5. MITIGATION MONITORING PROGRAM

5.1 AUTHORITY

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

5.2 MITIGATION COMPLIANCE RESPONSIBILITY

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

5.3 GENERAL MONITORING AND REPORTING PROCEDURES

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

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

### 5.4 MITIGATION MONITORING PROGRAM TABLE

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

- Potential Impact;
- Mitigation Measure;
- Location;
- Monitoring/reporting action;
- Responsible agency; and
- Timing
## MITIGATION MONITORING PROGRAM TABLE

<table>
<thead>
<tr>
<th>Potential Impact</th>
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| **Biological Resources**                                                       | **MM BIO-1: Marine Mammal Monitoring and Protection Plan (MMMPP).** 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:  
  - 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.  
  - All crews shall be notified of the need to evade, to the extent safely possible, crossing the path of migrating whales.  
  - Vessels shall maintain a distance of no closer than 1,000 feet from migrating whales during transits to and from the Project site.  
  - In the event a whale approaches to within 1,000 feet of the vessel in a manner outside of the vessel captain’s | In ocean waters offshore of SONGS | Compliance monitoring | CSLC               | Throughout installation period |
5. Mitigation Monitoring Program

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<td></td>
<td>control, all forward propulsion should be stopped, if safe to do so, until the animal has moved away.</td>
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<td>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.</td>
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<td></td>
<td>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-</td>
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### 5. Mitigation Monitoring Program

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| Potential impacts to giant kelp and seagrass resulting from turbidity.           | MM BIO-2: Turbidity Monitoring Plan. 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:  
  - 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;  
  - 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. | In ocean waters offshore of SONGS | Compliance monitoring | SCE                | Throughout installation period          |
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<td><strong>Geology and Soils</strong></td>
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<td>Potential impacts from seabed disruptions could occur from vessel anchoring during dredging and Large Organism Exclusion Device installation activities.</td>
<td><strong>MM GEO-1: Anchoring Plan.</strong> 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:</td>
<td>In ocean waters offshore of SONGS</td>
<td>Compliance monitoring</td>
<td>SCE</td>
<td>Throughout installation period</td>
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<td>• A list all of the vessels that will anchor during the Project and the number and size of anchors to be set;</td>
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<td>• 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;</td>
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<td>• 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,</td>
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<td>• 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 Plan.</td>
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<td>Plan that will minimize or avoid environmental impacts such as turbidity and anchor scarring.</td>
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#### Hazards and Hazardous Materials

**Potential impacts to personnel or accidental spills resulting from inclement weather conditions during Large Organism Exclusion Device installation.**

**MM HAZ-1: Inclement Weather Condition.**
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.

- **Location:** In ocean waters offshore of SONGS
- **Monitoring/Reporting Action:** Compliance monitoring
- **Responsible Agency:** SCE
- **Timing:** Throughout installation period

**Potential impacts resulting from an accidental spill or releases of hazardous substances or vapors during construction.**

**MM HAZ-2: Spill Response Plan.**
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...
## 5. Mitigation Monitoring Program

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</table>
| 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:  
  - 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;  
  - Description of Oil Spill Response Team and equipment;  
  - Description of the notification process; and  
  - Description of Marine Spill Scenarios and Response Procedures. | | | | | |
| Potential risk to divers associated with sediment removal into the open water environment during construction. | MM HAZ-3: Diver Safety Plan. 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:  
  - A description of the diving techniques and equipment that will be used to support the underwater work activities;  
  - A description of the procedures that will be used to perform each underwater | In ocean waters offshore of SONGS | Compliance monitoring | SCE | Throughout installation period |
### 5. Mitigation Monitoring Program

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<td>operation;</td>
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<td>● A description of the job safety analysis tool that will be used to prepare for each day’s diving operations;</td>
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<td>● An evacuation plan for evacuating injured divers;</td>
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<td>● A contact list for local emergency services organizations and facilities; and</td>
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<td>● 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.</td>
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<td>Hydrology and Water Quality</td>
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<td>Potential effect on light-sensitive resources from turbidity.</td>
<td>See MM BIO-2 for implementation of a Turbidity Monitoring Plan.</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
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<td>Recreation</td>
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<td>Potential impacts to fishing activities by the presence of support vessels during the Large Organism Exclusion Device installations, although temporary.</td>
<td><strong>REC-1: Coast Guard Advisory.</strong> 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</td>
<td>In ocean waters offshore of SONGS</td>
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<td>to avoid potential hazards.</td>
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