



RWQCB

9.2 Governmental Agency Comment Letters and Responses



**California Regional Water Quality Control Board**  
Central Coast Region

Internet Address: <http://www.waterboards.ca.gov/centralcoast>  
895 AeroVista Place, Suite 101, San Luis Obispo, California 93401  
Phone (805) 549-3147 • FAX (805) 543-0397



**Arnold Schwarzenegger**  
Governor

**RECEIVED**  
**COUNTY OF SANTA BARBARA**  
**JAN 08 2007**

**PLANNING AND DEVELOPMENT**  
**DEPARTMENT - ENERGY DIVISION**

January 4, 2007

Mr. Kevin Drude  
County of Santa Barbara County  
Department of Planning and Development, Energy Division  
123 E. Anapamu Street  
Santa Barbara, CA 93101

Dear Mr. Drude:

**ENVIRONMENTAL IMPACT REPORT, TRANQUILLON RIDGE OIL AND GAS DEVELOPMENT PROJECT, COUNTY EIR #06-EIR-000000-00005**

We have reviewed the *Environmental Impact Report, Tranquillon Ridge Oil and Gas Development Project*, County EIR #06-EIR-000000-00005 (the EIR). The County of Santa Barbara, Department of Planning and Development, submitted the subject document to the Central Coast Regional Water Quality Control Board to solicit comments.

RWQCB-1

The EIR indicates that the proposed project could have significant impacts on the waters of the State of California; however, if mitigation measures are utilized and all appropriate permits are obtained, the Central Coast Water Board will not object to the proposed project.

If you have any questions, please call **Rich Chandler at (805) 542-4627** or Sheila Soderberg at (805) 549-3592.

Sincerely,

*Sheila Soderberg*  
for  
Roger W. Briggs  
Executive Officer

S:\SLIC\Unregulated Sites\Tranquillon Ridge EIR\TranquillonEIR\_comments\_1-2-07.doc

California Environmental Protection Agency



**Response to Comment Set RWQCB**

**RWQCB-1:** Comment noted.

COL1

Tranquillon Ridge Oil and Gas Development Project Comment  
City of Lompoc 1/16/07

The proposed project would increase the life of the natural gas and crude oil pipeline from off-shore for an additional 30 years to 2037. The project also includes an increase of 15 years to the life of the Lompoc Oil and Gas Plant (LOGP). (If its estimated life was through 2022.) The project includes installation of an above-ground power line, equipment modification, and increased production. A related increase in risk of upset and wildland fire is projected. This could include fire, oil spill, hazardous substance release, or emergency event resulting from an earthquake, traffic accident or pipeline rupture. The EIR also notes on page 5.1-12 that significant corrosion on segments of the existing pipeline, the use of which is proposed to be extended to 2037 years, was identified in 1995 and 1996. The EIR states that through the City / County mutual aid agreement, the City of Lompoc's Fire Department (Station 1 or 2) could respond during an emergency along the pipeline route, or at the LOGP.

COL1-1  
 Cont'd

↑ fight a fire on the pipeline, as well as provide fire protection to the citizens of Lompoc. Currently, PXP does not fund any portion of the City of Lompoc's Fire Department Operations. If this growing City is to be expected to provide 1/3 equipment and 2/5 personnel resources of the initial response to an emergency at the LOGP, or along the pipeline / power line, then mitigation fees should be assessed to address the need for additional personnel, equipment and/or facilities generated by the increased risk associated with the expanded production and extended operational life of the pipeline and LOGP.

Concern

The City of Lompoc's Fire Department is identified in the EIR as a primary emergency responder, operating two of the three fire stations located within a fifteen-minute response time of the LOGP site.

**Fire Impact #2** – Operation of the new power line to valve site #2 could result in impacts to fire protection and emergency response resources, due to addition of an ignition source (New overhead power line) into a high fire hazard area.

**Fire Impact #3** – Increased risk of upset due to increased oil flow rates through the project pipelines and pipeline facilities could create impacts to fire protection and emergency response resources.

**Fire Impact #4** – Increased likelihood of upset conditions due to equipment modifications at the LOGP and potential increase of wet oil and sour gas quantities processed at the facility could create impacts to fire protection and emergency response. The proposed project would result in increased flow rates and related increased spill rates of 114 barrels (bbls), with a worst-case increase in flow rates of 688 bbls over current operations.

- The EIR argues that the change in spill volumes is relatively small 3.6 – 10.9 percent and response capabilities are currently available to address these increased spill volumes.
- The EIR also argues that while the need to maintain the required fire protection and emergency response capabilities for these facilities would be extended, the pipeline facilities represent only a very small portion of the local response services' scope of work. The EIR states that the response services are funded by PXP to provide the services and this funding would continue if the facilities life term is extended.
- The EIR argues that combined with resources onsite, County Station 51, and Lompoc Stations 1 and 2 have sufficient fire-fighting and emergency response capabilities (page 5.11-16 and 17).

**Response** – The City of Lompoc does not believe that the on-site resources, in combination with those of Station 51 and Lompoc Stations 1 and 2, would be sufficient to

COL1-1

**Response to Comment Set COL1**

**COL1-1:** Impacts Fire.1 through Fire.4 in Section 5.11.4 discuss the impacts to fire protection and emergency responders associated with the proposed project, including the emulsion and sour gas pipelines, LOGP, and power line. As concluded in the EIR, Impacts Fire.1 through Fire.4 are considered to be adverse but not significant (Class III). However, to ensure that these impacts are mitigated to the maximum extent feasible, in accordance with County policies, Mitigation Measures Fire-1 and Fire-2 are proposed to ensure that the facility Fire Protection Plans, Emergency Response Plan, and Oil Spill Response Plan are updated to reflect the proposed project and submitted to the Santa Barbara County Fire Department for review and approval.

According to Santa Barbara County Fire Department (Diane Sauer, personal communication, 2/16/07) PXP currently funds a “Partial Position” for County Fire Station #51. In addition, there is a Mutual Aid Agreement between Santa Barbara County and the City of Lompoc. Under the Mutual Aid Agreement, the County and City fire stations operate under what is called “Closest Resource” which means that if there is an incident, the agency closest to the site should respond. Therefore, even though there could be an incident under the jurisdiction of the City of Lompoc, if a County fire station or crew were closer to the incident site, the County fire station/crew would respond. With the Mutual Aid Agreement in place, this response assistance is provided free of charge between Santa Barbara County and the City of Lompoc. As result, some of the money the County Fire receives from PXP is distributed indirectly to the City of Lompoc under the terms of the Mutual Aid Agreement.

COL2

COL2-1 Hello: After looking the DEIR over a bit more, it would be nice to see a map showing the impact area of a hydrogen sulfide gas leak, along the length of the nearshore and onshore pipeline, assuming the worst case scenario of 600 psig. Please let me know if I have missed this in the DEIR. Thanks, Stacy Lawson

Stacy L. Lawson  
Senior Environmental Coordinator  
City of Lompoc  
(805) 875-8275 phone  
(805) 875-8375 fax

**Response to Comment Set COL2**

**COL2-1:** Figure 5.1-2 has been revised to reflect the fatality and injury zones associated with the existing sour gas pipeline and the LOGP.

APCD



Our Vision ☀ Clean Air

January 16, 2007

Nancy Minick, Project Manager  
 Energy Division  
 Planning and Development Department  
 123 East Anapamu Street  
 Santa Barbara, CA 93101

RECEIVED  
 COUNTY OF SANTA BARBARA  
 JAN 17 2007  
 PLANNING AND DEVELOPMENT  
 DEPARTMENT - ENERGY DIVISION

RE: PXP Tranquillon Ridge Project: Draft EIR

Dear Nancy:

Air Pollution Control District staff appreciates the opportunity to review and comment on the DEIR.

- APCD-1 1. **Page 5.8-5, Table 5.8.3.** The Table appears to state that, for the Federal standards, Santa Barbara County is Unclassified (U) for PM10 and in Attainment (A) for PM2.5. Please switch the order of the letters in the Table to clarify that PM10 is "A" and PM2.5 is "U".
- APCD-2 2. **Page 5.8-9, Section 5.8.1.5, 1<sup>st</sup> Paragraph.** The last sentence should state that, "subsequent modifications triggered offset requirements for ROC only under SBCAPCD rules", i.e., please delete *NOx* and *NAROC*.
- APCD-3 3. **Page 5.8-9, Section 5.8.1.5, last Paragraph.** The last sentence should be revised to state "Any new ROC emissions as a result..." so there is no contradiction with the above revision to the first paragraph of this section.
- APCD-4 4. **Page 5.8-12, 1<sup>st</sup> paragraph.** Please note in the FEIR that Santa Barbara County has been in attainment of the state CO standard for many years and ambient CO levels have declined significantly. Therefore, the APCD no longer requires analysis of traffic-related CO "hotspots" emissions at intersections.
- APCD-5 5. **Page 5.8-15, Criteria Pollutants.** This section addresses both CEQA significance thresholds and APCD requirements and triggers within the same paragraph. The terminology and definitions for each are different, thus the entire section is confusing and inaccurate. For clarity, we suggest that the DEIR break it up into two subsections; one for APCD requirements and one for CEQA thresholds and mitigation. The APCD section could reiterate the statement in Section 5.8.1.5, that ROC offsets will be required for any ROC emissions generated by this new project since the Point Pedernales project has triggered the APCD ROC offset

PXP Tranquillon Ridge Project DEIR  
 January 16, 2007  
 Page 2 of 2

APCD-5  
 Cont'd

threshold prior to this proposed project. With regard to NOx, for the proposed project, the APCD has determined that since the heater treaters are currently permitted at their maximum operational capacity, there are effectively no new NOx emissions from this project and thus no offsets are necessary. This needs to be stated. References to the FDP are confusing and should be deleted or clarified.

Thank you for the opportunity to comment. Please contact me at [bratzb@sbcapcd.org](mailto:bratzb@sbcapcd.org) or 961.8890 if you need additional information.

Sincerely,

Bobbie Bratz  
 Public Information Officer and Community Programs Supervisor

cc: Brian Shaftriz, APCD Santa Barbara County  
 Jim Menno, APCD Santa Barbara County  
 TEA Chron File  
 PXP Tranquillon Ridge Project File

\\sbcapcd.org\shares\groups\pca\wp\pca\cor\pxp\_tranquillon\_ridge\_deir.doc

**Response to Comment Set APCD**

- APCD-1:** Table 5.8.3 has been revised to clarify that Santa Barbara County is “unclassified” for the federal PM<sub>2.5</sub> standard.
- APCD-2:** The requested revision is included in Section 5.8.1.5.
- APCD-3:** The requested revision is included in Section 5.8.1.5.
- APCD-4:** Section 5.8.3.2 has been clarified to reflect that certain circumstances can trigger an analysis of traffic-related CO under the SBC P&D guidelines, although the SBCAPCD does not require it.
- APCD-5** Section 5.8.4.2 has been clarified to reflect how offset credits provide sufficient reductions to mitigate current plus project emissions.

CDPR

01/04/2007 13:48 8055851857

CHANNEL COAST DISTRICT

FILE 0011



State of California - The Resources Agency

Arnold Schwarzenegger, Governor

DEPARTMENT OF PARKS AND RECREATION

Ruth Coleman, Director

Channel Coast District  
911 San Pedro Street  
Ventura CA 93001  
(805) 585-1847

December 26, 2006

Kevin Drude, Energy Specialist  
County of Santa Barbara  
123 E. Anapamu Street  
Santa Barbara CA 93101

RE: EIR – Tranquillon Ridge Oil and Gas Development Project – SCH#20006021055

Dear Mr. Drude:

CDPR-1

The proposed Tranquillon Ridge Oil and Gas Development Project preferred alternative's potential Class 1 impacts to recreation, marine and biological resources in the case of an oil spill appear fairly significant to the near pristine coastal resources between Point Sal and Point Arguello. The 49 acre Point Sal State Beach has 1,463 meters of ocean frontage of which 1,000 meters is sandy beach and the remainder is rocky shoreline. Because of its outstanding scenic and natural character this park unit is included in the San Luis Obispo State Seashore (Public Resource Code 5001.6). In addition, the unit is eligible for registration as a National Natural Landmarks (NPS) and is within the Inventory of California Natural Area by the California Natural Area Coordinating Council.

The marine environment off Point Sal is considered outstanding from several standpoints, most significantly it contains both exposed and protected outer coast and contains examples of marine organisms from both Central and Southern California seascape provinces. Any potential impacts to these resources should be given serious review and evaluation.

CDPR-2

Further, adverse potential impacts to extremely popular Gaviota State Park and Refugio and El Capitan State Beaches are identified as likely given a "worst case scenario." These properties and the unique coastal resources they contain acquired by the State of California and stewarded by California State Parks are mentioned only in passing within the discussion and impact sections of the Recreation/ Land Use section of the Draft EIR. The resource values they contain and their existence as a prime destination location for 100's of thousands of visitors each year is not adequately addressed or evaluated. The Draft EIR is inadequate in this regard.

CDPR-3

In addition, possible impacts to the Burton Mesa Reserve - the habitat and the wildlife - and thus to surrounding properties, if clean-up would be required, also appear to be inadequately addressed. A major clean-up would have ramifications beyond the zone of impact.

While there is an understanding of the need, State Parks believes the Draft EIR falls short of fully addressing and mitigating the "increased impacts" of this project over current conditions.

Sincerely,

Richard A. Rojas  
District Superintendent, Channel Coast

**Response to Comment Set CDPR**

**CDPR-1:** The text of DEIR Section 5.14.1.1, Recreation/Land Use/Policy Consistency Analysis, Environmental Setting, has been revised to include the additional information regarding Point Sal State Beach that is referenced in Comment CDPR-1. It is noted that DEIR Section 5.14.4.1, Impact Analysis for the Proposed Project, Recreation, Impact Rec.1, states that Point Sal State Beach would be one of the recreational areas at greatest risk if there was a shoreline failure of the oil emulsion pipeline. This impact is identified as being *significant and unavoidable (Class I)* in the DEIR.

Regarding the marine environmental off Point Sal, the DEIR acknowledges and describes the diversity of marine resources in the project area. Impacts of an oil spill on those resources are described in detail, classified as Class I, significant and unavoidable, and mitigation measures are identified to help protect those resources.

**CDPR-2:** The text of DEIR Section 5.14.1.1, Recreation/Land Use/Policy Consistency Analysis, Environmental Setting for Recreation, has been revised to include additional information regarding El Capitan and Refugio State Beaches and Gaviota State Park. DEIR Section 5.14.4.1, Impact Analysis for the Proposed Project, Recreation, Impact Rec.1, concludes that these recreational areas would likely avoid direct spill impacts on the basis of the oil spill trajectory modeling provided in DEIR Appendix G. However, under a “worst case” oil spill scenario these recreational areas could be affected and related impacts would be considered potentially *significant and unavoidable (Class I)*. The text of DEIR Section 5.14.4.1, Impact Analysis for the Proposed Project, Recreation, Impact Rec.1, has been augmented to re-iterate this impact conclusion.

**CDPR-3:** The Burton Mesa Reserve was called out in the introductory second paragraph of the Terrestrial and Freshwater Biological Resources section of the DEIR and elsewhere, and its importance is recognized. Figures in Appendix A illustrate the location of Burton Mesa chaparral along the pipeline route. Burton Mesa chaparral in particular is recognized in the document as a sensitive habitat, and impacts to Burton Mesa chaparral and other sensitive habitats are considered significant under Impact TB.6, Spill Impacts to Vegetation and Wildlife. Mitigation Measures TB-10 through TB-14 require the inclusion of specific measures to protect, restore, and rehabilitate sensitive habitats and wildlife in the event of an oil spill. These measures would apply in the event of a spill affecting Burton Mesa chaparral and the Reserve. Reference to the Draft Land Management Plan for the Burton Mesa Ecological Reserve has been added to Section 5.2.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

**DEPARTMENT OF TRANSPORTATION**  
 50 HIGUERA STREET  
 SAN LUIS OBISPO, CA 93401-5415  
 PHONE (805) 549-3101  
 FAX (805) 549-3077  
 TDD (805) 549-3259  
<http://www.dot.ca.gov/dist05/>

**RECEIVED**  
**COUNTY OF SANTA BARBARA**  
**DEC 06 2006**  
 PLANNING AND DEVELOPMENT  
 DEPARTMENT - ENERGY DIVISION



*Flex your power!  
 Be energy efficient!*

December 5, 2006

SB-1/101/135 Var  
 SCH# 2006021055

Kevin Drude  
 Santa Barbara County  
 123 E. Anapamu Street  
 Santa Barbara, CA 93101

**COMMENTS TO: Draft EIR – Tranquillon Ridge Project**

Dear Mr. Drude:

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the above-referenced document and offers the following comments:

CDT-1

1. The Draft EIR does not provide specific visual, biological, or cultural resource impact information with regards to potential impacts within the State Highway Right of Way as requested in our comments on the projects Notice of Preparation. Prior to submitting an encroachment permit application, the applicant should provide visual, biological, and cultural resource impact information specific to the State Highway Right of Way and identify appropriate mitigation measures for those impacts.

CDT-2

2. Due to the preliminary nature of the information describing this project some items may not have been identified in this review. Significant mitigation measures while not identified at this point may be required as a condition of the encroachment permit for any work within the State Highway System. Detailed information such as complete engineering drawings, traffic studies, hydraulic calculations and environmental reports outlining impacts to environmental resources (biological, cultural, visual, etc.) within the state R/W may need to be identified, quantified and submitted for the Encroachment Permit review. These as well as other documents may need to be submitted and reviewed as part of the encroachment permit application before Caltrans can make a final determination as to the appropriateness of the mitigation measures within the State Highway System. The recommendations made in this review should be considered preliminary and subject to change based on more detailed review of the applicants final engineered construction level plans, final engineered traffic studies and actual field review of the proposed project site. In all cases, any deviation from Caltrans Design standards should not be considered to be a viable option until the applicant has been issued an approved exception to Design Standards.

**Draft EIR - Tranquillon Ridge Project – Drude**  
 December 5, 2006  
 Page 2

If you have any questions, or need further clarification on items discussed above, please don't hesitate to call Joseph Londono at (805) 549-3615

Sincerely,

Joseph Londono  
 District 5 Development Review Coordinator

*"Caltrans improves mobility across California"*

*"Caltrans improves mobility across California"*

**Response to Comment Set CDT**

- CDT-1:** For purposes of this EIR and in accordance with CEQA, the VAFB Onshore Alternative is conceptual at this time. However, if in the future a specific application is received, detailed visual, biological, and cultural resource impact information specific to the State Highway Right of Way will need to be provided, as required, to the Department of Transportation with any encroachment permit application.
- CDT-2:** For purposes of this EIR and in accordance with CEQA, the VAFB Onshore Alternative is conceptual at this time. However, if in the future a specific application is received, complete engineering drawings, traffic studies, hydraulic calculations, and environmental reports specific to the State Highway System will need to be provided, as required, to the Department of Transportation with any encroachment permit application. Please also see Response to Comment CDT-1.