

4.1 Introduction

The State California Environmental Quality Act (CEQA) Guidelines (Section 15130) require that cumulative impacts be analyzed in an Environmental Impact Report (EIR) when the resulting impacts are cumulatively considerable and, therefore, potentially significant. Cumulative impacts refer to the combined effect of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. The discussion of cumulative impacts must reflect the severity of the impacts as well as the likelihood of their occurrence. However, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Furthermore, the discussion should remain practical and reasonable in considering other projects and related cumulatively considerable impacts. According to Section 15355 of the 2001 State CEQA Guidelines:

“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Furthermore, according to State CEQA Guidelines, Section 15130 (a)(1):

As defined in Section 15355, a “cumulative impact” consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

In addition, as stated in the State CEQA Guidelines, Section 15064(i)(5), it should be noted that:

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the Proposed Project’s incremental effects are cumulatively considerable.

Therefore, the cumulative impacts discussion focuses on whether the impacts of the Proposed Project are cumulatively considerable within the context of combined impacts caused by other past, present, or future projects.

4.2 Past, Present, and Reasonably Foreseeable Future Projects

4.2.1 Geographically Related Projects

The discussion in Section 4.3 below provides the context for past, present, and reasonably foreseeable future projects that have the potential to contribute to cumulative impacts for the Proposed Project. Review of the County's Cumulative Project List (<http://sbcountyplanning.org/projects/index.cfm>), as well as consultation with County staff on past, present, and foreseeable future projects, has determined that there are no past, present, and reasonably foreseeable future projects occurring within a 2-mile radius of the Project Site that could potentially contribute to cumulative impacts. However, ongoing sand mining operations at and near the Project Site by the Gordon Sand Company could potentially contribute to cumulative impacts (refer to Figure 2-2). The Gordon Sand Company has been in operation since 1973 and consists of a sand screening and processing facility, access road, and sand collection pits. It operates under an approved Conditional Use Permit (77-CP-66). Access to areas of the Project Site is provided via an unpaved road, which is a remnant of the drilling operation and is used by Gordon Sand Company.

4.2.2 Coastal Oil and Gas Abandonment Projects

In addition to the standard geographically related cumulative projects, this Supplemental Environmental Impact Report (SEIR) identifies other coastal oil and gas abandonment projects that are located within or in close proximity to Santa Barbara County. These projects are similar to the Proposed Project in that they could result in retention of remnant materials onsite. Table 4-1 below summarizes these projects.

While the projects listed in Table 4-1 could have impacts on aesthetics and visual resources, biological resources, hazards, and recreation depending on their location and the level of remnant material retention, the Proposed Project would not contribute to any cumulatively substantial impacts. The impacts to aesthetics and visual resources as well as recreation associated with the Proposed Project would be located within the Rancho Guadalupe Dunes County Park boundaries and would be mitigated through the Applicant provision of a monetary contribution (in-lieu fee) for the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1. 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. Consequently, due to the localized nature of the Proposed Project's effects as well as the mitigation included to offset these effects, the Proposed Project would not contribute to cumulatively substantial impacts.

Table 4-1. Cumulative Coastal Oil and Gas Abandonment Projects

Name	Jurisdiction	Description
Ellwood Marine Terminal	County of Santa Barbara	The Ellwood Marine Terminal (EMT) previously stored and transported all oil production from Platform Holly and the South Ellwood Oil Field. Since completion of the Line 96 pipeline expansion, the EMT is no longer used and is being decommissioned; some infrastructure associated with the facility may remain in place, including buried pipelines and roadways.
Gaviota Terminal	County of Santa Barbara	Operations at the Gaviota Terminal, an on-shore crude oil storage facility consisting of six tanks, ceased in 2005. The facility is partially abandoned and a pilot soil remediation project is underway to help identify possible future remedial actions. Some site improvements may remain, including roads and drainage features.
Chevron 4H Shell Mounds	California State Lands Commission	Chevron proposes to abandon in place the remains (i.e., shell mounds) associated with four previously removed offshore oil platforms, namely Hazel, Hilda, Heidi, and Hope, and perform targeted restoration activities in the Carpinteria Salt Marsh, including both direct construction and provision of funding for additional future restoration.
Line 96 Abandonment	Goleta and County of Santa Barbara	Line 96, owned by the Ellwood Pipeline Company and operated by Venoco, is a 10-inch pipeline that previously transported oil produced from Platform Holly from the Ellwood Onshore Facility (EOF) to the EMT; some segments of the pipeline will be removed and other segments will potentially remain in place.
Guadalupe Oil Field	County of San Luis Obispo	Oil production at the Guadalupe Oil Field began in 1947 and continued to 1994. Since then, the use of most associated facilities has been discontinued and the oil field infrastructure is currently being abandoned under the Final Guadalupe-Nipomo Dunes Restoration Plan (Guadalupe Fund Committee 2001). While the remediation plan is extensive, it is expected that some of the remnant infrastructure and diluent will remain in place.

4.3 Cumulative Impact Analysis

Cumulative impact discussions for each environmental element are provided below. Where appropriate, mitigation measures for cumulative effects are also identified. Because there are no cumulative projects within a 2-mile radius of the Project Site, the only past, present, or reasonably foreseeable future project considered as part of the cumulative impact analysis within this SEIR is current sand mining operations at the Gordon Sand Company site.

Cumulative impact discussions for each environmental element are provided below.

4.3.1 Aesthetics and Visual Resources

Since the Proposed Project would involve leaving gravel sites in their current condition, visual and aesthetic resources would remain the same as described for the existing setting. As is evidenced by public views from Key Viewing Location (KVL) 1 and KVL 3, the remnant gravel detracts from views particularly in the mid-range, resulting in impacts to scenic vistas/resources and to the visual character or quality of public viewsheds involving the Project Site as a result of the Proposed Project. However, these impacts would be indirectly offset by a monetary contribution (in-lieu fee) for impacts to recreation (MM REC-1). This contribution from the Applicant would be used to purchase a 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. Purchase of a property under this mitigation would also indirectly preserve the aesthetic values of the like-for-like property, indirectly mitigating the impacts to visual resources resulting from remnant gravel within Rancho Guadalupe Dune County Park. Consequently, as a result of the mitigation, the Proposed Project would not contribute to cumulative impacts. Further, the existing Gordon Sand Company mining operation currently operates on the project site under an approved Conditional Use Permit (CUP) and will not contribute to any new aesthetic or visual resource impacts.

4.3.2 Air Quality and Greenhouse Gas Emissions

Because the Proposed Project would not involve any construction or operation activities, it would not result in any pollutant emissions, and would therefore not contribute to cumulative impacts at or near the Project Site.

4.3.3 Biological Resources

Implementation of the Proposed Project would not result in any adverse impacts to biological resources. The presence of the gravel in the dunes does not present a significant adverse impact on dune vegetation or wildlife. Rather, the gravel appears to be beneficial for the establishment and expansion of native dune vegetation, as well as habitat for native wildlife species including western snowy plover. Current operations by the Gordon Sand Company do not cumulatively contribute to this beneficial impact. Additionally, the in-lieu fee for the purpose of mitigating the recreational impact of the Proposed Project would result in indirect benefits to regional biological resources as described in Section 3.3, Biological Resources. The Applicant-provided in-lieu fee shall be used for the purchase of property for public recreational or open space purposes at a ratio of not less than 3:1. 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.

4.3.4 Cultural Resources

Because the Proposed Project would leave the Project Site in its current condition, cultural resources would remain as they are described under the existing setting and there would be no impacts to cultural resources. Therefore, the Proposed Project would not contribute to cumulative impacts to cultural resources.

4.3.5 Hydrology and Water Quality

Because the Proposed Project would not alter the current condition of the Project Site, it would not result in any impacts to hydrology or water quality, and would therefore not contribute to cumulatively considerable impacts to these areas.

4.3.6 Hazards

The Proposed Project would not involve any construction or operation activities and the existing setting would therefore not be changed as a result of its implementation. The gravel currently located at the dunes site is not considered hazardous and does not pose any safety concerns. Therefore, the Proposed Project would not contribute to cumulative impacts to hazards.

4.3.7 Land Use

Because the Proposed Project would include modifications to the conditions presented in the original CUP (82-CP-75[cz]) and Coastal Development Permit (96-CDP-10) issued for the oil development, the Proposed Project is assumed to remain consistent with the permits and all other applicable plans, policies, and regulations. Further, the Gordon Sand Company continues to operate under an approved CUP. Therefore, the project would result in cumulatively considerable land use impacts.

4.3.8 Noise

Implementation of the Proposed Project would not result in any activities that would alter baseline conditions. Because there are no potentially significant impacts expected from leaving the gravel in place, the Proposed Project would not contribute considerably to any noise-related impacts from the current Gordon Sand Company operations.

4.3.9 Recreation

Since the Proposed Project would involve leaving gravel sites in their current condition, conditions at the Project Site remain the same as those described for the existing setting. Consequently, degradation of recreational experience associated with the visual presence of introduced gravel in the natural dune area would continue. However, these impacts would be offset by the provision of an in-lieu fee by the Applicant for the purchase of property at a ratio of not less than 3:1. 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. Therefore, the Proposed Project would not contribute considerably to any cumulative recreational impacts.

4.3.10 Transportation and Traffic

Implementation of the Proposed Project would not have any impacts to transportation or traffic. Therefore, it would not contribute considerably to current or future impacts to transportation or traffic in the area.

