3.17 TRANSPORTATION/TRAFFIC

<table>
<thead>
<tr>
<th>Project: Would the Project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</td>
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<tr>
<td>b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</td>
<td></td>
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<tr>
<td>c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</td>
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<tr>
<td>d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</td>
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<tr>
<td>e) Result in inadequate emergency access?</td>
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<tr>
<td>f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</td>
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</tr>
</tbody>
</table>

3.17.1 Environmental Setting

3.17.1.1 Onshore

Access to the Project area is gained from U.S. Highway 101 from either the El Capitan Canyon Road exit (from the south, northbound) or the Refugio SB exit (from the north, southbound) to Calle Real. Calle Real is a frontage road that runs adjacent and parallel to Highway 101 between El Capitan Canyon and Refugio Canyon. The LFCPF is located approximately 300 feet (91 m) off of Calle Real at a gated guard shack. The LFCPF is a private facility and no public access is allowed.

Traffic counts in SBC are generally measured by Level of Service (LOS) designations. However, according to the SBC Public Works Department, Transportation Division, no level of service numbers are available for this portion of Calle Real. However, due to the
low demand in the area, SBC assumes a LOS for that portion of Calle Real to be LOS A
(Gary Smart, pers. comm., 2014).

Additionally, the California Department of Transportation (Caltrans) provides annual
average daily traffic (AADT) counts and Peak Hour counts for the Highway 101 at the
nearest Highway mile post (at El Capitan Canyon Ranch Road). Table 3.17-1 below
provides applicable AADT and peak hour data for this portion of Highway 101.

Table 3.17-1. Traffic Data for HWY 101 Milepost Number 33.852
(Exit 117, El Capitan SB Park)

<table>
<thead>
<tr>
<th>Back Peak Hour</th>
<th>Back Peak Month</th>
<th>Back AADT</th>
<th>Ahead Peak Hour</th>
<th>Ahead Peak Month</th>
<th>Ahead AADT</th>
</tr>
</thead>
<tbody>
<tr>
<td>4,000</td>
<td>37,500</td>
<td>30,500</td>
<td>4,000</td>
<td>31,000</td>
<td>29,700</td>
</tr>
</tbody>
</table>

AADT usually represents the total volume for the year divided by 365 days. Peak Hour
usually represents an estimate of the heaviest traffic flow which usually occurs between
7 to 9 a.m. and 5 to 7 p.m. Peak Hour values indicate the volume in both directions. On
roads with large seasonal fluctuations in traffic (such as Highway 101), the peak hour is
the hour near the maximum for the year but excluding a few (30 to 50 hours) that are
exceedingly high and are not typical of the frequency of the high hours occurring during
the season. Peak Month ADT is the average daily traffic for the month of heaviest traffic
flow, usually July or August.

3.17.1.2 Offshore

Vessel access to the offshore Project area generally occurs from local ports including
Port Hueneme while platform personnel generally access the site via crew-boat
departing from Ellwood Pier in SBC. The Project is located offshore of SBC within the
Santa Ynez Unit located in the Santa Barbara Channel (Channel). Marine traffic in the
Channel is comprised of military, commercial (fishing and shipping of oil and gas), and
private (recreational) vessels. The existing offshore facilities consist of three platforms
(Platforms Harmony, Heritage and Hondo) located in Federal waters, between
approximately 5 and 8 miles (8 to 13 km) offshore.

A Traffic Separation Scheme (TSS) manages vessel traffic in the Project region. The
TSS is a voluntary route of separate opposing flows of vessel traffic with an additional
empty safety lane. TSSs are generally in international waters and must be approved by
the International Maritime Organization (IMO) (NOAA 2006). The Channel TSS was
established to facilitate the safe movement of ships into and out of the Channel and the
POLA/Port of Long Beach (POLB) (IMO 2012). The TSS is recommended for use by all
seagoing vessels, but is not necessarily intended for use by tugs, tows, or other small
vessels that traditionally operate outside the usual traffic lanes or close to the shoreline.
For smaller oil and gas industry vessels using the Channel, the Joint Oil Fisheries Liaison Office (JOFLO) has established transportation corridors directly from offshore platforms to the onshore ports, harbors and piers from which crew and supplies are conveyed. The purpose of the JOFLO corridors is to provide a safe access route for oil and gas industry vessels in designated corridors as they approach and leave moorings, terminals, crew, supply, and harbor facilities, which reduces the potential for interference with commercial fishing vessels. Although the program is voluntary, a majority of the existing oil and gas vessel traffic to the Project platforms use the JOFLO corridors.

3.17.2 Regulatory Setting

3.17.2.1 Federal and State

Federal and State laws and regulations pertaining to this issue area and relevant to the Project are identified in Table 3.17-2.

| U.S. Ports and Waterways Safety Act | This Act provides the authority for the USCG’s program to increase vessel safety and protect the marine environment in ports, harbors, waterfront areas, and navigable waters, including by authorizing the Vessel Traffic Service, controlling vessel movement, and establishing requirements for vessel operation. |
| California Vehicle Code | Chapter 2, Article 3 of the Vehicle Code defines the powers and duties of the California Highway Patrol, which has enforcement responsibilities for the vehicle operation and highway use in the State. |
| California Other | The California Department of Transportation is responsible for the design, construction, maintenance, and operation of the California State Highway System and the portion of the Interstate Highway System in California. |

3.17.2.2 Local

Santa Barbara County. The SBC’s Comprehensive Plan, Circulation Element (2010) describes an Average Daily Traffic Count threshold for a 4 Lane Freeway in a Rural Area at 44,000 average daily trips. Section IV (Roadway Project and Intersection Consistency Standards for Determination of Project Consistency) of the Circulation Element states that a project’s consistency with this section [the Circulation Element, 2010] shall be determined as follows:

a) A project that would contribute ADTs to a roadway where the Estimated Future Volume does not exceed the policy capacity would be considered consistent with this Element.

b) For roadways where the Estimated Future Volume exceeds the policy capacity but does not exceed the Acceptable Capacity, a project would be considered consistent with this Element only if the number of ADTs contributed by the project
to the roadway was less than or equal to 2 percent of the remaining capacity of that roadway or 40 ADT whichever is greater.

c) For roadways where the Estimated Future Volume exceeds the acceptable capacity but does not exceed the Design Capacity, a project would be considered consistent with this Element only if the number of ADTs contributed by the project to the roadway does not exceed 25 ADT.

d) For roadways where the Estimated Future Volume exceeds the Design Capacity, a project would be consistent with this Element only if the number of ADTs contributed by the project does not exceed 10 ADT.

3.17.3 Impact Analysis

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less than Significant with Mitigation. The Project includes the retrieval and replacement of existing cables in the onshore LFCPF and the offshore areas between the Project platforms and between the platforms and the shoreline. Construction activities would include a minor increase in vessel and commuter traffic during the short-term. However, following the installation of the replacement cables, transportation conditions would return to pre-Project levels. No increases in traffic or Estimated Future Volume would occur. By law, all vessels are required to act in accordance with all USCG requirements. ExxonMobil would also be required to submit a Notice to Mariners (NTM) to the USCG (MM TRANS-1: Notice to Mariners), and Project vessels would be required to adhere to existing oil and gas industry vessel corridors (including TSS and JOFL as appropriate) while traveling directly from offshore Project platforms to the onshore ports, harbors, and piers from which crew and supplies are conveyed (MM TRANS-2: Vessel Traffic Corridors). As such, the Project is consistent with all applicable policies and plans. With implementation of MM TRANS-1 and MM TRANS-2, impacts associated with Project activities would be less than significant.

MM TRANS-1: Notice to Mariners. At least 15 days prior to construction, ExxonMobil shall submit to the U.S. Coast Guard (USCG) Eleventh District, and as required to the Captain of the Port, a Notice to Mariners to alert other commercial and recreational boaters within the Project vicinity. In accordance with USCG requirements and to alert nearby vessels, applicable work vessels shall also “fly” the appropriate day shape(s) that specify that the vessel is engaged in installation activities and that it has limited maneuverability.
MM TRANS-2: Vessel Traffic Corridors. Project vessels shall use established oil and gas and/or Joint Oil Fisheries Liaison Office corridors to the maximum extent feasible.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less than Significant Impact. According to the SBC Public Works Department, Transportation Division, no level of service numbers are available for this portion of Calle Real. Although no SBC data are available for this area, the California Department of Transportation (Caltrans) provides AADT counts for Highway 101 in the Project area at 37,500 AADT (back peak month). This is below the SBC threshold of 44,000 ADT. Based on the number of man hours required to complete Project activities, construction at the LFCPF would not create enough daily trips to breach the SBC threshold. Impacts associated with the Project are less than significant.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The Project does not include any proposed changes to air traffic. Nor does it include any onshore or offshore design features that would modify or change an existing transportation area. The Project is a replacement of existing cable system. As such, following installation, maintenance and operation of the cables would return to pre-Project conditions. No permanent to onshore or offshore traffic is proposed. No impact would result.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project does not include any onshore or offshore design features that would modify or change an existing transportation area. No changes to roads, walkways, bike paths, railroads, or offshore transportation corridors would occur. No impact would result.

e) Result in inadequate emergency access?

Less than Significant with Mitigation. Staging of onshore equipment would occur primarily within the LFCPF and outside of existing emergency access corridors. Staging at the bike path would be minimal and would occur near the existing closure area. Emergency access would remain open at all times. Impacts associated with emergency access for onshore construction activities are less than significant.
Offshore work activities at the platforms and on offshore vessels would be conducted under existing safety plans as well as Project-specific safety plans. This includes emergency access to personnel. Under Rule 33 CFR 147, 500 m is the radius of the Platforms Heritage and Harmony safety zones for the vessels over 100 feet (30 m) long that do not service the facilities. Safety zones surrounding Project platforms would ensure that individuals not associated directly with Projects activities would have no access to offshore construction areas. Offshore access to the Platforms would remain clear in case of emergency.

Pursuant to MM TRANS-1 (as noted above), ExxonMobil will be required to issue a NTM in order to notify the USCG and any commercial or recreational vessels within the Project area of Project activities. Work vessels will also “fly” the appropriate day shape(s) that specify that the vessel is engaged in installation activities and that it has limited maneuverability. These signals are shown by day in all weathers on vessels to denote certain activities in which they are engaged. In restricted visibility, the appropriate lights should also be displayed by day. Implementation of MM TRANS-1 will alert other vessels in the area of any potential hazards.

Pursuant to MM TRANS-2 (as noted above), Project vessels will use established oil and gas and/or JOFLO corridors to the maximum extent feasible. With implementation of MM TRANS-2, responders would be given priority access during emergency situations. Emergency access to and from the offshore environment would not be affected by Project vessels. Impacts are less than significant.

f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less than Significant Impact. The Project does not include any onshore or offshore design features that would modify or affect public transportation corridors. Staging for the southern portion of the tunnel would occur within a portion of the State Parks bike path running between El Capitan and Refugio SBs. However, construction activities would not close the bike path and would not require changes to the bike route. Bike traffic would be directed outside of the staging area for safety purposes. Impacts would be less than significant.

3.17.4 Mitigation Summary

ExxonMobil has proposed the following measures to be implemented during the Project to reduce potential conflicts with other vessel operations in the area.

- MM TRANS-1: Notice to Mariners.
- MM TRANS-2: Vessel Traffic Corridors.