

4.11 Land Use and Policy Consistency

4.11.1 Environmental Setting

The proposed Project site is located within the State-designated Cat Canyon Oil Field in northern Santa Barbara County, which includes over 26,440 acres of land and nearly 1,600 active and idle oil wells. The proposed Project is a subset of the Cat Canyon Oil Field (see Figure 2-2) and is approximately seven miles southeast of the City of Santa Maria. The unincorporated community of Sisquoc is located a mile north of the proposed Project (see Figure 2-3), and the unincorporated community of Orcutt is traversed by the western end of the proposed natural gas pipeline (see Figure 2-1). The unincorporated community of Garey is located an estimated 2.5 miles northwest of the proposed Project. As of 2010, the time of the most recent U.S. Census Bureau population survey, Santa Maria had a population of 99,553 persons and Sisquoc, Orcutt, and Garey had populations of 183, 28,905, and 68 persons, respectively (U.S. Census Bureau, 2015).

Land uses in and surrounding the proposed Project include oil and gas production, and agriculture (grazing and crops) (County of Santa Barbara, 2015a). Numerous residences are located within one mile of the Project site, and several are located just outside of the oil field boundaries (see Figure 2-3). The closest public school is the Benjamin Foxen Elementary School, which is located at 4949 Foxen Canyon Road in Sisquoc, approximately 1.5 miles northwest of the oil field boundary. Regional access to the proposed Project site is provided by Foxen Canyon Road, Dominion Road, Palmer Road and Cat Canyon Road, and facility access is currently provided via existing interior oil field roads, proposed for improvement. New entrances along Long Canyon Road are also proposed. Land uses along the natural gas pipeline include oil and gas, and agricultural along the eastern portion of the pipeline, and commercial and residential as the pipeline traverses the community of Orcutt to the west, including several schools and churches.

4.11.2 Regulatory Setting

4.11.2.1 Federal Regulations

Federal Clean Air Act. The federal Clean Air Act (CAA) is a federal law designed to control air pollution on a national level. It requires the federal Environmental Protection Agency (EPA) to develop and enforce regulations to protect the public from airborne contaminants known to be hazardous to human health. Under the CAA, the EPA has the authority to set limits on certain air pollutants, and limit emissions of air pollutants coming from certain sources. State and local air pollution agencies implement the CAA by developing solutions for local pollution problems, monitoring air quality, inspecting facilities under their jurisdictions, and enforcing CAA regulations.

Clean Water Act. The federal Clean Water Act (CWA) (Title 33 USC Section 1251 et seq.) places primary reliance for developing water quality standards on the states (e.g., water quality objectives). The CWA established the basic structure for regulating point and nonpoint discharges of pollutants into the waters of the United States and gives EPA the authority to implement pollution control programs, such as setting wastewater standards for industry. The CWA also authorizes EPA to delegate many permitting, administrative, and enforcement aspects of the law to state governments however, EPA still retains oversight responsibilities. In California, this responsibility has been delegated to the state, which administers the CWA through the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) (State Water Code, Section 13000 et seq.). Under the Porter-Cologne Act, the California State Water Board oversees nine Regional Water Boards that regulate the quality of waters within their regions.

Endangered Species Act. Pursuant to the federal Endangered Species Act (ESA), the United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service have authority over projects that may result in take of a species listed as threatened or endangered under the act. Take is defined under the ESA, in part, as killing, harming, or harassing. Under federal regulations, take is further defined to include habitat modification or degradation that results, or is reasonably expected to result, in death or injury to wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. If a likelihood exists that a project would result in take of a federally listed species, either an incidental take permit, under Section 10(a) of the ESA, or a federal interagency consultation, under Section 7 of the ESA, is required.

Migratory Bird Treaty Act. The federal Migratory Bird Treaty Act (MBTA) domestically implements a series of international treaties that provide for migratory bird protection. The MBTA authorizes the Secretary of the Interior to regulate the taking of migratory birds. The act further provides that it shall be unlawful, except as permitted by regulations, “to pursue, take, or kill any migratory bird, or any part, nest or egg of any such bird...” (Title 16, USC, Section 703). This prohibition includes both direct and indirect acts, although harassment and habitat modification are not included unless they result in direct loss of birds, nests, or eggs.

4.11.2.2 State Regulations

California Code of Regulations Title 14, Division 2. The Division of Oil, Gas and Geothermal Resources (DOGGR) is mandated by the California Laws for the Conservation of Petroleum and Gas (Public Resources Code (PRC) Division 3, starting with Chapter 1, Section 3000) and the California Code of Regulations (CCR) Title 14, Division 2, Chapters 2 through 4, to supervise the drilling, operation, maintenance and abandonment of oil, gas and geothermal wells in California. Title 14, Division 2, Chapter 4, Subchapters 1 through 3 and 5 provide DOGGR’s regulations for oil and gas wells. Compliance with these regulations is required for all new exploratory and development wells, on-going operation of existing wells, and well abandonment. Permits issued by DOGGR are required prior to the drilling and operation of oil and gas wells.

Section 660 of the California Streets and Highways Code. Section 660 of the California Streets and Highway Code (Section 660) requires that “any tower, pole, pole line, pipe, pipeline, fence, billboard, stand or building, or any structure, object of any kind or character not particularly mentioned in [this] section, or special event, which is in, under, or over any portion of the State highway rights of way” requires an encroachment permit issued by the California Department of Transportation (Caltrans) (Caltrans, 2015). The proposed natural gas pipeline would cross under Highway 101 along East Clark Avenue, and would require a permit from Caltrans and compliance with Section 660.

California Air Resources Board. The California Air Resources Board (CARB) has jurisdiction over all air pollutant sources in the states. CARB delegated its responsibility for stationary sources to local air districts however retained its authority over mobile emissions. CARB established the California Ambient Air Quality Standards (CAAQS) to define clean air criteria.

California Clean Air Act. The California Clean Air Act (CCAA) requires regions to develop and implement strategies to attain CAAQS. For some pollutants, the California standards are more stringent than the national standards. California also has separate standards for visibility reducing particles, sulfates, hydrogen sulfide (H₂S), and vinyl chloride. The Santa Barbara County Air Pollution Control District (SBCAPCD) is delegated the responsibility, through CARB, to develop the necessary regional air quality management plan for attaining and maintaining the ambient air quality standards. The California CAA also gives the SBCAPCD the authority to issue permits through its rules and regulations by requiring that new stationary

sources be subject to New Source Review (NSR). The NSR program ensures that the new stationary sources would not interfere with progress to attain the ambient air quality standards.

Air Toxics “Hot Spots” Information and Assessment Act of 1987 – AB 2588 (California Health & Safety Code, Division 26, Part 6). The Air Toxics “Hot Spots” Information and Assessment Act of 1987, known as the Hot Spots Act, requires an inventory of air toxics emissions from individual facilities, an assessment of health risk, and notification of potential significant health risk.

California Health & Safety Code Sections 25531– 25543, The Calderon Bill (SB 1889). These sections set forth changes in the following four areas: (1) provide guidelines to identify a more realistic health risk; (2) require high-risk facilities to submit an air toxic emission reduction plan; (3) hold air pollution control districts accountable for ensuring that the plans will achieve their objectives; and (4) require high-risk facilities to achieve their planned emission reductions.

Oak Woodlands Conservation (SB 1344). California Public Resources Code Section 21083.4 requires each county in California to consider a project’s impacts to oak woodlands during the CEQA environmental review process. If a county determines that there would be significant impacts to oak woodlands, it must require one or more specified mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands.

4.11.2.3 Local Regulations

County of Santa Barbara Comprehensive Plan. The County of Santa Barbara's (County’s) Comprehensive Plan consists of the following elements (County of Santa Barbara, 2015):

Circulation Element: Identifies the general location and extent of existing and proposed major roads, transit routes, terminals, and public utilities and facilities.

Conservation Element: Addresses the conservation, development, and use of natural resources including water, forests, soils, rivers, and mineral deposits. This element also includes a supplement that covers oak tree protection in the inland, rural areas of the County.

Land Use Element: Lays out the general patterns of development throughout the County, including the distribution of real estate, open space and agricultural land, mineral resources, recreational facilities, schools, and waste facilities. This element also includes an air quality supplement to ensure consistency between the County's land use and air quality plans. This is one of the broadest elements of the Comprehensive Plan, and includes the following four fundamental goals:

1. **Environment:** Environmental policies on development shall be respected. Economic and population growth shall proceed at a rate that can be sustained by available resources.
2. **Urbanization:** In order for the County to sustain a healthy economy in the urbanized areas and to allow for growth within its resources and within its ability to pay for necessary services, the County shall encourage infill, prevent scattered urban development, and encourage a balance between housing and jobs.
3. **Agriculture:** In the rural areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses.
4. **Open Lands:** Certain areas may be unsuited for agricultural uses due to poor or unstable soil conditions, steep slopes, flooding or lack of adequate water. These open lands have importance as grazing,

watershed, wildlife habitat, mineral resources, recreation, and scenic qualities. These lands are usually located so that they are not necessary or desirable for urban uses. There is no basis for the proposition that all land, no matter where situated or whatever the need, must be planned for urban purposes if they cannot be put to some other profitable economic use.

Noise Element: Identifies and appraises noise problems within the community and influences the distribution of land uses.

Open Space Element: Details plans and measures for preserving open space for natural resources, outdoor recreation, public health and safety, and agriculture.

Seismic Safety & Safety Element: Establishes policies to protect the community from natural and manmade hazards (e.g. seismic, geologic, flood, wildfire, and toxic materials hazards).

Safety Supplement: Amends the Seismic Safety & Safety Element and addresses facilities that handle acutely hazardous materials and are fixed in location to a single site; and gas pipelines which are considered to be fixed in location to a corridor.

Agricultural Element: Addresses the future use of agricultural lands and resources, and includes goals and policies applicable to projects that affect agricultural resources.

Energy Element: Contains long-range planning guidelines and strategies to encourage energy efficiency and alternative energy sources in Santa Barbara County.

Environmental Resource Management Element: Summarizes the various environmental factors analyzed in the Seismic Safety and Safety, Conservation, and Open Space Elements, and identifies policies which define whether development is appropriate given the severity of constraints.

Hazardous Waste Element: Includes goals, policies and siting criteria that must be evaluated for proposed hazardous waste facilities.

Scenic Highways Element: Presents the County's scenic highway goals, evaluation standards, preservation measures and procedures for obtaining official "Scenic Highway" designation for State and County roads.

County of Santa Barbara Orcutt Community Plan. The Orcutt Community Plan supplements the Santa Barbara County Comprehensive Plan for the unincorporated area of Orcutt, located south of the City of Santa Maria in northern Santa Barbara County. The Plan identifies growth projections and provides for orderly development to meet the full spectrum of housing, commercial and industrial space, roads, public facilities, and amenities for the community. The County Board of Supervisors first adopted the Orcutt Community Plan in 2001, with the plan being amended in both 2004 and 2012. The Orcutt Planning Area is located immediately south of the City of Santa Maria and contains approximately 14,650 acres within 10,300 assessor parcels. Consistent with State law, the planning area boundary contains both the unincorporated urban areas of the community of Orcutt and adjacent rural unincorporated areas. (County of Santa Barbara, 2005).

County of Santa Barbara Land Use and Development Code. The County's Land Use and Development Code (LUDC) constitutes a portion of Chapter 35 of the Santa Barbara County Code. The LUDC carries out the policies of the County's Comprehensive Plan by classifying and regulating the uses of land and structures within the County, consistent with these plans. The purpose of the LUDC is to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the County (LUDC Section 35.10.010 - Purpose of LUDC). (County of Santa Barbara, 2018b).

Oil development projects are permitted uses in the AG-I and AG-II zone districts (LUDC Section 35.21.030, Agricultural Zones Allowable Uses) subject to the requirements of the LUDC (Chapter 35 of the County Code) (County of Santa Barbara, 2018b).

County of Santa Barbara Petroleum Ordinance (County Code Chapter 25). The purpose of the County Petroleum Ordinance is, among other things, to protect the health, safety, public welfare, physical environment and natural resources of the County through regulation of onshore petroleum facilities and operations. The purpose of the Petroleum Ordinance is to protect the health, safety, public welfare, physical environment and natural resources of the county by the reasonable regulation of onshore petroleum facilities and operations, including but not limited to: exploration; production; storage; processing; transportation; disposal; plugging and abandonment of wells; and of operations and equipment accessory and incidental thereto. In addition to ensuring that the operation complies with adopted codes, regulations and standards, including but not limited to: the California Building Code; Electric Code and Fire Code; the American Society of Mechanical Engineers (ASME) Pressure Boiler and Pressure Vessel Code; the National Board Inspection Code; the American Petroleum Institute (API) standards; and other applicable California codes, statutes and regulations (County of Santa Barbara, 2018a).

Petroleum pipelines and associated onshore equipment are subject to the requirements of the Petroleum Ordinance.

Santa Barbara County Association of Governments (SBCAG) 2016 Congestion Management Program. The Congestion Management Plan (CMP) sets LOS D or better as the standard for roadways and intersections included within the CMP system. At the project level, if a proposed development is located adjacent to or near one of the CMP designated highways and arterials, then the proposed development must also meet the CMP specified thresholds of significance. U.S. 101 through the Project area is the nearest study area roadway included as part of the CMP (SBCAG, 2016).

SBCAG 2040 Regional Transportation Plan. The 2040 Regional Transportation Plan (RTP) is a long-range planning document that defines how the region plans to invest in the transportation system over 20-plus years based on regional goals, multi-modal transportation needs for people and goods, and estimates of available funding. The RTP includes a Sustainable Communities Strategy as required by SB 375. Chapter 4.0 (Policy Element) of the RTP provides policies related to implementing the RTP. However, a thorough review of the policies reveals they only apply to transportation planning and transportation projects within Santa Barbara County. While the proposed Project would utilize roadways with the County, the Project itself does not include the planning, construction, and operation of transportation facilities. Therefore, no policies from the RTP are included within the policy analysis provided in Table 4.11-1. (SBCAG, 2017).

4.11.3 Significance Criteria

The County Environmental Thresholds and Guidelines Manual (County, 2008) does not contain specific thresholds for land use. Generally, a significant impact can occur if a proposed project is potentially inconsistent with policies and standards adopted by a local agency for the purposes of environmental protection or would result in substantial growth inducing effects. Appendix G of the CEQA Statute and Guidelines provides the following thresholds for determining the potential environmental impact of a proposed project regarding land use; would the proposed Project:

- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- Conflict with any applicable habitat conservation plan or natural community conservation plan?

The proposed Project is located the Agricultural II (AG-II-100) and Agricultural Commercial (AC) zone districts, which allow for oil and gas production with approval of an Oil Drilling & Production Plan. The Project would not divide an established community. The proposed Project's potential consistency with applicable land use plans and policies is discussed in Table 4.11-1 below. Inconsistency with a plan or policy that does not have a physical impact on the environment may not be considered an impact under CEQA. CEQA issue areas with the potential for an impact on the environment are discussed in the respective issue area sections in this document.

4.11.4 Preliminary Policy Consistency Analysis

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Santa Barbara County Land Use Development Code			
Land Use & Development Code	Section 35.21.030: Agricultural Zones Allowable Land Uses	Table 2-1 (Allowed Land Uses and Permit Requirements for Agricultural Zones).	Potentially Consistent. Oil and gas uses are allowable on lands zoned Agricultural Commercial (AC) and Agricultural II (AG-II) in the inland area of the County with issuance of the appropriate permit(s). All parcels associated with the proposed Project East Cat Canyon Oil Field are zoned AC and AG-II. The power line and natural gas pipeline are also allowed uses within agricultural zones (AC and AG-II) and public right-of-way.
Land Use & Development Code	Section 35.52.080: Oil and Gas Pipelines, Inland Areas; Development Standards	e. Location of pipeline corridor. A pipeline corridor shall be sited so as to avoid significant impacts to resources (e.g., aquatic habitats, and archaeological areas) to the maximum extent feasible.	Potentially Consistent. Project design, including oil field collection and distribution pipelines minimizes impacts to aquatic features and other significant resources and maximizes use of previously disturbed and developed areas. The proposed SoCalGas natural gas pipeline would be placed within existing roadway beds and shoulders. Horizontal directional drilling (HDD) of Cat Canyon Creek, as well as various culverts crossings, would be conducted as part the proposed pipeline construction. HDD depths would be engineered to reduce the likelihood of drilling fluid release through surface fractures and to accommodate the 8" diameter of the pipeline. The HDD would be conducted in accordance with the County and CDFW approved HDD Fluid Management Plan as required by MM BIO-17.
Land Use & Development Code	Section 35.52.080: Oil and Gas Pipelines, Inland Areas; Development Standards	f. Spills. Where pipeline segments carrying hydrocarbon liquids pass through sensitive resource areas (e.g., aquatic habitats) as identified by the project environmental review, provisions identified in the environmental review shall be applied to minimize the amount of liquids released in the sensitive areas in the event of a spill. The potential for damage in those areas shall be minimized by considering spill volumes, duration, and trajectories in the selection of a pipeline corridor. In addition, appropriate measures for spill containment and cleanup (e.g., catch basins to contain a spill) shall be included as part of the required emergency response.	Potentially Consistent. Mitigation Measure BIO-1 (Emergency Response Action Plan) requires a Plan to mitigate impacts to biological resources in the event of an oil or other hazardous materials spill (including any seeps or surface expressions).

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Santa Barbara County Comprehensive Plan			
Agricultural Resources Element	Goal I	<p>Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara Country. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.</p> <p>Policy I.F. The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.</p>	<p>Potentially Consistent. Oil and gas production is an allowable use on lands designated AC and AG-II, as well as the proposed power line and natural gas pipeline. Limited grazing occurs on the proposed Project site and surrounding parcels that would continue during Project activities. Implementation of dust abatement and erosion control measures, including Stormwater Pollution and Prevention Plan (SWPPP) and Best Management Practices, would protect water, air, and soil resources. The proposed natural gas pipeline would be located within existing roadways and roadway shoulders, outside of active agricultural lands.</p>
Agricultural Resources Element	Goal III	<p>Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.</p> <p>Policy I.D: The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.</p> <p>Policy II.D: Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.</p>	<p>Potentially Consistent. Oil and gas production, as well as the power line, are allowable uses on lands designated AC and AG-II, and agricultural use of proposed Project lands is limited to grazing. The proposed natural gas pipeline would be located within existing roadways and roadway shoulders, outside of active agricultural lands.</p> <p>The existing parcels under a Williamson Act contract (Agricultural Preserve Contract No. 77AP019) are proposed to be reconfigured with a net increase of approximately 10-acres (517 total acres) under contract.</p> <p>In addition, many of the proposed Project facilities would be located in areas historically disturbed and used for oil development purposes and would not result in the conversion of any grazing area to a non-agricultural use. Implementation of the proposed Project would result in activities similar to previous oil field operations and would not conflict with ongoing agricultural activities on or near the proposed Project site. The proposed Project would not impact or remove land from active cultivation and would not convert highly productive agricultural lands to other uses. Existing and adjacent cattle operations could continue unimpeded by the proposed Project.</p>

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Conservation Element – Oak Tree Protection in the Inland Rural Areas of Santa Barbara County	Development Standard 1 and Oak Tree Protection Policy 1	<p>All development shall avoid removal of or damage to mature oak trees, to the maximum extent feasible. Mature oak trees are considered to be live oak trees six inches or greater diameter at breast height and blue oak trees four inches or greater diameter at breast height, or live and blue oaks six feet or greater in height. Native oak trees that cannot be avoided shall be replanted on site. When replanting oak trees on site is not feasible, replanting shall occur on receiver sites known to be capable of supporting the particular oak tree species, and in areas contiguous with existing woodlands or savannas where the removed species occurs. Replanting shall conform to the county’s Standard Conditions and Mitigation Measures.</p> <p>Native oak trees, native oak woodlands and native oak savannas shall be protected to the maximum extent feasible in the County’s rural and/or agricultural lands. Regeneration of oak trees shall be encouraged. Because of the limited range and increasing scarcity of valley oak trees, valley oak woodlands and valley oak savanna, special priority shall be given to their protection and regeneration.</p>	<p>Potentially Inconsistent. The proposed Project would require removal of approximately 1,500 oak trees with a diameter at breast height (dbh) of six (6) inches or larger. Additional coast live oak trees would need to be pruned back to allow equipment access to roads and well pads. MM BIO-16a requires an Oak Tree Protection Plan to guide activities (including trenching) near oak trees. Any tree damaged to the extent that it will not survive would be replaced according to the requirements of the separate Oak Tree Replacement Plan (MM BIO-16b). Measures BIO-16a through BIO-16d include implementation of the Oak Tree Protection Plan and Oak Tree Replacement Plan as well as monitoring by a qualified arborist/ biologist, and avoidance measures to prevent introduction or spread of Sudden Oak Death. The proposed Project includes conservation lands for habitat restoration, including oak woodlands. Implementation of these measures would reduce impacts to oak trees; however, even with implementation of available feasible mitigation identified here, there would be a significant degradation and loss of oak trees and oak woodland habitat with the removal of 1,500 oak trees totaling 29.2 acres of oak woodland. In addition, there would be a significant net temporal loss and permanent change in the extent and functional value of oak woodland communities. No valley oaks would be affected by the proposed Project.</p>
Energy Element	Policy 4.3	Reuse of Asphalt - Promote reuse of asphalt removed from roads and paved structures within the county and use of recycled materials in roadway and paved surface construction.	<p>Potentially Consistent. The proposed Project does not involve asphalt removal. All roadway or other surface paving would be conducted in accordance with this Policy, requiring the use of recycled materials.</p>
Hazardous Waste Element	Goal 7-1 Policy 7-1	<p>To ensure the safe transport of hazardous wastes from the source of generation to the point of ultimate disposal.</p> <p>The County and cities should promote the strong enforcement of existing laws regarding vehicle safety, inspections, and the hazardous waste manifest system for full protection of public health and the environment.</p> <p><i>Note: The Hazardous Waste Element states that “... for some issue areas such as transportation, there is no clear delineation between wastes and materials.” (HW Element, Chapter 7, p. 116.)</i></p>	<p>Potentially Consistent. As addressed in EIR Section 4.10 (Transportation and Traffic), the proposed Project would import light crude oil (LCO) for blending with produced crude. As proposed, at peak production, 21 one-way LCO truck trips would be required, as well as 74 one-way empty truck trips. The 95 trucks (21 + 74) would return with blended crude. All truck trips would be from/to Aera’s Belridge facility in Kern County (140.4 miles one-way). The proposed Project trucks would use existing routes.</p> <p>All vehicles transporting crude oil and hazardous wastes would be operated in accordance with the rules and regulations of the California Vehicle Code, as well as Mitigation Measure (MM) TR-1, prepare and implement Vehicle Safety Plan. In addition, the Truck Hazard Mitigation Plan required by MM RISK-4, would be prepared and implemented. Finally, tanker trucks would need to comply with Title 13 of the California Code of Regulations (Hazardous Materials Transportation).</p>

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Hazardous Waste Element	Policy 8-1	Any land use permit for a hazardous waste generator or a hazardous waste facility shall require submittal of an emergency response plan prior to operations, if such a plan is required under Chapter 6.95 (section 25500 et seq.) of the California Health and Safety Code.	Potentially Consistent. The proposed Project would entail reactivation of oil production at the East Cat Canyon Oil Field. All plans required by regulatory and mitigation requirements for proposed activities would be prepared and implemented, including its Production Plan; Emergency Response Plan (ERP); Spill Prevention, Control, and Countermeasure Plan (SPCC); and Oil Spill Contingency Plan (OSCP). These plans include preventive measures for operations and emergency response, as well as incorporate assumptions used in the proposed Project Quantitative Risk Assessments (QRAs), and are reviewed and approved by appropriate County departments.
Hazardous Waste Element	Goal 13-1	To protect the public health and safety and the environment by ensuring that all hazardous waste generators and facilities are operating safely and are in compliance with all appropriate local, state, and federal laws.	Potentially Consistent. County requirements include preparation and implementation of project specific Production Plan, ERP, SPCC Plan, and OSCP. In addition, the proposed Project would be required to comply with all applicable federal, State and County regulations for the storage, use and disposal for hazardous materials and waste, as outlined in EIR Section 4.7.2 (Regulatory Setting for Hazardous Materials/Risk of Upset).
Land Use Element	Land Use Development Policy 4	Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan. <i>(The remainder of this policy does not apply to the proposed Project.)</i>	Potentially Consistent. The proposed Project would be serviced by existing public roadways and no expansion of them would be required. Existing roadways within the proposed Project site would be expanded and paved to meet Project and fire abatement needs. Three water wells would be drilled and a septic system installed in accordance with County Environmental Health Services (EHS) requirements. As addressed in EIR Section 4.10 (Transportation and Traffic), temporary vehicle trips during construction, and permanent vehicle trips during project operation would not decrease existing roadway or intersection Levels of Service (LOS) or exceed County thresholds for roadway and intersection volume-to-capacity ratios; however, project-related heavy truck trips could impose safety hazards for which MM TR-1, prepare and implement Vehicle Safety Plan, would be required. Given its location within public roadways, a Construction Traffic Control Plan would be required for the natural gas pipeline in accordance with MM TR-4. All water used for steam generation would be obtained from the brine water produced by field operations on the Project property; no fresh water from any source is proposed for steam generation. Fresh groundwater consumption throughout the duration of the Project (construction plus operations) would range between 16 and 21 acre-feet per year for utility purposes, including fire protection, shower, dust control, well drilling and others, plus an additional 4 acre-feet per year for oak tree replacement watering during the first few years of the Project.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Land Use Element	Land Use Development Policy 10	<p>Impacts of oil, gas, and produced-water pipelines outside of industry facilities shall be minimized by requiring the use of available or planned common carrier and multiple-user pipelines to the maximum extent feasible. New pipeline construction shall be permitted only if the Planning Commission determines that the use of available or planned common carrier and multiple-user pipelines is not feasible or is not environmentally preferable to alternative proposals. New pipelines that are permitted shall be constructed, operated and maintained as common carrier or multiple-user pipelines unless the Planning Commission determines it is not feasible. New multiple-user pipelines shall provide equitable access to all shippers with physically compatible stock on a nondiscriminatory basis.</p> <p>New pipelines shall be restricted to approved corridors that have undergone comprehensive environmental review unless the Planning Commission determines that such corridors are not available, safe, technically feasible, or the environmentally preferred route for the proposed pipeline. The required environmental review for proposed pipelines shall include analysis to determine what cumulative impacts might result in adding future pipelines to that corridor.</p> <p>The design of new common carrier and multiple-user pipelines shall take into account the reasonable, foreseeable needs of other potential shippers. If other pipeline projects are expected to be located in the same corridor, the proposed project shall be required to coordinate concurrent or “shadow” construction with the other projects where practical.</p> <p>Permits for new pipeline construction shall require engineering of pipe placement and burial within the corridor to minimize incremental widening of the consolidated corridor during subsequent pipeline projects, unless the proposed route is determined to be unacceptable for additional pipelines.</p>	<p>Potentially Consistent. The proposed Project does not include construction of a produced oil pipeline outside of the proposed facility. During both phases of operation, light crude would be imported by tanker truck from Aera’s Belridge Producing Complex and blended with the produced oil. The resulting blend would be exported back to Belridge by tanker truck.</p>

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Land Use Element	Hillside and Watershed Protection Policy 1	Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.	Potentially Inconsistent. 305 acres of disturbance is required for the proposed Project oil field development, include grading for the central processing facility, the steam generation site, the production group station, well pads, roads and entrances, pipe corridors, building sites (including parking areas), laydown areas, storm water detention basins, site entrances, and a new beneficial reuse site. The proposed Project would maximize the use of existing roads, well pads, cleared areas, and contours wherever possible (64 acres previously disturbed or 21% of the 305 acres). Proposed cut and fill volumes are approximately 6.6 million cubic yards total. The natural gas pipeline traverses primarily existing public roadways and shoulders and grading is not required. Minimal disturbance is required for the power line tower foundations (0.01 and 2.1 acres permanent and temporary disturbance, respectively).
Land Use Element	Hillside and Watershed Protection Policy 2	All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.	Potentially Consistent. See Hillside and Watershed Protection Policy 1 above. No proposed Project features would be located within designated waterways, other than an "Arizona" swale crossing over a shallow drainage area for an entrance off of Long Canyon Road. For the new entrance off of Cat Canyon Road, over Cat Canyon Creek, construction would be conducted in accordance with MM BIO-3 which requires a minimum setback of 100 feet from riparian woodland habitat shall be put in place during all grading, unless otherwise authorized via the CDFW Streambed Alteration Agreement and Clean Water Act Section 401 and 404 permits. The natural gas pipeline would be installed under Cat Canyon Creek and other culverts using HDD, located at depths of less than 10 feet to over 30 feet below the ground surface or creek bed. Biological resource mitigation requires the avoidance of sensitive habitats to the extent feasible. Erosion control measures, including implementation of SWPPP and Best Management Practices, would minimize offsite soil transport. Required County engineering practices would ensure proper design and construction of project features to withstand geologic, hydrologic, and soil constraints.
Land Use Element	Hillside and Watershed Protection Policy 3	For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.	Potentially Consistent. See Hillside and Watershed Protection Policy 1 above. Erosion control measures, including implementation of SWPPP and Best Management Practices, would minimize soil exposure, construction during the rainy season, and transport of soils offsite.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Land Use Element	Hillside and Watershed Protection Policy 4	Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters.	Potentially Consistent. Erosion control measures, including implementation of SWPPP and Best Management Practices, would minimize offsite soil transport through the use of appropriate sediment capture devices.
Land Use Element	Hillside and Watershed Protection Policy 5	Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.	Potentially Consistent. Erosion control measures, including implementation of SWPPP and Best Management Practices, would minimize offsite soil transport through the use of sediment capture devices, mulching, and use of soil stabilizers, including seeding. MM BIO-7 requires that a Habitat Restoration Plan be prepared and implemented to ensure that habitats temporarily disturbed during construction are restored to the pre-project character and functional value and that permanent impacts are compensated at a 3:1 ratio.
Land Use Element	Hillside and Watershed Protection Policy 6	Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.	Potentially Consistent. See Hillside and Watershed Protection Policy 1 above. The entirety of the proposed Project would be located within the existing East Cat Canyon Oil Field. Development of new well pads and associated roadways, and equipment areas, would tie into drainage systems to be reviewed and approved by County Public Works.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Land Use Element	Hillside and Watershed Protection Policy 7	Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.	<p>Potentially Consistent. Drilling and operation of the proposed 296 new wells would be conducted in accordance with DOGGR requirements for sealing within fresh groundwater aquifers extending below the base of fresh groundwater. In addition, pursuant to CCR Title 14, Division 2, Chapter 4, Section 1722 (k), the proposed wells would be in compliance with the DOGGR Field Rules for East Cat Canyon Oil Field (all Sisquoc zones including the Brooks reservoir), which supplement the more broadly applicable statutory and regulatory requirements in fields where sufficient geologic and engineering data is available from previous drilling operations. The Field Rules identify downhole conditions and well construction information that oil and gas operators should consider during drilling and completion.</p> <p>In addition, the proposed Project site subsurface soil conditions between the deeper oil producing zones and shallower groundwater have the characteristics (confining shale, mudstone, siltstone, and/or sandstone) to minimize or possibly prohibit upward migration. Well casings, tubing, and cement seals shall be pressure tested at 125% of the maximum surface pressure prior to injection in accordance with DOGGR requirements. Pressure monitoring of the well annulus, tubing and casing during injection shall also comply with DOGGR requirements. Failure to achieve and maintain the required pressure thresholds will require corrective action before injection or the immediate shut-in of the well during injection, as well as notification of DOGGR and the RWQCB. Disposal wells that would be used for disposal of remaining produced water (not to be used for steam injection) and brine resulting from water filtration are also regulated by DOGGR through its UIC program.</p>

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Land Use Element	Streams and Creeks Policy 1	All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.	<p>Potentially Consistent. The proposed Project includes two road crossings at Long Canyon Creek, including one “Arizona” swale crossing over a shallow drainage, and one at Cat Canyon Creek. To mitigate for impacts to jurisdictional waters, the Applicant proposes a Conceptual Wetland Restoration Plan (see Appendix F-6). As part of the Conceptual Wetland Restoration Plan, the Applicant proposes restoration of Cat Canyon Creek between the existing crossing and the proposed new crossing. In addition, MM BIO-3 requires BMPs to minimize impacts to riparian and wetland areas during construction and routine operations including setbacks for refueling and equipment maintenance, contaminated water and debris containment, and a minimum setback of 100 feet from riparian habitats for all grading, unless otherwise authorized via the CDFW Streambed Alteration Agreement and Clean Water Act Section 401 and 404 permits. . If an accidental release of produced oil or water enters a stream corridor during construction or operations, cleanup would be conducted in accordance with the Emergency Response Action Plan (MM BIO-1) which would include measures to minimize soil and vegetation disturbance.</p> <p>An HDD of Cat Canyon Creek, as well as various culverts crossings, would be conducted as part the proposed SoCalGas natural gas pipeline. HDD depths would be engineered to reduce the likelihood of drilling fluid release through existing surface fractures and to accommodate the 8” diameter of the pipeline. The HDD would be conducted in accordance with County requirements and CDFW approved HDD Fluid Management Plan as required by MM BIO-17.</p>

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Land Use Element	Flood Hazard Area Policy 1	All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting improvements in accordance with federal regulations are provided. If the proposed development falls within the floodway fringe, development may be permitted, provided creek setback requirements are met and finished floor elevations are two feet above the projected 100-year flood elevation, and the other requirements regarding materials and utilities as specified in the Flood Plain Management Ordinance are in compliance.	<p>Potentially Consistent. Some well pads and their associated infrastructure may be located in flood hazard areas or areas of local flooding, but the wells and other equipment proposed for these pads would not generally be subject to severe damage if flooded. Local flood diversions are possible, but these would be minor due to the small size of the obstructions created by the well and ancillary equipment, to be located entirely within the East Cat Canyon Oil Field. The proposed SoCalGas natural gas pipeline would cross Cat Canyon Creek and several culverts which are subject to scour. Due to their limited footprints and pacing, the power line towers would also not be subject to severe damage if flooded.</p> <p>As required by Mitigation Measure (MM) SGW-2, a Flood Protection Plan shall be prepared and approved by P&D, in consultation with Flood Control, prior to issuance of Zoning Clearance. Per MM SGW-2, wells, equipment, materials, and wastes shall be protected from flooding and flood-related erosion during drilling and operation through the use of measures appropriate for the site and anticipated flood conditions and risk as determined by a registered civil engineer with expertise in flood protection and analysis. Protection shall apply to project components located within known designated flood hazard areas, as well as to project components adjacent to defined watercourses outside of mapped flood hazard areas.</p>
Land Use Element	Flood Hazard Area Policy 2	Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control works, i.e., dams, stream channelizations, etc.	<p>Potentially Consistent. Well equipment and other features associated with the proposed Project would not cause or contribute to flooding hazards due to their limited, separated footprints within the East Cat Canyon Oil Field, likewise for the adjacent power line. The proposed SoCalGas natural gas pipeline would be placed underneath existing roadbeds and shoulders and would not contribute to local runoff patterns once construction is completed.</p>
Land Use Element	Flood Hazard Area Policy 3	All development shall be reviewed in accordance with the requirements of County Code Chapter 15A–Floodplain Management and 15B–Development Along Watercourses.	<p>Potentially Consistent. In a letter dated August 21, 2015, the County Public Works Department, Flood Control and Water Agency recommended approval of the proposed Project subject to stated conditions and regulation. All improvement plans, grading plans, drainage plans/studies, landscape plans and a final map will be submitted to the County for review and approval.</p>
Land Use Element	Parks/Recreation Policy 4	Opportunities for hiking and equestrian trails should be preserved, improved, and expanded whenever compatible with surrounding uses.	<p>Potentially Consistent. The proposed Project would have no effect on local or regional hiking and equestrian trails. No public trails are located within the Project area and, except for a public road (Long Canyon Road) that traverses the oil field, the Project area is not open to the public.</p>

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Land Use Element	Visual Resource Policy 2	In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.	Potentially Consistent. The proposed Project is located within the East Cat Canyon Oil Field characterized by vegetated rolling hills with some limited scattered oil development equipment (existing ERG facilities). Well drilling and workover rigs would be used to develop the new wells and for periodic maintenance, respectively. When in use at some well sites, the rigs would be temporarily (6-9 days) visible to limited numbers of offsite viewers, including residents near the oil field boundary and along surrounding roadways (see Figure 2-3). As described above, the proposed facilities would be similar to surrounding oil development and compatible with the historical use of the area as an oil field.
Land Use Element	Historical and Archaeological Sites Policy 2	When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.	Potentially Consistent. Historical resources noted within the Project area have been avoided by redesign. However, there is a potential for discovering buried resources in Holocene soils which are located primarily in drainage bottoms and river valleys. MMs CULT-1 thru CULT-6 would minimize impacts to potential archaeological resources. This mitigation includes cultural and tribal monitoring, authority to halt worker crews during ground disturbance in Holocene sediments, and development of plans in the event of an inadvertent discovery of historical resources, unique archaeological resources, tribal cultural resources or human remains. With implementation of these mitigation measures, impacts to cultural resources would be less than significant (Class II).
Land Use Element	Historical and Archaeological Sites Policy 3	When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.	Potentially Consistent. See Historical and Archaeological Sites Policy 2 above.
Land Use Element	Historical and Archaeological Sites Policy 4	Off-road vehicle use, unauthorized collection of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.	Potentially Consistent. See Historical and Archaeological Sites Policy 2 above. The majority of proposed Project development would occur within previously developed areas, including roadways. Required monitoring and stoppage of construction in the event artifacts are found (MMs CULT-1 and CULT-6) would ensure proper treatment of unanticipated discovered artifacts.
Land Use Element	Historical and Archaeological Sites Policy 5	Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.	Potentially Consistent. See Historical and Archaeological Sites Policy 2 above. In accordance with AB 52, County P&D reached out to applicable tribes and individuals. MM CULT-5 requires notification of local tribal representatives in the event unanticipated tribal resources are encountered.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Noise Element	Noise Policy 1	In the planning of land use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.	Potentially Consistent. Proposed Project activities would not exceed the 65 dBA CNEL exterior threshold, nor the CEQA thresholds for daytime (5 dBA) and nighttime (3 dBA) increases over ambient conditions at the nearest residential receptors with the implementation of Applicant Minimization Measures (AMMs) to abate noise generated during construction activities, including the use of temporary acoustical barriers at Well Pads 1, 50, 56, and 17A (AMMs NOISE-1 thru NOISE-4), as well as avoiding concurrent grading operations at Well Pad 16A and drilling operations at Well Pad 17A (AMM NOISE-6). An additional AMM (AMM NOISE-5) proposes drilling noise modeling at the remaining well pads prior to the commencement of drilling to determine if noise abatement measures are required. Further, MMs NOISE-1 and NOISE-2 require the preparation and implementation of a Construction Noise Control Plan and Maintenance Noise Control Plan, respectively. Noise due to the construction of the natural gas pipeline and power line would be temporary in nature and MM NOISE-1 would apply; there would be negligible noise associated with pipeline or power line operations.
Noise Element	Noise Policy 5	Noise-sensitive uses proposed in areas where the Day-Night Average Sound Level is 65 dB or more should be designed so that interior noise levels attributable to exterior sources do not exceed 45 dB LDN when doors and windows are closed. An analysis of the noise insulation effectiveness of proposed construction should be required, showing that the building design and construction specifications are adequate to meet the prescribed interior noise standard.	Potentially Consistent. See Noise Policy 1.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Safety Element Supplement	Policy Hazardous Facility Safety 1-A	Risk Estimates: The County shall employ accurate estimates of risk associated with hazardous facilities to inform discretionary land-use decisions where substantial, preliminary evidence indicates involuntary public exposure to significant risk may result from the land-use decision.	Potentially Consistent. Quantitative Risk Assessments (QRAs) were prepared for the proposed Project oil field, natural gas pipeline, and crude oil transport operations in accordance with the County’s environmental thresholds which require a quantitative risk analysis to determine the total societal risk attributable to the full set of possible accidents that can occur from the operation of a hazardous facility or undertaking of an activity that involves handling of hazardous materials. The QRAs evaluated the probability of a range of potential accidents and identified how the surrounding community could be affected by each potential accident. The quantified risk of the proposed facilities to the public is presented in terms of the likelihood of one or more injury or fatality in the event the accident occurs. The range of potential accidents included: pool fire, jet fire, vapor cloud explosion, vapor cloud fire, and toxic vapor cloud (H ₂ S) for oil field, natural gas pipeline, and crude oil transport operations. All potential accidents were concluded to be less than significant (Class III) with the exception of risks to public safety by exposing the public to hazards from truck transport of LCO and blended crude oil product. With implementation of MM RISK-4, preparation and implementation Truck Hazard Mitigation Plan that addresses the various aspects of truck operation safety, this impact is less than significant (Class II).
Safety Element Supplement	Policy Hazardous Facility Safety 2-A	<p>Unacceptable Risk Involving New Development: Proposed new development that meets either of the following two criteria shall represent an unacceptably high level of risk and constitute a prima facie standard for denial of the proposed development.</p> <p>(1) All proposed development that registers mitigated risk in the red zone of the County’s risk thresholds unless the proposed development is determined to be urban dependent as defined in this supplement, it avoids exposure of highly sensitive land uses to significant risk, and no other feasible location is available.</p> <p>(2) All new development that registers mitigated risk in the amber zone of the County’s risk thresholds if exposure of a highly sensitive land use would occur as result of project approval.</p>	Potentially Consistent. See Policy Hazardous Facility Safety 1-A above. No potential accidents fall within the red zone of the County’s risk thresholds. The risks to public safety by exposing the public to hazards from truck transport of LCO and blended crude product as identified in the Safety 1-A discussion above would not affect highly sensitive land uses (schools, churches, hospitals, etc.). The QRA for the natural gas pipeline did include an assessment of the safety hazard to schools, following California Department of Education (CDE) protocols, to assess the acceptability of the risk and concluded that risk levels are in the CDE acceptable criteria category (Class III).

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Safety Element Supplement	Policy Hazardous Facility Safety 3-A: Siting	New hazardous facilities shall be sited to prevent unacceptable risk to offsite population as defined in this chapter. New hazardous facilities should also be sited to avoid significant offsite risk to populated areas, as defined in this chapter. Siting considerations undertaken to optimize public safety shall also examine routes used for transporting acutely hazardous materials to or from a new hazardous facility.	Potentially Consistent. See Policy Hazardous Facility Safety 1-A and 2-A above. As required by regulatory requirements and MM RISK-3, a Spill Prevention, Control and Countermeasures (SPCC) Plan would be prepared and implemented for Project operations. In addition, the Project would be required to comply with all applicable federal, State and County regulations for the storage, use, and disposal of hazardous materials and waste, as outlined in EIR Section 4.7.2 (Regulatory Setting for Hazardous Materials/Risk of Upset). In addition, tanker trucks would need to comply with Title 13 of the California Code of Regulations (Hazardous Materials Transportation), as well as MM RISK-4, preparation and implementation Truck Hazard Mitigation Plan.
Safety Element Supplement	Policy Hazardous Facility Safety 3-C: Mitigation	New hazardous facilities shall employ primary and secondary preventative measures to eliminate or reduce significant risk to offsite population.	
Safety Element Supplement	Policy Gas Pipeline Safety 1-B: Risk Estimates	To the extent practical, the County shall maintain accurate estimates of societal risk associated with gas pipelines to inform land-use decision-making of potential risk where substantial evidence indicates public exposure to significant risk may result.	Potentially Consistent. The QRA prepared for the proposed natural gas pipeline concludes that potential impacts associated with pipeline operations would be less than significant (Class III). The QRA for the natural gas pipeline also included an assessment of the safety hazard to schools, following California Department of Education (CDE) protocols, to assess the acceptability of the risk and concluded that risk levels are in the CDE acceptable criteria category (Class III). Further, the natural gas pipeline will be designed, constructed, operated, and maintained in accordance with all applicable regulatory requirements.
Safety Element Supplement	Policy Gas Pipeline Safety 2-B: Unacceptable Risk Involving Modifications to Existing Development.	Proposed modifications to existing development that require a discretionary land-use permit and meet any of the following three criteria shall represent an unacceptably high level of risk and constitute a prima facie standard for denial. 1) Modifications that increase risk and the resulting mitigated risk registers in the red zone of the County's risk thresholds, unless the proposed modification is required to comply with law, the modification does not increase significant risk to highly sensitive land uses, and no other feasible alternatives are achievable. 2) Modifications that increase risk and the resulting mitigated risk registers in the red zone of the County's risk thresholds, unless the proposed modification is made to an urban dependent land use and highly sensitive land uses are not exposed to significant risk as a result of the modification. 3) Modifications that increase risk and the resulting, mitigated risk registers in the amber zone of the County's risk thresholds if exposure of a highly sensitive land use would occur as result of project approval.	Potentially Consistent. See Policy Gas Pipeline Safety 1-B above.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Safety Element Supplement	Policy Gas Pipeline Safety 3-A: Routing.	New pipelines, or existing pipeline relocations, shall be routed to avoid significant risk to populated areas where feasible. New pipelines, or existing pipeline relocations, shall also be routed to prevent significant risk to highly sensitive land uses as defined in this chapter, unless the risk can be rendered insignificant via other measures.	Potentially Consistent. The new 8-inch natural gas pipeline would generally follow existing public roadways and their shoulders, cross under U.S. 101, and traverse the community of Orcutt. The QRA for the natural gas pipeline concluded impacts associated with construction and operation of the pipeline would be less than significant (green zone of the County's risk thresholds). The natural gas pipeline QRA also included an assessment of the safety hazard to schools, following California Department of Education (CDE) protocols, to assess the acceptability of the risk and concluded that risk levels are in the CDE acceptable criteria category (Class III – green zone of the County's risk thresholds). Further, the natural gas pipeline will be designed, constructed, operated, and maintained in accordance with all applicable regulatory requirements.
Safety Element Supplement	Policy Gas Pipeline Safety 4-A: Safe Design.	In a manner consistent with applicable law, the County shall condition discretionary land-use approvals of new gas pipelines to require safe design, including technology to prevent failure and reduce the consequences of failure. Examples include proven controls for preventing internal and external corrosion and fractures; proven leak detection; safe venting systems; appropriate capabilities for shutting the pipeline down and isolating the pipeline leak; and effective, public warning systems.	Potentially Consistent. The proposed natural gas pipeline is less than 12 inches and therefore does not require a discretionary land-use approval pursuant to Section 35.52.080 of the LUDC. Preparation and implementation of the Safety, Inspection, Maintenance, and Quality Assurance Program is a component of the County Mitigation Monitoring Program (see EIR Section 7.0).
Safety Element Supplement	Policy Gas Pipeline Safety 4-B: Safe Operations.	The County shall condition discretionary land-use approvals of new or substantially upgraded gas pipelines to require a Safety Inspection, Maintenance, Quality Assurance Program or similar mechanism to ensure adequate inspection (including smart pigs), maintenance, and other operating procedures. Any such mechanism shall meet the approval of County permitting agencies prior to commencement of pipeline operations and provide for systematic updates also subject to County approval.	Potentially Consistent. The proposed Project includes the construction of a new 14 mile 8-inch natural gas pipeline, valves, and metering station to be constructed, operated, and owned by SoCalGas. The new natural gas pipeline would be placed within existing roadways and roadway shoulders. The new pipeline would originate at the existing SoCalGas Line 1010 at Divide Station, located along Graciosa Road and terminate at the proposed Project onsite central processing facility. SoCalGas would be required to implement all regulatory requirements for the design, construction, operation, and maintenance of the proposed natural gas pipeline.
Safety Element Supplement	Policy Gas Pipeline Safety 5-A: Consultation with Pipeline Operators.	The County shall consult with applicable pipeline operators, including public utilities, during the preparation of land-use plans and during the early stages of reviewing discretionary permit applications on all properties that contain, or are adjacent to, gas pipelines, including public utility high pressure pipelines.	Potentially Consistent. The proposed Project includes the construction of a new 14 mile 8-inch natural gas pipeline, valves, and metering station to be constructed, operated, and owned by SoCalGas. The new natural gas pipeline would be placed within existing roadways and roadway shoulders. The new pipeline would originate at the existing SoCalGas Line 1010 at Divide Station, located along Graciosa Road and terminate at the proposed Project onsite central processing facility. SoCalGas would be required to implement all regulatory requirements for the design, construction, operation, and maintenance of the proposed natural gas pipeline.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Safety Element Supplement	Policy Gas Pipeline Safety 5-B: Setbacks.	The County shall require a minimum setback of 15-to-25 feet from the centerline of gas pipelines, including public utility high pressure pipelines, for all buildings and structures to prevent damage to the pipeline by external mechanical forces and to permit operators timely and unhindered access for repair, maintenance, survey, and emergency response. Exceptions to this policy shall include: (a) corridor-type locations such as roads and highways, and corridor-type uses such as other pipelines, bicycle and pedestrian paths, utilities, and appurtenances of corridors located in public rights-of way; (b) land subdivided before January 1, 2000, where a landowner or pipeline operator can demonstrate to the County that the minimum setback poses an undue hardship, and a setback of lesser distance (agreeable to the pipeline operator, land owner, and the County) can meet the intent of this policy; (c) pipeline endpoints and interconnecting pipelines, (d) replacement of a public utility pipeline with a functionally equivalent pipeline, and (e) where state or federal law preempts application of this policy.	Potentially Consistent. See Policy Gas Pipeline Safety 5-A above.
Safety Element Supplement	Policy Gas Pipeline Safety 5-C: Burial Depth.	Unless infeasible, new subsurface pipelines, or relocation of existing subsurface pipeline, shall be buried at an appropriate depth, taking into consideration effects of erosion, scouring, and other forms of natural or human-caused earth movement. A minimum burial depth shall be maintained for the entire operating life of the pipelines.	Potentially Consistent. See Policy Gas Pipeline Safety 5-A above. As shown on Figure 2-20, the pipeline would have a minimum 5 foot of backfill cover, including an asphalt cap in most locations since it would be placed within existing roadways or their shoulders. Under U.S. Highway 101, Cat Canyon Creek, as well as various road and culvert crossings, the natural gas pipeline would be installed via HDD at depths of less than 10 feet to over 30 feet below the ground surface or creek bed, depending on final engineering.
Safety Element Supplement	Policy Gas Pipeline Safety 5-D: Marking Presence.	New pipelines, or relocation of existing pipelines, shall include measures to clearly warn outside parties about the presence of a gas pipeline, including proper marking of the right-of-way with signage and use of brightly colored warning tape approximately one foot above buried pipelines where feasible.	Potentially Consistent. The natural gas pipeline alignment would be properly marked in accordance with State and local requirements, including this policy.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Seismic Safety and Safety Element	Land Use Planning Objective 1	Avoid the construction of buildings of all types and most structures on or across historically active or active faults. This is not always possible with long linear structures or facilities such as utility lines, roads, and irrigation canals. However, certain safety features such as shut-off valves, can be required to minimize damage and expedite repair. The appropriate setback distance from the trace of the fault would be variable, depending on the conditions, but normally would be a minimum of at least fifty feet on either side of the sheared zone.	Potentially Consistent. As addressed in EIR Section 4.6 (Geology Processes/Geologic Hazards), potential seismically-induced impacts (Impact GEO-1 and GEO-2) would be less than significant (Class III) given that the proposed oil development infrastructure must be designed and constructed to withstand anticipated horizontal and vertical ground acceleration in the Project area, based on the California Building Code. In addition, the electrical power line would be constructed to meet the requirements of CPUC General Order 95, and the natural gas pipeline would meet the requirements of CPUC General Order 112-F, which governs the design, construction, testing, operation, and maintenance of gas gathering and transmission and distribution piping systems in the State (supplementing the Federal Pipeline Safety Regulations). In addition, the proposed Project grading plan must conform to the requirements set forth in Chapter 70 of the California Building Code and the County Grading and Building Codes. Compliance with applicable regulatory standards and codes would be verified through County Building and Safety review and approval of building and grading plans required for the Project.
Congestion Management Plan			
Circulation	CMP LOS Goals	LOS D or better on U.S. 101 through the Project area.	Potentially Consistent. U.S. 101 at the Clark Avenue junction and at the Betteravia junction operates at an LOS C. The proposed Project would not affect these Levels of Service.
Orcutt Community Plan			
Land Use: Commercial & Industrial	Policy LUC-0-5	All commercial and industrial projects shall minimize impacts to adjoining residences, businesses, and open space areas.	Potentially Consistent. The proposed Project includes the SoCalGas natural gas pipeline which traverses the community of Orcutt (see Figure 2-1). Impacts to residential, business, as well as sensitive land uses would result from construction of the pipeline. These impacts would be temporary. Mitigation measures are required to minimize the construction impacts including: FIRE-1 (Fire Protection Master Plan), NOISE-1 (Construction Noise Control Plan), and TR-3 (Construction Traffic Control Plan). The QRA for the natural gas pipeline concluded that impacts due to pipeline operations, including impacts to schools, would be less than significant (Class III). Also see Policy Gas Pipeline Safety 3-A and 5-A above.
Fire Protection	Policy FIRE-0-2	Fire hazards in Orcutt shall be minimized in order to reduce the cost of/need for increased fire protection services and to protect the natural resources in undeveloped open space areas.	Potentially Consistent. MM FIRE-1, Fire Protection Master Plan, would be implemented during the construction of the natural gas pipeline.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Circulation	Policy CIRC-0-3	The County shall maintain a minimum Level of Service (LOS) C or better on roadways and intersections within the Orcutt Planning Area, except that Minimum Level of Service for the Foster Road/Hwy 135 and Lakeview/Skyway Dr. intersections and Stillwell and Lakeview Roads shall be LOS D.	Potentially Consistent. Only construction of the natural gas pipeline would affect local Orcutt roadways. These impacts would be temporary and MM TR-3 would be required during construction, preparation and implementation of a Construction Traffic Control Plan.
Circulation	Policy CIRC-0-10	Developers should be encouraged to pursue innovative measures to fully mitigate the transportation impacts associated with their projects.	Potentially Consistent. See Policy CIRC-0-3 above.
Air Quality	Policy AQ-0-2	Significant fugitive dust and PM ₁₀ emissions shall be reduced through implementation of appropriate construction restrictions and control measures, consistent with standards adopted by the Santa Barbara County Air Pollution Control Board (SBCAPCD).	Potentially Consistent. Per MM AQ-1a, dust abatement measures shall be implemented during construction.
Biology	Policy BIO-0-1	Important natural resources in Orcutt, including sandhill chaparral, central dune scrub, wetlands, oak trees and woodland, Bishop pine forest, specimen trees, and central sage scrub shall be protected, consistent with the Open Space Plan and the standards below, unless this would prevent reasonable development of a property.	Potentially Consistent. Impacts to adjacent vegetation are expected to be minimal and primarily indirect effects, because the pipeline would be installed in roadways and would cross under drainages using HDD to minimize effects to sensitive vegetation. In addition, adjacent land uses along the pipeline route in the City of Orcutt would be primarily residential and commercial.
Biology	Development Standard BIO-0.1.1	Development shall be sited and designed to avoid disruption and fragmentation of significant natural resources within and adjacent to designated undeveloped natural open space areas, minimize removal of significant native vegetation and trees, preserve wildlife corridors and provide reasonable levels of habitat restoration. Where possible, significant natural resources, such as specimen trees, adjacent to designated, natural undeveloped open space corridors should be preserved.	Potentially Consistent. The pipeline would be installed in roadways and would cross under drainages using HDD to minimize effects to sensitive vegetation.
Biology	Policy BIO-0-2	Consistent with necessary flood control practices, natural stream channels and riparian vegetation in Orcutt shall be maintained in an undisturbed state in order to protect banks from erosion, enhance wildlife passageways, and provide natural greenbelts, unless this would prevent reasonable development of a property.	Potentially Consistent. The pipeline would be installed in roadways and would cross under drainages using HDD to minimize effects to sensitive vegetation.
Biology	Policy BIO-0-3	Established native trees in designated open space areas shall be protected. Established native trees in developable areas shall be incorporated into the site landscaping plan to the greatest degree feasible except where it would interfere with reasonable development of a property. Native trees shall be considered established if they are six feet in height.	Potentially Consistent. The pipeline would be installed in roadways primarily within residential and commercial areas within the community of Orcutt.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Biology	Policy BIO-0-4	Non-native trees (e.g., eucalyptus groves and windrows) that provide known raptor nesting or key roosting sites shall be protected; nonnative specimen trees shall be protected to the greatest degree feasible except where it would interfere with reasonable development of a property. Non-native trees of less than 25 inches in diameter at breast height do not qualify as specimens for this Policy.	Potentially Consistent. The pipeline would be installed in roadways and would not require removal of raptor nest trees.
Flooding and Drainage	Policy FLD-0-2	Off-site runoff associated with development should be minimized.	Potentially Consistent. Per regulatory requirements, a SWPPP and Best Management Practices shall be implemented to reduce off-site runoff during natural gas pipeline construction. In addition, MM SGW-1, prepare and implement Erosion and Sediment Control Plan, would be required. Once constructed, the natural gas pipeline would be subsurface within existing roadways and their shoulders; therefore, would not cause any additional surface runoff.
Flooding and Drainage	Policy FLD-0-3	Short-term and long-term erosion associated with development shall be minimized.	Potentially Consistent. Short-term erosion could occur during construction; however, implementation of SWPPP requirements and Best Management Practices would minimize any offsite siltation. Further, the proposed SoCalGas natural gas pipeline would be located beneath existing roadways and their shoulders. Once constructed, no long-term erosion would occur as a result of the pipeline.
Geology, Topography, and Soils	Policy GEO-0-1	Development shall be sited to avoid geologically hazardous areas.	Potentially Consistent. The proposed SoCalGas natural gas pipeline would be located beneath existing roadways and their shoulders so most geological hazards would be avoided; however, while the proposed natural gas pipeline does not cross a mapped active or Alquist-Priolo fault, the alignment does cross the potentially active Casmalia fault where the pipeline runs along Graciosa Road, approximately ½-mile south of the Highway 1 and Highway 135 interchange.
Geology, Topography, and Soils	Policy GEO-0-2	In areas of high erosion potential, development shall be sited and designed to minimize increased erosion.	Potentially Consistent. The proposed SoCalGas natural gas pipeline would be located beneath existing roadways and their shoulders so erosion is not a concern once construction has been completed. For construction, a SWPPP and Best Management Practices shall be implemented to reduce off-site runoff and associated erosion.
History and Archaeology	Policy HA-0-1	Archaeological and historic resources in the Orcutt Planning Area shall be protected and preserved to the maximum extent possible.	Potentially Consistent. The proposed SoCalGas natural gas pipeline would be located beneath existing roadways and their shoulders; therefore, within previously disturbed soils.
Noise	Policy NSE-0-2	Construction noise in Orcutt shall be minimized during non-standard work hours.	Potentially Consistent. Construction of the proposed SoCalGas natural gas pipeline would be conducted in accordance with the local Noise Ordinance.

Table 4.11-1. Policy Consistency Analysis

Source	Item (s)	Plan, Ordinance, Regulation or Standard	Analysis
Risk of Upset/ Hazards	Policy RISK-0-1	The County shall minimize the risk to public safety associated with oil and gas activity.	Potentially Consistent. The proposed SoCalGas 8-inch natural gas pipeline would generally follow existing public roadways and their shoulders, including through the community of Orcutt. The QRA for the natural gas pipeline concluded impacts associated with construction and operation of the pipeline would be less than significant (green zone of the County's risk thresholds). The natural gas pipeline QRA also included an assessment of the safety hazard to schools, following California Department of Education (CDE) protocols, to assess the acceptability of the risk and concluded that risk levels are in the CDE acceptable criteria category (Class III – green zone of the County's risk thresholds). Further, the natural gas pipeline will be designed, constructed, operated, and maintained in accordance with all applicable regulatory requirements.
Risk of Upset/ Hazards	Policy RISK-0-3	The County shall minimize the risk to public safely associated with hazardous materials.	Potentially Consistent. Construction of the proposed natural gas pipeline would be required to comply with all applicable federal, State and County regulations for the storage, use and disposal for hazardous materials and waste, as outlined in EIR Section 4.7.2 (Regulatory Setting for Hazardous Materials/Risk of Upset).

4.11.5 Environmental Impacts and Mitigation Measures

State CEQA Guidelines §15125(d) requires that an EIR discuss any inconsistencies between a proposed project and applicable general plans, specific plans, and regional plans. Table 4.11-1 provides a preliminary evaluation of the proposed Project's potential inconsistency or consistency with applicable local policies, goals and standards. It is the responsibility of the County, the lead CEQA decision maker, to make the final determination regarding consistency issues as it relates to applicable Santa Barbara County policies.

4.11.5.1 Oil Field Development & Operation

Impact Land Use & Policy-1: Physically divide an established community.

The proposed Project is located within the State-designated Cat Canyon Oil Field, which has been used for oil production purposes for more than 100 years. Established residential communities are located in the northeastern edges of the Cat Canyon Oil Field and are not adjacent to the Project site. The nearest established community is the Town of Sisquoc, which is associated with the Palmer Oil Boom in the early 1900's and is located over one-mile northwest of the Project site. Under the proposed Project, development and oil production would occur in an area historically owned and used for oil and gas exploration activities. Surrounding land uses are similar in nature. **The proposed Project would not divide an established community, and no impact is expected.**

Impact Land Use & Policy-2: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project

As noted above, the proposed Project site is located in Agriculture II (AG-II) and Agricultural Commercial (AC) zone districts which allow for oil and gas exploration and development. Oil production operations within the State-designated Cat Canyon Oil Field would not result in land use conflicts with uses that currently occur on or adjacent to the Project site. It is the responsibility of the County, as decision maker with discretion over the Proposed Project, to make the final determination regarding consistency issues as it relates to applicable Santa Barbara County policies.

As summarized above in Table 4.11-1, the proposed Project would potentially conflict with two policies: (1) Hillside and Watershed Protection Policy 1 of the Land Use Element, which requires minimization of cut and fill; and (2) Development Standard 1 and Oak Tree Protection Policy 1 of the Conservation Element, which require the preservation of mature oak trees to the extent feasible. As proposed, the Project would require approximately 3 million cubic yards of cut and 3 million cubic yards of fill and would impact or require the removal of approximately 1,500 mature oak trees.

The Project site consists predominantly of rolling hills with some steep slopes. The proposed Project would require the grading of 305 acres to allow for the construction of the central processing facility, the steam generation site, the production group station, well pads, roads and entrances, pipe corridors, building sites (including parking areas), laydown areas, storm water detention basins, site entrances, and a new beneficial reuse site. Of the 305 acres that would be graded, approximately 64 acres or 21 percent is previously disturbed and use of existing roads and wells pads would be maximized. Section 4.09, Surface-Groundwater, provides Mitigation Measures to minimize impacts from erosion due to grading and terrain alteration to less than significant levels, however the grading of 6 million cubic of combined cut and fill would result in the substantial alteration of the existing area. As designed, the proposed Project does not appear to minimize cut and fill operations, and development associated with the project could be carried out with less alteration of the natural terrain.

While the proposed Project would remove fewer than 10 percent of existing mature oak trees located throughout the larger project area, the proposed Project's effects would likely be substantial, due to the large number of trees removed or damaged, as well as the widespread landscape-level pattern of direct and indirect effects to oak trees and woodlands resulting in habitat fragmentation, disruption of the canopy, and disruption of animal movement in and through the woodland throughout the Project site. Although impacts to mature oaks would be mitigated through the application of MM BIO-17a, MM BIO-17b, MM BIO-17c and MM BIO-17d, as discussed in Section 4.03, it does not appear that the proposed Project design meets the intent of the policy to avoid the removal or damage to mature oak trees to the maximum extent feasible.

The Project, as proposed, does not appear to meet the intent of the aforementioned County policies and can be considered a Class I, potentially significant impact to Land Use. However, due to the subjectivity of policy interpretation, it is the responsibility of the County decision maker to make the final determination regarding consistency issues as it relates to applicable County policies.

Impact Land Use & Policy-3: Conflict with any applicable habitat conservation plan or natural community conservation plan

As discussed above, the proposed Project is located in an area that has been historically used for oil and gas activities and would not be in conflict with a habitat conservation plan or natural community conservation plan. The US Fish and Wildlife Service (USFWS) is currently developing a General Conservation Plan (GCP) for Oil and Gas Activities in Santa Barbara County, but this process is in the early planning stages. The proposed Project would not conflict with this GCP. Furthermore, a permanent Conservation Easement is proposed as part of the Project. The Conservation Easement would be used to provide mitigation for potential Project impacts, and to provide conservation, educational, and recreational opportunities for the community. Therefore, the proposed Project would not conflict with any applicable habitat conservation or natural community conservation plans, and no significant impacts are expected.

4.11.5.2 Power Line Construction and Operation

Impact Land Use & Policy-1: Physically divide an established community

This potential impact does not apply to the power line component of the proposed Project.

Impact Land Use & Policy-2: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project

This potential impact does not apply to the power line component of the proposed Project.

Impact Land Use & Policy-3: Conflict with any applicable habitat conservation plan or natural community conservation plan

The proposed power line and substation would not be located within a habitat conservation plan or natural community conservation plan. The US Fish and Wildlife Service (USFWS) is currently developing a General Conservation Plan (GCP) for Oil and Gas Activities in Santa Barbara County, but this process is in the early planning stages and the proposed power line would not conflict with this GCP. **Impacts associated with the construction and operation of the proposed power line would not be in conflict with a habitat conservation plan or natural community conservation plan and would be less than significant (Class III).**

4.11.5.3 Natural Gas Pipeline Construction and Operation

Impact Land Use & Policy-1: Physically divide an established community

The proposed 14-mile natural gas pipeline would extend from the existing Southern California Gas (SoCalGas) Line 1010 at Divide Station, located along Graciosa Road, follow the alignment of East Clark Avenue through Orcutt, Dominion Road, Palmer Road, and Cat Canyon Road east of U.S. 101 and would terminate at Aera's proposed central processing facility. Although the natural gas pipeline would traverse the Community of Orcutt, the pipeline would be primarily installed in the existing public utility corridor within the public right-of-way, under existing road pavement. Ancillary pipeline features include the construction two permanent, aboveground isolation valves; four underground isolation valves; and a metering station. As discussed in Section 4.10, construction of the natural gas pipeline would require the temporary closure of pre-approved sections (i.e., shoulders or lanes) of public roadways in accordance with local encroachment permit requirements. However, due to the temporary nature of construction impacts, this impact was determined to be less than significant (Section X). Upon completion of construction, the natural gas pipeline would not be visible to the public and **would not physically divide an established community, and no impact is expected.**

Impact Land Use & Policy-2: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project

As discussed above the proposed 14-mile natural gas pipeline would be primarily installed in the existing public utility corridor within the public right-of-way, under existing road pavement. Policies applicable to the construction and operation of a natural gas pipeline include: Policy Gas Pipeline Safety 1-B: Risk Estimates, Policy Gas Pipeline Safety 3-A: Routing, Policy Gas Pipeline Safety 4-A: Safe Design, Policy Gas Pipeline Safety 5-A: Consultation with Pipeline Operators, Policy Gas Pipeline Safety 5-B: Setbacks, Policy Gas Pipeline Safety 5-C: Burial Depth and Policy Gas Pipeline Safety 5-D.

As discussed in Table 4.11-1 above, the QRA prepared for the proposed natural gas pipeline concluded that potential impacts associated with construction and operation of the pipeline would be less than significant (green zone of the County's risk thresholds). The QRA for the natural gas pipeline also included an assessment of the safety hazard to schools, following California Department of Education (CDE) protocols, to assess the acceptability of the risk and concluded that risk levels are in the CDE acceptable criteria category (Class III). Furthermore, the new natural gas pipeline would be placed within existing roadways and roadway shoulders. SoCalGas would be required to implement all regulatory requirements for the design, construction, operation, and maintenance of the proposed natural gas pipeline. Therefore, the proposed natural gas pipeline would not conflict with Policy Gas Pipeline Safety 1-B, Policy Gas Pipeline Safety 3-A: Routing, Policy Gas Pipeline Safety 4-A: Safe Design, Policy Gas Pipeline Safety 5-A and Policy Gas Pipeline Safety 5-B: Setbacks.

Additionally, the proposed natural gas pipeline would have a minimum 5 foot of backfill cover, including an asphalt cap in most locations since it would be placed within existing roadways or their shoulders. Under U.S. Highway 101, Cat Canyon Creek, as well as various road and culvert crossings, the natural gas pipeline would be installed via HDD at depths of less than 10 feet to over 30 feet below the ground surface or creek bed, depending on final engineering. The natural gas pipeline alignment would be properly marked in accordance with State and local requirements. Therefore, the proposed natural gas pipeline would not conflict with Policy Gas Pipeline Safety 5-C and Policy Gas Pipeline Safety 5-D. **Public utilities are allowed uses within all zone districts and the proposed natural gas pipeline would not conflict with**

any applicable land use plan, policy, or regulation of an agency with jurisdiction and impacts would be less than significant.

Impact Land Use & Policy-3: Conflict with any applicable habitat conservation plan or natural community conservation plan

The proposed natural gas pipeline would not be located within a habitat conservation plan or natural community conservation plan. The US Fish and Wildlife Service (USFWS) is currently developing a General Conservation Plan (GCP) for Oil and Gas Activities in Santa Barbara County, but this process is in the early planning stages and the proposed power line would not conflict with this GCP. **Impacts associated with the construction and operation of the proposed natural gas pipeline would not be in conflict with a habitat conservation plan or natural community conservation plan and would be less than significant.**