Section 4.1 Geological Resources</b>					
GEO-1: Seismic and Seismically Induced Hazards	LTSM	LTSM	NI	LTSM	LTSM
GEO-2: Landslide and Slope Failure	LTSM	LTSM	NI	LTSM	LTSM
GEO-3: Soil Settlement and Liquefaction	LTSM	LTSM	NI	LTSM	LTSM
GEO-4: Corrosion, Weathering, and Erosion	LTSM	LTSM	NI	LTSM	LTSM
GEO-5: Erosion-Induced Siltation	LTS	LTS	NI	LTS	LTS
<b>Section 4.2 Safety</b>					
S-1: Release of Oil During Cleanup of 6-inch Pipeline	LTS	LTS	NI	LTS	NI
S-2: Exposure of the Public and Environment to Safety Hazards Due to Collapse of the 421-1 or 421-2 Caissons	LTSM	LTSM	NI	LTSM	LTSM
S-3: Exposure of the Public and Environment to Safety Hazards Due to Collapse of or Damage to the Existing Timber Bulkhead or Rip-Rap Seawall	LTSM	LTSM	NI	LTSM	LTSM
S-4: Potential for Release of Oil or Hazardous Materials from Pier 421-2	<b>SU</b>	<b>SU</b>	<b>SU</b>	<b>SU</b>	<b>SU</b>
S-5: Potential for Release of Oil or Hazardous Materials From the Crude Oil Flowline	LTSM	LTSM	NI	LTSM	LTSM
S-6: Increased Amount of Oil or Hazardous Materials Potentially Released or Fire/Explosion from Oil Transfer in Line 96	<b>SU</b>	<b>SU</b>	NI	<b>SU</b>	NI
S-7: Increased Processing of Oil and Gas at the EOF	<b>SU</b>	NI	NI	NI	NI
S-8: Increased Risk of Fire	LTSM	LTSM	NI	LTSM	LTSM
S-9: Repressurization Monitoring	B	B	<b>SU</b>	B	B
<b>Section 4.3 Hazardous Materials</b>					
HAZ-1: Exposure of Public or Environment to Hazardous Materials	LTSM	LTSM	<b>SU</b>	LTSM	LTSM
HAZ-2: Release of Contaminated Sediment from the Caisson on Pier 421-2 during Operation of the Project	LTSM	LTSM	NI	LTSM	LTSM

<sup>2</sup> Impact Class: SU = Significant and unavoidable; LTSM = Less than significant with mitigation; LTS = Less than significant; NI = No impact; B = Beneficial

<sup>3</sup> For the full range of impacts associated with this alternative, see also Table 6-3.

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Impact	Impact Class <sup>2</sup>				
	Proposed Project	No Project	Quitclaim Alternative	Reinjection at Platform Holly	Processing PRC 421 Oil at LFC <sup>3</sup>
<b>Section 4.4 Air Quality and Greenhouse Gases</b>					
AQ-1: Increase in Emissions from Construction	LTS	LTS	NI	LTS	LTS
AQ-2: Increase in Emissions from Operations	LTS	LTS	NI	LTS	LTS
AQ-3: Odor Emissions from Operation	LTS	LTS	NI	LTS	LTS
AQ-4: Project Would Result in a Net Increase in GHG Emissions	LTSM	LTSM	NI	LTSM	LTSM
AQ-5: Project Would Contribute to Cumulative Air Quality Impacts	LTS	LTS	NI	LTS	LTS
<b>Section 4.5 Hydrology, Water Resources, and Water Quality</b>					
WQ-1: Temporary Construction Impacts to Marine Water Quality	LTSM	LTSM	NI	LTSM	LTSM
WQ-2: Temporary Construction Impacts to Wetlands	LTSM	LTSM	NI	LTSM	LTSM
WQ-3: Oil Spill Impacts to Surface and Marine Water Quality	SU	SU	SU	SU	SU
WQ-4: Cumulative Impacts to Marine Water Quality	SU	SU	SU	SU	SU
<b>Section 4.6 Marine Biological Resources</b>					
MBIO-1: Disturbance to Intertidal Organisms during Construction	LTSM	LTSM	NI	LTSM	LTSM
MBIO-2: Impacts to Marine Organisms from Sediment Resuspension in the Near-Shore Zone due to Disturbance of Sediments during Caisson Repairs	LTSM	LTSM	NI	LTSM	LTSM
MBIO-3: Noise Impacts to Marine Life during Caisson Repairs on Pier 421-2 and Decommissioning and Removal of Pier 421-1	LTS	LTS	NI	LTS	LTS
MBIO-4: Oil Spill Impacts to Marine Resources	SU	SU	SU	SU	SU
MBIO-5: Oil Spill Impacts to Commercial and Recreational Fishing	SU	SU	SU	SU	SU
MBIO-6: Impacts to Kelp Harvesting	LTS	LTS	NI	LTS	LTS
MBIO-7: Cumulative Impacts of an Oil Spill on Marine Resources	SU	SU	SU	SU	SU
<b>Section 4.7 Terrestrial Biological Resources</b>					
TBIO-1: Short-Term Construction Impacts to Biological Resources	LTSM	LTSM	NI	LTSM	LTSM
TBIO-2: Oil Spill Impacts to Terrestrial Biological Resources	SU	SU	SU	SU	SU
TBIO-3: Cumulative Impacts to Terrestrial Biological Resources	SU	SU	SU	SU	SU
<b>Section 4.8 Land Use, Planning, and Recreation</b>					
LU-1: Potential Conflicts with Goleta General Plan/Coastal Land Use Plan (GP/CLUP) and underlying Coastal Act Policies.	SU	SU	B	SU	SU

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Impact	Impact Class <sup>2</sup>				
	Proposed Project	No Project	Quitclaim Alternative	Reinjection at Platform Holly	Processing PRC 421 Oil at LFC <sup>3</sup>
LU-2: Oil Releases Could Affect Recreational Activities	SU	SU	SU	SU	SU
LU-3: Oil Releases from Pier 421-2 or Pipelines Could Affect Sensitive Area Resources and Raise Consistency Issues with Adopted Policies	SU	SU	SU	SU	SU
LU-4: Cumulative Impacts of Potential Project-Related Oil Spills on Area Land Use and Recreational Uses	SU	SU	SU	SU	SU
<b>Section 4.9 Public Services</b>					
PS-1: Adequacy of Fire Response	SU	SU	NI	SU	SU
PS-2: Operation without an Approved Fire Prevention Plan	LTSM	LTSM	NI	LTSM	LTSM
<b>Section 4.10 Transportation and Circulation</b>					
TR-1: Construction-Generated Traffic	LTSM	LTSM	NI	LTSM	LTSM
TR-2: Operation-Generated Traffic	LTS	LTS	NI	LTS	LTS
TR-3: Increased Potential for Traffic Accidents	LTS	LTS	NI	LTS	LTS
<b>Section 4.11 Noise</b>					
NZ-1: Construction Impacts to Beach Users and Golfers	LTS	LTS	NI	LTS	LTS
NZ-2: Operational Impacts to Beach Users and Golfers	LTS	LTS	NI	LTS	LTS
<b>Section 4.12 Aesthetics/Visual Resources</b>					
VR-1: Visual Effects from Construction Activities at PRC 421	LTSM	LTSM	NI	LTSM	LTSM
VR-2: Visual Effects from Accidental Oil Spills	SU	SU	SU	SU	SU
VR-3: Visual Improvements due to Removal of Pier 421-1	B	NI	NI	B	B
VR-4: Visual Changes to Pier 421-2	LTS	LTS	NI	LTS	LTS
<b>Section 4.13 Cultural, Historical, and Paleontological Resources</b>					
CR-1: Potential Impacts to Previously Undiscovered Cultural Resources During Construction	LTSM	LTSM	NI	LTSM	LTSM
CR-2: Potential Impacts to Cultural Resources Due to Oil Spill and Cleanup Activities	LTS	LTS	LTS	LTS	LTS
<b>Section 4.14 Energy Mineral Resources</b>					
EMR-1: Increase in Electricity Use	LTS	LTS	NI	LTS	LTS
EMR-2: Conflict with State-Adopted Energy Conservation Plans	LTS	LTS	NI	LTS	LTS

**Table 6-3. Summary of Environmental Impacts for the Processing PRC 421 Oil at LFC Alternative that are Not Applicable to the Proposed Project or other Alternatives<sup>4</sup>**

Impact	LFC Alternative Components	
	EOF to LFC Pipeline	LFC Facility
<b>PRC 421 EIR Section 4.1 Geological Resources</b>		
Similar to Line 96 GEO-1 (Slope Failures)	LTS	-
Similar to Line 96 GEO-2 (Erosion of Drainages)	LTSM	-
Similar to Line 96 GEO-3 (Expansive Soils)	LTSM	-
Similar to Line 96 GEO-4 (Faulting and Seismicity)	LTSM	-
Exposure of New Facilities to Seismic Hazards	-	LTSM
Exposure of New Facilities to Landslide and Slope Failure	-	LTSM
Exposure of New Facilities to Soil Settlement and Liquefaction	-	LTSM
Exposure of Soils to Erosion	-	LTSM
<b>PRC 421 EIR Section 4.2 Safety</b>		
Similar to Impact S-6 from this Revised Draft EIR (above) and to Line 96 H-3 (Pipeline Spill Impacts to the Environment)	<b>SU</b>	-
Potential for Release of Oil or Hazardous Materials from LFC Facilities	-	<b>SU</b>
Increased Risk of Fire	-	LTSM
<b>PRC 421 EIR Section 4.3 Hazardous Materials</b>		
Similar to Line 96 WQ-2 (Construction Impact to Waterways; also included in Water Quality)	LTSM	-
Exposure of Public or Environment to Hazardous Materials	-	LTSM
<b>PRC 421 EIR Section 4.4 Air Quality and Greenhouse Gases</b>		
Similar to Line 96 AQ-1 (Construction Emissions)	LTS	-
Increase in Emissions from Construction	-	LTSM
Increase in Emissions from Operations	LTS	LTS
Net Increase in GHG Emissions	LTSM	LTSM
<b>PRC 421 EIR Section 4.5 Hydrology, Water Resources, and Water Quality</b>		
Similar to Line 96 WQ-2 (Construction Impact to Waterways)	LTSM	-
Similar to Line 96 WQ-3 (Horizontal Directional Drilling Impacts to Onshore Waterways)	<b>SU</b>	-

<sup>4</sup> This table summarizes impacts identified in the 2011 Line 96 EIR (as applicable) and analysis performed in this EIR of potential impacts at Las Flores Canyon associated with the Processing PRC 421 Oil at LFC Alternative.

**Table 6-3. Summary of Environmental Impacts for the Processing PRC 421 Oil at LFC Alternative that are Not Applicable to the Proposed Project or other Alternatives<sup>4</sup>**

Impact	LFC Alternative Components	
	EOF to LFC Pipeline	LFC Facility
Similar to Line 96 WQ-4 (Impacts to Onshore Waterways from Potential Facilities Leaks)	SU	-
Construction Impacts to Water Quality	-	LTSM
Operational Impacts to Water Quality	-	SU
Wastewater Injection Impacts to Groundwater Quality	-	LTSM
<b>PRC 421 EIR Section 4.6 Marine Biological Resources</b>		
Similar to Line 96 BIO-2 (Construction Impacts to Sensitive Species)	SU	-
Similar to Line 96 BIO-3 (Construction Impacts to Native Habitats)	SU	-
Similar to Line 96 BIO-4 (Oil Spill Impacts to Biological Resources)	SU	-
Construction Impacts to Marine Biological Resources	-	LTSM
Operational Impacts to Marine Biological Resources	-	LTSM
<b>PRC 421 EIR Section 4.7 Terrestrial Biological Resources</b>		
Similar to Line 96 BIO-2 (Construction Impacts to Sensitive Species)	SU	-
Similar to Line 96 BIO-3 (Construction Impacts to Native Habitats)	SU	-
Similar to Line 96 BIO-4 (Oil Spill Impacts to Biological Resources)	SU	-
Construction Impacts to Sensitive Species and Native Habitats	-	LTSM
Oil Spill Impacts to Biological Resources	-	SU
<b>PRC 421 EIR Section 4.8 Land Use, Planning, and Recreation</b>		
Oil Releases Could Affect Recreational Activities (not included in Line 96 EIR)	SU	-
Similar to Line 96 AG-1 (Loss of Resources, Construction and Soil Disturbance)	LTSM	-
Similar to Line 96 AG-2 (Restoration after a Leak/Spill)	LTSM	-
Similar to Line 96 AG-3 (Loss of Prime Agricultural Land)	LTS	-
Similar to Line 96 AG-4 (Loss of Organic Cultural Land)	LTS	-
Potential Conflicts with Coastal Land Use Plan and underlying Coastal Act Policies	-	SU
Oil Releases Could Affect Recreational Activities	-	SU
<b>PRC 421 EIR Section 4.9 Public Services</b>		
Similar to Line 96 PS-1 (Adequacy of Fire Response)	SU	-
Similar to Line 96 PS-2 (Impacts on Water Utility Sewer)	LTS	-

**Table 6-3. Summary of Environmental Impacts for the Processing PRC 421 Oil at LFC Alternative that are Not Applicable to the Proposed Project or other Alternatives<sup>4</sup>**

Impact	LFC Alternative Components	
	EOF to LFC Pipeline	LFC Facility
Similar to Line 96 PS-3 (Impacts on Sewer)	LTS	-
Similar to Line 96 PS-4 (Impacts on Solid Waste Facilities)	LTS	-
Adequacy of Fire Response	-	<b>SU</b>
Expansion of Onsite Fire Protection Infrastructure	-	LTS
<b>PRC 421 EIR Section 4.10 Transportation and Circulation</b>		
Similar to Line 96 T-1 (Increased Construction Traffic)	LTSM	-
Construction-Generated Traffic	-	LTSM
Operation-Generated Traffic	-	LTS
<b>PRC 421 EIR Section 4.11 Noise</b>		
Similar to Line 96 N-1 (Noise from Pipeline Construction)	LTSM	-
Noise from Construction	-	LTSM
Noise from Operation	-	LTS
<b>PRC 421 EIR Section 4.12 Aesthetics/Visual Resources</b>		
Similar to Line 96 VR-3 (Visual Effects from Pipeline Construction)	LTS	-
Similar to Line 96 VR-4 (Visual Effects of Pipeline Installation)	LTSM	-
Similar to Line 96 VR-6 (Visual Effects from Accidental Oil Spills)	LTS	-
Visual Effects from Construction and Operation	-	LTS
<b>PRC 421 EIR Section 4.13 Cultural, Historical, and Paleontological Resources</b>		
Similar to Line 96 CR-2 (Construction at CA-SBA-139)	LTSM	-
Similar to Line 96 CR-3 (Construction Access to CA-SBA-139)	LTSM	-
Similar to Line 96 CR-4 (Construction Access to CA-SBA-83, CA-SBA-1676, and CA-SBA-1733)	LTSM	-
Similar to Line 96 CR-5 (Oil Spill Impacts)	LTSM	-
Potential Construction Impacts to Cultural Resources	-	LTSM
<b>PRC 421 EIR Section 4.14 Energy Mineral Resources</b>		
Similar to Line 96 EMR-1 (Electricity Use)	LTS	-
Increased Energy Use During Construction and Operation	-	LTS
Potential Construction of New Power Lines	-	LTSM