

## ES-1 Introduction

The purpose of the Executive Summary and impact summary table is to provide the reader with a brief overview of the proposed Shell Guadalupe Dunes Gravel Remediation In-Lieu Proposal (Proposed Project), the anticipated environmental effects, and the potential mitigation measures that could reduce the severity of the impacts associated with the Proposed Project. The County of Santa Barbara (County), as lead agency under the California Environmental Quality Act (CEQA), has prepared this Supplemental Environmental Impact Report (SEIR) in accordance with CEQA, Public Resources Code (PRC) Sections 21000 et seq., the State CEQA Guidelines, California Code of Regulations (CCR), Title 14, Sections 15000 et seq., and the County Guidelines for the Implementation of CEQA. It addresses the potential environmental impacts of the Proposed Project, and builds upon the description of existing setting, impact analysis, and findings contained in the 1982 Final Environmental Impact Report (EIR) for the Husky Oil-SMV Minerals Lease Oil and Gas Drilling/Production, Mussel Rock Dunes, Santa Barbara County (State Clearinghouse #82030203; 82-EIR-11).

This SEIR is an informational document that is being used by the general public and governmental agencies to review and evaluate the Proposed Project. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Proposed Project and its alternatives. The complete SEIR should be consulted for specific information about the environmental effects and the implementation of associated mitigation measures.

## ES-2 Project Overview

The Project proposes to amend conditional use permit (82-CP-75[cz]) and coastal development permit (96-CDP-10) to allow retention of all remnant gravel associated with permitted exploratory drilling activities in the Rancho Guadalupe Dunes County Park at the northwest corner of Santa Barbara County, which the Applicant previously estimated at approximately 293,752 cubic yards (cy) of combined sand and gravel. Permit Condition #31 of 82-CP-75(cz) and 96-CDP-10 relate to the exploratory drilling project and requires that Shell Oil Company (Applicant) remove all drilling and associated materials within the dunes to a maximum depth of 15 feet from existing grade. In exchange for leaving gravel in place, the Applicant proposes to provide a monetary contribution (in-lieu fee) to the County of Santa Barbara for the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1. The optimal property would be located within the north coastal region of the County, in the vicinity of the Project Site, characterized by similar dune habitat and substantial scenic value, and be suitable for passive recreational or open space uses by the public.

Project implementation would require approval of a revised Conditional Use Permit and a new Coastal Development Permit by the County Planning Commission and could potentially be appealed to the County Board of Supervisors. Final County discretionary permit action could also be potentially appealed to the California Coastal Commission (CCC). The decision makers must also consider and certify a final SEIR with appropriate findings (CEQA Guidelines Section 15091), a

statement of overriding considerations (CEQA Guidelines Section 15093) if applicable, and a mitigation monitoring and reporting program (MMRP) if applicable.

Usually, an EIR level of analysis is reserved for projects involving development, ground disturbance, or other impact-prone activities. The Proposed Project, however, would not involve any such activities. Due to the greater potential for impacts to result from the No Project Alternative and the Partial Gravel Removal Alternative, these project alternatives are analyzed in this SEIR at the same level of detail as the Proposed Project.

The No Project Alternative would involve compliance with the site remediation provisions (i.e. Permit Condition #31) of 82-CP-75(cz). As such, under the No Project Alternative, imported gravel present in the Upper Site, Road Site, Site 2, and Site D would be completely removed through excavation and sand sifting. It is estimated that the majority of remnant gravel is present at a depth of 2 to 3 feet, with certain areas containing gravel up to 15 feet below the surface, and that an estimated total of 1,237 cy of gravel would be removed. The No Project Alternative would take approximately 5 to 7 months to complete. Gravel would be exported to an off-site location; currently identified locations include the Greka Asphalt Plant in Santa Maria and the Granite Gardner Ranch facility in Buellton.

The Partial Gravel Removal Alternative is a hybrid alternative which would involve removing the imported gravel from only those areas where it is most visually prominent (the Road Site and Site D). Therefore, the Partial Gravel Removal would also require an amendment to conditional use permit (82-CP-75[cz]) and coastal development permit (96-CDP-10). The Partial Gravel Removal Alternative would be expected to remove approximately 698 cy of gravel and take approximately 3 to 4 months to complete. Sorted gravel would be transported offsite as described for the No Project Alternative.

## ES-3 Environmental Impact Report Scope

This SEIR examines potential short- and long-term impacts of the Proposed Project. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the Proposed Project is implemented. The significance of each identified impact was determined using either County Thresholds of Significance (County of Santa Barbara 2008) or CEQA thresholds where there is no County threshold. The following categories are used for classifying Project-related impacts.

- ***Class I - Significant adverse impacts that are unavoidable:*** Significant impacts that cannot be effectively mitigated. No measures could be taken to avoid or reduce these adverse effects to insignificant or negligible levels. Even after application of feasible mitigation measures, the residual impact would be significant.
- ***Class II - Significant but mitigable adverse impacts:*** These impacts are potentially similar in significance to those of Class I, but can be reduced or avoided by the implementation of mitigation measures. After application of feasible mitigation measures, the residual impact would not be significant.
- ***Class III - Adverse but not significant impacts:*** While not required under CEQA to reduce an impact to a level of insignificant, mitigation measure(s) are often applied to an identified

adverse but not significant impact to mitigate the impact to the maximum extent feasible in accordance with Santa Barbara County policy.

- **Class IV –Beneficial impacts:** Effects that are beneficial to the environment.

For each significant impact identified, mitigation to reduce impacts to less-than-significant levels are identified. In those instances where mitigation measures cannot reduce such impacts to less-than-significant levels, the impacts are identified as Class I.

The SEIR also presents alternatives to the Proposed Project, which include the No Project Alternative, and the Partial Gravel Removal Alternative, and a project-level assessment of the impacts that would be associated with the implementation of each. Finally, the cumulative impacts of the Proposed Project when added to other local proposed or approved projects were also evaluated in Section 4.0, *Cumulative Impacts*.

## ES-4 Notice of Preparation

The contents of this SEIR were established based on the findings in the notice of preparation (NOP) and attached materials, as well as public and agency input during the scoping period. A copy of the NOP and comments received during the NOP review period are included in Appendix A. In accordance with Section 15063 of the State CEQA Guidelines, the NOP was prepared and distributed to responsible and affected agencies and other interested parties for a 30-day public review. The public review period for the NOP began on October 23, 2013, and ended on November 23, 2013. The NOP was also posted in the Santa Barbara County Clerk's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Planning and Research to solicit statewide agency participation in determining the scope of the SEIR.

## ES-5 Summary of Project Impacts

The significance of each impact resulting from implementation of the Proposed Project has been determined according to either the County Thresholds and Guidelines Manual or CEQA thresholds. Table ES-1 presents a summary of the impacts, mitigation measures, and residual impacts from implementation of the Proposed Project, the No Project Alternative, and the Partial Gravel Removal Alternative. Table ES-2 compares the impacts of the Proposed Project with those of the alternatives. In summary, the Proposed Project, No Project Alternative, and Partial Gravel Removal Alternative would not result in significant and unavoidable impacts.

## ES-6 Environmentally Superior Alternative

Based on the analysis conducted for this SEIR, the Proposed Project would result in no significant adverse effects to any resource areas. Further, it would provide a beneficial effect to regional recreational opportunities through contribution of fees for purchase of property within the north coastal region of the County for public recreational or open space purposes at a ratio of not less than 3:1. Other alternatives analyzed would have significant (but mitigable) impacts to one or more resource areas, and would not provide the beneficial impact to recreation from in-lieu fees. Therefore, the Proposed Project is the Environmentally Superior Alternative.

As described in Section 1.5, Supplemental Environmental Impact Report, this Supplemental Environmental Impact Report (SEIR) builds upon the description of the existing setting, impact analysis, and findings contained in a previously certified EIR addressing the Project site – in this case the 1982 Final EIR for the Husky Oil-SMV Minerals Lease Oil and Gas Drilling/Production, Mussel Rock Dunes, Santa Barbara County (State Clearinghouse #82030203; 82-EIR-11). The 1982 Final EIR, per CEQA guidelines, accurately described impacts based on a reasonably foreseeable worst-case scenario; however, following certification of the EIR, Island B and Island C, which were included in the 1982 Final EIR impact analyses were not constructed; only Site D was constructed and used for exploratory drilling operations. For this reason, and as a result of the partial removal of the gravel under the 96-CDP-010 as well as the unforeseeable establishment of sensitive dune species, many of the impacts as described in the 1982 Final EIR did not occur. Rather, re-establishment of sensitive habitat and species and remediation activities in 1997, including partial gravel removal, have altered the existing environmental setting. This SEIR describes the existing setting of the Project Site as it was at the time of the publication of the Notice of Preparation (NOP), October 23, 2013. The impacts described in this SEIR (see Table ES-1 below) are specific to the In-Lieu Proposal, which would leave the remnant gravel in place. However, where relevant, this SEIR also describes the anticipated significant and unavoidable impacts identified in the 1982 Final EIR (see Table ES-2). Further, it describes the changes that have occurred at the Project Site since the certification of the 1982 Final EIR and how these changes in the existing setting have affected the potential impacts identified in the 1982 Final EIR.

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
<b>PROPOSED PROJECT</b>		
<b>Class I Impacts</b>		
N/A	N/A	N/A
<b>Class II Impacts</b>		
<b>3.1 Aesthetics and Visual Resources Impacts</b>		
Impact AV-1. Potential Impacts to Scenic Vistas or Resources Resulting from the Implementation of the Proposed Project	<b>Mitigation Measure REC-1. Monetary Contribution (In-Lieu Fee).</b> Shell Exploration and Production, Inc. (Applicant) shall provide an in-lieu fee to the County for the purpose of mitigating the recreational impact of the Proposed Project (18.9 acres footprint) through the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1 (56.7 acres). The mitigation ratio could potentially be greater based on property availability and quality. This property would be designated and preserved for recreational and open space use. The optimal property would be located within the north coastal region of the County, in the vicinity of the Project Site, characterized by similar dune habitat and substantial scenic value,	Less than Significant after Mitigation (Class II)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	<p>and be suitable for passive recreational or open space uses by the public. In addition to offsetting recreational impacts, this in-lieu fee would result in additional indirect benefits to aesthetics, geological resources, and biological resources.</p> <p><b>TIMING:</b> The Applicant shall provide the in-lieu fee to the County to purchase land for public recreational purposes at a ratio of not less than 3:1 prior to issuance of a Coastal Development Permit (13CDH-00000-00042).</p>	
<p>Impact AV-2. Impacts to Visual Character or Quality Resulting from the Implementation of the Proposed Project</p>	<p><b>Mitigation Measure REC-1. Monetary Contribution (In-Lieu Fee).</b> Shell Exploration and Production, Inc. (Applicant) shall provide an in-lieu fee to the County for the purpose of mitigating the recreational impact of the Proposed Project (18.9 acres footprint) through the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1 (56.7 acres). The mitigation ratio could potentially be greater based on property availability and quality. This property would be designated and preserved for recreational and open space use. The optimal property would be located within the north coastal region of the County, in the vicinity of the Project Site, characterized by similar dune habitat and substantial scenic value, and be suitable for passive recreational or open space uses by the public. In addition to offsetting recreational impacts, this in-lieu fee would result in additional indirect benefits to aesthetics, geological resources, and biological resources.</p> <p><b>TIMING:</b> The Applicant shall provide the in-lieu fee to the County to purchase land for public recreational purposes at a ratio of not less than 3:1 prior to issuance of a Coastal Development Permit (13CDH-00000-00042).</p>	<p>Less than Significant after Mitigation (Class II)</p>

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
<b>3.9 Recreation Impacts</b>		
<p>Impact REC-1. Impacts to existing neighborhood or regional parks that would require expansion of or result in a substantial physical deterioration of the facilities from implementation of the Proposed Project.</p>	<p><b>Mitigation Measure REC-1. Monetary Contribution (In-Lieu Fee).</b> Shell Exploration and Production, Inc. (Applicant) shall provide an in-lieu fee to the County for the purpose of mitigating the recreational impact of the Proposed Project (18.9 acres footprint) through the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1 (56.7 acres). The mitigation ratio could potentially be greater based on property availability and quality. This property would be designated and preserved for recreational and open space use. The optimal property would be located within the north coastal region of the County, in the vicinity of the Project Site, characterized by similar dune habitat and substantial scenic value, and be suitable for passive recreational or open space uses by the public. In addition to offsetting recreational impacts, this in-lieu fee would result in additional indirect benefits to aesthetics, geological resources, and biological resources.</p> <p><b>TIMING:</b> The Applicant shall provide the in-lieu fee to the County to purchase land for public recreational purposes at a ratio of not less than 3:1 prior to issuance of a Coastal Development Permit (13CDH-00000-00042).</p>	<p>Less than Significant after Mitigation (Class II)</p>
<p>Impact REC-2. Impacts that would terminate or interfere with the established recreational uses from implementation of the Proposed Project.</p>	<p><b>Mitigation Measure REC-1. Monetary Contribution (In-Lieu Fee).</b> Shell Exploration and Production, Inc. (Applicant) shall provide an in-lieu fee to the County for the purpose of mitigating the recreational impact of the Proposed Project (18.9 acres footprint) through the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1 (56.7 acres). The mitigation ratio could potentially be greater based on property availability and quality. This property would be designated and preserved for recreational and open space use. The optimal property would be located within the north coastal region of the County, in the vicinity of the Project Site, characterized by similar dune habitat and substantial scenic value, and be suitable for passive recreational or open space uses by the public. In addition to offsetting recreational impacts, this in-lieu fee</p>	<p>Less than Significant after Mitigation (Class II)</p>

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	would result in additional indirect benefits to aesthetics, geological resources, and biological resources. <b>TIMING:</b> The Applicant shall provide the in-lieu fee to the County to purchase land for public recreational purposes at a ratio of not less than 3:1 prior to issuance of a Coastal Development Permit (13CDH-00000-00042).	
<b>Class III Impacts</b>		
<b>3.7 Land Use and Planning</b>		
Impact LU-1. Impacts to community development and/or incompatible land uses.	No Mitigation Required	Less than Significant (Class III)
Impact LU-2. Impacts related to compatibility with applicable land use plans, policies, or regulations of agencies with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	No Mitigation Required	Less than Significant (Class III)
Impact LU-3. Impacts related to compatibility with any applicable habitat conservation plan or natural community conservation plan.	No Mitigation Required	Less than Significant (Class III)
<b>No Impacts</b>		
<b>3.2 Air Quality and Greenhouse Gas Emissions Impacts</b>		
No Impact	N/A	N/A
<b>3.3 Biological Resources Impact</b>		
No Impact	N/A	N/A
<b>3.4 Cultural Resources Impacts</b>		
No Impact	N/A	N/A

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
<b>3.5 Hazards Impacts</b>		
No Impact	N/A	N/A
<b>3.6 Hydrology and Water Quality Impacts</b>		
No Impact	N/A	N/A
<b>3.8 Noise Impacts</b>		
No Impact	N/A	N/A
<b>3.10 Transportation and Traffic Impacts</b>		
No impact	N/A	N/A
<b>NO PROJECT ALTERNATIVE</b>		
<b>Class I Impacts</b>		
N/A	N/A	N/A
<b>Class II Impacts</b>		
<b>3.3 Biological Resources Impact</b>		
Impact ALT1-BIO-1. Potential impacts to unique, rare, or threatened plant species and natural communities.	<p><b>Mitigation Measure 1982-BIO-1.</b>                      Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the following:</p> <ul style="list-style-type: none"> <li>a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes.</li> <li>b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area.</li> <li>c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.</li> </ul>	Less than Significant after Mitigation (Class II)
Impact ALT1-BIO-2. Disturbance and removal of environmentally sensitive habitat.	<p><b>Mitigation Measure 1982-BIO-1.</b>                      Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the</p>	Less than Significant after Mitigation (Class II)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	following: a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes. b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area. c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.	
Impact ALT1-BIO-3. Potential impacts to unique, rare, threatened, or endangered wildlife species and/or habitat that support these species.	<b>Mitigation Measure 1982-BIO-1.</b> Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the following: a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes. b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area. c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.	Less than Significant after Mitigation (Class II)
Impact ALT1-BIO-4. Introduction or spread of non-native vegetation with the Project Site.	<b>Mitigation Measure 1982-BIO-1.</b> Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the following: a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes. b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area. c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.	Less than Significant after Mitigation (Class II)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
<b>3.4 Cultural Resources Impacts</b>		
Impact ALT1-CR-1. Potential disruption, alteration, destruction, or adverse impact on cultural resources and/or human remains as a result of the No Project Alternative	<b>Mitigation Measure 1982-CR-1.</b> If cultural resources should be encountered or suspected, work shall be halted promptly, and a professional archaeologist consulted.	Less than Significant after Mitigation (Class II)
<b>3.5 Hazards Impacts</b>		
Impact ALT1-HAZ-1. Hazardous Materials Release During Construction	<b>Mitigation Measure 1982-HAZ-1.</b> Mitigation from the 1982 Final EIR requires that all spills of greater than 1,000 gallons should be reported to the County Planning Department and Petroleum Administrator within 24 hours, and in the event of such a spill the operator should excavate and remove contaminated soils and replace with soils of the same type and horizon.	Less than Significant after Mitigation (Class II)
<b>3.6 Hydrology and Water Quality Impacts</b>		
Impact ALT1-HWQ-1. Impacts to water quality or surface runoff resulting from implementation of the No Project Alternative	<b>Mitigation Measure 1982-HWQ-1.</b> Mitigation Measures in the 1982 Final EIR include measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes, which require that: supplies, drilling mud, cuttings, and wastes shall be stores in impervious containers; sumps and tanks, other than those used for drilling shall be covered; and all toxic or harmful wastes shall be removed from the dune area for proper disposal.	Less than Significant after Mitigation (Class II)
Impact ALT1-HWQ-2. Impacts to impervious surfaces, groundwater, and discharge resulting from implementation of the No Project Alternative	<b>Mitigation Measure 1982-HWQ-1.</b> Mitigation Measures in the 1982 Final EIR include measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes, which require that: supplies, drilling mud, cuttings, and wastes shall be stores in impervious containers; sumps and tanks, other than those used for drilling shall be covered; and all toxic or harmful wastes shall be removed from the dune area for proper disposal.	Less than Significant after Mitigation (Class II)
<b>3.7 Land Use and Planning</b>		
Impact ALT1-LU-2. Impacts related to compatibility with applicable land use	<b>Mitigation Measure 1982-BIO-1.</b> Mitigation required in the 1982 Final EIR included measures from the	Less than Significant after Mitigation (Class II)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
plans, policies, or regulations of agencies with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the following: a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes. b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area. c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.	
<b>Class III Impacts</b>		
<b>3.1 Aesthetics and Visual Resources Impacts</b>		
Impact ALT1-AV-1. Potential Impacts to Scenic Vistas or Resources Resulting from the Implementation of the No Project Alternative	No Mitigation Required	Less than Significant (Class III)
Impact ALT1-AV-2. Impacts to Visual Character or Quality Resulting from the Implementation of the No Project Alternative	No Mitigation Required	Less than Significant (Class III)
<b>3.2 Air Quality and Greenhouse Gas Emissions Impacts</b>		
Impact ALT1-AQ-1. Increased Air Emissions from Processing and Hauling activities	<b>Standard County Dust Control Measures.</b> The Applicant would be required to comply with the standard APCD conditions for dust control as follows: a. Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site. b. During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, use water trucks or sprinkler systems to prevent dust from leaving the site and to create a crust after each day's activities cease. c. During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from	Less than Significant (Class III)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	<p>leaving the site.</p> <p>d. Wet down the construction area after work is completed for the day and whenever wind exceeds 15 mph.</p> <p>e. When wind exceeds 15 mph, have site watered at least once each day including weekends and/or holidays.</p> <p>f. Order increased watering as necessary to prevent transport of dust off-site.</p> <p>g. Cover soil stockpiled for more than two days or treat with soil binders to prevent dust generation. Reapply as needed.</p> <p>h. If the site is graded and left undeveloped for over four weeks, the Owner/Applicant shall immediately:</p> <p>i) Seed and water to re-vegetate graded areas; and/or</p> <p>ii) Spread soil binders; and/or</p> <p>iii) Employ any other method(s) deemed appropriate by P&amp;D or APCD.</p> <p><b>PLAN REQUIREMENTS:</b> These dust control requirements shall be noted on all grading plans.</p> <p><b>PRE-CONSTRUCTION REQUIREMENTS:</b> The contractor or builder shall provide P&amp;D monitoring staff and APCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to:</p> <p>Assure all dust control requirements are complied with including those covering weekends and holidays.</p> <p>Order increased watering as necessary to prevent transport of dust offsite.</p> <p>Attend the pre-construction meeting.</p> <p><b>TIMING:</b> The dust monitor shall be designated prior to issuance of grading permit. The dust control components apply from the beginning of any grading or construction throughout all development activities until Final Building Inspection Clearance is issued.</p> <p><b>MONITORING:</b> P&amp;D processing planner shall ensure measures are on plans. P&amp;D grading inspectors shall spot check grading to ensure compliance onsite. APCD inspectors shall respond to nuisance</p>	

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Impact	Mitigation Measure	Residual Significance
	complaints.	
Impact ALT1-AQ-2. Consistency with the Air Quality Attainment Plan	No Mitigation Required	Less than Significant (Class III)
Impact ALT1-AQ-3. Greenhouse Gas Emissions from Construction Activities	No Mitigation Required	Less than Significant (Class III)
<b>3.5 Hazards Impacts</b>		
Impact ALT1-HAZ-2. Hazardous Conditions During Construction	No Mitigation Required	Less than Significant (Class III)
<b>3.7 Land Use and Planning</b>		
Impact ALT1-LU-1. Impacts to community development and/or incompatible land uses	No Mitigation Required	Less than Significant (Class III)
<b>3.8 Noise Impacts</b>		
Impact ALT1-NOI-1. Short-term increase in construction noise from gravel removal	No Mitigation Required	Less than Significant (Class III)
<b>3.9 Recreation Impacts</b>		
Impact ALT1-REC-1. Impacts to existing neighborhood or regional parks that would require expansion of or result in a substantial physical deterioration of the facilities from implementation of the No Project Alternative.	No Mitigation Required	Less than Significant (Class III)
Impact ALT1-REC-2. Impacts that would terminate or interfere with the established recreational uses from implementation of the No Project Alternative.	No Mitigation Required	Less than Significant (Class III)
<b>3.10 Transportation and Traffic Impacts</b>		
Impact ALT1-TT-1. Traffic congestion impacts from mining and removal activities	<b>Standard County Haul Permit Requirements.</b> Prior to the commencement of construction activity, the Applicant shall apply to for a haul permit from the County, providing the haul route, dates and hours of hauling, type and capacity of hauling	Less than Significant (Class III)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	equipment, and the type as well as the volume of material being hauled. <b>TIMING:</b> The Applicant shall submit the haul permit application no later than 14 days prior to the start of hauling operations. <b>MONITORING:</b> County inspection personnel will document the condition of the roadway prior to the commencement of any hauling and Road Division personnel shall perform inspection within the County road right of way.	
Impact ALT1-TT-2. Roadway Degradation	<b>Standard County Haul Permit Requirements.</b> Prior to the commencement of construction activity, the Applicant shall apply to for a haul permit from the County, providing the haul route, dates and hours of hauling, type and capacity of hauling equipment, and the type as well as the volume of material being hauled. <b>TIMING:</b> The Applicant shall submit the haul permit application no later than 14 days prior to the start of hauling operations. <b>MONITORING:</b> County inspection personnel will document the condition of the roadway prior to the commencement of any hauling and Road Division personnel shall perform inspection within the County road right of way.	Less than Significant (Class III)
<b>No Impacts</b>		
N/A	N/A	N/A
<b>PARTIAL GRAVEL REMOVAL ALTERNATIVE</b>		
<b>Class I Impacts</b>		
N/A	N/A	N/A
<b>Class II Impacts</b>		
<b>3.3 Biological Resources Impact</b>		
Impact ALT2-BIO-1. Potential impacts to unique, rare, or threatened plant species and natural communities.	<b>Mitigation Measure 1982-BIO-1.</b> Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the	Less than Significant after Mitigation (Class II)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	following: a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes. b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area. c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.	
Impact ALT2-BIO-2. Temporary disturbance of environmentally sensitive habitat.	<b>Mitigation Measure 1982-BIO-1.</b> Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the following: a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes. b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area. c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.	Less than Significant after Mitigation (Class II)
Impact ALT2-BIO-3. Potential impacts to unique, rare, threatened, or endangered wildlife species and/or habitat that support these species.	<b>Mitigation Measure 1982-BIO-1.</b> Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the following: a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes. b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area. c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.	Less than Significant after Mitigation (Class II)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
Impact ALT2-BIO-4. Introduction or spread of non-native vegetation with the Project Site.	<p><b>Mitigation Measure 1982-BIO-1.</b>                      Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the following:</p> <ul style="list-style-type: none"> <li>a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes.</li> <li>b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area.</li> <li>c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.</li> </ul>	Less than Significant after Mitigation (Class II)
<b>3.4 Cultural Resources Impacts</b>		
Impact ALT2-CR-1. Potential disruption, alteration, destruction, or adverse impact on cultural resources and/or human remains as a result of the Partial Gravel Removal Alternative	<p><b>Mitigation Measure 1982-CR-1.</b>                      If cultural resources should be encountered or suspected, work shall be halted promptly, and a professional archaeologist consulted.</p>	Less than Significant after Mitigation (Class II)
<b>3.5 Hazards Impacts</b>		
Impact ALT2-HAZ-1. Hazardous Materials Release During Construction	<p><b>Mitigation Measure 1982-HAZ-1.</b>                      Mitigation from the 1982 Final EIR requires that all spills of greater than 1,000 gallons should be reported to the County Planning Department and Petroleum Administrator within 24 hours, and in the event of such a spill the operator should excavate and remove contaminated soils and replace with soils of the same type and horizon.</p>	Less than Significant after Mitigation (Class II)
<b>3.6 Hydrology and Water Quality Impacts</b>		
Impact ALT2-HWQ-1. Impacts to water quality or surface runoff resulting from implementation of the Partial Gravel Removal Alternative	<p><b>Mitigation Measure 1982-HWQ-1.</b>                      Mitigation Measures in the 1982 Final EIR include measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes, which require that: supplies, drilling mud, cuttings, and wastes shall be stores in impervious containers; sumps and tanks, other than those</p>	Less than Significant after Mitigation (Class II)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	used for drilling shall be covered; and all toxic or harmful wastes shall be removed from the dune area for proper disposal.	
Impact ALT2-HWQ-2. Impacts to impervious surfaces, groundwater, and discharge resulting from implementation of the Partial Gravel Removal Alternative	<p><b>Mitigation Measure 1982-HWQ-1.</b>                      Mitigation Measures in the 1982 Final EIR include measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes, which require that: supplies, drilling mud, cuttings, and wastes shall be stores in impervious containers; sumps and tanks, other than those used for drilling shall be covered; and all toxic or harmful wastes shall be removed from the dune area for proper disposal.</p>	Less than Significant after Mitigation (Class II)
<b>3.7 Land Use and Planning</b>		
Impact ALT2-LU-2. Impacts related to compatibility with applicable land use plans, policies, or regulations of agencies with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	<p><b>Mitigation Measure 1982-BIO-1.</b>                      Mitigation required in the 1982 Final EIR included measures from the Energy Facility Siting Management Plan for the Mussel Rock Dunes. Measures related to site abandonment from this Plan include the following:</p> <ul style="list-style-type: none"> <li>a. A detailed dune restoration program shall be required of every oil and gas operator within the dunes.</li> <li>b. In active dune areas, the vegetation used for dune stabilization or revegetation shall be limited to native plants compatible with the habitat area.</li> <li>c. Construction of nesting and/or denning structures may be required at a site to encourage displaced wildlife to return to an area.</li> </ul>	Less than Significant after Mitigation (Class II)
<b>Class III Impacts</b>		
<b>3.1 Aesthetics and Visual Resources Impacts</b>		
Impact ALT2-AV-1. Potential Impacts to Scenic Vistas or Resources Resulting from the Implementation of the Partial Gravel Removal Alternative	No Mitigation Required	Less than Significant (Class III)
Impact ALT2-AV-2. Impacts to Visual Character or Quality Resulting from the Implementation of the Partial Gravel Removal Alternative	No Mitigation Required	Less than Significant (Class III)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
<b>3.2 Air Quality and Greenhouse Gas Emissions Impacts</b>		
Impact ALT2-AQ-1. Increased Air Emissions from Processing and Hauling activities	<p><b>Standard County Dust Control Measures.</b></p> <p>The Applicant would be required to comply with the standard APCD conditions for dust control as follows:</p> <ul style="list-style-type: none"> <li>a. Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site.</li> <li>b. During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, use water trucks or sprinkler systems to prevent dust from leaving the site and to create a crust after each day’s activities cease.</li> <li>c. During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.</li> <li>d. Wet down the construction area after work is completed for the day and whenever wind exceeds 15 mph.</li> <li>e. When wind exceeds 15 mph, have site watered at least once each day including weekends and/or holidays.</li> <li>f. Order increased watering as necessary to prevent transport of dust off-site.</li> <li>g. Cover soil stockpiled for more than two days or treat with soil binders to prevent dust generation. Reapply as needed.</li> <li>h. If the site is graded and left undeveloped for over four weeks, the Owner/Applicant shall immediately:                         <ul style="list-style-type: none"> <li>i) Seed and water to re-vegetate graded areas; and/or</li> <li>ii) Spread soil binders; and/or</li> <li>iii) Employ any other method(s) deemed appropriate by P&amp;D or APCD.</li> </ul> </li> </ul> <p><b>PLAN REQUIREMENTS:</b> These dust control requirements shall be noted on all grading plans.</p> <p><b>PRE-CONSTRUCTION REQUIREMENTS:</b> The contractor or builder shall provide P&amp;D monitoring staff and APCD with the name and contact information for an assigned onsite dust control monitor(s)</p>	Less than Significant (Class III)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	who has the responsibility to: Assure all dust control requirements are complied with including those covering weekends and holidays. Order increased watering as necessary to prevent transport of dust offsite. Attend the pre-construction meeting. <b>TIMING:</b> The dust monitor shall be designated prior to issuance of grading permit. The dust control components apply from the beginning of any grading or construction throughout all development activities until Final Building Inspection Clearance is issued. <b>MONITORING:</b> P&D processing planner shall ensure measures are on plans. P&D grading inspectors shall spot check grading to ensure compliance onsite. APCD inspectors shall respond to nuisance complaints.	
Impact ALT2-AQ-2. Consistency with the Air Quality Attainment Plan	No Mitigation Required	Less than Significant (Class III)
Impact ALT2-AQ-3. Greenhouse Gas Emissions from Construction Activities	No Mitigation Required	Less than Significant (Class III)
<b>3.5 Hazards Impacts</b>		
Impact ALT2-HAZ-2. Hazardous Conditions During Construction	No Mitigation Required	Less than Significant (Class III)
<b>3.7 Land Use and Planning</b>		
Impact ALT2-LU-1. Impacts to community development and/or incompatible land uses	No Mitigation Required	Less than Significant (Class III)
<b>3.8 Noise Impacts</b>		
Impact ALT2-NOI-1. Short-term increase in construction noise from gravel removal	No Mitigation Required	Less than Significant (Class III)
<b>3.9 Recreation Impacts</b>		
Impact ALT2-REC-1. Impacts to existing neighborhood or regional parks that would	No Mitigation Required	Less than Significant (Class III)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
require expansion of or result in a substantial physical deterioration of the facilities from implementation of the Partial Gravel Removal Alternative.		
Impact ALT2-REC-2. Impacts that would terminate or interfere with the established recreational uses from implementation of the Partial Gravel Removal Alternative.	No Mitigation Required	Less than Significant (Class III)
<b>3.10 Transportation and Traffic Impacts</b>		
Impact ALT2-TT-1. Traffic congestion impacts from mining and removal activities	<p><b>Standard County Haul Permit Requirements.</b>                      Prior to the commencement of construction activity, the Applicant shall apply to for a haul permit from the County, providing the haul route, dates and hours of hauling, type and capacity of hauling equipment, and the type as well as the volume of material being hauled.</p> <p><b>TIMING:</b> The Applicant shall submit the haul permit application no later than 14 days prior to the start of hauling operations.</p> <p><b>MONITORING:</b> County inspection personnel will document the condition of the roadway prior to the commencement of any hauling and Road Division personnel shall perform inspection within the County road right of way.</p>	Less than Significant (Class III)
Impact ALT2-TT-2. Roadway Degradation	<p><b>Standard County Haul Permit Requirements.</b>                      Prior to the commencement of construction activity, the Applicant shall apply to for a haul permit from the County, providing the haul route, dates and hours of hauling, type and capacity of hauling equipment, and the type as well as the volume of material being hauled.</p> <p><b>TIMING:</b> The Applicant shall submit the haul permit application no later than 14 days prior to the start of hauling operations.</p> <p><b>MONITORING:</b> County inspection personnel will document the condition of the roadway prior to the commencement of any hauling and Road Division personnel shall perform inspection within the</p>	Less than Significant (Class III)

**Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts**

Impact	Mitigation Measure	Residual Significance
	County road right of way.	
<b>No Impacts</b>		
N/A	N/A	N/A

As described above, where relevant, this SEIR also describes the anticipated significant and unavoidable impacts identified in the 1982 Final EIR. Further, it describes the development and changes that have occurred at the Project Site since the certification of the 1982 Final EIR and how these changes in the existing setting have affected the potential impacts identified in the 1982 Final EIR. Following certification of the EIR, Island B and Island C, which were included in the 1982 Final EIR impact analyses were not constructed; only Site D was constructed and used for exploratory drilling operations. For this reason, and as a result of the partial removal of the gravel under the 96-CDP-010 as well as the unforeseeable establishment of sensitive dune species, many of the impacts as described in the 1982 Final EIR did not occur. Rather, re-establishment of sensitive habitat and species and remediation activities in 1997, including partial gravel removal, have altered the existing environmental setting. Please see Table ES-2 below for a summary of the relevant 1982 Final EIR impacts, relevant mitigations included in the 1982 Final EIR and/or this SEIR, and current residual significance as described in the SEIR based on existing baseline conditions, updated since the certification of the 1982 Final EIR.

**Table ES-2. Summary of 1982 Impacts, Relevant Mitigation, and Current Residual Impacts**

1982 Final EIR Impact	Relevant Mitigation Measure	Current Residual Significance
<b>3.1 Aesthetics and Visual Resources Impacts</b>		
Impact 1982-AV-1. Island B is readily visible from Main street at 0.25 mile. Some equipment at Island D will also be visible at distances of 0.75 mile or more, though less obtrusive. <sup>1</sup>	<b>Mitigation Measure 1982-AV-1.</b> Construction with materials or painting with colors that blend with sand background. Move Site B 300 feet to the west.	Less than Significant after Mitigation (Class II) in the 1982 Final EIR and Less than Significant after Mitigation (Class II) based on existing baseline conditions
<b>3.3 Biological Resources Impact</b>		
Impact 1982-BIO-1: Project implementation could impact a small breeding least tern colony if construction and/or drilling is conducted between mid-April and early September.	<b>Mitigation Measure 1982-BIO-1.</b> Mitigation required in the 1982 Final EIR included adherence to all applicable policies set forth in the County LCP including restrictions on noise generating activities during the least tern breeding season and establishment of a monitoring program of the least tern colony during phased development of the project.	Significant and Unavoidable (Class I) in the 1982 Final EIR and Less than Significant after Mitigation (Class II) based on existing baseline conditions
Impact 1982-BIO-2: Degradation of the dune ecosystem could result from project-related impacts such as introduction of exotic vegetation, and use of chemical or oil-based stabilizers.	No Mitigation Required	Significant and Unavoidable (Class I) in the 1982 Final EIR and Less than Significant (Class III) based on existing baseline conditions

<sup>1</sup> As described in Section 3.1, *Aesthetics and Visual Resources*, Island B was never constructed following the certification of the 1982 Final EIR.

**Table ES-2. Summary of 1982 Impacts, Relevant Mitigation, and Current Residual Impacts**

1982 Final EIR Impact	Relevant Mitigation Measure	Current Residual Significance
<b>3.9 Recreation Impacts</b>		
<p>Impact 1982-REC-1. Intrusion of a non-open space use (i.e., 3 drilling/production island) into an area that is recognized for its scenic, ecological, and recreational values.</p>	<p><b>Mitigation Measure REC-1. Monetary Contribution (In-Lieu Fee).</b> Shell Exploration and Production, Inc. (Applicant) shall provide an in-lieu fee to the County for the purpose of mitigating the recreational impact of the Proposed Project (18.9 acres footprint) through the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1 (56.7 acres). The mitigation ratio could potentially be greater based on property availability and quality. This property would be designated and preserved for recreational and open space use. The optimal property would be located within the north coastal region of the County, in the vicinity of the Project Site, characterized by similar dune habitat and substantial scenic value, and be suitable for passive recreational or open space uses by the public. In addition to offsetting recreational impacts, this in-lieu fee would result in additional indirect benefits to aesthetics, geological resources, and biological resources.</p> <p><b>TIMING:</b> The Applicant shall provide the in-lieu fee to the County to purchase land for public recreational purposes at a ratio of not less than 3:1 prior to issuance of a Coastal Development Permit (13CDH-00000-00042).</p>	<p>Significant and Unavoidable (Class I) in the 1982 Final EIR and Less than Significant after Mitigation (Class II) based on existing baseline conditions</p>

**Table ES-3. Summary of Environmental Impacts for Proposed Project and Alternatives**

Impact	Impact Class		
	Proposed Project	No Project Alternative	Partial Gravel Removal Alternative
<b>3.1 Aesthetics and Visual Resources Impacts</b>			
Potential Impacts to Scenic Vistas or Resources Resulting from the Implementation of the Proposed Project.	Less than Significant after Mitigation (Class II)	Less than Significant (Class III)	Less than Significant (Class III)
Impacts to Visual Character or Quality Resulting from the Implementation of the Proposed Project.	Less than Significant after Mitigation (Class II)	Less than Significant (Class III)	Less than Significant (Class III)
<b>3.2 Air Quality and Greenhouse Gas Emissions Impacts</b>			
Increased Air Emissions from Processing and Hauling activities.	No impact	Less than Significant (Class III)	Less than Significant (Class III)
Consistency with the Air Quality Attainment Plan.	No impact	Less than Significant (Class III)	Less than Significant (Class III)
Greenhouse Gas Emissions from Construction Activities.	No impact	Less than Significant (Class III)	Less than Significant (Class III)
<b>3.3 Biological Resources Impact</b>			
Potential impacts to unique, rare, or threatened plant species and natural communities.	No impact	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)
Disturbance and removal of environmentally sensitive habitat.	No impact	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)
Potential impacts to unique, rare, threatened, or endangered wildlife species and/or habitat that support these species.	No impact	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)
Introduction or spread of non-native vegetation with the Project Site.	No impact	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)

**Table ES-3. Summary of Environmental Impacts for Proposed Project and Alternatives**

Impact	Impact Class		
	Proposed Project	No Project Alternative	Partial Gravel Removal Alternative
<b>3.4 Cultural Resources Impacts</b>			
Potential disruption, alteration, destruction, or adverse impact on cultural resources and/or human remains.	No Impact	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)
<b>3.5 Hazards Impacts</b>			
Hazardous Materials Release During Construction	No Impact	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)
Hazardous Conditions During Construction	No Impact	Less than Significant (Class III)	Less than Significant (Class III)
<b>3.6 Hydrology and Water Quality Impacts</b>			
Impacts to water quality or surface runoff.	No Impact	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)
Impacts to impervious surfaces, groundwater, and discharge.	No Impact	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)
<b>3.7 Land Use and Planning Impacts</b>			
Impacts to community development and/or incompatible land uses.	Less than Significant (Class III)	Less than Significant (Class III)	Less than Significant (Class III)
Impacts related to compatibility with applicable land use plans, policies, or regulations of agencies with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Less than Significant (Class III)	Less than Significant after Mitigation (Class II)	Less than Significant after Mitigation (Class II)
Impacts related to compatibility with any applicable habitat conservation plan or natural community conservation plan.	Less than Significant (Class III)	No impact	No impact

**Table ES-3. Summary of Environmental Impacts for Proposed Project and Alternatives**

Impact	Impact Class		
	Proposed Project	No Project Alternative	Partial Gravel Removal Alternative
<b>3.8 Noise Impacts</b>			
Short-term increase in construction noise from gravel removal	No Impact	Less than Significant (Class III)	Less than Significant (Class III)
<b>3.9 Recreation Impacts</b>			
Impacts to existing neighborhood or regional parks that would require expansion of or result in a substantial physical deterioration of the facilities.	Less than Significant after Mitigation (Class II)	Less than Significant (Class III)	Less than Significant (Class III)
Impacts that would terminate or interfere with the established recreational uses.	Less than Significant after Mitigation (Class II)	Less than Significant (Class III)	Less than Significant (Class III)
<b>3.10 Transportation and Traffic Impacts</b>			
Traffic congestion impacts from mining and removal activities	No Impact	Less than Significant (Class III)	Less than Significant (Class III)
Roadway Degradation	No Impact	Less than Significant (Class III)	Less than Significant (Class III)