

**CALENDAR ITEM  
C77**

A 78

06/28/16

S 39

PRC 6785.1

D. Simpkin

**RESCISSION OF APPROVAL OF AN AMENDMENT AND AUTHORIZATION OF AN  
AMENDMENT OF LEASE**

**LESSEES:**

Southern California Edison Company  
2131 Walnut Grove  
Rosemead, CA 91770

San Diego Gas and Electric Company  
P.O. Box 1831  
San Diego, CA 92112

City of Riverside  
Public Works Department  
3900 Main Street  
Riverside, CA 92522

**AREA, LAND TYPE, AND LOCATION:**

21.5 acres, more or less, of sovereign land in the Pacific Ocean, near San Onofre, San Diego County.

**AUTHORIZED USE:**

Cooling water conduits, environmental monitoring buoys, and a walkway and riprap.

**LEASE TERM:**

42 years, beginning March 1, 1981.

**CONSIDERATION:**

\$151,275 per year, with the State reserving the right to fix a different rent periodically during the lease, as provided in the lease.

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**PROPOSED AMENDMENT:**

Amend the Lease to authorize the installation of Large Organism Exclusion Devices and to satisfy all or part of the insurance requirements through maintenance of a self-insurance program.

**STAFF ANALYSIS AND RECOMMENDATION:**

**Authority:**

Public Resources Code sections 6005, 6216, and 6301; California Code of Regulations, Title 2, section 2000, subdivision (b).

**Public Trust and State's Best Interests Analysis:**

Southern California Edison Company (SCE) has submitted a new application to amend the existing lease to include the installation, use, and maintenance of a revised Large Organism Exclusion Devices (LOED) around each existing primary offshore intake structure as well as the auxiliary offshore intake structures at the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, for a total of four LOED.

The proposed amendment is to allow for the installation of LOED on the cooling water intake conduits associated with the SONGS Units 2 and 3. Both Units 2 and 3 reactors were shut down in January 2012 and now the intake conduits pull in less ocean water. The Lessees are proposing to install LOED in response to the State Water Resources Control Board's Once Through Cooling (OTC) Policy. The OTC policy requires operators of existing power plants with offshore intakes to install LOED in order to prevent the entrapment of large marine organisms. The LOED are net-like devices installed around the primary offshore intake structures and auxiliary offshore intake structures.

In 2012, the Commission adopted a Mitigated Negative Declaration for the LOED project. This included a Mitigation Monitoring Program. The LOED project authorized in 2012 was designed to be an independent, free-standing, structural frame "cage" that would have completely enclosed each existing primary offshore intake structures. The revised project utilizes a synthetic net-like material that will be attached by scuba divers on the existing intake structures. The new LOED design eliminates the need for dredging and seafloor disturbance and should not cause any additional interference with any public trust uses or resources. The LOED are being installed to protect public trust resources consistent with the Water Board's OTC policy. The Water Board has approved the design in concept and plans to formally approve the design in the coming months.

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In addition, staff is recommending that the Lessees be authorized to satisfy the insurance requirements outlined in the lease through maintenance of a self-insurance program. The proposed lease amendment includes provisions ensuring that the self-insurance coverage is maintained and meets the requirements under the lease.

For all the reasons above, Commission staff believes the approval of this Lease amendment is consistent with the common law Public Trust Doctrine and in the best interests of the State.

**OTHER PERTINENT INFORMATION:**

1. Lessees have the right to use the upland adjoining the lease premises. SCE is the Operating Agent of the SONGS.
2. On January 31, 1985, the Commission authorized the issuance of a General Lease – Industrial Use to the Lessees for cooling water conduits, environmental monitoring buoys, and a walkway and riprap as well as a temporary construction/sand placement area in conjunction with the operation of Units 2 and 3 at SONGS ([January 31, 1985, Calendar Item 27](#)).
3. In 2001, the Lease was amended to allow a longer term for the environmental monitoring buoys ([February 5, 2001, Calendar Item 56](#)).
4. On October 19, 2012, the Commission authorized an amendment to the lease to allow for the installation, use, and maintenance of two LOED on the primary offshore intake structures of Units 2 and 3, dredging and the ability to satisfy all or part of the insurance requirements through maintenance of a self-insurance program, but the Lease was never amended ([October 19, 2012, Calendar Item 78](#)). The LOED were never installed and staff is now recommending that the Commission rescind its October 19, 2012, authorization. A revision of rent was also authorized as part of Calendar Item 78 but that revision of rent has already taken effect and is not being rescinded as part of this item.
5. This action is consistent with Strategy 1.1 of the Commission's Strategic Plan to deliver the highest levels of public health and safety in the protection, preservation and responsible economic use of the lands and resources under the Commission's jurisdiction.
6. Rescission of the lease approval is not a project as defined by the California Environmental Quality Act (CEQA) because it is an

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administrative action that will not result in direct or indirect physical changes in the environment.

Authority: Public Resources Code section 21065 and California Code of Regulations, Title 14, section 15378, subdivision (b)(5).

7. Pursuant to the Commission's delegation of authority and the State CEQA Guidelines (Cal. Code Regs., tit.14, § 15025), Commission staff prepared a Mitigated Negative Declaration (MND) identified as CSLC MND No. 765, State Clearinghouse No. 2012081072, and a Mitigation Monitoring Program (MMP) for the San Onofre Nuclear Generating Station Units 2 & 3, Offshore Large Organism Exclusion Device Installation Project.

The MND was prepared and circulated for public review pursuant to the provisions of CEQA. On October 19, 2012, the Commission found that, based upon the entire record before the Commission, including the Initial Study, the MND, and the comments received in response thereto, there was no substantial evidence that the project would have a significant effect on the environment; California Code of Regulations, Title 14, section 15074, subdivision (b). The MND was adopted by the Commission on October 19, 2012. As part of the Commission's approval, the Commission also adopted the MMP, as contained in Exhibit C.

Commission staff reviewed the proposed amendment to the lease to install newly designed LOED on the two primary offshore intake structures and the two auxiliary offshore intake structures. The newly designed LOED are comprised of barrier nets that result in less impact than the original LOED design. The installation of the LOED on the auxiliary offshore intake structures was also not included in the MND. Based on the submitted information, staff has determined that this does not involve any "substantial changes" or "new information of substantial importance" resulting in any new or substantially more severe significant impacts, and thus no additional CEQA analysis is required as specified in Public Resources Code section 21166 and section 15162 subdivision (a) of the State CEQA Guidelines.

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.

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**EXHIBITS:**

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

**RECOMMENDED ACTION:**

It is recommended that the Commission:

**CEQA FINDING:**

Find that the Mitigated Negative Declaration, CSLC No. 765, State Clearinghouse No. 2012081072, was prepared by Commission staff and adopted by the Commission on October 19, 2012.

Find that the Commission reviewed and considered the information contained in the previously adopted MND, and that in the Commission's independent judgment, the scope of activities to be carried out under the lease to be amended under this authorization have been adequately analyzed, that none of the events specified in Public Resources Code section 21166 or State CEQA Guidelines section 15162 resulting in any new or substantially more severe significant impacts has occurred, and therefore, no additional CEQA analysis is required.

Re-adopt the Mitigation Monitoring Program, as contained on file in the Sacramento Office of the State Lands Commission as Exhibit C to Calendar Item 78 from the October 19, 2012, Commission Meeting.

**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.

**PUBLIC TRUST AND STATE'S BEST INTERESTS:**

Find that the proposed lease amendment is consistent with the common law public trust doctrine and is in the best interests of the State.

**AUTHORIZATION:**

1. Rescind the October 19, 2012 authorization to amend General Lease – Industrial Use No. PRC 6785.1 (Calendar Item 78); the revision of rent authorized in the same action will remain in effect.
2. Authorize the amendment of Lease No. PRC 6785.1, a General Lease – Industrial Use, effective June 28, 2016, to amend the Land Use or Purpose and Special Conditions to include the installation,

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use, and maintenance of four Large Organism Exclusion Devices on the primary and auxiliary offshore intake structures of Units 2 and 3 as described in Exhibit A and shown on Exhibit B (for reference purposes only); and liability insurance in the amount of \$5,000,000; Lessee may satisfy all or part of the insurance requirements through maintenance of a self-insurance program as outlined in the lease; all other terms and conditions of the lease as previously amended will remain in effect without amendment.

## LAND DESCRIPTION

Three parcels of tide and submerged land lying in the Pacific Ocean adjacent to the San Onofre Nuclear Generating Station, San Diego County, State of California, more particularly described as Parcel 1, Parcel 2 and Parcel 3, as follows:

PARCEL 1

COMMENCING at the easterly terminus of that certain course in the southwesterly boundary line of the 83.63 acre parcel of land shown on the Licensed Surveyor's Map filed on June 13, 1963, as Map No. 6242 of Record of Surveys in the Office of the County Recorder of said County, said certain course is shown on said map as having a bearing of S 49° 34' 15" E and a length of 300.24 feet; thence S 57° 24' 41" E, 8.64 feet to the TRUE POINT OF BEGINNING; thence the following 45 courses:

1.	S 33° 00' 00" W,	56.81 feet;
2.	S 39° 44' 55" W,	2,347.44 feet;
3.	N 57° 00' 00" W,	58.14 feet;
4.	S 33° 00' 00" W,	140.00 feet;
5.	S 57° 00' 00" E,	50.00 feet;
6.	S 33° 00' 00" W,	681.39 feet;
7.	N 57° 00' 00" W,	20.00 feet;
8.	S 33° 00' 00" W,	140.00 feet;
9.	S 57° 00' 00" E,	20.00 feet;
10.	S 33° 00' 00" W,	5,029.50 feet;
11.	S 57° 00' 00" E,	40.00 feet;
12.	N 33° 00' 00" E,	5,029.50 feet;
13.	S 57° 00' 00" E,	80.00 feet;
14.	N 33° 00' 00" E,	140.00 feet;
15.	N 57° 00' 00" W,	50.00 feet;
16.	N 33° 00' 00" E,	681.39 feet;
17.	S 57° 00' 00" E,	20.00 feet;
18.	N 33° 00' 00" E,	140.00 feet;
19.	N 57° 00' 00" W,	11.37 feet;
20.	N 39° 44' 55" E,	543.88 feet;
21.	S 50° 15' 05" E,	70.00 feet;
22.	N 39° 44' 55" E,	140.00 feet;
23.	N 50° 15' 05" W,	45.00 feet;
24.	N 39° 44' 53" E,	1,660.88 feet;
25.	S 61° 03' 16" E,	21.05 feet;
26.	S 26° 17' 55" W,	2,343.08 feet;

27. N 57° 00' 00" W,	11.43 feet;
28. S 33° 00' 00" W,	140.00 feet;
29. S 57° 00' 00" E,	20.00 feet;
30. S 33° 00' 00" W,	681.38 feet;
31. N 57° 00' 00" W,	50.00 feet;
32. S 33° 00' 00" W,	140.00 feet;
33. S 57° 00' 00" E,	80.00 feet;
34. S 33° 00' 00" W,	2,699.50 feet;
35. S 57° 00' 00" E,	40.00 feet;
36. N 33° 00' 00" E,	2,699.50 feet;
37. S 57° 00' 00" E,	20.00 feet;
38. N 33° 00' 00" E,	140.00 feet;
39. N 57° 00' 00" W,	20.00 feet;
40. N 33° 00' 00" E,	681.38 feet;
41. S 57° 00' 00" E,	50.00 feet;
42. N 33° 00' 00" E,	140.00 feet;
43. N 57° 00' 00" W,	58.09 feet;
44. N 26° 17' 55" E,	2,347.21 feet; and
45. N 33° 00' 00" E,	64.97 feet

to a point in the southwesterly boundary line of the 83.63 acre parcel of land shown on said Licensed Surveyor's Map No. 6242; thence along said southwesterly line, the following two courses:

46. N 65° 24' 53" W,	48.94 feet; and
47. N 57° 24' 41" W,	137.60 feet

to the TRUE POINT OF BEGINNING.

EXCEPTING THEREFROM any portion lying landward of the ordinary high water mark.

PARCEL 2

Twenty-six circular parcels of submerged land offshore from the San Onofre Nuclear Generating Station, twenty-four of the twenty-six parcels having a radius of 20 feet and two of the twenty-six parcels having a radius of 70 feet; the centers of said circles having the following California Coordinate System Zone 6 Coordinates (CCS27, Zone 6):

Those parcels having a radius of 20 feet;

A	N 438,950	E 1,595,140
B	N 437,800	E 1,596,785
C	N 438,625	E 1,597,360
D	N 439,775	E 1,595,710



E	N 435,015	E 1,597,290
F	N 435,850	E 1,597,860
G	N 434,670	E 1,599,495
H	N 436,325	E 1,600,650
I	N 435,175	E 1,602,300
J	N 436,000	E 1,602,875
K	N 437,145	E 1,601,225
L	N 432,860	E 1,605,610
M	N 438,110	E 1,597,255
N	N 437,855	E 1,597,815
O	N 422,795	E 1,615,480
P	N 422,030	E 1,616,020
Q	N 421,930	E 1,616,115
R	N 421,405	E 1,616,475
S	N 409,340	E 1,621,035
T	N 430,910	E 1,599,985
U	N 444,820	E 1,586,260
V	N 437,340	E 1,599,050
W	N 417,210	E 1,621,415
X	N 412,635	E 1,622,490

Those parcels having a radius of 70 feet;

Y	N 435,877	E 1,600,930
Z	N 423,061	E 1,615,705

PARCEL 3

Parcel 3 was for a temporary use which has expired and therefore is no longer included in the lease area.

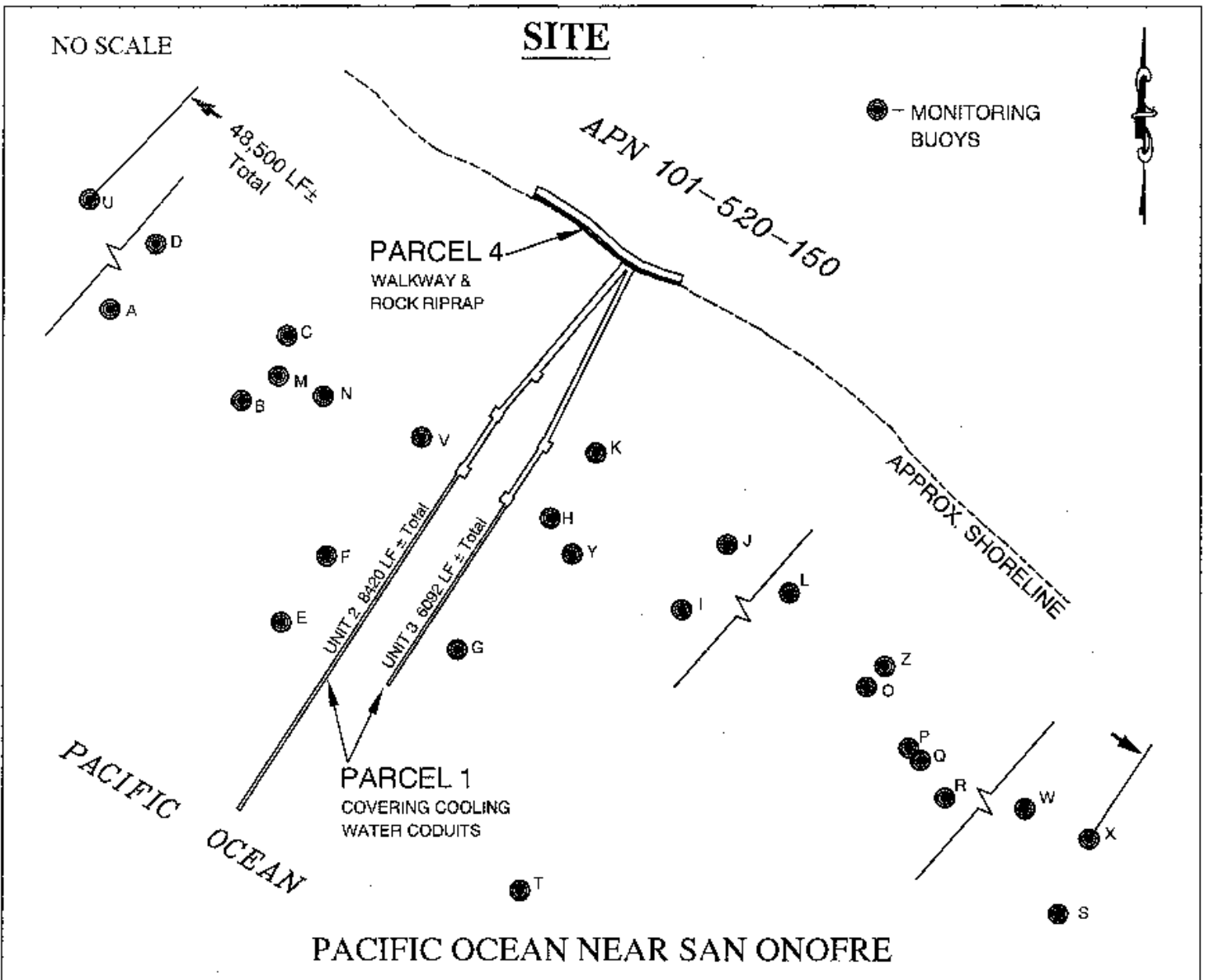
PARCEL 4

Those tide and submerged lands lying immediately beneath an existing walkway and rock riprap as shown on the plot plan of "Permanent Beach Walkway", sheet 1 of 4, in Southern California Edison Company's application on file in Lease PRC 4560 of State Lands Commission.

EXCEPTING THEREFROM any portion lying landward of the ordinary high water mark.

END OF DESCRIPTION

-PREPARED BY THE CALIFORNIA STATE LANDS COMMISSION-



MAP SOURCE: USGS QUAD

**Exhibit B**  
 PRC 6785.1  
 SOUTHERN CALIFORNIA  
 EDISON CO. ET AL  
 APN 101-520-150  
 GENERAL LEASE -  
 INDUSTRIAL USE  
 SAN DIEGO COUNTY



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.

1  
2 **5 MITIGATION MONITORING PROGRAM**

3  
4 **5.1 AUTHORITY**

5  
6 CEQA directs Lead Agencies to adopt, concurrent with adoption of an MND, a program  
7 for reporting or monitoring the changes that have been incorporated into the project or  
8 that have been made a condition of approval to mitigate or avoid significant  
9 environmental effects. This proposed Mitigation Monitoring Program (MMP) has been  
10 prepared to provide a summary and discussion of the ways in which the CSLC, as the  
11 Lead Agency for the Project, would ensure the measures identified in the MND are  
12 implemented, and identifies other agencies potentially having enforcement and  
13 compliance responsibilities. While the MMP may identify other public agencies with  
14 oversight or permitting jurisdiction, until the mitigation measures have been completed,  
15 the CSLC would remain responsible for ensuring all measures are implemented in  
16 accordance with the MMP. Should the CSLC adopt the MND after considering it  
17 together with any comments received during the public review process, it would adopt a  
18 final MMP in compliance with CEQA. (See Pub. Resources Code § 21081.6, subd. (a);  
19 State CEQA Guidelines §§ 15074, subd. (d), 15097.)  
20

21 **5.2 MITIGATION COMPLIANCE RESPONSIBILITY**

22  
23 SCE is responsible for successfully implementing all of the mitigation measures (MMs)  
24 in the MMP, and is responsible for assuring that these requirements are met by all of its  
25 construction contractors and field personnel. Standards for successful mitigation also  
26 are implicit in many mitigation measures that include requirements such as obtaining  
27 permits or avoiding a specific impact entirely. Additional mitigation measures may be  
28 imposed by applicable agencies with jurisdiction through their respective permit  
29 processes.  
30

31 **5.3 GENERAL MONITORING AND REPORTING PROCEDURES**

32  
33 The CSLC and the environmental monitor(s) are responsible for integrating the  
34 mitigation monitoring procedures into the Project implementation process in  
35 coordination with SCE. To oversee the monitoring procedures and to ensure the  
36 required measures are implemented properly, the environmental monitor assigned must  
37 be on-site during any portion of Project implementation that has the potential to create a  
38 significant environmental impact or other impact for which mitigation is required. The  
39 environmental monitor is responsible for ensuring that all procedures specified in the  
40 MMP are followed.  
41

1 Site visits and specified monitoring procedures performed by other individuals will be  
2 reported to the assigned environmental monitor. A monitoring record form will be  
3 submitted to the environmental monitor by the individual conducting the visit or  
4 procedure so that details of the visit can be recorded and progress tracked by the  
5 environmental monitor. A checklist will be developed and maintained by the  
6 environmental monitor to track all procedures required for each mitigation measure and  
7 to ensure that the timing specified for the procedures is adhered to. The environmental  
8 monitor will note any problems that may occur and take appropriate action to rectify the  
9 problems.

#### 10 11 **5.4 MITIGATION MONITORING PROGRAM TABLE**

12  
13 The following mitigation monitoring program table lists all MMs identified in Section 3 of  
14 the MND. The table lists the following information, by column:

- 15  
16
- 17 • Potential Impact;
  - 18 • Mitigation Measure;
  - 19 • Location;
  - 20 • Monitoring/reporting action;
  - 21 • Responsible agency; and
  - Timing

1

**MITIGATION MONITORING PROGRAM TABLE**

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
<b>Biological Resources</b>					
Potential impacts to the movement of marine mammal species during installation of the Large Organism Exclusion Devices.	<p><b>MM BIO-1: Marine Mammal Monitoring and Protection Plan (MMMPP).</b> The Contractor will execute the MMMPP to ensure the protection of marine mammals likely to occur in the area during vessel transit to and from the Project site as well as during installation of the Large Organism Exclusion Devices. Any changes to the MMMPP shall be submitted to the California State Lands Commission staff for approval at least 2 weeks before Project mobilization. Specific measures in the MMMPP include:</p> <ul style="list-style-type: none"> <li>• A training session shall be conducted by a National Marine Fisheries Service (NMFS)-approved marine mammal monitor with all vessel crews to review the purpose and need for this MMMPP.</li> <li>• All crews shall be notified of the need to evade, to the extent safely possible, crossing the path of migrating whales.</li> <li>• Vessels shall maintain a distance of no closer than 1,000 feet from migrating whales during transits to and from the Project site.</li> <li>• In the event a whale approaches to within 1,000 feet of the vessel in a manner outside of the vessel captain's</li> </ul>	In ocean waters offshore of SONGS	Compliance monitoring	CSLC	Throughout installation period

5. Mitigation Monitoring Program

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	<p>control, all forward propulsion should be stopped, if safe to do so, until the animal has moved away.</p> <ul style="list-style-type: none"> <li>In the event a whale strike occurs, the vessel captain must notify the U.S. Coast Guard immediately and provide information on a "Injured Marine Mammal and Ship Strike Report log." Subsequent notifications must be made to NMFS and Southern California Edison.</li> </ul> <p>The NMFS-approved marine mammal monitor shall observe for the presence of marine mammals within the Project area. The monitor shall notify the on-site construction foreman and initiate a cease-work order in the event a marine mammal approaches within 200 feet of the Primary Offshore Intake Structure where the installations are underway. Marine mammals that are seaward of the construction barge or that may surface near the barge to investigate shall be closely observed. The monitors shall have the discretion to continue operations if he/she determines that the mammal is headed away from the activity zone. Mammals attempting to haul out on the barge or on other equipment shall be chased away using approved methods from the NMFS and subject to NMFS approval. All sightings shall be documented in a monitor logbook with a date-</p>				

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	<p>stamped photograph taken of the animal, if possible. Any unique markings the animal possesses shall be catalogued, such as tags, scars, and/or discolorations.</p>				
<p>Potential impacts to giant kelp and seagrass resulting from turbidity.</p>	<p><b>MM BIO-2: Turbidity Monitoring Plan.</b> A Turbidity Monitoring Plan shall be implemented during Project dredging and construction activities to monitor any effects to water clarity in the immediate areas of Large Organism Exclusion Device (LOED) installation. The Plan shall be submitted to the California State Lands Commission staff for approval, in consultation with the Regional Water Quality Control Board, at least 2 weeks before Project mobilization and shall include, at a minimum, the following elements:</p> <ul style="list-style-type: none"> <li>• Details on how Southern California Edison will continually evaluate construction-related turbidity relative to natural (background) turbidity occurring in unaffected areas during dredging and construction activities;</li> <li>• Requirements for a qualified observer to record turbidity from a suitable vantage point during each day of dredging and construction; and specific adaptive management activities and/or corrective action measures should monitoring indicate unacceptable turbidity levels above ambient conditions.</li> </ul>	<p>In ocean waters offshore of SONGS</p>	<p>Compliance monitoring</p>	<p>SCE</p>	<p>Throughout installation period</p>

5. Mitigation Monitoring Program

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
<b>Geology and Soils</b>					
Potential impacts from seabed disruptions could occur from vessel anchoring during dredging and Large Organism Exclusion Device installation activities.	<p><b>MM GEO-1: Anchoring Plan.</b> Southern California Edison shall submit a Final Anchoring Plan to California State Lands Commission staff for review and approval, in consultation with the U.S. Coast Guard, U.S. Army Corps of Engineers and the National Marine Fisheries Service, at least 2 weeks prior to commencement of dredging and installation activities and shall implement the Plan during all anchoring activities. The Anchoring Plan shall include, at a minimum, the following elements:</p> <ul style="list-style-type: none"> <li>• A list all of the vessels that will anchor during the Project and the number and size of anchors to be set;</li> <li>• Maps showing the anchoring sites identified during pre-construction surveys to ensure that all anchors shall avoid any rocky habitat, kelp beds, and impacts to recreational and commercial boaters;</li> <li>• Descriptions of navigation equipment that would be used to ensure anchors are accurately set and of the anchor handling procedures that would be followed to prevent or minimize anchor dragging; and,</li> <li>• Requirement to be included in appropriate contracts for the Project that contractors shall, whenever feasible, use appropriate installation techniques and procedures described in the Anchoring</li> </ul>	In ocean waters offshore of SONGS	Compliance monitoring	SCE	Throughout installation period



Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	Plan that will minimize or avoid environmental impacts such as turbidity and anchor scarring.				
<b>Hazards and Hazardous Materials</b>					
Potential impacts to personnel or accidental spills resulting from inclement weather conditions during Large Organism Exclusion Device installation.	<b>MM HAZ-1: Inclement Weather Condition.</b> Southern California Edison’s Contractor shall tie-down or provide secondary containment for any deck equipment that may discharge contaminants in order to minimize the potential for unanticipated release of pollutants due to inclement weather or rough sea conditions. In addition, the Contractor shall monitor weather conditions and shall cease work if the Contractor determines that existing or forecast sea states or weather conditions would create unsafe working conditions for personnel or equipment.	In ocean waters offshore of SONGS	Compliance monitoring	SCE	Throughout installation period
Potential impacts resulting from an accidental spill or releases of hazardous substances or vapors during construction.	<b>MM HAZ-2: Spill Response Plan.</b> Southern California Edison’s (SCE’s) Contractor shall prepare a Spill Response Plan that presents the procedures and protocols to be used in the event of an onshore or offshore oil spill resulting from the activities associated with the construction and installation of the proposed Large Organism Exclusion Devices. Project vessels shall have a shipboard Spill Prevention and Response Plan and all necessary equipment to implement said Plan on board. Before Project mobilization, SCE shall submit the Plan to the Office of Oil Spill Prevention and	In ocean waters offshore of SONGS	Compliance monitoring	SCE	Throughout installation period

5. Mitigation Monitoring Program

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	<p>Response for review and approval, and verification of that approval will be provided to the California State Lands Commission a minimum of 2 weeks prior to installation operations and, at a minimum, include the following elements:</p> <ul style="list-style-type: none"> <li>• Discussion of potential spill sources of hydrocarbons are limited to leakage or spillage of fuel or lubricants from onshore and marine equipment used during dispositioning operations;</li> <li>• Description of Oil Spill Response Team and equipment;</li> <li>• Description of the notification process; and</li> <li>• Description of Marine Spill Scenarios and Response Procedures.</li> </ul>				
Potential risk to divers associated with sediment removal into the open water environment during construction.	<p><b>MM HAZ-3: Diver Safety Plan.</b> The Contractor shall prepare and submit to California State Lands Commission staff at least 2 weeks prior to Project mobilization a Diver Safety Plan that provides, at a minimum, the following elements:</p> <ul style="list-style-type: none"> <li>• A description of the diving techniques and equipment that will be used to support the underwater work activities;</li> <li>• A description of the procedures that will be used to perform each underwater operation;</li> </ul>	In ocean waters offshore of SONGS	Compliance monitoring	SCE	Throughout installation period

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	<ul style="list-style-type: none"> <li>• A description of the job safety analysis tool that will be used to prepare for each day's diving operations;</li> <li>• An evacuation plan for evacuating injured divers;</li> <li>• A contact list for local emergency services organizations and facilities; and</li> <li>• Incorporation of the Associated Pacific Constructors, Inc.'s Health, Safety, and Environment Plan and U.S. Coast Guard and Occupational Safety and Health Administration safety regulations.</li> </ul>				
<b>Hydrology and Water Quality</b>					
Potential effect on light-sensitive resources from turbidity.	See <b>MM BIO-2</b> for implementation of a <b>Turbidity Monitoring Plan</b> .	n/a	n/a	n/a	n/a
<b>Recreation</b>					
Potential impacts to fishing activities by the presence of support vessels during the Large Organism Exclusion Device installations, although temporary.	<b>REC-1: Coast Guard Advisory.</b> Prior to any dredging or installation activities, Southern California Edison shall provide the U.S. Coast Guard (USCG) with Project details—including information on Project locations, times, and other details of activities that may pose hazards to mariners (i.e., barges, buoys, etc.)—so that the USCG can include such information in the Local Notice to Mariners to advise boaters that could pass near the area of the activity in order to avoid potential hazards.	In ocean waters offshore of SONGS	Compliance monitoring	SCE	Throughout installation period