**U.S. DEPARTMENT OF TRANSPORTATION**

**PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**

**ENVIRONMENTAL ASSESSMENT**

**Special Permit Information:**

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|---|---|
| **Docket Number:** | PHMSA-2025-1502 |
| **Requested By:** | Sable Offshore Corp. |
| **Operator ID#:** | 40881 |
| **Original Date Requested:** | December 19, 2025 |
| **Issuance Date:** | December 23, 2025 |

## I. INTRODUCTION

The National Environmental Policy Act (NEPA), 42 United States Code (USC) §§ 4321 – 4375 *et seq*., and U.S. Department of Transportation (DOT) Order No. 5610.1D, require the Pipeline and Hazardous Materials Safety Administration (PHMSA) to analyze a proposed action to determine whether such action would have a significant impact on the human and natural environment. PHMSA analyzes special permit requests for potential risks to public safety and the environment that could result from the decision to grant, grant with additional conditions, or deny the request. As part of this analysis, PHMSA evaluates whether granting a special permit would provide an equal or greater level of safety compared to the operation of the pipeline in regular compliance with the federal pipeline safety regulations. PHMSA's environmental review associated with a special permit is limited only to impacts that would result from granting or denying the special permit.

Pipeline special permits are authorized by statute in 49 USC § 60118(c) and the regulatory requirements, including the application process, are set forth in 49 CFR 190.341. PHMSA is also authorized to grant special permits on an emergency basis under 49 U.S.C. § 60118(c)(2) and 49 CFR 190.341(g). When the expected environmental impacts of a proposed emergency action are

not considered significant, PHMSA prepares an environmental assessment to the extent practicable.[1]

This Environmental Assessment (EA) is being developed to assess the environmental impacts associated with the Emergency Special Permit issued to Sable Offshore Corp. (Sable) on December 23, 2025, in addition to the proposed non-emergency Special Permit (SP) currently under review by PHMSA. The Emergency Special Permit (ESP) granted Sable's request to waive compliance with the requirements of 49 CFR § 195.452(h)(4)(iii)(H) for two segments of the Santa Ynez Pipeline System (SYPS). The proposed non-emergency SP requests to waive the same regulatory requirement.

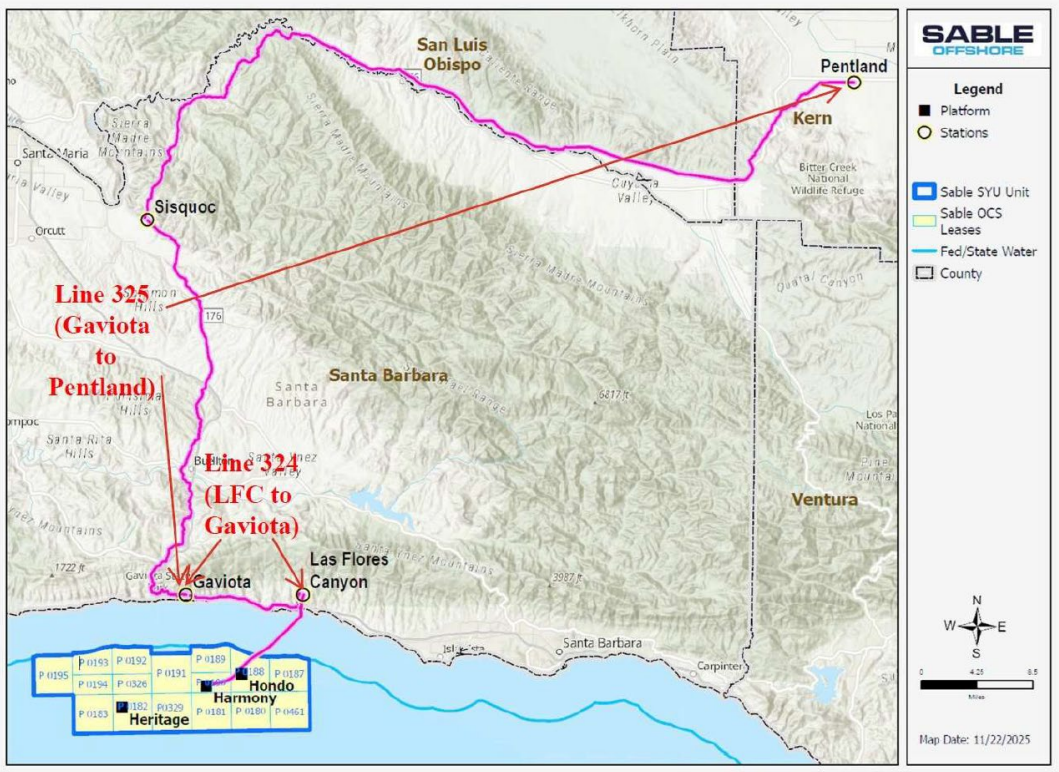
## II. PROJECT DESCRIPTION

### 1) Description of Location

The SYPS is a Part 195-regulated interstate pipeline facility that originates at offshore oil production platforms located on the Outer Continental Shelf (OCS). The SYPS transports the oil produced at the platforms through Federal and State waters and an onshore processing facility in Santa Barbara County, California, known as the Las Flores Canyon Processing Facility (LFC), before transporting the oil through two downstream pipeline segments, CA-324 and CA-325 (formerly known as "Line 901" and "Line 903", respectively), that traverse portions of Santa Barbara, San Luis Obispo, and Kern Counties.[2] A map depicting the location of segments CA-324 and CA-325 within the SYPS is provided below:

[1] USDOT Order 5610.1D: DOT's Procedures for Including Environmental Impacts, Sec. 23(b).

[2] Crude oil has been transported from offshore oil production platforms through the SYPS up to LFC since May 2025. Petroleum flowed through the entire SYPS, including segments CA-324 and CA-325, until May 19, 2015, when a rupture occurred along segment CA-324 approximately 100 yards north of Highway 101 and 0.25 miles west of Refugio State Beach in Santa Barbara County, California. The SYPS has remained in an active state, but petroleum did not flow through it, from the time that 2015 rupture occurred until May 2025.




Segment CA-324 is approximately 10.86 miles in length. It generally runs parallels to the north of U.S. Highway 101 along the southern coast between the LFC consolidated oil and gas processing facility and Gaviota Pump Station. The pipeline segment ends at Las Flores Canyon. This pipeline segment is located north of U.S. Highway 101 and generally follows powerline and/or natural gas pipeline rights-of-way across coastal terraces and incised canyons. Segment CA-325 is split into two portions – CA-325A and 325B. The CA-325A segment is approximately 38.72 miles in length. This pipeline segment extends west from Gaviota Pump Station to a motor operated valve (MOV) located east of Gaviota Creek and U.S. Highway 101. It then enters Gaviota State Park approximately 0.5 miles east of U.S. Highway 101 and extends westerly across the gently sloping coastal terrace and Cañada del Barro before dropping into the Cañada de la Gaviota drainage area. From there, the segment crosses U.S. Highway 101 and Gaviota Creek (Cañada de la Gaviota) immediately south of the U.S. Highway 101 "Caltrans" rest stop area. The pipeline segment then extends west and north from the Gaviota Creek MOV.

CA-325A continues west up a broad spur ridge to the ridge crest and the westerly boundary of Gaviota State Park. The pipeline segment traverses narrow ridge crests, crosses out of the Park and onto Hollister Ranch for approx. 0.5 miles, before crossing back into the Park and descending toward the west fork of Gaviota Creek (Betty Creek). The right-of-way passes west of the Vista del Mar School and Las Cruces Adobe and then crosses beneath Highway 1 west of its intersection with U.S. Highway 101. The pipeline segment continues northward along the west side of U.S. Highway 101 through the Santa Ynez Mountains. It crosses long expanses of grasslands across the Las Cruces Ranch and steep walled canyons that form part of the Nojoqui Creek watershed. North of Moonshine Creek, the route crosses ridges with rock outcroppings. The pipeline crosses beneath the Santa Ynez River west and south of Buellton and continues north across the Purisima and Solomon Hills. It crosses the northern edge of the San Rafael Mountains and the eastern edge of the Santa Maria Valley. The pipeline segment crosses beneath the Sisquoc River and continues north across the River Valley. It traverses moderately to severely sloping foothills at Kelly Canyon and extends west to the Sisquoc Pump Station at the southern end of Santa Maria Canyon.

The CA-325B 30-inch pipeline segment (formerly referred to as Line 903 – Sisquoc to Pentland) is approximately 74.84 miles in length. The pipeline segment follows Santa Maria Canyon after leaving the Sisquoc Pump Station. It then extends northeast towards Tepusquet Road. The route crosses relatively gentle terrain until it reaches the crest of the Sierra Madre Mountains, where it traverses steep slopes approaching Suey Canyon and Buckhorn Canyon. The pipeline segment follows the northern edge of the Sierra Madre Mountains south of State Highway 166 through the Los Padres National Forest. The route crosses rugged terrain across the crests of the Sierra Madre Mountains, descends the mountains, crosses the Sierra Madre Ridge Road, and enters the Cuyama River Valley near Gypsum Canyon. At the Cuyama River crossing, CA-325B exits Santa Barbara County and enters San Luis Obispo County. The pipeline segment continues for approximately 44.5 miles through ranch land, terminating at the Pentland Station in Kern County.

High Consequence Areas (HCAs)[3] along segments CA-324 and 325 are provided below:

| Pipeline Segment Designation | Total Mileage | High Consequence Area (HCA) Type |
|---|---|---|
| CA-324 | 10.86 | Impact to ecologically sensitive regions (coastline) |
| CA-325A | 38.72 | Impact to the city of Buellton (population center, drinking water), and ecologically sensitive regions |
| CA-325B | 74.84 | Impact to ecologically sensitive regions |

Lines CA-324 and 325 traverse multiple counties as well as State and federal land. Approximate mileage is included below:

| | Jurisdiction | CA-324 (miles) | CA-325A (miles) | CA-325B (miles) | Total (miles) |
|---|---|---|---|---|---|
| **County** | Santa Barbara County | 10.9 | 38.7 | 23.8 | 73.4 |
| | San Luis Obispo County | 0 | 0 | 37.2 | 37.2 |
| | Kern County | 0 | 0 | 13.8 | 13.8 |
| | Total | 10.9 | 38.7 | 74.8 | 124.4 |
| **Sub-Jurisdiction** ***(Note 1)*** | California State Parks and Recreation (Gaviota State Park) | 0 | 4.1 | 0 | 4.1 |
| | U.S. Forest Service | 0 | 0 | 6.3 | 6.3 |
| | U.S. Fish and Wildlife (Bitter Creek Wildlife Refuge) | 0 | 0 | 4.5 | 4.5 |
| | California Dept. of Fish and Wildlife (Carrizo Plain Ecological Reserve) | 0 | 0 | 4.5 | 4.5 |

[3] See 49 CFR § 195.450 (defining high consequence area for purposes of the integrity management requirements in 49 CFR § 195.452).

| | | | | |
|---|---|---|---|---|
| Bureau of Land Management | 0 | 0 | 1.0 | 1.0 |
| City of Buellton | 0 | 1.1 | 0 | 1.1 |
| Total | 0 | 5.2 | 16.3 | 21.5 |

*Note 1: Mileage included in County jurisdiction.*

**2) Description of Action**

PHMSA developed this EA to assist in analyzing the environmental impacts associated with the ESP issued to Sable on December 23, 2025 and proposed non-emergency SP currently under PHMSA consideration. Sable sought the ESP to implement the terms of a Consent Decree entered in Civil Action No. 2:20-CV-02415 by the U.S. District Court for the Central District of California ("Consent Decree"). The Consent Decree, entered in response to a failure that occurred near Refugio State Beach in May 2015, imposed certain conditions on the resumption of petroleum transportation through CA-324 and CA-325. Specifically, the Consent Decree required the prior operator to obtain certain waivers to address "the limited effectiveness of cathodic protection" for CA-324 and CA-325.[4]

At the time of entry of the Consent Decree, CA-324 and CA-325 were considered intrastate pipeline facilities subject to regulation by the California Office of the State Fire Marshall (OSFM) pursuant to the terms of its State certification with PHMSA under 49 U.S.C. § 60105(a). Section 60118(d) of the Pipeline Safety Act (PSA) authorizes certified state authorities to issue waivers of the safety standards that would otherwise apply to an intrastate pipeline facility, subject to review by PHMSA under a 60-day prior notice and objection process. For several decades prior to the entry of the Consent Decree, however, CA-324 and CA-325 were considered interstate

[4] Consent Decree at Appx. B, Article I, Section 1.A and B. The Consent Decree did not require the prior operator to obtain these waivers from OSFM if it replaced CA-324 and CA-325. Id. at Appx. B, Article I, Section 2. Appendix D of the Consent Decree also provides for the submission and approval of a "Restart Plan" prior to resuming petroleum transportation through the segments.

pipeline facilities subject to regulation by PHMSA under the PSA.[5] Indeed, PHMSA issued a Corrective Action Order (CAO) to the operator of CA-324 and CA-325 at the time of the failure, Plains All American Pipeline, LP (Plains), pursuant to its sole and exclusive regulatory authority, and the terms and conditions of that CAO provided the basis for many of the provisions subsequently included in the Consent Decree.[6]

The interstate status of CA-324 and CA-325 changed in 2016, when Plains canceled the tariffs filed with the Federal Energy Regulatory Commission (FERC) for providing interstate oil transportation service on both pipeline segments under the Interstate Commerce Act. Pursuant to a longstanding and well-established Statement of Agency Policy and Interpretation codified in Appendix A to part 195, PHMSA "generally rel[ies] on the FERC filings; that is, if there is a tariff or concurrence filed with FERC governing the transportation of hazardous liquids over a pipeline facility or if there has been an exemption from the obligation to file tariffs obtained from FERC," in determining whether to "consider the facility to be an interstate pipeline facility within the meaning of the [PSA]." *Id.* Accordingly, Plains decision to cancel the FERC tariffs had the effect of transforming CA-324 and CA-325 into intrastate pipeline facilities, a status that both pipeline segments retained when the District Court approved the Consent Decree.

In 2024, Sable acquired the SYPS from another operator and sought to obtain the waivers required under the Consent Decree for CA-324 and CA-325 from OFSM. On December 17, 2024, OFSM issued those waivers, and on February 11, 2025, PHMSA notified OSFM that it had no objection to the same under the 60-day notification provision in the PSA.

Several months later, on November 26, 2025, Sable notified PHMSA that it had recently determined that CA-324 and CA-325 were once again part of an interstate pipeline facility under the PSA. Citing the definitions in the PSA and policy statement in Appendix A to part 195, Sable

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[5] Except for purposes of enforcing the requirements in State one-call damage prevention programs, State authorities are prohibited from regulating the safety of interstate pipeline facilities under the PSA. 49 U.S.C. § 60104(c). Interstate pipeline facilities are subject to PHMSA's sole and exclusive regulatory authority for safety purposes.

[6] Plains Pipeline, LP, CPF No. 5-2015-5011H, Corrective Action Order (May 21, 2015), subsequently amended on June 3, 2015, November 12, 2015, and June 16, 2016.

explained that its acquisition and intention to operate the entire SYPS as a single pipeline system transporting oil produced on the OCS into and through the State of California supported the conclusion that the SYPS was an interstate pipeline facility. On December 17, 2025, PHMSA sent a response concurring with Sable's November 26, 2025 determination that the SYPS, including segments CA-324 and CA-325, is an interstate pipeline facility under the PSA. PHMSA further stated that it had sole and exclusive authority to regulate the safety of that interstate pipeline facility, including for purposes of issuing and administering any waivers that might be required for CA-324 and CA-325.

After receiving PHMSA's response, on December 19, 2025, Sable applied for an ESP for segments CA-324 and CA-325. In its application, Sable asked PHMSA to adopt "substantially the same measures" in the ESP as those "that have already been reviewed and approved by [OSFM] through issuance of [the] State Waivers." Specifically, Sable's application sought (1) regulatory relief from 49 C.F.R. § 195.452(h)(4)(iii)(H) and (2) "a special permit from PHMSA for [the] limited effectiveness of cathodic protection" as provided under the Consent Decree.

On December 23, 2025, PHMSA granted the application and issued the ESP to Sable. The ESP included substantially the same conditions as those contained in the two State Waivers previously issued by OFSM, which are summarized further below. Sable's application for the non-emergency SP includes substantially the same conditions as the ESP and the State Waivers.

## III. PURPOSE AND NEED

Issuance of a special permit is necessary to resume transportation of petroleum through CA-324 and CA-325 under the terms of the Consent Decree. The Consent Decree required the prior operator, Plains, to obtain waivers from OFSM as an alternative to completely replacing the line pipe in both segments. Sable subsequently acquired CA-324 and CA-325 from another operator and obtained the waivers required from OFSM under the Consent Decree. Having recently decided to begin using the SYPS once again as an interstate pipeline facility, Sable appropriately sought to obtain the waivers required under the Consent Decree from PHMSA.

Moreover, Sable asked PHMSA to grant those waivers on an emergency basis to address an actual or impending emergency involving pipeline transportation pursuant to Executive Order

14156.[7] Issued in accordance with the authority provided in the National Emergencies Act (50 U.S.C. § 1601 et seq.), the President declared a national energy emergency in Executive Order 14156 based on his finding that "[t]he United States' insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to our Nation's economy, national security, and foreign policy."[8] The Executive Order directs agencies, such as PHMSA, to "identify and exercise any lawful emergency authorities available to them, as well as all other lawful authorities they may possess, to facilitate," among other activities, the "production, transportation, refining, and generation of domestic energy resources."[9] The Executive Order further directs agencies to "identify and use all lawful emergency or other authorities available to them to facilitate the supply, refining, and transportation of energy in and through the West Coast of the United States . . . ."[10]

PHMSA determined that granting the ESP was consistent with the requirements in the PSA given the national energy emergency declared by the President in Executive Order 14156. Specifically, the ESP would enable and facilitate the ***special permit segments*** to meet regional energy demands, reduce refinery feedstock prices, mitigate the risks of fuel shortages on the West Coast, and reduce United States dependency on imported oil and the associated energy security risks of such imports. As described in Executive Order 14156, the national energy emergency requires the expeditious deployment of domestic "unrealized energy resources" and the United States' "current inadequate development of domestic energy resources leaves us vulnerable to hostile foreign actors and poses an imminent and growing threat to the United States' prosperity and national security."[11] As an executive agency, PHMSA must "exercise any

[7] 49 U.S.C. § 60118(c)(2); 49 CFR 190.341(g).

[8] Exec. Order 14156: Declaring a National Energy Emergency (Jan. 20, 2025), Sec. 1.

[9] Id. at Sec. 2(a). The order's definition of "energy" or "energy resources" includes "crude oil," and its definition of "transportation" includes "the physical movement of energy, including through, but not limited to, pipelines." Sec. 1(a); 1(c).

[10] Id. at Sec. 3(b).

[11] Id. at Sec. 1.

lawful emergency authorities" and "all other lawful authorities" to facilitate the transportation of "domestic energy resources."[12]

In addition, the current crude oil supply conditions in California create the additional risk of a statewide motor fuel supply emergency. The reduction in regional sources of crude caused by declining onshore production, and the current inability to move oil out of the Santa Ynez Unit due to the lack of adequate pipeline transportation into California, has increased the state's reliance on imported crude oil from countries such as Iraq, Ecuador, and Brazil. Oil from these locations must be shipped significant distances to California by ocean-going tankers at greater expense and a potentially greater environmental impact than oil produced in-state. California's reliance on foreign crude creates significant risk of disruptions given current geopolitical conditions. Issuance of ESP will facilitate the prompt and safe restart of CA-324 and CA-325, which would immediately and significantly improve energy security by offsetting the need for imported crude. For these reasons, the President's declaration of a national energy emergency in Executive Order 14156 supports the issuance of the ESP and the subsequent non-emergency SP.

PHMSA's decision to grant the ESP also implements the directives in Executive Order 14154 (January 20, 2025) ("Unleashing American Energy"), in which the President identified that "high energy costs devastate American consumers by driving up the cost of transportation, heating, utilities, farming and manufacturing, while weakening our national security."[13] Executive Order 14154 establishes a policy to "encourage energy exploration and production on Federal lands and waters, including on the Outer Continental Shelf, in order to meet the needs of our citizens and solidify the United States as a global energy leader long into the future," as well as to "protect the United States'[] economic and national security and military preparedness by ensuring that an abundant supply of reliable energy is readily accessible in every State and territory of the Nation."[14] Executive Order 14154 further directs multiple agencies, including the Department of Transportation, to "undertake all available efforts to eliminate all delays within

[12] Id. at Sec. 2(a).

[13] Exec. Order 14154: Unleashing American Energy (Jan. 20, 2025), Sec. 1.

[14] Id. at Sec. 2.

their respective permitting processes," and to use "all possible authorities, including emergency authorities, to expedite the adjudication of Federal permit" for projects deemed "essential for the Nation's economy or national security."[15] As with Executive Order 14156, grant of the ESP implements Executive Order 14154 by facilitating the transportation of petroleum through CA-324 and CA-325 in an expedient fashion and allowing for the realization of the above-described energy supply and security benefits.

Finally, PHMSA's decision to grant the ESP avoided a potential gap in coverage under the waivers issued by OSFM. Because CA-324 and 325 were reconfigured as an interstate pipeline, the ESP was necessary to replace those waivers, which no longer have any legal effect due to the operation of the preemption provision in 49 U.S.C. § 60104(c). Sable's recent invocation of the *Notice of Limited Enforcement Discretion and Statement of Policy for Issuing Special Permits in Response to the National Energy Emergency* (*National Energy Emergency Enforcement Discretion*) that PHMSA issued on January 12, 2026, in applying for a non-emergency special permit provides further assurance that any gap in coverage will be avoided.[16] Consistent with the *National Energy Emergency Enforcement Discretion*, Sable has committed to following the conditions in the ESP after it expires on February 21, 2026 pending a final determination from PHMSA on its application for a non-emergency SP.

## IV. BACKGROUND AND REGULATORY REQUIREMENTS

### 1) Existing Part 195 Requirement

Section 195.452(h)(4)(iii)(H) provides that certain corrosion of or along a longitudinal seam weld must be mitigated within 180 days of discovery. On September 12, 2025, PHMSA published a revised interpretation clarifying the applicability of the requirements in § 195.452(h)(4)(iii)(H). Specifically, PHMSA clarified that corrosion that coincidentally occurs

[15] Id. at Sec. 5.

[16] A copy of the *National Energy Emergency Enforcement Discretion* is available on the PHMSA website at https://www.phmsa.dot.gov/news/notice-limited-enforcement-discretion-and-statement-policy-issuing-special-permits-response.

along a longitudinal seam but which is not otherwise preferential to the seam does not need to be mitigated per section 195.452(h)(4)(iii)(H).[17]

**2) Consent Decree Requirements**

Appendix B of the Consent Decree provides that, as a condition of resuming petroleum transportation through segments CA-324 and CA-325, the operator must either (1) obtain a waiver for both segments from OSFM "for the limited effectiveness of cathodic protection," or (2) completely replace the line pipe in both segments. As noted above, Sable obtained the waivers required from OSFM, but those waivers are no longer effective due to the change in the jurisdictional status of CA-324 and CA-325, which are now interstate pipeline facilities subject to the sole and exclusive regulatory authority of PHMSA under the PSA.

Consistent with the terms of the Consent Decree and the requirements in the PSA, PHMSA issued the ESP for segments CA-324 and CA-325 to replace the OSFM waivers. The ESP included conditions that are substantially the same as those included in the prior waivers.

**3) Existing Environmental Review**

*Initial EIS:* On July 18, 1984, the US Department of the Interior (DOI) and the California State Lands Commission (CSLC) prepared a draft joint Environmental Impact Report/Environmental Impact Statement ("Draft EIS"), pursuant to the requirements in NEPA and the California Environmental Quality Act (CEQA), analyzing the construction, operation, and ongoing repair and maintenance of segments CA-324 and CA-325.[18]

Following public comment, in January 1985, the DOI and CSLC prepared a Final Environmental Impact Report/Environmental Impact Statement ("Final EIS"). Both the Draft EIS

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[17] PHMSA, Hazardous Liquid Integrity Management Frequently Asked Question 7.16 (September 12, 2025).

[18] The Draft EIS analyzed the "Celeron / All American Pipeline Proposal," which consisted of the construction, operation, and ongoing repair and maintenance of an approximately 1,200-mile pipeline to transport Outer Continental Shelf and other locally produced crude oils from the Santa Barbara and Santa Maria Basins to McCamey, Texas. Segments CA-324 and CA-325 were analyzed in the Draft EIS as part of the "Celeron segment" of the proposal. The operational life of these segments were assumed to continue until "the availability of crude oil" for use in the segments was exhausted. (*See* Draft EIS, p. 2-35.)

and Final EIS also analyzed the environmental effects of identified routing alternatives to determine the significance of these potential impacts, the avoidability of these impacts, and potential mitigative measures. Collectively, this EA refers to the Draft EIS and Final EIS as the "Initial EIS."[19] The Initial EIS serves to characterize impacts associated with the construction of CA-324 and CA-325, as well as routine maintenance and repair activities as part of ongoing operation.

*Replacement EIR/EA.* In 2022, Santa Barbara County and the DOI's Bureau of Land Management prepared a joint Revised Notice of Preparation of a Draft Environmental Impact Report/Environmental Impact Assessment ("Replacement EIR/EA") for the proposed Plains Replacement Pipeline Project (Project). The notice assessed the significance of potential environmental impacts associated with the replacement of CA-324 and CA-325 to determine which issue areas to cover in an environmental impact statement.[20] The Replacement EIR/EA determined potentially significant impacts could result to biological resources, cultural resources, and hydrological resources. In October 2023, the pipeline operator withdrew its application for the proposed project, stating that potential environmental impacts associated with the proposed project would be unnecessary and avoidable given that the existing pipeline could be responsibly restarted.[21] The Replacement EIR/EA now characterizes impacts associated with the No Action Alternative, discussed further below.

*IM Rule EA*. In 2000, PHMSA conducted an environmental assessment in conjunction with the Integrity Management Rule (IM Rule) at 49 CFR 195.452, which governs the frequency of integrity assessments and prescribes a schedule of anomaly repairs for covered pipelines not

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[19] The Draft EIS and Final EIS can be accessed at http://cosantabarbara.app.box.com/s/gc3vhh8ns8aiwketnq35vwbehnhre672 and https://cosantabarbara.app.box.com/s/lkl9oo9xdsaangevdp6pasfo0cmimvlt, respectively, and are incorporated into this EA.

[20] The Revised Notice of Preparation of a Draft Environmental Impact Report/Environmental Impact Assessment can be accessed at https://cosantabarbara.app.box.com/s/xs3savjcx9rkdsrmobc2eedzec8cn78k and is incorporated into this EA.

[21] The Withdrawal Letter can be accessed here: https://cosantabarbara.app.box.com/s/3gvdwbzta1l19ss9r7cpkuvinte1byuv/file/1343281220509

otherwise subject to a special permit (see Appendix A). PHMSA's EA associated with that rulemaking determined that hydrostatic testing could be associated with minor environmental impacts, including:

- slight disturbance of the right-of-way to uncover short segments of the line;
- potential for leaks of water and oil residue mixture; and
- disposition of the spent water test medium that mixes with residue oil.

PHMSA's EA also determined that internal inspections may have minor environmental impacts, including:

- possible need to install pig launchers and receivers and valves or other appurtenances to accommodate inspection tools; and
- possibility of additional localized disturbances along the right-of-way for excavations to examine and repair identified anomalies.[22]

PHMSA determined that these impacts would be limited to small areas on the applicable pipeline segment's right-of-way and would not involve additional vegetation or environmental disturbances beyond the equipment site. PHMSA concluded that these adverse impacts would not be significant, and determined that:

> the combined impacts of the initial baseline assessment (pressure testing or internal inspection), the subsequent periodic assessments, and additional preventive and mitigative measures that may be implemented to protect high consequence areas will result in positive environmental impacts. The number of incidents and the environmental damage from failures in and near high consequence areas are likely to be reduced. However, from a national perspective, the impact is not expected to be significant for the pipeline operators covered by the final rule.[23]

[22] Appx. A at 23.

[23] 65 Fed. Reg. at 75405.

The IM rule EA also determined that acceleration of integrity assessments of affected segments would "only shift[] the improved integrity assurance forward for a few years for most high consequence areas."[24]

The IM Rule EA serves to establish the environmental insignificance of integrity assessments and anomaly repair activities that are required under the ESP, including in-line inspections and excavations and repair of pipe anomalies. The focus of the IM EA is generalized impacts of the mitigations resulting from the rulemaking. It does not assess location-specific impacts related to this pipeline itself. However, PHMSA reviewed the IM EA and determined that the environmental resource areas analyses are applicable to site specific actions, such as this emergency special permit.

## V. PHMSA NEPA REVIEW

PHMSA's EA for the ESP and non-emergency SP is limited to an evaluation of the significance of impacts associated with the Action Alternative, compared to those that would result under the No Action Alternative. These alternatives are discussed in more detail below.

### 1) Alternatives

*Alternative 1: No Action Alternative*. This Alternative involves the failure to issue a regulatory waiver and the construction of approximately 123 miles of new pipe at or near segments CA-324 and CA-325's existing right-of-way, pursuant to Appendix B, Article I, Section 2 of the Consent Decree. This Alternative would involve substantially greater earth disturbances compared to the Action Alternative, based on the need to excavate the entire pipeline route, install

[24] *Id*. Apart from these previous NEPA reviews, the US Department of Interior Bureau of Safety and Environmental Enforcement ("BSEE") also recently determined that BSEE's decision to approve an extension of time to resume operations on the 16 federal offshore leases comprising Sable's Santa Ynez Unit will not significantly affect the quality of the human environment under NEPA. See US Dept. of Interior Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, "Finding of No Significant Impact, ExxonMobil/Sable Offshore Corporation Lease Extension of the Santa Ynez Unit – Environmental Assessment," May 2025 (available at https://www.boem.gov/sites/default/files/documents/environment/environmental-assessment/2025_0528_SableEA_FONSI_508c.pdf). Santa Ynez Unit production activities send oil through the SYPS for eventual downstream transportation.

line pipe, and backfill. Upon completion of replacement, the new pipeline segments would transport oil and continue to comply with the existing requirements of Part 195. This includes performance of integrity assessments, such as ILIs, on an operator-determined schedule not to exceed once every five years, and the potential repair of anomalies identified from assessments according to the requirements in 49 CFR 195.452, generally through excavation and localized replacement of affected pipe.

*Alternative 2: Action Alternative.* The Action Alternative is the grant of the waiver sought in the ESP and non-emergency SP. This would address the energy emergency conditions identified above, including regional fuel shortages and resultant economic and national security issues, through facilitating the transportation of petroleum through CA-324 and CA-325 within the framework of the Consent Decree and at an equivalent or greater level of safety as provided under the Consent Decree and Part 195. No large-scale earth disturbances involved with pipeline replacement would be required under the No Action Alternative.[25] Under the Proposed Alternative, additional maintenance, inspection, and localized repair activities ("Special Permit Conditions") would be required as further described below.

PHMSA personnel separately reviewed information regarding the location of segments CA-324 and CA-325 and the conditions in the ESP and non-emergency SP. PHMSA personnel previously determined that the ESP would achieve at least an equivalent level of safety as adhering to the Part 195 regulations in full.

In addition, this EA does not evaluate alternatives beyond PHMSA's mandate. This EA considers only reasonable alternatives, including those which are consistent with the legal framework currently applicable to the special permit segments (i.e., the requirements specified in the Consent Decree and Part 195), and which meet the above-described purpose and need for the

[25] The Action Alternative does not include actions taken by the operator that are not required under the ESP, or which are discrete tasks that had already been completed prior to the issuance of the ESP. These actions include the installation of numerous safety valves and real-time transient model (RTTM) leak detection system to reduce spill volumes, performance of integrity assessments and repairs of identified anomalies pursuant to the Consent Decree's specifications, and spike hydrostatic testing pursuant to the State Waivers, each of which lower the risk of a pipeline failure. Nor does the Action Alternative include initial construction of CA-324 and 325.

ESP.[26] This EA does not consider, nor does NEPA require, consideration of every theoretical alternative. This EA only analyzes reasonable, foreseeable impacts of specifically the Action Alternative (i.e., granting the special permit) and No Action Alternative. Alternatives that require speculation outside of the current legal framework (as may occur in the possibility of prospective termination or modification of the Consent Decree or amendment to Part 195), or which do not meet the purpose and need for the proposed action (such as permanent abandonment of the special permit segments without replacement) are not considered in this EA.

## VI. OVERVIEW OF SPECIAL PERMIT CONDITIONS

The ESP and non-emergency SP conditions require maintenance, inspection, and repair activities that are more stringent than required under Part 195. In particular, the conditions require fracture toughness testing, spike hydrotesting, more frequent integrity assessments and direct examinations, and more stringent anomaly repair criteria. The conditions do not provide for or allow any expansion in capacity or new or expanded physical infrastructure along segments CA-324 or CA-325.

A summary of conditions imposing the above requirements is provided below.

- *Condition 14(c):* Requires two Ultrasonic Wall Measurement (UTWM) ILI assessments per year for the first two years following restart, then, at minimum, annual ILI assessments thereafter, to assess metal loss, including due to corrosion. Part 195 only requires such integrity assessments on a once-per-five-year schedule, and the Special Permit Segments were previously only assessed on a once-per-three-year schedule. The higher assessment frequency established in the ESP will facilitate the timely detection and repair of such anomalies before they pose integrity risks.
- *Condition 14(d):* Requires, at minimum, annual Ultrasonic Shear Wave Crack Detection (USCD) ILI assessments. Part 195 only requires such assessments on a once-per-five-year schedule. The higher assessment frequency established in the ESP will facilitate the timely detection and repair of such anomalies before they pose integrity risks.

[26] USDOT Order 5610.1D.

- *Condition 14(e):* Requires running high-resolution deformation ILI tool along with each UTWM ILI assessments.
- *Condition 14(i)-(k):* Requires ILI tool vendor to determine tool tolerance per API 1163 2nd Ed. and include that tolerance in determining the size of each indication reported to Sable. Sable must account for this tool tolerance and anomaly growth rates in scheduling repairs and future reassessment intervals and must demonstrate ILI tool accuracy for each run by using calibration, excavations, and unity plots demonstrating tool accuracy meets the vendor's specifications (typical for depth within 10% accuracy for 80% of the time). Sable must perform at least four validation digs in accordance with Level 2 of API 1163.
- *Conditions 16-17:* Requires immediate repair of crack or crack-like anomalies equal to or greater than 50% of wall thickness (vs 80% threshold in § 195.452(h)(4)(i)). Requires 180-day repair of all internal or external metal loss anomalies with an ILI-reported depth of 40% wall loss or more, including tool tolerance (vs 50% wall loss threshold in § 195.452(h)(4)(iii)(F)).
- *Condition 18:* Requires Sable to develop a corrosion growth rate procedure to annually calculate corrosion growth rates between successive ILI assessments, including the most accurate signal matching between ILI data sets.
- *Condition 21(b)-(f):* Requires Sable to field-analyze a sample of assessment-identified anomalies to compare, and to apply 6t by 6t interaction criteria, and to use an approved third-party to review all ILI reports, verification dig results, unity plots, field findings, and any other finding that could affect the integrity of the Special Permit Segments within 6 months of each ILI assessment.

Some of the activities specified in the conditions already have been completed prior to the grant of the ESP, namely fracture toughness testing and spike hydrotesting. Moreover, multiple integrity assessments and substantial anomaly repairs have also been performed by Sable along segments CA-324 and CA-325 prior to the grant of the ESP. These discrete, previously-completed activities are not considered for purposes of characterizing impacts associated with the Action Alternative.

## VII. AFFECTED RESOURCES AND ENVIRONMENTAL CONSEQUENCES

## 1) Land Use, Agriculture, and Recreation

The right-of-way for segments CA-324 and CA-325 runs parallel to US Highway 101 along Santa Barbara County's southern coast, until CA-325 turns north toward the Sisquoc Pump Station and then continues east toward the Pentland Station terminal in Kern County, California. The route primarily crosses grazing land between side canyons containing riparian vegetation, as well as oak woodland, rangeland, and irrigated cropland. There are also mountainous portions along the segments' route, and coastal and eastern foothill areas. Portions of these areas have experienced forest and range fires, particularly during dry years and under strong easterly wind conditions. Recreational facilities surrounding or in proximity to segments CA-324 and CA-325 include Refugio and Gaviota State Parks, which include beaches and campgrounds. Beyond Gaviota Pass, the segments enter the Los Padres National Forest, in which various recreational activities occur, ranging from hunting, camping, and off-roading.

The No Action Alternative would require construction of new pipeline and would potentially be subject to Santa Barbara County's Inland and Coastal Zoning Ordinance standards as well as Santa Barbara County's Comprehensive Plan, including its Coastal Land Use Plan, as well as similar standards within San Luis Obispo and Kern Counties. The No Action Alternative could result in significant land use impacts, which would be determined upon review by local agencies pursuant to these authorities.

Under the Action Alternative, no new construction will occur beyond localized excavations that may be required based on the results of the integrity assessments. As no land use conversion is proposed, no significant impacts to land use, agriculture, or recreational resources will occur. Although the Action Alternative would involve the performance of integrity assessments on a more frequent basis than is otherwise required under Part 195, which may result in the need to perform localized excavations to repair anomalies discovered from such assessments (according to the more stringent repair criteria in the permit conditions), these activities were already addressed and determined to be insignificant in the IM rule EA. There is no evidence to suggest that more frequent integrity assessments would result in significant environmental impacts. The degree of excavation under the Action Alternative would be substantially less as

compared to the No Action Alternative, which would entail large-scale excavation for the entire length of the special permit segments.

Moreover, the Action Alternative will not alter the segments' existing oil transmission capacity, route, or facilities so as to introduce new impacts related to land use and recreation, such as agricultural land conversions, providing uncontrolled access to previously inaccessible areas, or affecting forest fire or wildfire risks. Nor would the Action Alternative produce any new impacts related to conflicts with land use policies limiting pipeline crossings at environmentally sensitive habitat areas or recreational areas beyond what was already determined in the Initial EIS. As such, other land use impacts (other than impacts related to potential oil spill impacts, as described below) associated with the Action Alternative would not be significant.[27]

The Action Alternative would not present significant impacts to agricultural or recreational resources due to potential oil spills, as PHMSA will not issue the special permit if it does not achieve an equivalent level of safety to the regulations. Specifically, the Action Alternative's heightened inspection, monitoring, testing, maintenance, and repair requirements collectively will minimize the risk of an oil spill and minimize the magnitude of any such spill should it occur relative to the initial construction, operation, and ongoing repair and maintenance of segments CA-324 and 325, to a degree equivalent or superior to Part 195 requirements. Compliance with the permit conditions provide that segments CA-324 and CA-325 will be operated in accordance with inspection and repair standards that are more stringent than required under Part 195.

**2) <u>Cultural and Historic Resources</u>**

The Initial EIS identified the presence of cultural resource sites within segments CA-324 and CA-325's right of way, including lithic scatters, bedrock millingstones, rock shelters, campsites, habitations, quarries, pit houses, and burial sites, among others, and as part of construction of these segments, imposed Mitigation Measure 30, which required the pipeline

[27] Sable has also installed 27 new safety valves along CA-324 and 325 that serve to limit the spill volume in the event of a rupture, reflecting best available technology to minimize spill volume pursuant to California AB 864.

operator to comply with a cultural resources inventory and treatment plan to be finalized by federal and state land management agencies, including the State Historic Preservation Office, before construction commenced. (Draft EIS, p. 4-159, Final EIS, p. 3-7.) The Initial EIS required that the plan would include an intensive cultural resource survey, site-specific mitigation measures, data recovery programs, archaeological monitoring, and cooperation with appropriate Native American groups. (Draft EIS, pp. 4-159 through 4-160; Final EIS, pp. 4-13 through 4-14.) Mitigation Measure 30 has already been implemented as part of the initial construction of the segments.

Under the Action Alternative, no new construction will occur beyond localized excavations that may be required based on integrity assessments. The Action Alternative would involve the performance of integrity assessments on a more frequent basis, which may result in the need to perform localized excavations to repair anomalies discovered from such assessments (under the more stringent repair criteria in the permit conditions). These excavations will take place within disturbed soil within the existing rights-of-way for segments CA-324 and CA-325. Because of these prior mitigations it is unlikely that eligible cultural resources exist.

Continued operation of the already-constructed pipeline is a non-invasive activity which has no potential to impact historic properties under NHPA. Although future maintenance and anomaly repairs may involve ground disturbance in discrete areas, such work would occur within the existing, previously disturbed right-of-way, where additional NRHP-eligible resources are not expected. Because survey and mitigation occurred prior to the construction of the pipeline, it is believed that no additional resources remain. However, full review of the initial EIS and subsequent EIR was not possible due to the emergency nature of this special permit request. Emergency consultation with CA State Historic Preservation Officer (SHPO), Santa Ynez Band of Chumash Indians Tribal Historic Preservation Officer (THPO), and the Advisory Council on Historic Preservation (ACHP) is ongoing due to the possibility that some ground disturbance could be required to repair anomalies which could otherwise pose a hazard to health and human safety, within the disturbed pipeline ROW. PHMSA has requested comment on our finding that the current action will have no adverse effect on historic properties, with the conditions that the operator follow the mitigation requirements of the initial EIS, an Unanticipated Discovery

Protocol is implemented, and any additional mitigations determined following consultation with SHPO/THPOs should potentially eligible historic properties be discovered.

On the other hand, the No Action Alternative could potentially result in significant impacts to cultural resources, as determined in the 2020 EIA (EIA, pp. 13-14), due to the substantially greater degree of subsurface disturbance associated with the wholesale replacement of the existing pipe along CA-324 and 325.

**3) <u>Biological Resources</u>**

As noted above, Segments CA-324 and CA-325's rights-of-way are primarily alongside grazing land between side canyons containing riparian vegetation, as well as oak woodland, rangeland, and irrigated cropland. There are also mountainous portions along the segments' route, as well as coastal and eastern foothill areas. The Initial EIS determined that no significant adverse impacts to aquatic biology would occur during construction due to the limited and temporary nature of construction activities. (Draft EIS, p. 4-42.) The Initial EIS nonetheless imposed Mitigation Measure 8 to further limit potential impacts, which restricted the amount of construction equipment fuel and lubrication that could be located near sensitive streams and where construction equipment fueling and lubrication activities could occur. (Draft EIS, p. 4-153; Final EIS, p. 4-6.) Mitigation Measure 8 continues to be implemented by Sable when conducting any applicable repair and maintenance activities along segments CA-324 and CA-325, independent of the grant of the ESP.

The Initial EIS further determined that construction of segments CA-324 and CA-325 would result in significant adverse impacts to sensitive plant and wildlife species (Draft EIS, pp. 4-45 through 4-46.), and imposed several mitigation measures to address these impacts. Based on a review of the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool, PHMSA identified 31 federally listed or proposed species and critical habitat with the potential to occur in the Action Area. Due to the ongoing performance of such repair and maintenance activities since segments CA-324 and CA-325 were constructed, their rights-of-way have remained relatively clear of mature vegetation. However, PHMSA

acknowledges some areas within and immediately adjacent to the project area may contain suitable habitat for these species.

Under the Action Alternative, no new construction will occur beyond localized excavations that may be required based on integrity assessments. Therefore, no significant impacts to terrestrial or aquatic biological resources are expected to occur. Although the Action Alternative would involve the performance of integrity assessments on a more frequent basis, which may result in the need to perform localized excavations to repair anomalies discovered from such assessments (under the more stringent repair criteria in the permit conditions), these activities were already addressed and determined to be insignificant in the IM rule EA, and are otherwise of a limited scope that no significant impacts to biological resources would be expected. Moreover, these excavations are not expected to affect biological resources because they are within the existing rights-of-way for segments CA-324 and CA-325, where such resources are not expected to be found.

The Action Alternative would not present significant impacts to biological resources due to potential oil spills. Specifically, the Action Alternative's heightened inspection, monitoring, testing, maintenance, and repair requirements collectively will minimize the risk of an oil spill and minimize the magnitude of any such spill should it occur relative to the initial construction, operation, and ongoing repair and maintenance of segments CA-324 and 325, to a degree equivalent or superior to Part 195 requirements that are applicable to other pipelines, including replacement of CA-324 and 325. Compliance with the permit conditions provide that segments CA-324 and CA-325 will be operated in accordance with inspection and repair standards that are more stringent than required under Part 195.

To address the uncertainty of future repair locations, PHMSA is consulting with the USFWS. PHMSA completed emergency consultation with USFWS. PHMSA is in the process of initiating non-emergency consultation with USFWS. Sable should consult the "Official Species List for General Project Design Guidelines," which provides recommendations to help avoid or minimize adverse effects to listed species and designated critical habitat. Through its non-emergency consultation with USFWS, PHMSA and USFWS may determine different mitigation measures are needed. Based on the limited scope of the potential ground disturbance

activities, duration, and confinement of work to the existing ROW, PHMSA anticipates that the proposed action may affect, but is not likely to adversely affect listed species or designated critical habitat under Section 7 of the Endangered Species Act. Future consultation is needed.

The No Action Alternative could potentially result in significant impacts to biological resources, as determined in the Replacement EIR/EIA (Replacement EIR/EIA, pp. 11-12), due to the substantially greater degree of subsurface disturbance associated with wholesale replacement of CA-324 and 325. This includes some 123 new trenched stream crossings (requiring a Section 404 Clean Water Act permit from the US Army Corps of Engineers) and potential vegetation trimming and clearing that would result in removal or trimming of habitats for threatened and endangered species listed in the California Natural Diversity Database (Replacement EIR/EIA, p. 12).

### 1) Air Quality

Segments CA-324 and CA-325 pass through the South Central Coast and San Joaquin Valley Air Basins of California and are located within Santa Barbara, Kern, and San Luis Obispo Counties. Currently, Santa Barbara County and the portion of San Luis Obispo County in which the segments pass through are in attainment with all National Ambient Air Quality Standards.[28] The San Joaquin Valley Air Basin in Kern County is currently designated as nonattainment for the following pollutants: 8-hour ozone (2008 and 2015 National Ambient Air Quality Standard (NAAQS)), PM2.5 (1997, 2006, 2001 NAAQS), and in maintenance for 8 hour ozone (1997 NAAQS) and PM10. .[29]

The Initial EIS determined that construction-related emissions (primarily resulting from heavy-duty vehicle traffic) would not result in any significant air quality impacts because such emissions would account for a small portion of the background ambient emissions in the

[28] EPA, "California Nonattainment/Maintenance Status for Each County by Year for all Criteria Pollutants", available at https://www3.epa.gov/airquality/greenbook/anayo_ca.html. These two Counties are listed as in nonattainment or "nonattainment-transitional" pursuant to the 2023 area designations for the California Ambient Air Quality Standards for ozone. See https://ww2.arb.ca.gov/sites/default/files/2024-10/State_2023_O3.pdf.

[29] EPA, "California Nonattainment/Maintenance Status for Each County by Year for all Criteria Pollutants", available at https://www3.epa.gov/airquality/greenbook/anayo_ca.html.

surrounding area and any such emissions would be temporary and transient. (Draft EIS, pp. 4-3, 4-5.) The Initial EIS also concluded that operation of segments CA-324 and CA-325 and associated pump stations would result in a minor incremental increase in ambient background concentrations of nitrogen oxides, carbon monoxide, hydrocarbons, and sulfur dioxide. As such, no significant impacts related to air quality were anticipated to occur. (Draft EIS, p. 4-5.) The air quality impacts described in the Initial EIS would be comparable to what would occur under the No Action Alternative given that there would be similar types of construction activities occurring.

The air quality impacts described in the Initial EIS would be comparable to what would occur under the No Action Alternative given that there would be similar types of construction activities occurring. Although the Action Alternative would involve the performance of integrity assessments on a more frequent basis, which may result in the need to perform localized excavations to repair anomalies discovered from such assessments, inspection-related activities were already addressed and determined to be insignificant in the IM rule EA and are not otherwise associated with significant emissions. There is no evidence to suggest that more frequent integrity assessments would result in significant environmental impacts. Moreover, the Action Alternative would not increase these segments' oil transmission capacity beyond that contemplated in the Initial EIS, and therefore will not directly or indirectly increase operational emissions at any pump stations or other final delivery points.

Future routine repair and maintenance work conducted under the Action Alternative would require substantially less excavation activities than initial construction of segments CA-324 and CA-325 (whose air quality impacts were already deemed insignificant in the Initial EIS) and as compared to the No Action Alternative (involving wholesale replacement of CA-324 and CA-325). Therefore, the Proposed Action is not associated with significant air quality impacts.

**4) <u>Hydrological Resources</u>**

Segments CA-324 and CA-325 cross three bodies of water, as noted in the table below.

| Name | USGS QUAD | Longitude (DD) | Latitude (DD) |
|---|---|---|---|
| Santa Ynez River | Solvang | -120.2124695 | 34.6143644 |
| Sisquoc River | Foxen Canyon | -120.2207732 | 34.8471759 |
| Cuyama River | Miranda Pine Mtn | -120.0690660 | 35.0982197 |

The Initial EIS determined that construction and operation of CA-324 and CA-325 would not result in any significant adverse impacts to surface water resources due to the limited and temporary nature of construction activities. (Draft EIS, p. 4-31 through 4-33, S-5, 4-163.) The Initial EIS further determined that the initial construction or operation of segments CA-324 and CA-325 would not result in any significant impacts to groundwater resources. (Draft EIS, pp. 4-34 - 35.). The hydrological resource impacts described in the Initial EIS would be comparable to what would occur under the No Action Alternative given that there would be similar types of construction activities occurring.

Under the Action Alternative, no new construction will occur beyond localized excavations that may be required based on integrity assessments. Therefore, no significant impacts to hydrological resources will occur. Although the Action Alternative would involve the performance of integrity assessments on a more frequent basis, which may result in the need to perform localized excavations to repair anomalies discovered from such assessments (under the more stringent repair criteria in the permit conditions), inspection-related activities were already addressed and determined to be insignificant in the IM rule EA. There is no evidence to suggest that more frequent integrity assessments would result in significant environmental impacts. Moreover, these excavations are not expected to affect hydrological resources because they are within the existing rights-of-way for segments CA-324 and CA-325. In fact, the extent of excavation associated with these repair activities is considerably less than the degree of excavation associated with initial construction of these segments (which was deemed to present insignificant impacts to hydrological resources) or complete replacement under the No Action Alternative.

The Action Alternative would also not present significant impacts to hydrological resources due to potential oil spills. Specifically, the Action Alternative's heightened inspection,

monitoring, testing, maintenance, and repair requirements collectively will minimize the risk of an oil spill and minimize the magnitude of any such spill should it occur relative to the initial construction, operation, and ongoing repair and maintenance of segments CA-324 and 325, to a degree equivalent or superior to part 195 requirements that are applicable to other pipelines, including replacement of CA-324 and 325. Compliance with the conditions of the ESP provide that segments CA-324 and CA-325 will be operated in accordance with inspection and repair standards that are more stringent than required under Part 195.

On the other hand, the No Action Alternative could potentially result in significant impacts to hydrological resources, as determined in the 2020 EIA (EIA, p. 14), due to the substantially greater degree of excavation and grading activities associated with wholesale replacement of the existing pipe along CA-324 and 325, and the resulting erosion and sedimentation along adjacent areas. The Action Alternative avoids these potentially significant impacts associated with replacement because it does not involve such large-scale construction activities.

**5) <u>Hazardous Waste and Substance Discharge</u>**

Segments CA-324 and CA-325 are not regulated under the Resource Conservation and Recovery Act (RCRA) or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Segments CA-324 and CA-325 are not expected to generate hazardous waste or non-excluded hazardous substances.[30] The US Environmental Protection Agency (EPA) lists no superfund sites in the vicinity of the Action Alternative.

The Action Alternative will not alter segments CA-324 or CA-325's existing route or facilities so as to introduce new streams of hazardous waste or substance discharges. Given that segments CA-324 and CA-325 do not handle hazardous waste or hazardous substances, nor do the Action Alternative or No Action Alternative involve the introduction of any activities that would involve hazardous waste or hazardous substances, neither alternative will produce any significant environmental impacts associated with the discharge of hazardous waste or hazardous

[30] Petroleum substances, including crude oil, are excluded from the definition of hazardous substances under CERCLA, see 42 U.S.C. Section 9601(10).

substances. Although hydrotesting can generate some small waste streams consisting of a water and oil residue mixture, hydrotesting has already been previously completed in 2025, prior to the grant of the ESP, and is not a new waste stream specific to the Action Alternative.

**6) Geology and Topography**

As noted above, Segments CA-324 and CA-325's rights-of-way are primarily alongside grazing land between side canyons containing riparian vegetation, as well as oak woodland, rangeland, and irrigated cropland. There are also mountainous portions along the segments' route, as well as coastal and eastern foothill areas. The Initial EIS concluded that, although some temporary and permanent changes to topography would occur from the initial construction of CA-324 and 325, the scale of such changes was sufficiently minor such that no significant impacts related to subsidence and physiology would occur. (Draft EIS, p. 4-15.) Potential impacts related to subsidence and impacts related to paleontology, unique geologic features, and mineral/petroleum resources were also not determined to be significant. (Draft EIS, pp. 4-19 through 4-20.)

The Initial EIS imposed several mitigation measures associated with potential impacts associated with seismicity and faulting. Mitigation Measures 1 and 3 required detailed geologic, seismologic, and geotechnical studies to be prepared and recommendations to be incorporated into the segments' final design and route. Mitigation Measure 2 required the pipeline design also to incorporate appropriate ground motion parameters. (Draft EIS, pp. 4-150 through 4-151; Final EIS, pp. 4-2 through 4-4.) With the implementation of these mitigation measures, the Initial EIS determined that all geology-related impacts would be less than significant. (Draft EIS, p. S-4.). Ultimately, these mitigation measures were implemented as part of initial construction of the segments. The impacts to geology and topography described in the Initial EIS would be comparable to what would occur under the No Action Alternative given that there would be similar types of construction activities occurring

Under the Action Alternative, no new construction or reroutes will occur beyond localized excavations that may be required based on integrity assessments. Therefore, the Action Alternative would have no potential to effect geology or topography. The Action Alternative does

not involve any changes to the segments' existing alignment so as to involve different geologic conditions than those which were implicated by the segments' initial construction. Although the Action Alternative would involve the performance of integrity assessments on a more frequent basis, which may result in the need to perform localized excavations to repair anomalies discovered from such assessments, these activities will not result in reroutes or design changes that could cause significant topographic impacts or disturb geological resources.

**7) <u>Noise and Visual Environment</u>**

The construction efforts associated with the No Action Alternative are comparable to those undertaken as part of the original construction of CA-324 and CA-325. The Initial EIS determined that the segments' initial construction noise impacts would be significant and unavoidable at sensitive receptors near their rights-of-way, including at schools, parks, residential subdivisions, and individual residences. (Draft EIS, pp. 4-94, 4-100.)[31] Further, the Initial EIS determined that potentially significant visual impacts would result from construction of CA-324 and CA-325 as part of right-of-way clearing through the Los Padres National Forest (LPNF), and from the construction of permanent, aboveground facilities associated with the Sisquoc Pump Station in the Santa Barbara County. (Draft EIS, pp. 4-88 through 4-93; Final EIS, p. 3-6.) The Initial EIS directed implementation of certain Mitigation Measures to reduce these construction-related impacts to a less-than-significant level, each of which have been implemented.[32] Accordingly, replacement of the segments under the No Action Alternative would potentially raise significant

[31] Moreover, the Initial EIS directed implementation of Mitigation Measure 34 (which required the Pump Station to be shielded from the school by a noise barrier such as a berm or structural enclosure) to limit to a non-significant level noise impacts to the former location of the Vista del Mar school, near the Gaviota Pump Station. (Draft EIS, pp. 4-162 and S-12; Final EIS, p. 4-16.) However, the Vista del Mar school has since relocated to a location remote from the Gaviota Pump Station, and Mitigation Measure 34 has been implemented.

[32] The Initial EIS imposed Mitigation Measures 31 and 32 in order to mitigate these significant impacts. Measure 31 required screening the Gaviota Pump Station and Sisquoc Pump Station with native shrubs, trees, and/or naturalized masses of evergreen shrubs and trees as appropriate for each site's location and climatic conditions. (Draft EIS, pp 4-160 through 4-161; Final EIS, p. 4-14 through 4-15.) Measure 32 required that the pipeline use a 50-foot construction corridor within the Los Padres National Forest (LPNF), protect existing large diameter trees, feather the edges of the cleared right-of-way, and reseed cleared areas with native species. (Draft EIS, p. 4-161; Final EIS, p. 4-15.) Implementation of these mitigation measures reduced the potentially significant visual resources impacts identified at the Gaviota Pump Station and Sisquoc Pump Station to a less than significant level. (*Id.*, p. 4-165.)

noise and visual impacts, particularly associated with the construction and land-clearing activities of the replacement project.

Under the Action Alternative, no new construction will occur beyond localized excavations that may be required based on integrity assessments. Therefore, no significant impacts to noise and the visual environmental will occur. Although the Action Alternative would involve the performance of integrity assessments on a more frequent basis, which may result in the need to perform localized excavations to repair anomalies discovered from such assessments, inspection-related activities were already addressed and determined to be insignificant in the IM rule EA. There is no evidence to suggest that more frequent integrity assessments would result in significant environmental impacts. The Action Alternative will not alter segments CA-324 and CA-325's existing route or facilities or any pump stations so as to introduce new noise- or visual environment-related impacts to sensitive receptors. Therefore, the Action Alternative will not result in significant noise or visual impacts.

**8) <u>Socioeconomic Impacts</u>**

The replacement of CA-324 and CA-325 under the No Action Alternative is comparable to the project involving the original construction of CA-324 and CA-325, which was previously assessed by the Initial EIS. The Initial EIS determined that all socioeconomic impacts related to construction and operation of the segments would be insignificant. (Draft EIS, pp. 4-60 through 4-64.) The socioeconomic impacts described in the Initial EIS would be comparable to what would occur under the No Action Alternative given that there would be similar types of construction activities occurring.

Under the Action Alternative, no new construction will occur beyond localized excavations that may be required based on integrity assessments. Therefore, no significant impacts to socioeconomics are anticipated to occur. Although the Action Alternative would involve the performance of integrity assessments on a more frequent basis, which may result in the need to perform localized excavations to repair anomalies discovered from such assessments, inspection-related activities were already addressed and determined to be insignificant in the IM rule EA. There is no evidence to suggest that more frequent integrity assessments would result in

significant environmental impacts. None of the activities associated with the Action Alternative are expected to produce significant socioeconomic impacts in the area.

## VIII. CONCLUSIONS

PHMSA finds that issuance of the ESP and subsequent non-emergency SP does not result in significant environmental impacts. The Action Alternative's scope is narrow and does not involve any new construction in areas not previously disturbed by the initial construction of segments CA-324 and CA-325. The Action Alternative requires routine repair, inspection, and maintenance activities (albeit under a more stringent schedule), which culminate only in, at most, the performance of limited excavations localized within the existing segments' right-of-way. Such activities have already been determined to be insignificant in previous environmental assessment by PHMSA associated with the IM Rule. In comparison, the No Action Alternative (replacement of CA-324 and 325) could raise significant environmental impacts, particularly to land use, hydrological resources, cultural resources, and biological resources.

In accordance with USDOT Order 5610.1D, PHMSA has independently evaluated this EA for its accuracy, scope, and contents. To ensure the integrity of the review, PHMSA provided comprehensive guidance to the operator, specifically outlining the types of data and information essential for the preparation of the environmental document. Furthermore, PHMSA collaborated directly with the applicant to direct the analytical focus toward areas with a higher potential for significant impacts, ensuring a rigorous evaluation of potential environmental effects. The ESP can be found on the Federal Docket Management System located on the Internet at www.regulations.gov under docket no. PHMSA-2025-150.

**Completed by PHMSA in Washington, D.C., on:** February 20, 2026

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**Appendix A**

**Environmental Assessment for Final Rule: Pipeline Integrity Management in High Consequence Areas, Docket No. RSPA 00-7408**