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.

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5.4 MITIGATION MONITORING PROGRAM TABLE

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

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- Potential Impact;
- Mitigation Measure;
- 16 Location;
- Monitoring/reporting action;
- Responsible agency; and
- 19 Timing

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MITIGATION MONITORING PROGRAM TABLE

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
Biological Resour	ces				
Biological Resour Potential impacts to the movement of marine mammal species during installation of the Large Organism Exclusion Devices.	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	In ocean waters offshore of SONGS	Compliance monitoring	CSLC	Throughout installation period
	manner outside of the vessel captain's				

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	control, all forward propulsion should be				
	stopped, if safe to do so, until the animal				
	has moved away.				
	 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.				
	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-				

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	stamped photograph taken of the animal, if possible. Any unique markings the animal				
	possesses shall be catalogued, such as tags,				
	scars, and/or discolorations.				
Potential impacts	MM BIO-2: Turbidity Monitoring Plan. A	In ocean	Compliance	SCE	Throughout
to giant kelp and	Turbidity Monitoring Plan shall be implemented	waters	monitoring		installation
seagrass resulting	during Project dredging and construction	offshore of			period
from turbidity.	activities to monitor any effects to water clarity in	SONGS			
	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.				

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
Geology and Soils	3				
Potential impacts from seabed disruptions could occur from vessel anchoring during dredging and Large Organism Exclusion Device installation activities.	MM GEO-1: Anchoring Plan. 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 activitiesand shall implement the Plan during all anchoring activities. The Anchoring Plan shall include, at a minimum, the following elements: • A list all of the vessels that will anchor during the Project and the number and size of anchors to be set; • 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; • 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, • Requirement to be included in appropriate contracts for the Project that contractors shall, whenever feasible, use appropriate installation techniques and	In ocean waters offshore of SONGS	Compliance monitoring	SCE	Throughout installation period
	procedures described in the Anchoring				

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.				
Hazards and Haza	rdous 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.	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.	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	In ocean waters offshore of SONGS	Compliance monitoring	SCE	Throughout installation period

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	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

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
Lludvolo my and We	 operation; A description of the job safety analysis tool that will be used to prepare for each day's diving operations; An evacuation plan for evacuating injured divers; A contact list for local emergency services organizations and facilities; and 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. 				
Hydrology and Wa	•	,	, , , , , , , , , , , , , , , , , , ,	, , , , , , , , , , , , , , , , , , ,	,
Potential effect on light-sensitive resources from turbidity.	See MM BIO-2 for implementation of a Turbidity Monitoring Plan.	n/a	n/a	n/a	n/a
Recreation					
Potential impacts to fishing activities by the presence of support vessels during the Large Organism Exclusion Device installations, although temporary.	REC-1: Coast Guard Advisory. 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	In ocean waters offshore of SONGS	Compliance monitoring	SCE	Throughout installation period

Potential Impact	Mitigation Measure	Location	Monitoring/ Reporting Action	Responsible Agency	Timing
	to avoid potential hazards.				