

**CALENDAR ITEM
C49**

A 37
S 19

08/15/14
PRC 7163.1
K. Foster

**CONSIDER ADOPTION OF A MITIGATED NEGATIVE DECLARATION AND
MITIGATION MONITORING PROGRAM; AMENDMENT OF LEASE, AND
AUTHORIZATION TO ACCEPT A QUITCLAIM DEED**

LESSEE:

Exxon Mobil Corporation
P.O. Box 4358
Houston, TX 77210

AREA, LAND TYPE, AND LOCATION:

34 acres, more or less, of sovereign land in the Pacific Ocean offshore of El Capitan State Beach, near the city of Goleta, Santa Barbara County.

AUTHORIZED USE:

Continued use and maintenance of pipelines transporting crude oil/water emulsion, a treated water outfall line, and power cables between the Las Flores Marine Terminal facility and the Lessee's Santa Ynez Unit offshore oil platforms.

LEASE TERM:

34 years, beginning February 1, 1988.

CONSIDERATION:

\$161,700 per year subject to annual modification by the Gross National Product Implicit Price Deflator

PROPOSED AMENDMENT:

1. Amend Section 1 of the Lease to add Base Rent of \$127,456 for purposes of establishing annual rent for Temporary Use Area Parcel 1 (Parcel 1), and to allow for the annual adjustment of rent for the use of Parcel 1 beginning February 1, 2015, by application of the Gross National Product Implicit Price Deflator formula to the Base Rent.
2. Amend Section 2 to add a provision authorizing Lessee to conduct its Offshore Power System Reliability – B Project (Project), as described in the Mitigated Negative Declaration (State Clearinghouse Number [SCH] # 2014051098), and the Mitigation Monitoring Program (MMP) attached hereto as Exhibit C.

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3. Amend Section 2 to add a provision requiring Lessee to provide written notification to Lessor within 10 days of commencement of its use of Parcel 1, and to stipulate that annual rent for Parcel 1 shall be due and payable, without delay or offset, for each lease year said Parcel is utilized. Should the Project not require the use of Parcel 1, no rent shall be owed for said Parcel.
4. Amend Section 2 to add a provision requiring Lessee to submit, for Lessor staff review and acceptance, a quitclaim deed for Parcel 1 within 90 days following Project completion. Parcel 1 shall be automatically removed from the Lease Premises upon written acceptance of the quitclaim deed by Lessor staff.
5. Amend Section 2 to add a provision requiring Lessee to submit to Lessor all of the following at least 90 days prior to start of construction:
 - A final set of construction contract specifications;
 - A free span analysis to determine the maximum allowable cable free span length, along with a contingency plan should the maximum allowable free span length as constructed be found to exceed the pre-construction analysis calculations;
 - A Project-specific hazardous spill contingency plan;
 - A critical operations and curtailment plan;
 - A vessel anchoring plan; and
 - A construction schedule time line chart.
6. Amend Section 2 to require Lessee to submit to Lessor at least 30 days prior to the start of construction a decision on which of the two existing cables, either A or B will be replaced, along with a detailed analysis of the cable conditions on which the decision is based.
7. Amend Section 2 to add a provision requiring Lessee to file a timely advisory of pending offshore construction operations at least two weeks prior to start of construction with the local U.S. Coast Guard District office for publication in the Local Notice to Mariners, and to provide a copy of said Notice to Lessor.
8. Amend Section 2 to add a provision requiring Lessee to submit to Lessor all the following within 60 days of Project completion:
 - A set of "as-built" drawings;
 - A post-construction written narrative report;
 - A post-construction ROV or diver video survey; and
 - A post construction seafloor survey.

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9. Amend Section 2 to add a provision requiring Lessee's authorized contractor(s) to maintain a logbook during Project operations to keep track of all debris or objects of any kind that fall into the water.
10. Amend Section 3 to add a Land Description for Parcel 1.

All other terms and conditions of the lease shall remain in effect without amendment.

OTHER PERTINENT INFORMATION:

1. Applicant owns and has the right to use the upland adjoining the lease premises.
2. On January 21, 1988, the Commission authorized the issuance of Lease No. PRC 7163.1, a General Lease – Right of Way Use, for a 34-year term ending January 31, 2022, to Exxon Corporation (now Exxon Mobil Corporation), for a crude oil/water emulsion pipeline, a treated water outfall line, and three power cables (identified as cables A, B, and C) connecting Exxon Mobil's Las Flores Canyon facility to its Santa Ynez Unit (SYU) oil platforms Harmony, Heritage and Hondo.
3. On February 21, 2003, the Commission authorized an amendment to Lease No. PRC 7163.1 to allow for the removal and replacement of power cable C with cable C1 within the existing right-of-way, due to cable C's failure in November of 1999.
4. On August 30, 2013, Exxon Mobil submitted an application to amend Lease No. PRC 7163.1 to allow for the removal and replacement of existing cable C1, which has experienced two electrical failures since its installation in 2003, with a new cable to be designated as F2, and for the removal and replacement of one of the existing cables A or B with a new cable to be designated either A2 or B2, within the existing right-of-way as part of Phase II of its Offshore Power System Reliability – B project (Project). Phase I of the Project, currently being implemented, covers activities in federal waters, including electrical system upgrades to platforms Harmony, Heritage, and Hondo, and the installation of a new power cable connecting platforms Harmony and Heritage. Staff recommends approval of the amendment.
5. Exxon Mobil has identified a project implementation contingency where one or both of the replacement cables cannot be connected to shore if existing conduits that allow for cable transition between the sea floor and

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the upland have deteriorated and either the existing cables cannot be removed once cut or the new cables cannot be inserted. In the event the new cable ends cannot be connected, they will be dropped on the seafloor adjacent to the existing lease area in the area shown in Exhibit B as Temporary Use Area Parcel 1 (Parcel 1). The cable ends would occupy Parcel 1 until Exxon Mobil has prepared a contingency plan and obtained the applicable permits to allow for the implementation of an alternative means to connect the cables to shore. Exxon Mobil has identified the probability of this project implementation contingency as being very low, but Exxon Mobil cannot rule it out completely.

6. Rent for Parcel 1 would apply for each lease year that Parcel 1 is used. If Parcel 1 is not used, no rent would be charged. For reference purposes, should Exxon Mobil need to use Parcel 1 during the 2015 lease year (February 1, 2015, to January 31, 2016), rent would be \$216,211.
7. The Commission is the lead agency for the Project pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) and conducted an Initial Study to determine if the Project may have a significant effect on the environment pursuant to State CEQA Guidelines section 15063 (Cal. Code Regs., tit. 14, § 15063).

Although the Initial Study identified several potentially significant impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, recreation, transportation/traffic, utilities and service systems, mandatory findings of significance, commercial fishing, and environmental justice, mitigation measures were proposed and agreed to by the Applicant prior to public review that would avoid or mitigate the identified potentially significant impacts “to a point where clearly no significant effects would occur” (State CEQA Guidelines, § 15070, subd. (b)(1)). Consequently, the Initial Study concluded that “there is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment” (State CEQA Guidelines, § 15070, subd. (b)(2)), and a Proposed Mitigated Negative Declaration (MND) was prepared.

Pursuant to the Commission’s delegation of authority and the State CEQA Guidelines section 15025, the staff prepared a Proposed MND identified as CSLC MND No. 773, State Clearinghouse No. 2014051098. The Proposed MND and Initial Study were circulated for a minimum 30-day

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public review period from May 30, 2014 to July 3, 2014, and staff received five comment letters, as follows:

- Exxon Mobil Production Company (Applicant): The Applicant had multiple clarifications throughout the document, inclusive of comments and corrections to Appendix F, Air Quality Spreadsheets; an addition to the Project Description for a splice replacement on Cable A onshore and the addition of another crew boat to transfer personnel from the Santa Ynez Unit (SYU) platforms to the Cable Installation Vessel (CIV); and requested minor modifications to Mitigation Measures (MMs) TBIO-2, MBIO-3b, CUL-1, and CF-1.
- County of Santa Barbara (County, Local Agency): The County corrected a reference to their permitting authority in Table 1-2; requested that the MND Project Description note the addition of a splice replacement on Cable A onshore and another crew boat to transfer personnel from the SYU platforms to the CIV; and expressed concerns regarding onshore cultural resources, impacts to recreational use of a bike path and public access, and MM REC-1.
- Santa Barbara Air Pollution Control District (SBAPCD, Local Agency): The SBAPCD corrected errors regarding SBAPCD Rule 202.F.7 and in the Appendix F, Emissions Summary; requested clarification on how MMs AQ-1 and AQ-2 would further reduce and minimize impacts to GHG emissions; and suggested that additional standard conditions to reduce impacts to air quality be applied to the Project.
- California Division of Oil, Gas, and Geothermal Resources (DOGGER, State Agency): DOGGR requested that the MND mention the Division and its statutory authority over oil and gas extraction in the area; and recommended that well locations within proposed Project development be determined relative to any proposed installation and any structures be placed in a manner that would not impede future access to said well(s).
- California Coastal Commission (CCC, State Agency): The CCC requested a map of all onshore Project activities; an addition to Table 1-2 regarding the CCC's Federal Consistency Certification as a required regulatory action; and clarification regarding monarch butterfly roost buffers, seismic and geologic stability, MM HAZ-9, and tunnel seepage (as it would affect water quality). In addition, the CCC requested minor modifications to MMs MBIO-1a, MBIO-3a, MBIO-3c, MBIO-4, MBIO-6, MBIO-7, and WQ-1.

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In response to these comments, Commission staff revised the MND as follows:

- Requested minor corrections were made throughout the document as appropriate.
- One modified figure (Figure 3.4-4) and two new figures (Figures 3.12-1 and 3.16-1) were prepared to better portray onshore Project components and address potential impacts to cultural resources, recreational access, and abandoned wells.
- In consultation with the commenters and the Applicant, MMs TBIO-2, MBIO-1a, MBIO-3a, MBIO-3b, MBIO-3c, MBIO-4, MBIO-6, MBIO-7, WQ-1, CUL-1, HAZ-9, REC-1, and CF-1 were modified.
- One new MM and one new Applicant Proposed Measure (APM), agreed to by the Applicant, were incorporated in the MND:
 - 1) *MM AQ-3* (the previous AQ-3 was re-named AQ-4): *Construction Emissions Reduction*, to address the SBAPCD's suggestion for the inclusion of standard air quality conditions; and
 - 2) *APM MIN-1: Coordination with DOGGR*, to address DOGGR's request for the MND and Applicant to identify and coordinate with DOGGR on any adjacent abandoned wells or supporting infrastructure.

Staff determined that these changes do not constitute a "substantial revision," as defined in State CEQA Guidelines section 15073.5, subdivision (b), and that recirculation of the MND prior to Commission consideration is not required pursuant to in State CEQA Guidelines section 15073.5, subdivision (c). Specifically, staff determined the following.

- MM AQ-3 provides additional clarification on air quality measures; it does not modify the effectiveness of the existing mitigation nor change the impact (which was identified as "Less than Significant with Mitigation" in the Proposed MND).
- APM MIN-1 was added by the Applicant to formalize a process of coordination with DOGGR as requested by DOGGR; "No Impact" is anticipated as identified in the Proposed MND.

Based upon the Initial Study, the Proposed MND, and the comments received in response thereto, there is no substantial evidence that the Project will have a significant effect on the environment; California Code of Regulations, Title 14, section 15074, subdivision (b). A Mitigation Monitoring Program has been prepared in conformance with the provisions of CEQA (Pub. Resources Code, § 21081.6), and is contained in Exhibit C, attached hereto.

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8. This activity involves lands identified as possessing significant environmental values pursuant to Public Resources Code section 6370 et seq., but such activity will not affect those significant lands. Based upon the staff's consultation with the persons nominating such lands and through the CEQA review process, it is the staff's opinion that the Project, as proposed, is consistent with its use classification

APPROVALS OBTAINED:

None

FURTHER APPROVALS REQUIRED:

Santa Barbara County Planning and Development
Santa Barbara County Air Pollution Control District
California Coastal Commission
California Regional Water Quality Control Board
California Department of Parks and Recreation
U.S. Army Corps of Engineers
Bureau of Ocean Energy Management
Bureau of Safety and Environmental Enforcement

EXHIBITS:

- A. Land Description
- B. Site And Location Map
- C. Mitigation Monitoring Program

RECOMMENDED ACTION:

It is recommended that the Commission:

CEQA FINDING:

Certify that the Proposed MND, CSLC MND No. 773, State Clearinghouse No. 2014051098, was prepared for this Project pursuant to the provisions of CEQA, that the Commission has reviewed and considered the information contained therein and in the comments received in response thereto and that the Proposed MND reflects the Commission's independent judgment and analysis.

Adopt the Proposed MND and determine that the Project, as approved, will not have a significant effect on the environment.

Adopt the Mitigation Monitoring Program, as contained in Exhibit C, attached hereto.

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SIGNIFICANT LANDS INVENTORY FINDING:

Find that this activity is consistent with the use classification designated by the Commission for the land pursuant to Public Resources Code section 6370 et seq.

AUTHORIZATION:

Authorize the amendment of Lease No. PRC 7163.1, a General Lease - Right-of-Way Use effective on August 15, 2014, to allow for: 1) the removal and replacement of two existing power cables with two new cables along with numerous pre-construction and post-construction requirements, 2) the establishment of a base rent value for a temporary use parcel for purposes of calculating rent owed if the temporary use parcel is used, 3) the addition of Temporary Use Area Parcel 1 on sovereign land in the Pacific Ocean as described in Exhibit A and as shown on Exhibit B (for reference purposes only) attached and by this reference made a part hereof, and 4) authorize staff acceptance of a quitclaim deed for temporary use Parcel 1 upon Project completion; all other terms and conditions of the lease will remain in effect without amendment.

EXHIBIT A

PRC 7163.1

LAND DESCRIPTION

A parcel of submerged land lying in the bed of the Santa Barbara Channel, in the vicinity of El Capitan State Beach, County of Santa Barbara, State of California, described as follows:

BEGINNING at a point lying distant N 45°52'32" E 17,599.45 feet from the southerly terminus of course number 12, said course described as N 45°52'32" E 22,875.25 feet in Section 3 of Lease Number PRC 7163.1 authorized on January 21, 1988, on file at the Sacramento Office of the California State Lands Commission; thence from said point of beginning S 44°06'19" E 496.56 feet; thence N 45°53'30" E 4,850.07 feet; thence N 3°34'58" W 655.22 feet to the northerly terminus of said course number 12, thence along said course number 12, S 45°52'32" W 5,275.80 feet to the POINT OF BEGINNING.

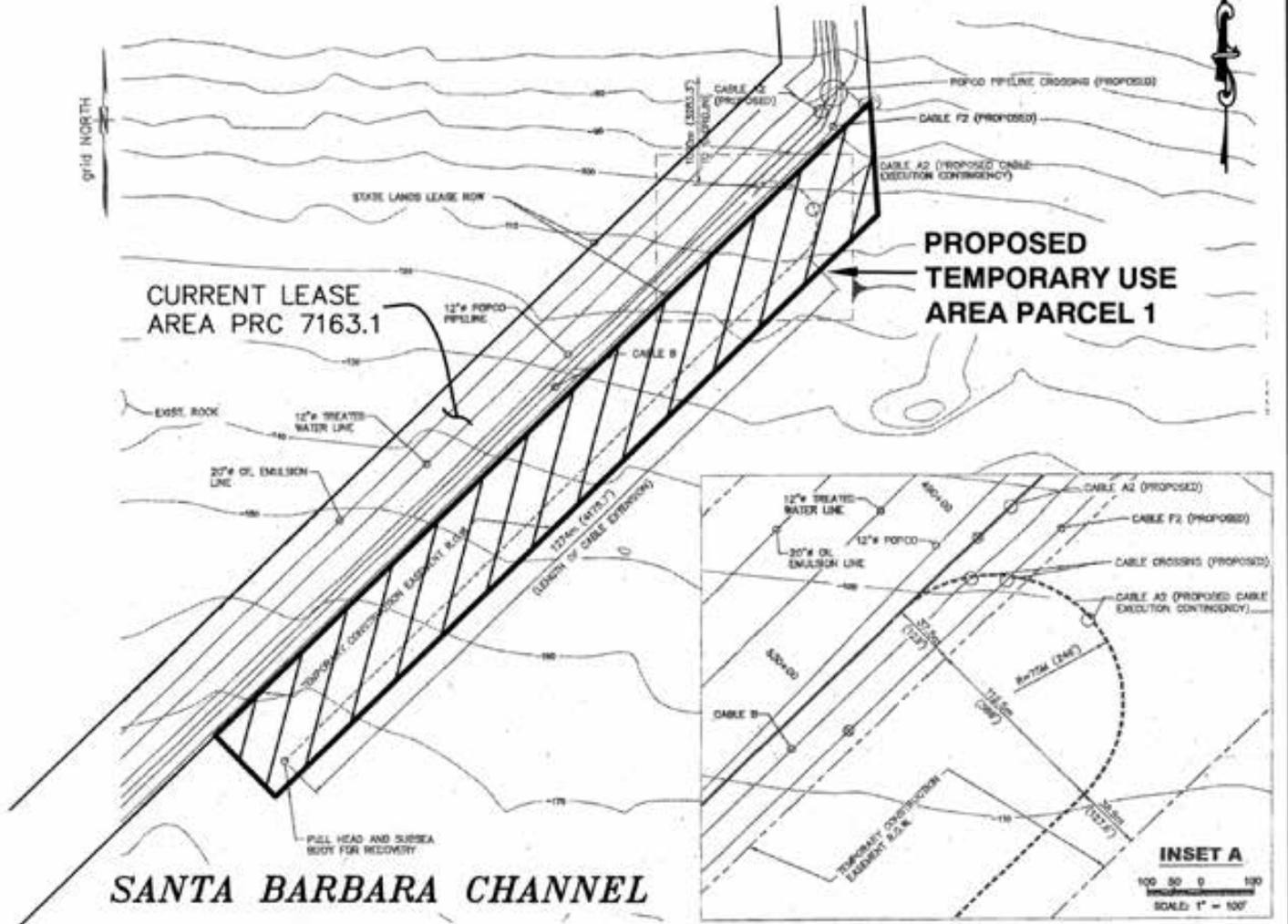
END OF DESCRIPTION

Prepared 7/17/2014 by the California State Lands Commission Boundary Unit.



NO SCALE

SITE



SANTA BARBARA CHANNEL

OFFSHORE, EL CAPITAN STATE BEACH

NO SCALE

LOCATION



SANTA BARBARA CHANNEL

MAP SOURCE: USGS QUAD

Exhibit B

PRC 7163.1
 EXXON MOBIL OPSRB
 LEASE AMENDMENT
 SANTA BARBARA
 COUNTY



DJF 07/17/14

This Exhibit is solely for purposes of generally defining the lease premises, is based on unverified information provided by the Lessee or other parties and is not intended to be, nor shall it be construed as, a waiver or limitation of any State interest in the subject or any other property.

EXHIBIT C
CALIFORNIA STATE LANDS COMMISSION
MITIGATION MONITORING PROGRAM
SANTA YNEZ UNIT OFFSHORE POWER SYSTEM RELIABILITY-B (OPSR-B)
PROJECT
(State Clearinghouse No.2014051098)

The California State Lands Commission (CSLC) is the lead agency under the California Environmental Quality Act (CEQA) for the Santa Ynez Unit Offshore Power System Reliability-B (Opsr-B) Project (Project). In conjunction with approval of this Project, the CSLC adopts this Mitigation Monitoring Program (MMP) for implementation of mitigation measures (MMs) for the Project to comply with Public Resources Code section 21081.6, subdivision (a) and State CEQA Guidelines sections 15091, subdivision (d) and 15097.

The Project authorizes ExxonMobil Production Company (Exxon or Applicant) to conduct the Project in accordance with the terms and conditions of its existing CSLC Lease No. PRC 7163.

PURPOSE

It is important that significant impacts from the Project are mitigated to the maximum extent feasible. The purpose of a MMP is to ensure compliance and implementation of MMs; this MMP shall be used as a working guide for implementation, monitoring, and reporting for the Project's MMs.

ENFORCEMENT AND COMPLIANCE

The CSLC is responsible for enforcing this MMP. The Project Applicant is responsible for the successful implementation of and compliance with the MMs identified in this MMP. This includes all field personnel and contractors working for the Applicant.

MONITORING

The CSLC staff may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as necessary. Some monitoring responsibilities may be assumed by other agencies, such as affected jurisdictions, cities, and/or the California Department of Fish and Wildlife (CDFW). The CSLC and/or its designee shall ensure that qualified environmental monitors are assigned to the Project.

Environmental Monitors. To ensure implementation and success of the MMs, an environmental monitor must be on site during all Project activities that have the potential to create significant environmental impacts or impacts for which mitigation is required. Along with the CSLC staff, the environmental monitor(s) are responsible for:

- Ensuring that the Applicant has obtained all applicable agency reviews and approvals;

- Coordinating with the Applicant to integrate the mitigation monitoring procedures during Project implementation (for this Project, many of the monitoring procedures shall be conducted during the deconstruction phase); and
- Ensuring that the MMP is followed.

The environmental monitor shall immediately report any deviation from the procedures identified in this MMP to the CSLC staff or its designee. The CSLC staff or its designee shall approve any deviation and its correction.

Workforce Personnel. Implementation of the MMP requires the full cooperation of Project personnel and supervisors. Many of the MMs require action from site supervisors and their crews. The following actions shall be taken to ensure successful implementation.

- Relevant mitigation procedures shall be written into contracts between the Applicant and any contractors.

General Reporting Procedures. A monitoring record form shall be submitted to the Applicant, and once the Project is complete, a compilation of all the logs shall be submitted to the CSLC staff. The CSLC staff or its designated environmental monitor shall develop a checklist to track all procedures required for each MM and shall ensure that the timing specified for the procedures is followed. The environmental monitor shall note any issues that may occur and take appropriate action to resolve them.

Public Access to Records. Records and reports are open to the public and would be provided upon request.

MITIGATION MONITORING TABLE

This section presents the mitigation monitoring table for the following environmental disciplines: aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, recreation, transportation/traffic, utilities and service systems, mandatory findings of significance, commercial fishing, and environmental justice. All other environmental disciplines were found to have less than significant or no impacts and are therefore not included below. The table lists the following information, by column:

- Impact;
- Mitigation [or Applicant-proposed] measure (full text of the measure);
- Location (where impact occurs and mitigation measure should be applied);
- Monitoring/reporting action (action to be taken by monitor or Lead Agency);
- Timing (before, during, or after construction; during operation, etc.);
- Responsible party; and
- Effectiveness criteria (how the agency can know if the measure is effective).

Table C-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
<i>Aesthetics</i>						
Night Lighting	MM VIS-1: Glare Minimization. Lights shall be shielded or re-aimed to minimize glare from night lighting when used onshore or on vessels within 0.5 mile from shore, unless such shielding would conflict with U.S. Coast Guard requirements.	Both	Observe nighttime lighting positioning for compliance	During nighttime work	ExxonMobil and CSLC	Glare is minimized
<i>Air Quality</i>						
Project Emissions	<p>MM AQ-1: Emissions Reporting Plan (ER Plan). ExxonMobil shall prepare an ER Plan to be submitted to the Bureau of Safety and Environmental Enforcement (BSEE) and the Santa Barbara County Air Pollution Control District (SBCAPCD), for review and approval 60 days prior to commencement of cable retrieval or installation activities. The ER Plan shall include:</p> <ul style="list-style-type: none"> • Detailed information of onshore activities, inclusive of internal combustion engine use, duration of use, fuel consumed, and calculated emissions. • Detailed information of offshore activities, inclusive of engine use, methods to measure fuel consumption, and calculated emissions from the dynamically positioned cable installation vessel and associated equipment used in the retrieval and installation of the cables. • Process for preparation and submittal of daily fuel use and emissions data from the retrieval and installation of the cables (when within 25 miles of Santa Ynez Unit (SYU) facilities, which shall be provided to BSEE and the SBCAPCD. • Statement that a summary of the daily and total fuel use and emissions associated with 	Both	Emissions Reporting Plan	During all work activities	ExxonMobil with review and approval by CSLC staff, BSEE, and SPCAPCD	Reduce potential emissions from Project equipment

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>the Project shall be submitted to Santa Barbara County to verify compliance with SBCAPCD rules and regulations and Project-specific permit conditions within 60 days of Project completion.</p> <ul style="list-style-type: none"> An air quality contingency plan (AQC Plan) that identifies potential measures that could be implemented by the contractors to reduce, defer or eliminate emissions without adversely impacting safety or Project completion. 					
	<p>MM AQ-2: Low-Sulfur Fuels. ExxonMobil shall require all cable retrieval and installation vessels and other associated internal combustion engines to use fuel with less than 0.0015 percent sulfur by weight (15 parts per million) when operating within Santa Barbara County, consistent with Santa Barbara County Air Pollution Control District requirements.</p>	Offshore	Emissions Reporting Plan	During all offshore work activities	ExxonMobil and CSLC	Reduce potential emissions from Project equipment
Construction Emissions	<p>MM AQ-3: Construction Emissions Reduction. The Applicant shall implement the following measures as required by State law:</p> <ul style="list-style-type: none"> All portable diesel-powered construction equipment shall be registered with the State's portable equipment registration program OR shall obtain an Air Pollution Control District permit. Fleet owners of mobile construction equipment are subject to the California Air Resources Board (CARB) Regulation for in-use off-road Diesel Vehicles (the purpose of which is to reduce diesel particulate matter [PM] and criteria pollutant emissions from in-use [existing] off-road diesel-fueled vehicles). All commercial diesel vehicles are limited to an engine idling time of five minutes while loading and unloading; electric auxiliary power units 	Onshore	Compliance	During all onshore construction activities	ExxonMobil and SBAPCD	Reduce potential emissions from Project construction

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>should be used whenever possible. The following measures shall be implemented to the maximum extent feasible:</p> <ul style="list-style-type: none"> • Diesel construction equipment meeting the CARB Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible. • Diesel powered equipment should be replaced by electric equipment whenever feasible. • If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by Environmental Protection Agency or California. • Catalytic converters shall be installed on gasoline-powered equipment, if feasible. • All construction equipment shall be maintained in tune per the manufacturer's specifications. • The engine size of construction equipment shall be the minimum practical size. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite. 					
Particulate Matter/Fugitive Dust	MM AQ-4: Dust Control Measures. Dust generated by onshore construction activities shall be kept to a minimum with a goal of retaining dust on site. During construction, clearing, grading, earth moving, excavation, or transportation, water trucks or sprinkler systems shall be used to	Onshore	Observe dust control measures for compliance	During all onshore construction activities	ExxonMobil and CSLC	Reduce air quality impacts caused by particulate matter and

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>prevent dust from leaving the site and create a crust after each day's activities cease. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day.</p> <p>Additionally, the following measures shall be implemented to further reduce the potential for dust generation on site:</p> <ul style="list-style-type: none"> • Increased watering frequency should be required whenever the wind speed exceeds 15 miles per hour (mph). • Minimize amount of disturbed area and reduce on site vehicle speeds to 15 mph or less. • If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. • Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads. • After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. • The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such 					fugitive dust

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.					
Terrestrial Biological Resources						
Sensitive Species or Habitats	MM TBIO-1: Terrestrial Wildlife Awareness Training. ExxonMobil shall include awareness training for its contractors of the sensitive species located in Corral Creek. The training shall be conducted by a California State Lands Commission (CSLC) staff-approved biologist, and shall include a description of the species, protection status under the law, the potential range of movement, and what to do in the event one is found within the construction area. This training shall be incorporated into the pre-construction meeting(s) with construction personnel to perform the work. Training materials shall be submitted to CSLC staff for approval 3 weeks prior to the commencement of Project activities.	Onshore	Signatures of trained employees for compliance	Prior to the start of onshore work activities and as needed for new personnel accessing the Project site	ExxonMobil and CSLC	Sensitive Species Avoidance
	MM TBIO-2: Breeding/Nesting Bird Protection. If onshore Project activities are scheduled to occur between March 1 and August 31, to avoid or reduce potential impacts to nesting special-status avian species, and/or avian species protected by the Migratory Bird Treaty Act (MBTA) and Fish and Game Code, ExxonMobil shall retain a California State Lands Commission staff-approved biologist to conduct a pre-construction nesting survey for special-status avian species within 2 weeks prior to Project implementation. The survey shall be conducted within the Project and buffer areas during the appropriate survey periods for each species. Surveys and survey timing shall follow California	Onshore	Surveys, establishment of buffers (if required) Notification and follow-up Correspondence between agencies and ExxonMobil	Prior to onshore work activities if Project work activities will occur between March 1 and August 31 of any year	ExxonMobil with CDFW and/or USFWS as applicable	Reduce impacts to breeding/nesting bird species

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) approved protocols where applicable. Where active special-status or MBTA/Fish and Game Code-protected bird nest sites are identified or suspected to occur during preconstruction surveys, the approved biologist shall provide his/her survey results to the CDFW and USFWS. Upon discussion with Agency staff, an appropriate buffer zone around each nest site will be established depending on each species' protection status, each species' sensitivity or acclimation to human activities, and site conditions (i.e., vegetation and topography). Nesting buffer zones shall be marked with stakes, and signs shall be placed on the stakes indicating that no construction activities are to be conducted in the buffer areas until the areas are cleared by the approved biologist.</p>					
	Also implement MM VIS-1: Glare Minimization (see above)					
	Also implement MM WQ-2: Stormwater Pollution Prevention Plan (SWPPP) (see below)					

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>MM MBIO-1b: Anchoring Plan. At least 30 days prior to commencement of offshore activities, ExxonMobil shall prepare and submit an Anchoring Plan to California State Lands Commission (CSLC) staff, California Coastal Commission, Bureau of Safety and Environmental Enforcement, and National Marine Fisheries Service for review and approval that describes how, based on the results of the Pre-Construction Marine Biological Survey (MM MBIO-1a), ExxonMobil will avoid placing anchors on sensitive ocean floor habitats and pipelines. The Plan shall include at least the following information:</p> <ul style="list-style-type: none"> • A list of all vessels that will anchor during the Project and the number and size of anchors to be set; • Detailed maps showing proposed anchoring sites that are located at least 40 feet (12 meters) from rocky habitat identified during the Pre-Construction Marine Biological Survey; • A description of the navigation equipment that would be used to ensure anchors are accurately set; and • Anchor handling procedures that would be followed to prevent or minimize anchor dragging, such as placing and removing all anchors vertically. 	Offshore	Anchoring Plan	At least 30 days prior to start of offshore activities	ExxonMobil	Compliance with approved Anchoring Plan will ensure no anchors are placed in sensitive habitat areas
Sensitive Species/Habitat	<p>MM MBIO-2: Site Access. Under safe conditions, ExxonMobil shall provide access to the site to permitting agencies, during installation and installation-related activities, including but not limited to, the cable installation vessel and support vessels.</p>	Offshore	Site visits by permitting agencies (if requested)	During Project work activities as required by CSLC and other permitting agencies	ExxonMobil, coordinated with CSLC and other permitting agencies	Agency access provided to observe effectiveness in field
Also implement MM HAZ-3: Fueling Measure (see below)						
Also implement MM HAZ-7: Oil Spill Response Plan (OSRP) (see below)						

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	Also implement MM HAZ-8: Oil Spill Response Plan (OSRP) Training (see below)					
	<p>MM MBIO-3a: Cable Installation and Retrieval. ExxonMobil shall install and retrieve all cables in such a way and consistent with the California State Lands Commission (CSLC) staff-approved Anchoring Plan as to avoid areas of rocky substrate, and other sensitive marine habitats such as eelgrass and kelp beds, and oil and gas pipelines whenever feasible. ExxonMobil shall require contractors to use a remotely operated vehicle (ROV) to monitor and videotape selected portions of the installation activities during cable lay operations. If the ROV observes a rocky outcrop or other sensitive marine habitat, the ROV shall assist the cable installation vessel in adjusting its route to avoid the feature, whenever it is feasible to do so.</p>	Offshore	Daily monitoring reports; ROV data	During operations	ExxonMobil	Avoidance of sensitive habitats and pipelines
	<p>MM MBIO-3b: Post-Project Survey. During cable installation and retrieval activities and no more than 30 days following completion of cable installation and retrieval activities, ExxonMobil shall perform a post-installation remotely operated vehicle (ROV) survey upon completion of cable installation and retrieval activities along the length of the completed cable installation in State waters as follows:</p> <ul style="list-style-type: none"> • The survey shall include the entirety of the area affected by the Project, including all anchor locations, in State waters to confirm seafloor cleanup and site restoration. • The survey shall document the length of cable in areas of rocky substrate and the actual amount of rocky substrate and number of organisms affected by the cable placement. • A California State Lands Commission staff-approved marine biologist shall be onboard the 	Offshore	Survey	No more than 30 days following completion of cable installation and retrieval activities	ExxonMobil	Survey is essential to determine any post-Project impacts

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>lay vessel during the ROV survey to observe and record the effects of cable lay operations on the seafloor substrates and the biota along the entire cable route, or if unable to be present during lay operations, shall review ROV collected data of the area during installation and retrieval activities, and prepare a report based on the data. Records of the effects of cable lay operations on the seafloor substrates and the biota along the route captured by other means (divers or drop camera) shall also be reviewed and included in the report.</p> <ul style="list-style-type: none"> • In nearshore areas inaccessible by ROV, the post-installation marine biological survey shall be conducted by divers to identify any impacts to the nearshore area that could have resulted from construction activity. • All surveys employing low-energy geophysical equipment, including ROV surveys, shall be conducted by an entity holding a valid Permit under the CSLC's Offshore Low Energy Geophysical Survey Permit Program (see www.slc.ca.gov/Division_Pages/DEPM/OGPP/OGPP.html). 					
	<p>MM MBIO-3c: Post-Project Technical Report. No more than 60 days following completion of the Post-Project Survey, ExxonMobil shall prepare and submit a post-Project technical report with videos of both the installation and post-construction remotely operated vehicle (ROV) surveys to California State Lands Commission (CSLC) staff (and other requesting agencies) for review and approval. The report shall include at least the following information:</p> <ul style="list-style-type: none"> • A map of the survey route noting the location of all impacted areas and the video timestamp 	Offshore	Technical Report	No more than 60 days following completion of Post-Construction survey	ExxonMobil with submittal to CSLC (and other requesting agencies)	Report is essential to determine and mitigate for any post-Project impacts

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>of each relevant site in the ROV survey video;</p> <ul style="list-style-type: none"> Quantification (in square meters) of seafloor impacts and estimated numbers and species of organisms affected if any; If required, a restoration proposal that is based on the results of the survey and proportional to the actual amount of rocky habitat, kelp, and eelgrass affected. The proposal shall contain direct restoration actions that repair or restore affected areas and/or a contribution to an ongoing restoration program in the area (e.g., SeaDoc Society Lost Fishing Gear Recovery Project), as specified by the CSLC staff. If eelgrass restoration is required, ExxonMobil shall include an eelgrass restoration strategy that adheres to the Southern California Eelgrass Mitigation Policy and include a requirement to use only native eelgrass (e.g., <i>Zostera marina</i>) for restoration purposes, where appropriate. A schedule for implementing and completing the required restoration. 					
	<p>MM MBIO-4: Excavated Sand Disposal (Conduit). Sand excavated at or near the conduit shall be cast via a hose, 20 to 50 feet (6 to 15 meters) south, downslope, into the sand channel between the out-of-service cables and the Pacific Offshore Pipeline Company pipeline away from sensitive marine habitats such as eelgrass and kelp beds, armor rock, boulder fields, broken rock, or bedrock ridges wherever it is feasible to do so.</p>	Offshore	Compliance	During offshore activities or near conduits	ExxonMobil with submittal to CSLC	Reduce potential impacts to water quality, sensitive species or habitat
	<p>MM MBIO-5: Abalone Avoidance. Divers shall inspect the waters adjacent to the conduit terminus for abalone within 30 days prior to installation of any equipment/cable. If abalone</p>	Offshore	Inspection within 30 days of Project activities	Prior to and throughout all Project activities as	ExxonMobil in consultation with CSLC	Reduce potential impacts to sensitive

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>is detected near the conduit terminus during the pre-construction marine biological survey or the diver inspection, ExxonMobil shall notify California State Lands Commission (CSLC) staff immediately and shall not begin Project operations until the following has occurred.</p> <ul style="list-style-type: none"> • If white or black abalone is detected, ExxonMobil shall: (1) consult with the California Department of Fish and Wildlife (CDFW) and applicable Federal wildlife agency authorizations; and (3) obtain CSLC staff approval to begin. • If a non-listed abalone species is detected, ExxonMobil shall: (1) move all anchor(s) at least 50 feet (15 meters) away to avoid any direct impacts on abalone; and (2) obtain CSLC staff, in consultation with CDFW, approval to begin. 			required	and CDFW	species or habitat
Sensitive Species	<p>MM MBIO-6: Marine Wildlife Monitoring and Contingency Plan (MWMCP). ExxonMobil shall prepare a MWMCP for review and approval by California State Lands Commission (CSLC) staff at least 60 days prior to commencement of cable installation and shall implement the MWMCP during cable retrieval and installation operations. The MWMCP shall include the following elements, and shall be implemented consistent with vessel and worker safety:</p> <ul style="list-style-type: none"> • Prior to the start of offshore activities ExxonMobil shall provide awareness training to all Project-related personnel and vessel crew, including viewing of an applicable wildlife and fisheries training video, on the most common types of marine wildlife likely to be encountered in the Project area and the types 	Offshore	<p>MWMCP submitted to CSLC</p> <p>Documentation that training was conducted and that approved observers are on board CIV</p> <p>Daily observation reports submitted to NMFS and</p>	Submit for approval 60 days prior to start of offshore activities	ExxonMobil with submittal to CSLC and other agencies	Sensitive species avoidance and reduce potential impacts to species or habitat

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>of activities that have the most potential for affecting the animals.</p> <ul style="list-style-type: none"> • A minimum of two National Marine Fisheries Service (NMFS)-qualified marine mammal observers shall be located on the cable installation vessel (CIV) to conduct observations, with two observers on duty during all cable installation activities. The MWMCP shall identify any scenarios that require an additional observer on the CIV or other Project vessel and, in these cases, make recommendations as to where they should be placed to ensure complete coverage of the surrounding marine environment. • Shipboard observers shall submit a daily sighting report to CSLC staff no later than noon the following day that shall be of sufficient detail to determine whether observable effects to marine mammals are occurring. • The observers shall have the appropriate safety and monitoring equipment to conduct their activities (including night-vision equipment). • The observers shall have the authority to stop any activity that could result in harm to a marine mammal or sea turtle. For monitoring purposes, the observers shall set a 1,640 foot (500 meter) radius hazard zone around the CIV and other Project vessels (if required by the MWMCP) for the protection of large marine mammals (i.e., whales) and a 500-foot (152-meter) radius hazard zone around the CIV and other Project vessels (if required by the MWMCP) for the protection of smaller marine mammals (i.e., dolphins, sea lions, seals, etc.) or sea turtles. 		<p>CSLC following completion of daily work</p> <p>Final Report submitted at end of Project activities</p>			

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<ul style="list-style-type: none"> • ExxonMobil shall immediately contact the Santa Barbara Marine Mammal Center (SBMMC) for assistance should a marine mammal be observed to be in distress. In the event that a whale becomes entangled in any cables or lines, the observer shall notify NMFS and the SBMMC, so appropriate response measures can be implemented. Similarly, if any take involving harassment or harm to a marine mammal occurs, the observer shall immediately notify the required regulatory agencies. • While cable is being deployed, cable-laying vessel speeds shall be limited to less than 2 nautical miles per hour (knots), with the speed of Project support vessels while assisting cable-laying vessel moderated to 3 to 5 knots to minimize the likelihood of collisions with marine mammals and sea turtles. • Propeller noise and other noises associated with cable laying activities shall be reduced or minimized to the extent possible. • The captain of the CIV and ExxonMobil Project management shall be responsible for ensuring that the MWMCP is implemented. 					
Sensitive Species/Habitat	MM MBIO-7: Offshore Vessel Lighting. Work-area lighting shall be of minimum intensity, consistent with the American Bureau of Shipping vessel class requirements and as required by U.S. Coast Guard operational regulations, and shall be directed inboard and downward to reduce the potential for seabirds to be attracted to the work area. When feasible, all vessel cabin windows shall be equipped with shades, blinds, or shields that block internal light during nighttime operations. If an injured bird is discovered on a vessel, the bird shall be transported as soon as	Offshore	Compliance	Throughout all offshore work activities	ExxonMobil	Sensitive species impacts

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	practical on a returning crew or supply vessel to an approved wildlife care facility. The onboard marine mammal monitors shall routinely inspect lighted vessels for birds that may have been attracted to the lighted vessels.					
Cultural and Paleontological Resources						
Offshore Cultural Resources	<p>MM CUL-1: Avoidance of Offshore Cultural Resources. The following measures shall be implemented:</p> <ul style="list-style-type: none"> • ExxonMobil shall arrange for responsible agencies to attend a meeting with the cable installation contractor ship's captain to review cultural site avoidance procedures prior to commencing cable installation activities. If agency personnel cannot attend, the meeting shall be held and documentation of meeting submitted to those agencies. • Contractors and vessel operators working in areas of a probable location of the previously identified site shall be instructed to remain outside of a 300-foot-diameter (90-meter [m]) protective zone to the extent possible during all offshore installation activities. This protective zone is to account for routine uncertainties in using remote sensors to precisely locate potential cultural resources in deep waters. • If complete avoidance of the protective zone is not possible, a remotely operated vehicle (ROV) with a color-imaging or equivalent accuracy sonar with a range of at least 300 feet (90 m) in polar-scanning mode shall be used to monitor cable retrieval and installation activities within the protective area to allow real time monitoring and detection of potential cultural resources. 	Offshore	Pre-project trainings and compliance reports as well as notification and follow-up correspondence between agencies and ExxonMobil if resource is encountered	Prior to offshore work activities and throughout any and all offshore work activities as necessary	ExxonMobil and agencies as required	Reduce potential impacts to offshore cultural resources

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<ul style="list-style-type: none"> ExxonMobil shall immediately halt cable laying operations or retrieval operations and notify Bureau of Safety and Environmental Enforcement (BSEE) and California State Lands Commission (CSLC) staffs if impacts may occur to a previously undetected cultural resource site. ExxonMobil shall perform an investigation, according to BSEE/CSLC staff instructions, to assess whether the site is significant. If the site is significant, the BSEE/CSLC staffs shall inform ExxonMobil how to protect the resource. In the event that a cable needs to be laid outside of the previously surveyed area, ExxonMobil shall use a ROV to identify potential cultural resources within the revised corridor prior to installation. If a previously undetected resource site is discovered, the applicant shall notify the BSEE and CSLC staffs. The BSEE and/or the CSLC staffs shall retain the option for inspectors to be present on a vessel at the sites to ensure that proper cable installation and retrieval procedures are conducted. 					
	Also implement MM MBIO-1b: Anchoring Plan (see above)					
Onshore Cultural Resources	<p>MM CUL-2: Avoidance of Onshore Cultural Resources. The following measures shall be implemented:</p> <ul style="list-style-type: none"> All onshore construction plans shall state that excavation shall be limited to approximately 8 to 9 feet (2.4 to 2.7 meters [m]) below ground surface and to 3 to 6 feet (0.9 to 1.8 m) below the cable from the entry point at the tunnel north wall for a distance of approximately 400 feet (122 m) north of the wall. Evidence of 	Onshore	Pre-project trainings and compliance reports as well as notification and follow-up correspondence between agencies and ExxonMobil if	Prior to and throughout any onshore work activities as necessary	ExxonMobil and agencies as required	Reduce potential impacts to onshore cultural resources

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>compliance with this mitigation measure shall be documented prior to land use clearance and monitored by the Santa Barbara County (SBC) Environmental Quality Assurance Program Monitor in the field.</p> <ul style="list-style-type: none"> • In areas where native soil would be disturbed, ExxonMobil shall have a County-approved archaeologist and a Native American representative monitor construction in compliance with the provisions of the County Archaeological Guidelines. Prior to Project approval, ExxonMobil shall submit a contract or Letter of Commitment between ExxonMobil and the archaeologist, consisting of a project description and scope of work, for County review and approval. ExxonMobil shall also provide County staff with the name and contact information for the assigned onsite monitor(s) prior to grading/building permit issuance and pre-construction meeting. • If potential cultural resource material is encountered during excavation within previously filled areas, work shall be halted until a Planning and Development-qualified archaeologist and Native American representative are consulted. Protection of archaeologically significant material shall be in accordance with SBC Guidelines. • A pre-construction meeting, inclusive of agency personnel, shall be organized to educate onsite construction personnel as to the sensitivity of archaeological resources in the area. If agency personnel cannot attend, the meeting shall be held and documentation of meeting submitted to those agencies. ExxonMobil personnel shall instruct all construction and Project personnel to avoid 		resources are encountered			

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	removing cultural materials from the property. Evidence of compliance with this mitigation measure shall be documented prior to land use clearance.					
Geology and Soils						
Geologic Hazard	MM GEO-1: Engineering Design. ExxonMobil shall ensure that all contracts specify that contractors use current industry standards with respect to seismic considerations in engineering designs.	Both	Submission of work plans and post-construction as-built plans	Prior to and following installation activities	ExxonMobil	Reduce potential impacts of risk of upset to Cables
	Also implement MM MBIO-1b: Anchoring Plan (see above)					
	Also implement MM MBIO-3a: Cable Installation and Retrieval (see above)					
	Also implement MM WQ-2: Stormwater Pollution Prevention Plan (SWPPP) (see below)					
Greenhouse Gas Emissions						
Generation of GHG Emissions	Implement MM AQ-1: Compliance with Emissions Reporting Plan (see above)					
	Implement MM AQ-2: Low-Sulfur Fuels (see above)					
Hazards and Hazardous Materials						
Risk of Water or Soil Contamination	MM HAZ-1: Use and Storage of Lubricating Oils, Hydraulic Fluids, and Waste Oils. ExxonMobil shall ensure that all installation contractors maintain good housekeeping practices to avoid washing of lubricants or other hydrocarbon from deck into the ocean or dropping of debris overboard. All lubricating oils, hydraulic fluids, waste oils and related materials shall be stored in contained areas.	Both	Pre-project trainings and compliance reports	Throughout all Project work activities	ExxonMobil	Reduce risks of water or soil contamination
	MM HAZ-2: Loading of Project Materials. ExxonMobil shall ensure that all materials related to cable retrieval and installation operations are loaded on the cable installation vessel at applicable port locations and transfer of materials at sea shall be avoided to the extent feasible. No crane lifts or transfers of materials and equipment shall be made over operating pipelines and power cables.	Offshore	Pre-project communication and compliance reports	Prior to and throughout Project work activities	ExxonMobil	Reduce risks of water or soil contamination

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	MM HAZ-3: Fueling Measure. To reduce incidental fueling spills, ExxonMobil shall refuel all equipment and vessels involved in the Project at existing onshore fueling facilities (e.g., ports/piers). There shall be no boat-to-boat fuel transfers, with the exception of skiffs on the dedicated Project cable installation vessel (CIV), which are only fueled when on the CIV.	Both	Pre-project communication and compliance reports	Prior to and throughout Project work activities	ExxonMobil and BSEE, CSLC, and SBC	Reduce risks of water or soil contamination
Risk of Upset from Anchoring	MM HAZ-4: Anchor Setback. ExxonMobil shall set all anchors a minimum of 250 feet (76 meters) from active pipelines and power cables.	Offshore	Compliance	Throughout Project work activities	ExxonMobil	Reduce risks of anchoring
Risk of Habitat Disturbance or Hazardous Material Contamination	MM HAZ-5: Critical Operations and Curtailment Plan (COCP). ExxonMobil shall prepare a COCP for offshore cable installation and retrieval operations that describe weather and sea conditions that would require curtailment of operations to reduce the risks of habitat disturbance of hazardous materials contamination. The plan shall be submitted to Bureau of Safety and Environmental Enforcement and California State Lands Commission staffs 60 days prior to commencement of the cable installation and retrieval operations.	Offshore	COCP	60 days prior to and adhered to throughout Project work activities	ExxonMobil, BSEE, CSLC, and SBC	Reduce risks of habitat disturbance of hazardous materials contamination
Risk of Hazardous Materials Release	MM HAZ-6: Cable Release Prevention Plan. ExxonMobil shall prepare and submit a Cable Release Prevention Plan that details the specific measures to be taken at all locations where a cable is suspended and could fail and fall to the ocean floor and disturb marine habitats. The plan shall detail design measures, engineering measures, safety measures, and redundancy in safety equipment to reduce the risk of the cable falling to the ocean floor. The plan shall be submitted to Bureau of Safety and Environmental Enforcement and California State Lands Commission staffs 60 days prior to commencement of the	Offshore	Cable Release Prevention Plan	60 days prior to and adhered to throughout Project work activities	ExxonMobil BSEE, and CSLC	Reduce risks of habitat disturbance of hazardous materials release

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	cable installation and retrieval operations.					
Risk of Water or Soil Contamination	MM HAZ-7: Oil Spill Response Plan (OSRP). ExxonMobil shall prepare a Project-specific OSRP that clearly identifies responsibilities of onshore and offshore contractors and ExxonMobil personnel. The OSRP shall list and identify the location of oil spill response equipment (including booms) and response times for deployment. Petroleum-fueled equipment on the main deck of all vessels shall have drip pans or other means of collecting dripped petroleum, which shall be collected and treated with onboard equipment. Response drills shall be in accordance with Federal and State requirements. Contracts with off-site spill response companies shall be in-place and shall provide additional containment and clean-up resources as needed. The OSRP shall be submitted to Bureau of Safety and Environmental Enforcement, California State Lands Commission, and Santa Barbara County staffs 60 days prior to commencement.	Both	OSRP	60 days prior to and throughout Project work activities	ExxonMobil with submittal to CSLC, BSEE, and other agencies as required	Reduce risks of water or soil contamination
	MM HAZ-8: Oil Spill Response Plan (OSRP) Training. ExxonMobil shall provide offshore and onshore OSRP training to primary contractors and sub-contractors to ensure clear understanding of responsibilities and prompt oil spill response procedures. ExxonMobil shall provide records documenting boom deployment training has been completed within the last year for both platform and Clean Seas personnel. ExxonMobil shall notify the Bureau of Safety and Environmental Enforcement (BSEE) at least 72 hours before the drill so BSEE can witness boom deployment operations.	Both	Pre-project trainings and compliance reports as well as notification and follow-up correspondence between agencies and ExxonMobil	Prior to the start of work activities and as needed for new personnel accessing the Project site and 72 hours prior to drill deployment	ExxonMobil with submittal to CSLC, BSEE, and other agencies as required	Reduce risks of water or soil contamination
Risk of Hazardous Materials Release	MM HAZ-9: Safety Plan for Tunnel Cable Installation and Removal Operations.	Onshore	Safety Plan for Tunnel Cable	60 days prior to commence-	ExxonMobil and SBC	Reduce risks of habitat

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	ExxonMobil shall prepare a Safety Plan for Tunnel Cable Installation and Removal Operations that describes procedures that will be followed and safety measures that will be taken to ensure damage to other cables and pipelines does not occur. The plan shall include the method proposed to enable continuous monitoring of cable pull activities in the tunnel. The procedures shall identify activities during which Santa Ynez Unit operations will be shutdown. The plan shall include a hazards study evaluation of cable installation and removal operations in the tunnel using an appropriate method (e.g., "What-If" or "Checklist"). The study shall identify potential failure modes, protection devices or systems, safety procedures and redundant safety equipment or measures (levels of protection). Procedures and the plan shall be submitted to the Santa Barbara County System Safety Reliability Review Committee 60 days prior to commencement of the cable installation and retrieval operations for review and comment.		Installation and Removal Operations	ment of cable installation and retrieval operations and throughout onshore Project work activities		disturbance of hazardous materials release
Risk of Hazardous Materials Release and Safety Communication	MM HAZ-10: Execution Plan. ExxonMobil shall prepare an Execution Plan describing cable removal and installation procedures in the onshore tunnel. The plan shall describe measures that will be taken to minimizing the tension/stress that will be placed on cables during cable pulling operations. The plan shall be submitted to California State Lands Commission staff and the Santa Barbara County System Safety Reliability Review Committee 60 days prior to commencement of cable removal and installation operations.	Onshore	Execution Plan	60 days prior to commencement of cable installation and retrieval operations and throughout onshore Project work activities	ExxonMobil and SBC	Reduce risks hazardous materials release
	MM HAZ-11: Cable Pulling Operations. ExxonMobil shall de-energize the cables and	Both	Compliance	Prior to tunnel work activities	ExxonMobil, CSLC, and	Reduce safety risks

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	shutdown the oil and gas pipelines in the tunnel during cable pulling operations in the tunnel, unless ExxonMobil can clearly demonstrate to Santa Barbara County and California State Lands Commission staffs that cable pulling operations can be performed safely while the cables and pipelines in the tunnel are operating.				SBC	associated with energized cables
	Also implement MM MBIO-1a: Pre-Construction Marine Biological Survey and MM MBIO-1b: Anchoring Plan (see above)					
Hydrology and Water Quality						
Water Quality	MM WQ-1: Conduit Flushing. Prior to conduit flushing, ExxonMobil shall obtain permission, if required, from the Central Coast Regional Water Quality Control Board (CCRWQCB) to discharge any accumulated material within the conduit. This may require submitting samples and a Report of Waste Discharge to the CCRWQCB.	Both	Low Threat Permit and Sampling Results	Prior to conduit flushing	ExxonMobil and CCRWQCB	Reduce potential impacts to water quality, sensitive species or habitat
Water Quality from Stormwater Run-Off Erosion or Sediment Loading	MM WQ-2: Stormwater Pollution Prevention Plan (SWPPP). ExxonMobil shall prepare a site-specific SWPPP for use during construction work and submit to Santa Barbara County and the Central Coast Regional Water Quality Control Board for review and approval. The plan shall be designed to control erosion from the construction area that could conceivably reach Corral Creek and cause a temporary increase in sediment loading and shall include best management practices to prevent unauthorized releases during construction.	Onshore	SWPPP	Submitted prior to and adhered to throughout all onshore construction work	ExxonMobil and CCRWQCB	Reduce potential impacts to water quality.
	Also implement MM MBIO-1b: Anchoring Plan (see above)					
Mineral Resources						
Abandoned wells or supporting infrastructure	APM MIN-1: Coordination with Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). In the event that unanticipated oil and/or gas resources in the form of formerly abandoned wells or supporting	Onshore	Compliance	During construction	ExxonMobil and DOGGR	Avoid impacts to abandoned wells and infrastructure

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	infrastructure are encountered during onshore construction activities, work activities will cease in that location and the DOGGR Santa Maria District office shall be contacted at (805) 937-7246 in order to coordinate identification and avoidance of the resource.					
Recreation						
Access to Recreational Facilities or Areas	<p>MM REC-1: Recreation Public Safety Measures. ExxonMobil shall adhere to the following conditions to avoid impacts related to public safety during Project construction:</p> <ul style="list-style-type: none"> • During any time that the south tunnel access manhole is open, safety barriers shall be erected in the immediate area to ensure public safety. In addition, speed limits for vehicle traffic along the bike path shall be adhered to pursuant to State Parks rules implemented for public safety. • In order to ensure public safety, signs shall be posted alerting cyclists and pedestrians to Project-related work being conducted along the bike path when access to the tunnel is required. Notices shall be posted at least 24 hours prior to any vehicle access. 	Onshore	Compliance reports and documentation of signage	Prior to onshore construction work, at least 24 hours prior to onshore construction work, and throughout all onshore project activities as required	Exxon Mobil with State Parks and CSLC	Minimize impacts to safety and recreational access
	<p>MM REC-2: Pre- and Post-Construction Inspections. ExxonMobil shall submit photo-documentation of the physical condition of the bike path at the work area before and after access to the south manhole tunnel. ExxonMobil shall be responsible for any maintenance or repair work necessary, if there is evidence of damage during construction. ExxonMobil shall coordinate with El Capitan and Refugio State Parks for pre- and post-construction inspections.</p>	Onshore	Compliance reports and documentation as well as notification and follow-up correspondence between agencies and ExxonMobil	Prior to Project work activities and following completion of work activities	ExxonMobil in coordination with State Parks as required	Minimize impacts to safety and recreational access

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
Transportation / Traffic						
Offshore Vessel Conflicts	MM TRANS-1: Notice to Mariners. At least 15 days prior to construction, ExxonMobil shall submit to the U.S. Coast Guard (USCG) Eleventh District, and as required to the Captain of the Port, a Notice to Mariners to alert other commercial and recreational boaters within the Project vicinity. In accordance with USCG requirements and to alert nearby vessels, applicable work vessels shall also “fly” the appropriate day shape(s) that specify that the vessel is engaged in installation activities and that it has limited maneuverability.	Offshore	Notice to Mariners	At least 15 days prior to offshore work activities	ExxonMobil and USCG	Minimize risks associated with offshore vessel conflicts
Vessel Collisions, Interferences or Conflicts	MM TRANS-2: Vessel Traffic Corridors. Project vessels shall use established oil and gas and/or Joint Oil Fisheries Liaison Office (JOFFLO) corridors to the maximum extent feasible.	Offshore	Compliance	Throughout all offshore work activities	ExxonMobil and JOFFLO	Minimize transportation conflicts
Utilities and Service Systems						
Solid Waste Removal and Abundance	MM WASTE-1: Recycling Feasibility Analysis. ExxonMobil shall submit a Recycling Feasibility Analysis for review and approval by Santa Barbara County and California State Lands Commission staffs 60 days prior to commencement of Project activities, for the installed cables in State waters. Unless otherwise supported by the analysis, ExxonMobil or assigned contractor will be required to recycle the out-of-service cables to the extent feasible. The analysis shall include tests of cable recycling at a selected recycle company and determine any conditions and/or limitations to recycling. Also implement WQ-2: Stormwater Pollution Prevention Plan (see above)	Both	Recycling Feasibility Analysis	Prior to work activities	ExxonMobil in coordination with CSLC and County of Santa Barbara	Reduce waste impacts to less than significant
Commercial Fishing						
Commercial and Recreational	MM CF-1: Commercial Fishery Constraints. ExxonMobil shall implement the following	Offshore	Pre-project consultation	At least 15 days prior to	ExxonMobil with USCG	Minimize risks to commercial

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
Fishing and Offshore Vessel Conflicts	<p>measures to reduce the potential for impacts to commercial fishing operations:</p> <ul style="list-style-type: none"> • Consult with Joint Oil Fisheries Liaison Office (JOFLO) and commercial fishermen, as appropriate, during the planning stages and construction to identify and mitigate any unanticipated impacts regarding the Project. If the JOFLO determines that conflicts with commercial fishing operations in the Santa Ynez Unit area develop during the Project, ExxonMobil shall make all reasonable efforts to satisfactorily resolve any issues with affected fishermen. Possible resolutions may include physical modification of identified problem areas on the replacement cables, the establishment of temporary preclusion zones, or off-site, out-of-kind, measures. Evidence of consultations shall be provided to California State Lands Commission (CSLC) staff, Bureau of Safety and Environmental Enforcement, and Santa Barbara County. • Review design concepts and installation procedures with JOFLO to minimize impacts to commercial fishing to the maximum extent possible. • Require contractors, to the extent reasonable and feasible, to recover all items lost overboard during activities associated with the Project. Logs shall be maintained on the cable installation and support vessels that identify the date, time, location, depth, and description of all items lost overboard. • Require the contractor to scout the nearshore conduit terminus area (prior to initiating work there) to determine the presence of any traps that could interfere with the cable operations. If any traps are found, the affected fishermen 		reports as well as notification and follow-up correspondence between agencies and ExxonMobil	commencement of construction activities and throughout all offshore project activities as required	and JOFLO	and recreational fishing and risks associated with transportation conflicts

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>shall be contacted through JOFLO and requested to relocate the traps for the Project duration. With written permission from the owner, if the traps have not been moved by the time Project activities are scheduled to begin, any traps that could interfere with the activities shall be relocated and then returned to the original site at the end of the work.</p> <ul style="list-style-type: none"> • In the absence of existing corridors, establish temporary vessel traffic corridors, reviewed and approved by JOFLO, inside 30 fathoms (55 meters) where vessel corridors have not been established specifically for the Project area, for the Project duration. • Include training on vessel traffic corridors in all pre-construction meetings with Project contractors and their personnel. 					
	Also implement MM TRANS-1: Notice to Mariners (see above)					
	Also implement MM TRANS-2: Vessel Traffic Corridors (see above)					
	Also implement MM MBIO-1b: Anchoring Plan (see above)					
	Also implement MM MBIO-3a: Cable Installation and Retrieval (see above)					
	Also implement MM MBIO-3b: Post-Project Survey (see above)					
	Also implement MM MBIO-3c: Post-Project Report (see above)					