

NOTICE OF PREPARATION

TO: State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95812

FROM: Kathryn Lehr, Planner
Santa Barbara County
Planning & Development
123 East Anapamu Street
Santa Barbara, CA 93101

SUBJECT: Notice of Preparation of a Draft an Environmental Impact Report

PROJECT NAME: Plains Replacement Pipeline Project

PROJECT LOCATION: Gaviota Coast inland to the Sisquoc Pump Station, through San Luis Obispo County in Cuyama to the Plains Pentland Pump Station in Kern County

PROJECT CASE Nos: 17DVP-00000-00010, 17CUP-00000-00027, 17DRP-00000-00002 and 17CDP-00000-00060

PROJECT APPLICANT: Plains Pipeline, L.P. (Plains)

Santa Barbara County (SB County) is currently processing an application for a project that requires preparation of an Environmental Impact Report under the California Environmental Quality Act (CEQA). The County of Santa Barbara will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified above and will use the EIR when considering approval of the proposed Project. Responsible Agencies, Trustee Agencies or other public agencies that have a role in approving or implementing the proposed Project may also need to consider this EIR when issuing approval for the implementation of the proposed Project. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project.

Due to the time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this notice which began with your agency's receipt of the NOP.

1. NAME OF CONTACT PERSON. (Please include address, e-mail and telephone number)
2. PERMIT(S) or APPROVAL(S) AUTHORITY. Please provide a summary description of these and send a copy of the relevant sections of legislation, regulatory guidance, etc.
3. ENVIRONMENTAL INFORMATION. Please detail what environmental information must be addressed in the Environmental Impact Report to enable your agency to use this documentation as a basis for your permit issuance or approval.
4. PERMIT STIPULATIONS/CONDITIONS. Please provide a list and description of standard conditions that your agency will likely apply to features of this project as well as any project specific conditions that may be developed to address project specific impacts.

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STATE CLEARINGHOUSE

5. ALTERNATIVES. Please provide alternatives your agency recommends to be analyzed in the EIR.

6. REASONABLY FORESEEABLE PROJECTS, PROGRAMS or PLANS. Please name any future project, programs or plans that may have the potential to combine with and/or compound or increase environmental impacts associated with the project as proposed.

7. FURTHER COMMENTS. Please provide any further comments, information or documentation that may help the county to scope the document and determine the appropriate level of environmental assessment.

The project description, location and the potential environmental effects are contained in the attached materials. For current project information and additional application materials, the following page has been established on the County's website at:

[<http://sbcountyp planning.org/energy/projects/PlainsPipeline.asp>](http://sbcountyp planning.org/energy/projects/PlainsPipeline.asp)

If we do not receive your comments or recommendations, we will assume that you have no comment as to the impacts the project may have on affected resources. Please send your response to Kathryn Lehr, project planner, at the address shown above.

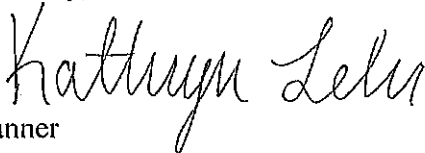
Additionally, two scoping meetings have been scheduled for the Plains Replacement Pipeline Project. The first scoping meeting has been scheduled for **February 27, 2019, Wednesday at 6:00 PM** for the convenience of agencies, property owners and residents located within or near the South SB County area and will be held in the Santa Barbara County Administration Building, Board of Supervisors Hearing Room, Fourth Floor, 105 E. Anapamu Street, Santa Barbara, CA 93101. The second scoping meeting has been scheduled for **February 28, 2019 Thursday at 6:00 PM** in SLO County will be held at the South County Regional Center, 800 West Branch St., Arroyo Grande, CA 93420.

The Scoping Meeting discussions will be limited to understanding the proposed project and associated environmental concerns including potential mitigation measures and possible alternatives to the project. The merits of the project will not be discussed at this time. The attached project overview and scope of analysis identified by P&D staff will be used as a starting point for discussion during the scoping meeting, but other environmental concerns may be raised by the public at this meeting.

For current project information, the following page has been established on the County's website: <http://sbcountyp planning.org/energy/projects/PlainsPipeline.asp>.

Feel free to contact the project planner at (805) 568-3560 or klehr@countyofsb.org for more information or if you have any questions. We thank you for your time and consideration.

Sincerely,



Planner

February 14, 2019

cc: Clerk of the Board (please post for 30 days)

Encl: Project Overview and Scope of Analysis

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PROJECT OVERVIEW AND SCOPE OF ANALYSIS

A. APPLICANT

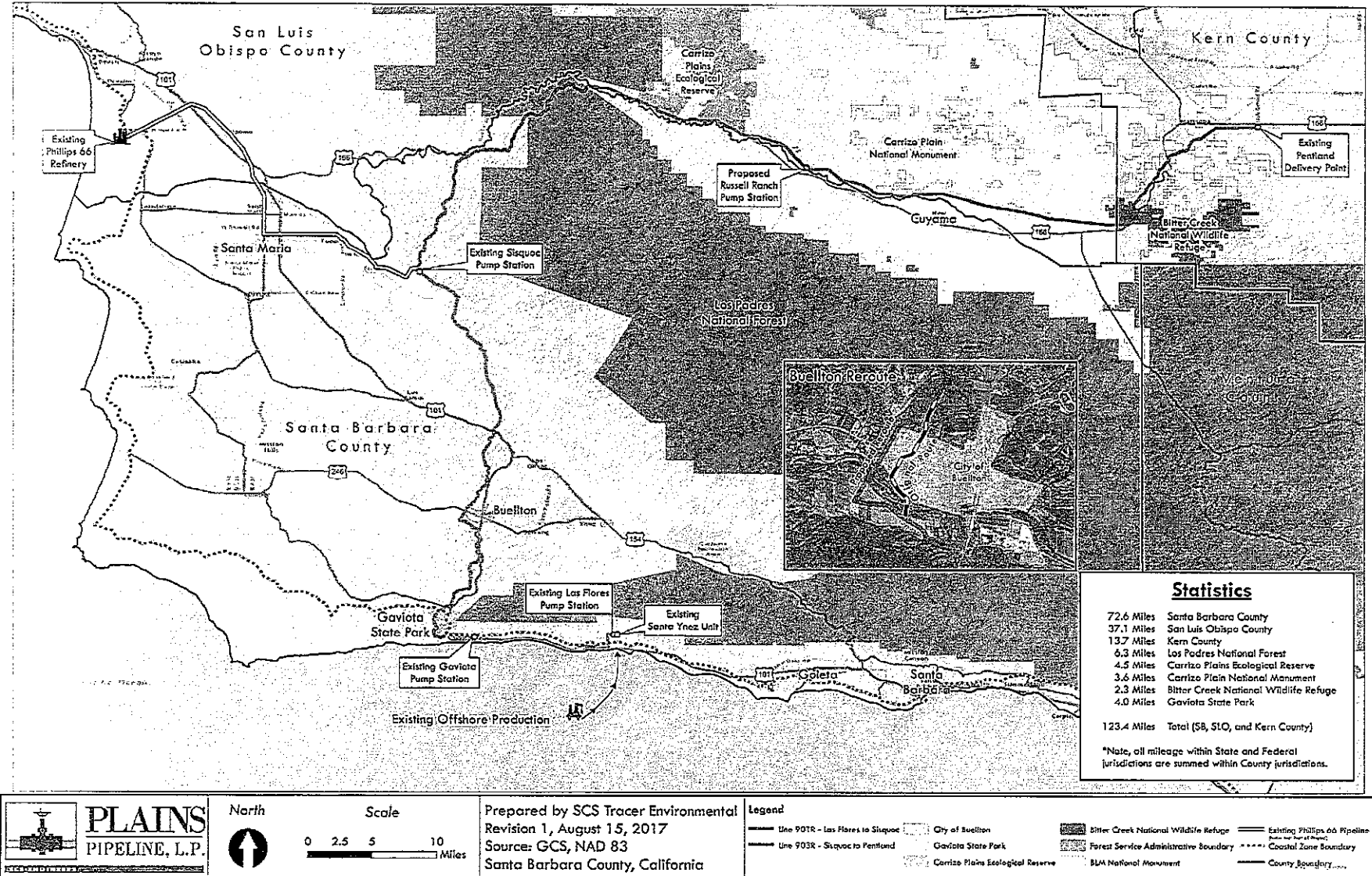
Ms. Heather Tuggle
Plains Pipeline, L.P. (Plains)
333 Clay Street #1600
Houston, TX 77002

B. LOCATION

Plains Pipeline, L.P. is proposing to replace the existing, and currently shut-in, 123.4-mile Line 901 and 901 pipeline system. The existing Plains Line 901, a 10.9-mile, insulated twenty-four inch diameter steel pipeline currently extends from the Plains Las Flores Pump Station (within ExxonMobil's Las Flores Canyon facility) north of Highway 101 along the Gaviota Coast into the Gaviota Pump Station. Line 903, a 113.5-mile, insulated thirty-inch diameter, steel pipeline, exits the Gaviota Pump Station, crosses under Highway 101 into Gaviota State Park and parallels Highway 101 as it heads inland. Line 903 crosses underneath Highway 101 just north of its intersection with State Route 154, south of Los Alamos, and continues north through the southern portion of the State Designated Cat Canon Oil Field and underneath the Sisquoc River to the Sisquoc Pump Station. Once Line 903 reached the Sisquoc Pump Station it heads eastward along the SB County and SLO County boundary to the Pentland Delivery Point in Kern County. Although the existing pipeline alignment currently traverses through the City of Buellton, the proposed pipeline would be relocated outside the existing alignment just outside Buellton City limits. Additionally, the proposed alignment would deviate from the existing alignment for a small portion along the Gaviota Coast to avoid sensitive resources.

The proposed pipeline would traverse approximately 260 different parcels (155 in SB County) which range in size from just less than 1-acre to over 3,400-acres and are zoned AG-I (Agriculture), AG-II (Agriculture), REC (Recreation), M-CR (Coastal Related Industry), M-CD (Coastal Dependent Industry), RMZ (Resource Management) within Santa Barbara (SB), AG (Agriculture) and RL (Rural Lands) within San Luis Obispo (SLO), and Kern County. The existing and proposed replacement pipelines also cross California Department of Fish and Wildlife's Carrizo Plains Ecological Reserve as well as Federal lands, including Los Padres National Forest, the Carrizo Plain National Monument and the Bitter Creek Wildlife Refuge. No change in existing land use designation and/or zone district is proposed as part of the Project. Figure 1 shows the proposed alignment within SB, SLO and Kern Counties, as well as State and Federal lands.

Figure 1. Project Vicinity Map



C. REQUEST/DESCRIPTION

Overview of the Project

Plains is proposing to replace the existing Line 901 and 903 pipeline system with a smaller diameter and smaller capacity un-insulated steel pipeline, herein after referred to as Lines 901R and 903R. As part of the proposed Project Plains would install, operate and maintain Lines 901R and 903R, forty pipeline control valves, update equipment at three existing pump stations, expand and upgrade the existing Sisquoc Pump Station, construct a new pump station in the Cuyama Valley region of SLO County; and update and install various pipeline-related ancillary equipment including but not limited to: pipeline location markers, cathodic protection, fiber optic lines, supervisory control and data acquisition (SCADA) systems, remote communication equipment, emergency battery systems, diesel powered back-up generators, and/or solar panels. Although removal of the existing pipeline is not proposed at this time, portions of the line may be removed where technically feasible and required by agreement with landowners and/or Project Conditions. Therefore, impacts associated with pipeline removal would also be address and analyzed.

Background and Historic Operation

On February 18, 1986 SB County approved the Celeron/All American Pipeline Project under a Final Development Plan (85-DPF-066cz), which was subsequently revised in 1988 (88-DPF-033). The proposed Celeron/All American Pipeline Project was for the construction of a 1,200-mile pipeline that would transport Outer Continental Shelf and other locally produced crude oils from the Santa Barbara and Santa Maria Basins through Emidio Station in Kern County California, to McCamey Texas. The 122-mile Celeron segment would extend from Las Flores to Emidio Station and the 1,084-mile All American segment would extend from Emidio Station in California, to McCamey Texas; both pipelines would transport heated crude oil. Pipeline construction occurred from 1988 to 1991, and Line 903 became operational in 1991, and Line 901 became operational a few years later in 1994. Line 901 and 903 system was an interstate pipeline and operated under federal jurisdiction.

On May 19, 2015, Line 901 ruptured approximately 100 yards north of Highway 101, and oil traveled through a drainage culvert to the Pacific Ocean approximately ¼ mile west of Refugio State Park. An estimated 124,000 gallons or 2,960 barrels of crude oil were released. On May 20, the Director of Planning and Development gave verbal and email authorization to Plains to conduct emergency response operations pursuant to the County's Coastal Zoning Ordinance. Site clean-up and monitoring activities continued into 2016 and were overseen by the Unified Command led by the United States Coast Guard (USCG) and the United States Environmental Protection Agency (EPA), in consultation with the California Department of Fish and Wildlife (CDFW), County Office of Emergency Management (OEM) and Plains. The Unified Command was dissolved in early 2017.

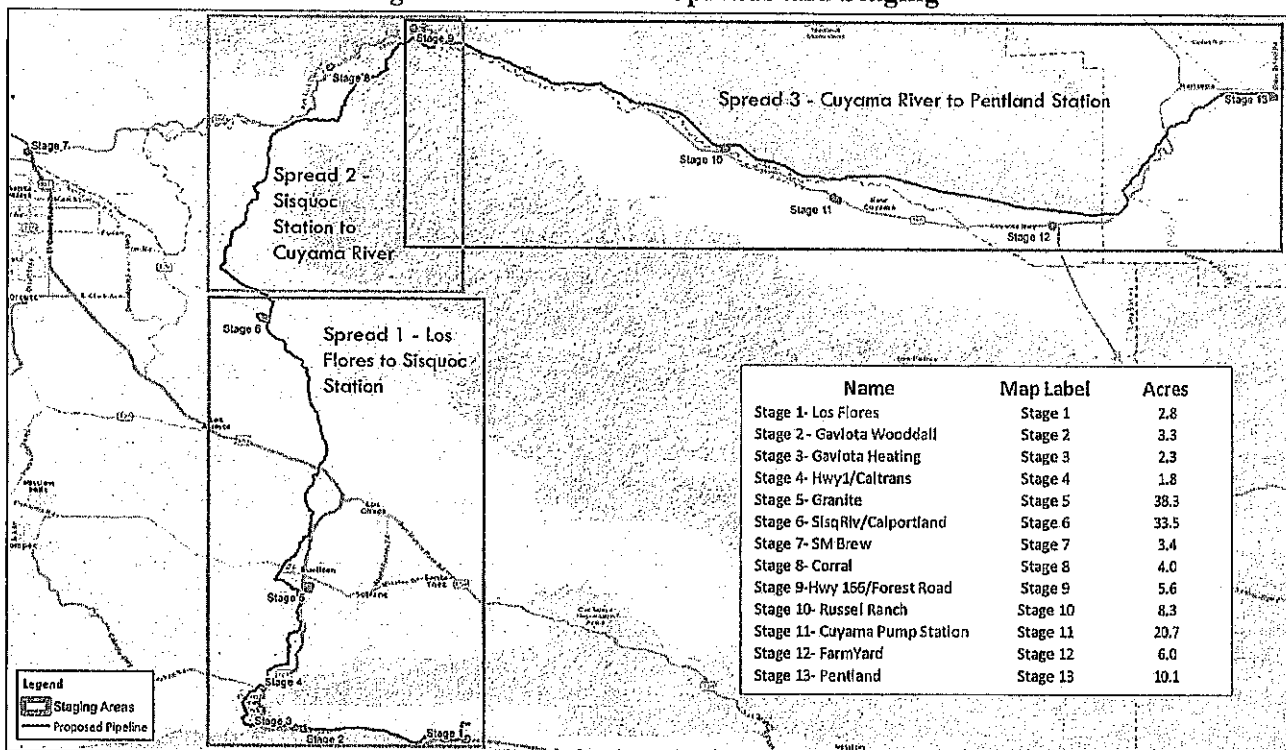
Since the May 19, 2015 rupture and release of crude oil, Plains' 901 and 903 pipeline system has been shut-in. As part of their review and investigation, the Pipeline Hazardous Materials Safety Administration (PHMSA) issued a Corrective Action Order (CAO) requiring the purging of Line 901, a review of the pipeline's integrity and repair of any integrity-threatening anomalies identified by subsequent inspections and a root cause failure analysis. The CAO required Line 901 to remain shut down until PHMSA approves the restart of the pipeline. Two amendments were issued shortly thereafter. The first amendment to the CAO was issued on June 3, 2015 and addressed preliminary findings from PHMSA's investigation and required additional testing on Line 901 and 903, further review of processes, management and oversight of Line 903 and reduction of Line 903's operating

pressures. The second amendment was issued on November 12, 2015 and required the purging of Line 903 between the Gaviota and Pentland Pump Stations and the filling of both Line 901 and 903 with inert gas. Purge operations began on November 30, 2015 and were completed on April 18, 2016. To-date, the Line 901 and 903 pipeline system from the Las Flores Pump Station to the Pentland Pump Station remain non-operational. Plains continues to work with PHMSA to address the CAO requirements.

Pipeline Construction

To construct the replacement pipeline and abandon or remove designated pipeline sections within the proposed 12-18 month timeline, Plains is proposing to utilize three construction spreads concurrently (see Figure 2).

Figure 2. Construction Spreads and Staging



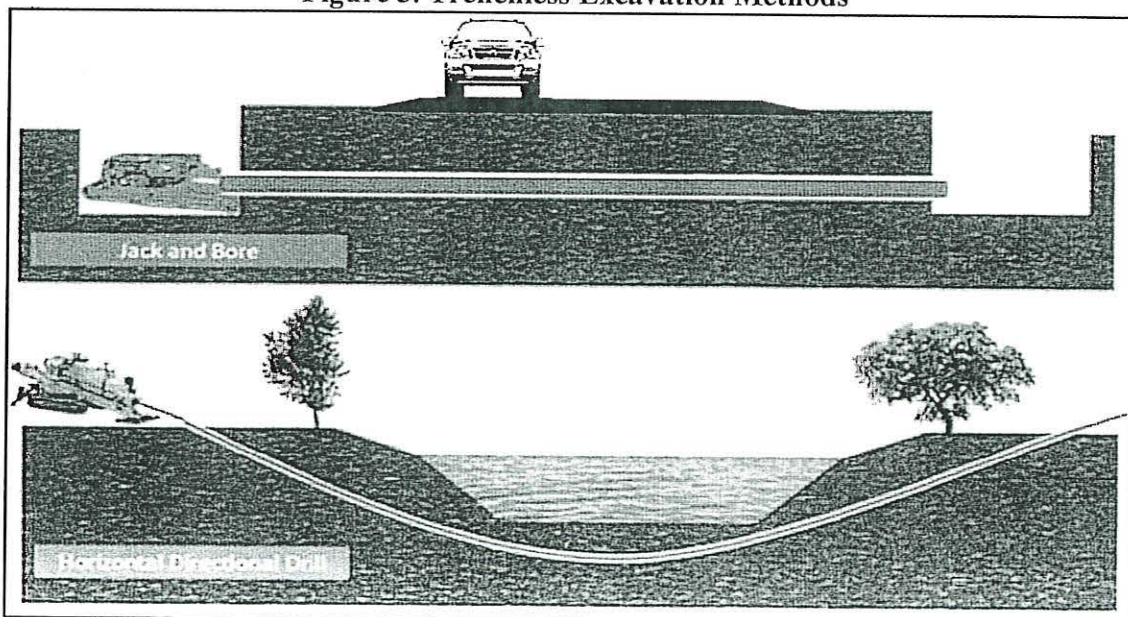
Each construction spread would be comprised of a crew of approximately 150 to 200 employees and associated construction equipment with vehicles to support pipeline installation, abandonment and/or removal activities. Construction equipment and vehicles include, but are not limited to the following: light-duty passenger trucks, passenger vans, heavy duty trucks, welding trucks, fuel trucks, water trucks, stringing trucks, graders, dozers, trackhoes, trenching machines, bending machines, forklift, Horizontal Directional Drilling (HDD) machine, jack and Boring Machine, mud pumps, cranes, air compressors and generators. Designated staging areas would be located in level areas near or adjacent to the pipeline alignment and respective work areas and would be dismantled and returned to existing conditions as work activities progress or culminate. A centralized pipe yard for short-term storage and offsite fabrication of valve systems and similar equipment would be utilized as well. Trucks would transport materials to identified staging areas along the pipeline alignment.

Construction would occur during permitted hours, however trenchless excavation methods (described below) may need to operate 24 hours, 7 days a week where safety and technical needs warrant longer working hours. The three construction spreads are expected to operate simultaneously and are estimated to average approximately 700 linear feet of pipeline installation per day, depending on site conditions and terrain.

Pipeline installation would generally occur in the following six steps:

1. **Construction Staging.** This stage includes the establishment of a Pipe Yard, as noted above, as well as the various staging areas along the pipeline alignment.
2. **Pipeline Construction Corridor and Right-of-Way.** This stage entails the clearing of the temporary construction corridor (i.e., vegetation and tree removal as necessary) under the observation of biological and cultural monitors and marking of the pipeline right-of-way. During this stage topsoil along the pipeline alignment would be removed and stockpiled and the area would be graded in preparation for trenching activities.
3. **Excavation and Trenchless Construction.** During this stage trenching machines would be used to excavate along the pipeline alignment at a depth of approximately 6-7 feet below grade. In areas that require deeper pipeline placement such as creeks or road crossings, trenchless excavation methods would be utilized. Trenchless excavation methods include Jack and Bore or Horizontal Directional Drilling (HDD) (See Figure 3). Jack and Bore entails the excavation of access pits on either side of the crossing at the same depth as the pipeline and a boring machine. As the boring machine creates a straight horizontal path to the exit pit as it pulls the casing pipe behind it. Once the tunnel is drilled and the casing is in place, the pipeline is strung through the casing and the access pits are backfilled. HDD is typically used for longer sections than Jack and Bore, such as sensitive resources or major rivers. The HDD machine does not require access pits and is typically set up on the existing ground surface. The HDD is setup so that it gradually angles down to the target depth and then resurfaces again hundreds of feet away creating an underground arc.

Figure 3. Trenchless Excavation Methods



4. Pipeline Transportation and Installation. During this stage, sections of pipeline would be transported from the Pipe Yard and staging areas to the project site, placed in the trench, welded to one another and sand blasted. The weld joints would then be treated with epoxy to prevent corrosion. No insulation would be applied or used along any portion of the replacement pipeline.

5. Testing and Inspection. Once the pipeline segments have been welded, each joint would be inspected via x-ray to ensure quality control and the pipeline would be lowered by crane into the trench. Once the trench has been back filled, pipeline segments would be hydrostatically tested to ensure the integrity of the newly constructed pipeline. If any portion of the pipeline fails during this test, the pipeline segment would be re-exposed and Steps 4 and 5 would be repeated until pipeline integrity is verified.

6. Restoration of Construction Corridor. During this final stage, the Temporary Construction Corridor, created as part of Step 2, would be restored. Topography would be returned to existing grade, top soil would be redistributed and disturbed areas would be revegetated according to a Revegetation and Restoration Plan.

Pipeline Abandonment

Pipeline Abandonment activities would adhere with all Federal, State and local requirements. Where technically feasible and allowed by landowners and permits, portions of the existing pipeline would be abandoned in place and minimize additional project impacts. Pipeline abandonment activities would require approximately 25-30 additional specialized employees, and specialized equipment including material delivery trucks, pump trucks and import trucks. The same construction Pipe Yard and staging areas would be used for these activities as well.

Abandonment activities would generally occur as follows:

1. Buried pipeline sections would be flushed/cleaned of any fluids. (Already completed under PHMSA's oversight and direction pursuant to their COAs)
2. Unless otherwise noted in the equipment list, existing aboveground equipment such as facility piping, motor operated valves, pig launchers, and pig receivers would be removed.
3. Existing check valves would be exposed via the excavation of an access pit approximately 20 x 30 feet in size and would be removed.
4. Depending upon terrain conditions, small sections of buried pipeline would be exposed in intervals varying from one-half (0.5) to two (2) miles for access purposes. Below-grade access to the pipeline would be achieved via excavation of temporary access pits approximately 20 x 30 feet in size. Due to the proposed location of the replacement pipelines parallel with and in close proximity to existing pipelines, excavations associated with the abandonment process would primarily fall within the perimeter of the Temporary Construction Corridor for the replacement pipeline.
5. Using the excavated access locations, the buried pipelines would be filled with a material such as slurry, foam, nitrogen, or an equivalent inert substance and exposed ends would be welded closed with steel plates.

6. All excavations would be backfilled, recompactd as appropriate for their location, and revegetated/recontoured to return to existing prior conditions as much as possible.

7. Buried sections of pipeline would be recorded such that future land owners/users are able to identify their location.

Pipeline Removal

Portions of the existing pipeline may be removed where technically feasible and required by agreement with landowners and/or Project conditions. Approximately 117 of the total 257 parcels have easement or right-of-way agreements with clauses which allow the property owner to request pipeline removal. If all the applicable property owners request that the pipeline is removed from their properties, approximately 77.8-miles of pipeline would be removed.

Pipeline removal activities would use most of the same personnel, vehicles and equipment required for pipeline construction, with the addition of 50-70 specialized employees, passenger trucks, passenger vans, material delivery/hauling trucks, welding trucks and dump trucks.

Pipeline removal would generally occur as follows:

1. Buried pipeline sections would be flushed/cleaned of any remaining fluids. (Already completed under PHMSA's oversight and direction pursuant to their COAs)
2. A typical benched or sloped trench approximately thirty (30) feet in width would be excavated over the top of the pipeline segment; topsoil would be separated and stockpiled.
3. Welding trucks would be used to cut the pipeline into individual sections.
4. Sidebooms, trackhoes, trucks, and various construction fleet vehicles would be utilized to lift and remove sections of pipe.
5. Pipe sections would loaded onto flatbed trucks and hauled to regional metal recycling facilities.
6. Due to the reduction in pipeline diameter between existing and replacement pipeline sizes, additional fill material would be imported. The trench would be backfilled with native soil and/or clean fill material and top soil would be replaced. The disturbed area would be recontoured and revegetated to as close to prior surrounding conditions as possible.
7. Large woody vegetation such as oak trees may not be replanted if such vegetation would be likely to disrupt the operation and/or maintenance of the replacement pipeline system.
8. Unless otherwise noted in the equipment list, existing aboveground equipment such as valves, facility piping, pig launchers, and pig receivers would be removed.
9. Two (2) existing below-grade check valve stations would no longer be needed. Valve station 1-300 would be excavated and removed at the same time as the surrounding pipeline segments and the surface conditions recontoured and revegetated to as close to prior surrounding

conditions as possible. Valve station 3-1200 would be replaced by the new Russell Ranch Pump Station. All other valve and pump stations would be repurposed for the replacement pipeline system.

Removal of the existing pipeline segments would commence approximately four (4) weeks prior to construction of the replacement pipelines, the two processes would proceed concurrently thereafter. If the majority of the existing pipeline was required to be removed, the entire removal process as well as replacement pipeline construction would take approximately 15-21 months to complete.

Operations, Spill Contingency and Safety

Plains is proposing to utilize their centralized Control Center in Midland, Texas to manage the operations of the replacement pipeline, Lines 901R and 903R. The Control Center is manned by qualified personnel 24-hours per day, 365 days per year. Approximately 10 full-time staff would be needed for pipeline operations and maintenance.

The replacement pipeline system would be monitored 24 hours a day, 7 days a week by a Supervisory Control and Data Acquisition (SCADA) control system. Plains personnel in the Midland Control Center would utilize a SCADA system to continually monitor and operate pipeline systems, and carry out a remote shut-down of the system if circumstances warrant. Additionally, the pipeline SCADA system allows for various Plains personnel to access and view pipeline-related operational data, in real-time, from any properly equipped computer system in the world, including Plains offices in Santa Maria and Bakersfield, California. This shared access to technology allows for close coordination around-the-clock between local Plains operations staff and controllers in Plains' Midland Control Center.

Pipeline Controllers have the authority and the responsibility to shut down the pipeline systems when pipeline integrity is in doubt. Restart the pipeline systems is delayed until any identified issues are corrected and proper authorization has been received from Operations and Control Center Management and if necessary, the State Fire Marshall's Office of Pipeline Safety. Once the pipeline is shut off, Plains' pipeline controllers in Midland, Texas can choose to automatically isolate the affected section of pipe by remotely closing automated valves

The Project design and construction would conform to industry accepted best practices and Best Available Technology (BAT) in adherence with the Elder California Pipeline Safety Act, California Assembly Bill 864, as well as all local, state, and federal requirements for pipeline design and construction. Prior to commencement of pipeline operations, the Project would be incorporated into the operator's existing Pipeline Operation & Maintenance Plan, Operator Qualifications Plan, Pipeline Integrity Management Plan, and Emergency Response Plan in compliance with applicable local, state, and federal requirements.

Design considerations for the proposed Project include:

- Although subject to final design modifications, the system would likely be constructed of API 5L Gr. X52 carbon steel with a maximum operating pressure (MOP) of approximately 1,350 pounds per square inch (psig) and a maximum operating temperature of 200 degrees Fahrenheit.
- Consultation with the California State Fire Marshal (CSFM) Pipeline Safety Division.

- Adherence to CFR Title 49 Part 195 “Transportation of Hazardous Liquid by Pipeline”, CCR Title 19 Div. 1 Ch. 14 “Hazardous Liquid Pipeline Safety”, and appropriate sections of API, ANSI, ASME, CEC, CFC, CBC, NACE, NFPA, and other applicable codes.
- Incorporation of the use of in-line inspection tools, such as smart pigs.
- Completion of a hydraulic and surge analysis.
- Incorporation of results from a final Emergency Flow Restriction Device (EFRD) analysis.
- Completion of a seismic and geotechnical study including field and laboratory testing.
- Confirmation of existing utility locations for consideration during final pipeline route selection and maintain required clearances.

Pipeline Safety considerations during construction would include:

- Hydrostatic testing per DOT and CSFM regulations and retention of associated construction records.
- Non-destructive testing of all welded pipeline joints in a manner which meets or exceeds applicable standards per Department of Transportation (DOT) regulations and additional applicable local, state, and federal requirements.²
- Geotechnical testing to verify adherence to construction specifications.
- Installation of at least one (1) below ground warning tape above each pipeline.
- Installation of aboveground pipeline location markers.
- Installation of security fencing around all valve and pump stations.

Examples of personnel safety considerations during construction include:

- Compliance with applicable California Occupational Safety and Health Administration (OSHA) administered regulations such as shoring, bracing, and confined space entry.
- Overall construction safety program by licensed construction contractor(s).
- Implementation of various onsite safety activities including completion of Job Safety Analysis (JSA), daily safety tailgate briefings, and dedicated safety monitoring personnel.
- Advanced utility locating to avoid interference with existing underground improvements.

Examples of safety considerations throughout operations and maintenance of the proposed facilities include continued:

- Compliance with CFR Title 49 Part 195 “Transportation of Hazardous Liquid by Pipeline”, CCR Title 19 Div. 1 Ch. 14 “Hazardous Liquid Pipeline Safety”, and appropriate sections of API, ANSI, ASME, CEC, CFC, CBC, NACE, NFPA, and other applicable codes.
- Maintenance of routine and emergency operations plans.
- Safety training for operations staff; minimum experience requirements by operator classification.
- Maintenance inspections and retention of associated records as required by local, state, and federal regulations.
- Routine safety device inspections and testing.
- Maintenance of the facility’s Hazardous Materials Business Plan and Spill Prevention, Control, and Countermeasures Plan.
- Coordinated interface with interconnected systems operated by third parties.
- Maintenance and testing of the pipeline SCADA systems.
- In-line inspection to meet or exceed the frequency established by applicable regulations.
- Maintenance of aboveground pipeline location markers.
- Participation in Underground Service Alert utility locating system.

- Maintenance and replacement of equipment and components throughout the life of the Project.
- Documentation of results of tests and inspections over life of the Project, including the date and extent of any replaced pipeline segments.

Examples of Leak Protection and SCADA Leak Detection System Elements & Operation:

- A series of motor-operated-valves (MOV) and check valves would be installed in strategic locations to protect environmentally sensitive areas consistent with all applicable local, state, and federal regulations.
- Cathodic protection (sacrificial anode system) designed to protect the pipelines from external corrosion.
- Safety and operational data would be monitored by a SCADA system. Information would be gathered from multiple points along the pipeline system and would include flow rate, temperature, and pressure.
- Operating data would be continuously monitored to identify deviations indicative of a leak or rupture. The pipeline would shut down when conditions vary beyond pre-set pressure and flow conditions in accordance with the Elder California Pipeline Safety Act and additional applicable local, state, and federal requirements.
- The automatic shutoff system would shut off pipeline pumps without human intervention if the instruments detect:
 - A drop in pipeline pressure below a programmed threshold.
 - A drop in pipeline pressure combined with increased pipeline flow at the origination point and decreased pipeline flow at the destination point.
- In the event the pipeline flow reverses direction, strategically located check valves on the pipeline would close automatically, without human intervention.

D. ISSUE AREAS

Each specified impact area warrants an objective and systematic discussion that identifies the baseline environmental setting; thresholds of significance; impacts and their severity; and, where the impact is potentially significant, the mitigation measures to avoid, reduce or eliminate the impact.

Baseline Conditions

Although the existing Line 901 and 903 pipeline system is currently shut down, the permits that authorized the construction of the pipeline system remain active. If Plains addresses PHMSA's CAO and subsequent amendments, Plains maintains the ability to restart the pipeline system without the need for additional permits or project approval from County decision makers. Under CEQA baseline is normally the conditions that exist on the ground at the time the Notice of Preparation is released. However, under CEQA the Lead Agency has the discretion to decide how the existing physical conditions without the project can most realistically be measured, subject to environmental review and as supported by factual evidence. Since Plains retains the ability to restart the pipeline system without additional discretionary permits and to provide a realistic representation of facility operations, baseline conditions for the resources area analyses will be an average of the last 3 full years of pipeline operations prior to the May 19, 2015 spill event (2012-2014).

Air Quality

The Air Quality and Greenhouse Gas (GHG) analyses would include the evaluation of criteria air pollutants, GHG emissions, odors and consistency of the Project with the regional and applicable Air

Quality Management Plans. The Applicant has prepared an Air Quality Technical Report (AQTR) and associated emission calculations for the proposed Project. The AQTR was reviewed by the Santa Barbara County Air Quality Control District (SBCAPCD) and all SBCAPCD comments have been addressed. The AQTR includes information for both stationary and mobile emissions. The results of this analysis indicate that long-term unmitigated emissions are not predicted to exceed the County of Santa Barbara's significance threshold levels for NO_x, ROC, PM_{2.5} and PM₁₀.

However, per the emission calculations submitted as part of the Application, the proposed Project's NO_x, ROC and PM₁₀ emissions resulting from construction activities would exceed 25 tons within a 12-month period. Pursuant to SBCAPCD's Rule 202 D.16, if the combined emissions from all construction equipment used to construct a stationary source which requires an Authority to Construct permit have the potential to exceed 25 tons of any pollutant, except carbon monoxide, in a 12-month period, the owner of the stationary source shall provide offsets under the provisions of Rule 804 and shall demonstrate that no ambient air quality standard would be violated. Furthermore, since Santa Barbara County violates the state standard for PM₁₀, dust mitigation measures are required for all discretionary construction activities regardless of the significance of the fugitive dust impacts based on the policies in the 1979 Air Quality Attainment Plan.

At this time, the proposed Project includes the abandonment of the majority of the Line 901 and 903 pipeline system (122.9 miles) between Las Flores and Pentland. However, as discussed above, approximately 117 property owners have the ability to request the removal of the pipeline on their respective properties. Activities associated with potential removal of the 77.8 miles of the existing pipeline could result in NO_x and PM₁₀ (fugitive dust) emissions that exceed 25 pounds per day. Nevertheless, these emissions are not associated with stationary sources that would require an ATC from the SBCAPCD and therefore at this time would not be considered to exceed any existing thresholds.

Lastly, the SBCAPCD determined that no Health Risk Assessment (HRA) would be necessary for this project thus no HRA has been conducted. SBCAPCD requires permits for equipment and operations associated with this project.

Greenhouse Gases

According to the submitted calculations, pipeline construction and installation activities are anticipated to generate approximately 18,984 metric tonnes of CO₂ equivalent per year (MTCO₂e/year). These emissions would exceed the GHG threshold established by the County Board of Supervisors in the approved Environmental Thresholds and Guidelines Manual (revised March 2018). A bright-line GHG threshold of 1,000 metric tons of carbon dioxide equivalent per year applies to the Project. Potential mitigation may include the development of a County-approved GHG Mitigation Plan to mitigate potential impacts.

Biological Resources

The EIR would evaluate the extent of temporary and permanent impacts to wildlife and habitat as a result of the proposed Project and identify potential feasible mitigation measures. Construction activities include grading and vegetation removal, excavation, trenchless excavation, pipeline installation, and associated activities. Operational activities typically include routine on-going maintenance activities and accidental spill response activities.

Under the proposed Project, 122.9 miles of the existing Line 901 and 903 pipeline system from Las Flores to Pentland would be in abandoned in place and 123.4 miles of replacement pipeline would be installed within or adjacent to the existing pipeline corridor. Pipeline installation activities could

potentially temporarily interfere with terrestrial wildlife movement primarily during construction. Construction activities would affect wildlife in adjacent habitats by interfering with localized movement patterns or causing animals to temporarily avoid areas adjacent to the work. More mobile species (birds and larger mammals) would be expected to disperse into surrounding habitat areas during land clearing and grading, and other temporary construction activities. Potential impacts from the operation of the proposed Project include wildlife interference from maintenance vehicles, anomaly repairs and unanticipated spills and spill response.

The Biological Assessment included a review of the California Natural Diversity Database as well as pedestrian surveys which identified potential impacts to the following listed, threatened and endangered species, including, but not limited to: California red-legged frog, steelhead, and southwestern willow flycatcher, least Bell's vireo, Nelson's antelope squirrel (observed in 2017), giant kangaroo rat, Tipton kangaroo rat, and San Joaquin kit fox (sign observed in 2017). Additionally per the Assessment, upland habitat for the California tiger salamander, potential habitat for the Kern primrose sphinx moth and blunt-nosed leopard lizard (observed 2017 in SJV) could be affected. Vegetation trimming and clearing of the pipeline alignment would result in the removal or trimming of habitats such as, but not limited to: coast live oak woodland, annual grassland, California coastal scrub, riparian and wetland habitats.

The potential impacts to coast live oak woodland are of particular concern, with approximately 654 mature (at least 6 inches diameter at breast height) trees that may be impacted or removed by the proposed Project. Oak woodlands support a variety of sensitive species and are afforded special protection by local ordinances and the CDFW. As part of their application Plains has also compiled a Conceptual Oak Tree Mitigation Analysis which identifies potential oak mitigation opportunities within the project area. Potential impacts associated with biological resources could be significant.

Cultural/Historic Resources

The cultural/historic resources analysis would determine whether the Project may adversely affect the significance of cultural/historic resources. The EIR would provide a discussion of the potential impacts related to Cultural Resources and mitigation measures for project activities and alternatives. Construction activities include grading and vegetation removal, excavation, trenchless excavation, pipeline installation, and associated activities. As discussed above, approximately 117 property owners have the ability to request the removal of the pipeline on their respective properties. Activities associated would include excavation, pipeline removal and associated activities. Operational activities typically include routine on-going maintenance activities and accidental spill response activities. Direct impacts could include impacts that result from intentional ground disturbance related to grading, excavation and pipeline removal. Indirect impacts may also occur as a result of the project, but would not result from intentional ground disturbance. Other indirect impacts could include erosion, unauthorized artifact collecting, and vandalism.

The Applicant has prepared a Phase I Archaeological Survey Report for the proposed project, which includes the results of archival and background research, official record searches conducted at the Central Coast Information Center (CCIC) of the California Historical Resources Information System at the University of California, Santa Barbara, the Southern San Joaquin Valley Information Center (SSJVIC) at California State University Bakersfield, the Heritage Database with the United States Forest Service, Los Padres North Zone, and the BLM Bakersfield Field Office Cultural Resource Geo database. An intensive (BLM Class III) pedestrian survey of the proposed Project Study Area has also been conducted.

As designed, the proposed pipeline would be directionally drilled to avoid the majority of recorded and identified sites located within the right-of-way. Additional archeological investigations would need to be conducted to define the Area of Potential Effect and determine if the project would impact historical sites. All subsurface work would be conducted in accordance with an approved work plan, currently being developed in coordination with the State Historic Preservation Officer (SHPO) and the Bureau of Land Management (BLM). Project impacts would be evaluated against Section 8 of SB County's Environmental Thresholds and Guidelines Manual (revised May 2018). Potential impacts associated with cultural/historic resources could be significant.

Geologic Processes/Geologic Hazards

The Project includes the construction of a new, replacement pipeline which would traverse a variety of terrains, geological conditions and hazards. Potential issues that would be evaluated include geologic hazards such as erosion, slope instability, unsuitable soil conditions, and liquefaction. The potential for impacts as a result of seismic hazards such as strong seismic ground shaking would also be addressed.

In coordination with the Risk of Upset analysis, an assessment of the potential for spills related to geologic processes, hazards and seismic activity would be conducted.

The Applicant has prepared a Geologic Hazards Evaluation for the proposed pipeline alignment which crosses ten potentially active faults, twelve splays of the San Andres Fault, expansive soils, erodible soils, steep slopes and soils with liquefaction potential. The EIR section would also address existing environmental conditions in the affected area, identify and analyze environmental impacts of construction and operation of the proposed Project, and would include recommended measures to reduce or avoid adverse geologic impacts anticipated from Project construction and operation.

Project impacts would be evaluated against Section 10 of SB County's Environmental Thresholds and Guidelines Manual (revised May 2018).

Hazardous Materials/Risk of Upset

The main objectives of the Risk of Upset analysis are to disclose the potential for serious accidents, exposure to the public, safety and environmental risks of spill events, and the mitigation measures that could reduce these risks. This analysis would consider the potential for risks associated with the installation of the natural gas pipeline and the transportation of crude oil via pipeline using Risk of Upset studies provided by the Applicant, including a Pipeline Quantitative Risk Analysis (QRA), an Emergency Flow Restriction Device (EFRD) Study and a Surge Study prepared for the proposed Project. This issue area discussion would also include a description of the differences (i.e., pipeline pressure, diameter, material thickness, etc.) between the existing line that ruptured and the proposed replacement line.

Risk would be assessed according to Section 15 requirements of SB County's Environmental Thresholds and Guidelines Manual which specify thresholds for significant impact to the public through exposure to acute risks (i.e., serious injury and fatality) that stem from certain types of activities. Potential impacts associated with Risk of Upset could be significant.

Noise

The noise and vibration analysis would focus on potential adverse impacts from temporary construction-type noise (including trenching activities, pipeline installation and vehicle noise), impacts from truck

traffic along offsite travel routes, and permanent stationary noise sources, such as pump stations and valve sites. The EIR would also address noise associated with construction of the proposed natural gas pipeline.

In assessing noise impacts from proposed activities, details such as predicted decibel levels, duration, etc., for each construction and operation activity would be compared against the County's Community Noise Equivalent Level (CNEL) thresholds in locations of adjacent noise sensitive receptors. The noise and vibration analysis would identify specific recommendations and noise mitigation components to reduce adverse impacts to the extent feasible. Project impacts would be evaluated against Section 13 of SB County's Environmental Thresholds and Guidelines Manual (revised May 2018).

Paleontological Resources

Portions of the Project are located within areas that are known to be sensitive for significant paleontological resources, as defined by federal standards codified in the Potential Fossil Yield Classification Index (PFYC). Due to the extensive subsurface disturbance associated with this project, there is the potential for impact to these resources.

Surface/Groundwater Resources

The Applicant has prepared a Groundwater Protection Report which provides a desktop analysis of shallow groundwater and/or sensitive aquifers that are within the proximity of the proposed project. Grading and excavation activities may result in erosion and sedimentation along the pipeline alignment and adjacent disturbed areas, particularly if precipitation effects occur. Portions of the proposed pipeline would also be constructed within mapped flood plains and below numerous streams, creeks and rivers. Use of heavy equipment and machinery could potentially result in an accidental release of hazardous materials. Surface and groundwater have the potential to be impacted if an accidental release were to occur in these areas. Additionally, approximately 40 miles of the proposed pipeline would transect five geographic areas known to contain shallow groundwater averaging about 30 to 110 feet below ground surface. Where boring or HDD would take the pipeline to a greater depth, the relative risk to shallow groundwater would increase. The total length of boring and HDD installation within shallow groundwater areas is limited to approximately 2.87 miles (2%) of the total 123.4 mile replacement pipeline system.

The water resources section of the EIR would assess the Project's potential to affect surface and groundwater resources. Due to the nature of the project and the proposed pipeline alignment, potential impacts to surface and groundwater quality could be significant.

Traffic/Transportation

The Traffic and Transportation analysis would focus on the contribution of new traffic volumes associated with construction and operational activities. This analysis would also consider potential impacts to traffic flow from temporary lane or roadway closures related to the installation of the oil and gas pipelines.

The construction of the proposed Project would introduce new traffic volumes. As detailed in Section C under *Pipeline Construction* the project would utilize three construction spreads concurrently. Each construction spread would be comprised of a crew of approximately 150 to 200 employees and associated construction equipment and vehicles to support pipeline installation, abandonment and/or removal activities. Designated staging areas would be located in level areas near or adjacent to the pipeline alignment and respective work areas and would be dismantled and returned to existing

conditions as work activities progress or culminate. The potential primary staging areas would be used to store construction materials and would be located in previously disturbed areas, such as underutilized commercial parking lots, fallow agricultural fields, and private oilfield or agricultural work yards. Most of the preliminarily identified staging areas would be located in rural areas and impacts to traffic to/from the staging areas is anticipated to occur before morning peak hours and/or after evening peak hours and would be temporary. A centralized pipe yard for short-term storage and offsite fabrication of valve systems and similar equipment would be utilized as well. Trucks would transport materials to identified staging areas along the pipeline alignment.

Upon completion of the pipeline construction project, operations and maintenance would require 10 full-time equivalent operators and maintenance staff. Traffic generated by operators would be minimal (less than 50 daily trips generated by the 10 operators) and would not significantly impact public highways and roads in the vicinity of the pipeline corridor.

Most of the project related traffic is associated with the construction phase of the project. As described in the Applicant's Traffic Impact Analysis, approximately 192 to 206 daily trips are anticipated per construction spread, with 8 trips or less occurring the AM and PM peak hours on regional roadways including: US 101, SR 1, SR 246, and SR 166.

Approximately 400 to 600 employees and/or contractors would be employed for Project construction at various locations across the construction corridor. Construction workforce parking would occur in designated locations at previously disturbed or developed sites such as, but not limited to, existing, underutilized commercial parking lots, existing industrial work yards, or temporary unpaved parking areas in locations that are already relatively flat in topography and devoid of natural habitat. Construction employees would report to the approved parking zones, consolidate into field vehicles as feasible, and commute to the active work zone along designated traffic routes. Construction workers would drive to/from approved parking zones prior to the beginning of and after the end of each work day. Potential impacts to traffic and transportation along regional roadways as well as key intersections would be analyzed.

Project impacts would be evaluated against Section 19 of SB County's Environmental Thresholds and Guidelines Manual (revised May 2018).

Land Use

The Project would be subject to the County's Inland and Coastal Zoning Ordinance standards as well as policies from the County's Comprehensive Plan, including the Coastal Land Use Plan. The Project is proposing the transportation of produced crude oil via pipeline.

The Project would be subject to the SB County's Inland and Coastal Zoning Ordinance standards, SLO County's Inland Land Use Ordinance (LUO) Title 22, as well as policies from SB and SLO Countys' Comprehensive Plans. SB County policies require that pipelines be constructed, operation and maintained as common-carrier or multiple-use pipelines and require that the Applicant to account for the reasonable, foreseeable needs of other potential shippers in the design of their common carrier and multiple-user pipelines. Multiple-user pipelines provide equitable access to shippers with physically compatible stock on a nondiscriminatory basis. The proposed project would replace an existing pipeline system and appurtenances and include the construction of a new pump station. No residential development is proposed, all employees would travel to and from the site on a daily basis and the Project would not require connection to domestic or sanitary water services.

CEQA Guidelines §15125(d) requires that an EIR discuss any inconsistencies between a proposed project and applicable general plans, specific plans, and regional plans. As such, a preliminary policy consistency analysis would be developed and would contain a list and analysis of applicable ordinance standards and policies. However, it is the responsibility of SB and SLO Counties, as decision makers with discretion over the Proposed Project, to make the final determination regarding consistency issues as it relates to applicable Santa Barbara County policies.

Issues Anticipated to be Less Than Significant

The following issue areas would be evaluated in the EIR, but are anticipated to be less than significant:

Aesthetics/Visual Resources

The proposed pipeline would be located underground with the exception of several valve sites, a new crude oil storage tank at the Sisquoc Pump Station and the proposed Russell Ranch Pump Station. The new facilities may be visible from public roads, however with the exception of the proposed crude oil storage tank at the Sisquoc Pump Station, would be similar in nature to existing development in the surrounding areas and are not anticipated to significantly impact identified public vantage points or scenic resources. Additional visual analysis may be conducted.

Agricultural Resources

The pipeline would be located approximately 5-7 feet below grade in most areas, except for roadway and stream/river crossings, and would temporarily disturb minor portions of agricultural properties, many of which are under Williamson Act Contracts. Additionally, the Agricultural Preserve Advisory Committee (APAC) reviewed the project and found it to conform to the County's uniform rules for parcels under Agricultural Preserve Contracts.

Energy

The County's Environmental Thresholds and Guidelines Manual does not contain significance thresholds for electrical and/or natural gas service impacts. As part of the proposed Project, a 3.8 mile natural gas line would be constructed, owned and operated by Southern California Gas Company to supply the expanded Sisquoc Pump Station. The proposed project is not anticipated to require a substantial increase in energy demand and would not require the development of new energy sources.

Fire Protection

The proposed project would include the construction of an additional pump station as well as a secondary containment area for the 120,000 barrel crude oil break-out tank, new fire water storage tank, and installation of a foam fire suppression system at the Sisquoc pump station. All facilities have been reviewed by the County Fire Department and would adhere to the required standards for fire protection including, but not limited to, emergency access, onsite stored water systems and portable fire extinguishers.

Public Facilities

The proposed project would not generate waste in excess of County thresholds and would not require connection to public water or sanitary facilities.

Recreation

The alignment of the proposed pipeline generally follows the existing right-of-way with the exception of three areas, one of which is a reroute around the City of Buellton. The pipeline alignment would traverse several state and federal parks and may result in temporary area closures. However, the quality or quantity of existing recreational opportunities recreational uses, including biking, equestrian or hiking trails in the project vicinity is not anticipated to be degraded.

Project Alternatives

Alternatives would be designed to avoid and/or substantially reduce any impacts that cannot otherwise be mitigated to a level below significance. The alternatives discussion would include an analysis of environmental impacts of each alternative considered, along with a comparative analysis to distinguish the relative effects of each alternative and its relationship to Project objectives. The alternatives analysis would also identify the “environmentally superior alternative” from among the alternatives.

