



CENTRAL COAST SALMON ENHANCEMENT, INC.

*Enhancing Fisheries while
Improving the Environment*

John McKenzie
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Dear Mr. McKenzie,

Please accept the following information regarding the Plains Exploration and Production Phase V Oil Field Expansion Conditional Use Permit; DRC2012-00035.

Name of Contact Person: Stephnie Wald, steph@centralcoastsalmon.com, 805-471-3789 (cell) 805-473-8221 (office)

Permit or Approval Authority: N/A

Environmental Information: N/A for permit or agency approval, however Central Coast Salmon Enhancement (CCSE) considers the following information important to PXP's expansion plans.

1. EIR needs to consider disruptive impacts on Steelhead trout relative to 24/7 drilling potential if the rigs are in proximity to Pismo Creek; ie: will fish spawning/rearing/oversummering behavior be affected by rig operations?
2. Pre- and post-construction monitoring of steelhead needs to be incorporated into mitigation measures; monitoring to include redd surveys, snorkel surveys, e-fishing surveys in project areas to quantify habitat use prior to and after expansion; if post-construction monitoring indicates a reduction in population for two successive years, mitigation measures (TBD) would need to be implemented.
3. PXP property contains a steelhead passage barrier referred to as the Hyla Crossing. Removing the barrier could be considered for mitigation.
4. PXP owns the property along Pismo Creek that UPRR has an easement on where a second passage barrier exists including a malfunctioning fish ladder installed by UPRR in the 1970's to mitigate for an eleven (11) foot elevation difference between the downstream culvert edge and the bed of the channel below. CCSE has 100% plans to remediate this barrier and is awaiting word on funding implementation of the design. PXP, as the landowner of the property over which UPRR has the easement, could financially support implementation of the design as mitigation for impacts to steelhead on the project site.
5. Make the highest effort possible to keep expansion footprint out of the 100' creek set-back.
6. Make the highest effort possible to stabilize disturbed areas with PERMEABLE surfaces using LID methods to "slow it, sink it, spread it" to minimize water quality impacts.
7. Make the highest efforts possible to integrate highest efficiencies in all aspects of the design and construction of the new building/offices.

Permit Stipulations/Conditions: N/A

Relevant information:

CCSE has completed the Pismo Creek/Edna Area Watershed Management Plan which includes watershed hydrology/geology information that may be useful to EIR preparers. In addition, the Pismo Creek Estuary Restoration Plan is in draft format as of this date and will be finalized by March, 2013. Both of these documents are available by contacting Stephnie Wald at the email address above.

229 Stanley Avenue, Arroyo Grande CA 93420

Phone: 805-473-8221

Fax: 805-473-8167

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Further comments:

Huasna Creek is mentioned in the Initial Study. I believe this is an error and the preparer likely meant Pismo Creek.

Sincerely,

Stephnie Wald
Watershed Projects Manager
December 21, 2012



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