

1 **5.0 MITIGATION MONITORING PROGRAM**

2 The California State Lands Commission (CSLC) is the lead agency under the California
3 Environmental Quality Act (CEQA) for the ExxonMobil Santa Ynez Unit Offshore Power
4 System Reliability - B Phase 2 Project (Project). In conjunction with approval of this
5 Project, the CSLC adopts this Mitigation Monitoring Program (MMP) for implementation
6 of mitigation measures (MMs) for the Project to comply with Public Resources Code
7 section 21081.6, subdivision (a) and State CEQA Guidelines sections 15091,
8 subdivision (d) and 15097.

9 The Project authorizes ExxonMobil Production Company (ExxonMobil or Applicant) to
10 conduct cable replacement and retrieval activities in accordance with the terms and
11 conditions of its existing CSLC Lease No. PRC 7163.1.

12 **5.1 PURPOSE**

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

17 **5.2 ENFORCEMENT AND COMPLIANCE**

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

21 **5.3 MONITORING**

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

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

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

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

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

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

- 12 • Relevant mitigation procedures shall be written into contracts between the
13 Applicant and any contractors.
- 14 • Worker Environmental Awareness Training (under **MM TBIO-1**) shall be
15 implemented and all personnel would be required to participate. ExxonMobil shall
16 include awareness training for its contractors of the sensitive species both
17 onshore and offshore. The training shall include a description of the species,
18 protection status under the law, the potential range of movement, what to do in
19 the event one is found within the construction area and any other pertinent
20 information. This training should be incorporated into the pre-construction
21 meeting(s) with construction personnel to perform the work. Agency
22 representatives shall be invited to attend the meeting(s).

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

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

31 **5.4 MITIGATION MONITORING TABLE**

32 This section presents the mitigation monitoring table (Table 5-1) for the following
33 environmental disciplines: Aesthetics, Air Quality and Greenhouse Gas Emissions,
34 Terrestrial Biological Resources, Marine Biological Resources, Cultural and
35 Paleontological Resources, Geology and Soils, Hazards and Hazardous Materials,

1 Hydrology and Water Quality, Land Use and Planning, Noise, Recreation,
2 Transportation and Traffic, Utilities and Service Systems. All other environmental
3 disciplines were found to have less than significant or no impacts and are therefore not
4 included below. The table lists the following information, by column:

- 5 • Impact (impact number, title, and impact class);
- 6 • Mitigation measure (full text of the measure);
- 7 • Location (where impact occurs and mitigation measure should be applied);
- 8 • Monitoring/reporting action (action to be taken by monitor or Lead Agency);
- 9 • Timing (before, during, or after construction; during operation, etc.);
- 10 • Responsible party; and
- 11 • Effectiveness criteria (how the agency can know if the measure is effective).

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
Aesthetics						
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
Air Quality						
Project Emissions	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: <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 	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

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	<p>total fuel use and emissions associated with 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). 	Onshore	Compliance	During all onshore construction activities	ExxonMobil and SBAPCD	Reduce potential emissions from Project construction

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	<ul style="list-style-type: none"> • All commercial diesel vehicles are limited to an engine idling time of five minutes while loading and unloading; electric auxiliary power units should be used whenever possible. <p>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	MM AQ-4: Dust Control Measures. Dust	Onshore	Observe dust	During all	ExxonMobil	Reduce air

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Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
Matter/Fugitive Dust	<p>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 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. 		control measures for compliance	onshore construction activities	and CSLC	quality impacts caused by particulate matter and fugitive dust

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Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<ul style="list-style-type: none"> 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 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	Onshore	Surveys, establishment of buffers (if required) Notification	Prior to onshore work activities if Project work activities will occur between	ExxonMobil with CDFW and/or USFWS as applicable	Reduce impacts to breeding/nesting bird species

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	<p>(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 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>		<p>and follow-up Correspondence between agencies and ExxonMobil</p>	<p>March 1 and August 31 of any year</p>		
	<p>Also implement MM VIS-1: Glare Minimization (see above)</p> <p>Also implement MM WQ-2: Stormwater Pollution Prevention Plan (SWPPP) (see below)</p>					

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Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	www.slc.ca.gov/Division_Pages/DEPM/OGPP/OGPP.html .					
	<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

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Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
Sensitive Species/Habitat	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.	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)					
	Also implement MM HAZ-8: Oil Spill Response Plan (OSRP) Training (see below)					
	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.	Offshore	Daily monitoring reports; ROV data	During operations	ExxonMobil	Avoidance of sensitive habitats and pipelines
	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:	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

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Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<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 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. • 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/) 					

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Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>OGPP.html).</p> <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 of each relevant site in the ROV survey video; • 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 	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

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Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	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 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. 	Offshore	Inspection within 30 days of Project activities	Prior to and throughout all Project activities as required	ExxonMobil in consultation with CSLC and CDFW	Reduce potential impacts to sensitive species or habitat

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Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
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 of activities that have the most potential for affecting the animals. • 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 	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 CSLC following completion of daily work</p> <p>Final Report submitted at end of Project activities</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

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	<p>sufficient detail to determine whether observable effects to marine mammals are occurring.</p> <ul style="list-style-type: none"> • 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. • 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 					

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	<p>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.</p> <ul style="list-style-type: none"> • 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	<p>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 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.</p>	Offshore	Compliance	Throughout all offshore work activities	ExxonMobil	Sensitive species impacts
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 	Offshore	Pre-project trainings and compliance reports as well as notification	Prior to offshore work activities and throughout any and all offshore	ExxonMobil and agencies as required	Reduce potential impacts to offshore cultural

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	<p>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.</p> <ul style="list-style-type: none"> • 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. • 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 		<p>and follow-up correspondence between agencies and ExxonMobil if resource is encountered</p>	<p>work activities as necessary</p>		<p>resources</p>

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	<p>significant. If the site is significant, the BSEE/CSLC staffs shall inform ExxonMobil how to protect the resource.</p> <ul style="list-style-type: none"> 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 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. In areas where native soil would be disturbed, ExxonMobil shall have a County-approved 	Onshore	Pre-project trainings and compliance reports as well as notification and follow-up correspondence between agencies and ExxonMobil if resources are encountered	Prior to and throughout any onshore work activities as necessary	ExxonMobil and agencies as required	Reduce potential impacts to onshore cultural resources

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>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.</p> <ul style="list-style-type: none"> • 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 removing cultural materials from the property. Evidence of compliance with this mitigation measure shall be documented prior to land use clearance. 					

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
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	Submittal 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
	MM HAZ-3: Fueling Measure. To reduce	Both	Pre-project	Prior to and	ExxonMobil	Reduce risks

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	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.		communication and compliance reports	throughout Project work activities	and BSEE, CSLC, and SBC	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 Commis-	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

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	sion staffs 60 days prior to commencement of the 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	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

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	deployment operations.					
Risk of Hazardous Materials Release	MM HAZ-9: Safety Plan for Tunnel Cable Installation and Removal Operations. 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.	Onshore	Safety Plan for Tunnel Cable Installation and Removal Operations	60 days prior to commencement of cable installation and retrieval operations and throughout onshore Project work activities	ExxonMobil and SBC	Reduce risks of habitat 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	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

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	Safety Reliability Review Committee 60 days prior to commencement of cable removal and installation operations.					
	MM HAZ-11: Cable Pulling Operations. ExxonMobil shall de-energize the cables and 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.	Both	Compliance	Prior to tunnel work activities	ExxonMobil, CSLC, and SBC	Reduce safety risks 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.

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
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 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.	Onshore	Compliance	During construction	ExxonMobil and DOGGR	Avoid impacts to abandoned wells and infrastructure
Recreation						
Access to Recreational Facilities or Areas	MM REC-1: Recreation Public Safety Measures. ExxonMobil shall adhere to the following conditions to avoid impacts related to public safety during Project construction: <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
	MM REC-2: Pre- and Post-Construction Inspections. ExxonMobil shall submit photo-	Onshore	Compliance reports and	Prior to Project work activities	ExxonMobil in	Minimize impacts to

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	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.		documentation as well as notification and follow-up correspondence between agencies and ExxonMobil	and following completion of work activities	coordination with State Parks as required	safety and recreational access
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 (JOFLO) corridors to the maximum extent feasible.	Offshore	Compliance	Throughout all offshore work activities	ExxonMobil and JOFLO	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	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

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	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)						
Commercial Fishing						
Commercial and Recreational Fishing and Offshore Vessel Conflicts	<p>MM CF-1: Commercial Fishery Constraints. ExxonMobil shall implement the following 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 	Offshore	Pre-project consultation reports as well as notification and follow-up correspondence between agencies and ExxonMobil	At least 15 days prior to commencement of construction activities and throughout all offshore project activities as required	ExxonMobil with USCG and JOFLO	Minimize risks to commercial and recreational fishing and risks associated with transportation conflicts

Table 5-1. Mitigation Monitoring Program

Potential Impact	Mitigation Measure/Applicant Proposed Measure (MM/APM)	Location	Monitoring / Reporting Action	Timing	Responsible Party	Effectiveness Criteria
	<p>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.</p> <ul style="list-style-type: none"> • 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 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. • 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)					