APPENDIX F

Mitigation Monitoring Program

MITIGATION MONITORING PROGRAM

The California State Lands Commission (CSLC) is the lead agency under the California Environmental Quality Act (CEQA) for the AT&T Japan-U.S. Cable Network Decommissioning Project (Project). In conjunction with approval of this Project, the CSLC adopts this Mitigation Monitoring Program (MMP) for implementation of mitigation measures (MMs) for the Project to comply with Public Resources Code section 21081.6, subdivision (a), and State CEQA Guidelines sections 15074, subdivision (d), and 15097.

1.1 PURPOSE

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

1.2 ENFORCEMENT AND COMPLIANCE

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

1.3 MONITORING

CSLC staff may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as necessary. Some monitoring responsibilities may be assumed by other agencies, such as affected jurisdictions (i.e., U.S. Fish and Wildlife Service [USFWS], National Marine Fisheries Service [NMFS], California Department of Fish and Wildlife [CDFW]). The CSLC or its designee shall ensure that qualified environmental monitors are assigned to the Project.

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

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

- Coordinating with the Applicant to integrate the mitigation monitoring procedures during Project implementation
- Confirming that the MMP is followed

The environmental monitor shall immediately request any deviation from the procedures identified in this MMP to CSLC staff or its designee and shall not implement the request until CSLC staff or its designee approve any deviation and its correction.

Workforce Personnel. Implementation of the MMP requires the full cooperation of Project personnel and supervisors. Many of the MMs require action from site supervisors and their crews. To facilitate successful implementation, relevant mitigation procedures shall be written into contracts between the Applicant and any contractors.

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

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

1.4 MITIGATION MONITORING PLAN

This section presents the mitigation measures for Air Quality; Biological Resources; Cultural Resources; Cultural Resources – Tribal; Hazards and Hazardous Materials; Hydrology and Water Quality; Recreation; and Transportation. All other environmental factors were found to have less than significant or no impacts; therefore, they are not included. The MMP includes the following information:

- **Potential Impact**
- **Mitigation Measure** (full text of the measure)
- **Monitoring/Reporting Action** (action to be taken by monitor or Lead Agency)

- **Effectiveness Criteria** (how the agency can know if the measure is effective)
- **Responsible Party** (entity responsible to ensure MM compliance)
- **Timing** (Phase 1 and/or 2; before, during, or after construction; during operation; etc.)

1.4.1 AIR QUALITY

***Potential Impact:* Project activities emissions in SLOAPCD jurisdiction**

MM AQ-1a: Reactive Organic Gases (ROG) + Nitrogen Oxides (NO_X) and Diesel Particulate Matter (DPM) Emission Offset Credits - San Luis Obispo Air Pollution Control District (SLOAPCD). No later than 30 days prior to the commencement of Project-related activities, the Applicant or its designee shall provide evidence to CSLC staff that ROG + NO_X and DPM emission offset credits have been purchased to offset the Project's ROG + NO_X and DPM emissions that exceed their respective SLOAPCD construction significance thresholds.

Monitoring/Reporting Action: Provide evidence that ROG + NO_X and DPM emission offset credits have been purchased

Effectiveness Criteria: Offset ROG + NOx and DPM emissions within SLOAPCD jurisdiction

Responsible Party: Applicant or their designee

Timing: Prior to the commencement of Project-related activities

***Potential Impact:* Project activities emissions in MCAQMD jurisdiction**

MM AQ-1b: Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_X) Emission Offset Credits- Mendocino County Air Quality Management District (MCAQMD). No later than 30 days after the completion of Project-related activities, the Applicant or its designee shall provide funding to MCAQMD for implementation of offsite emission reduction projects that achieve real, quantifiable ROG and NO_X reductions within the North Coast Air Basin. The Applicant shall deposit funds with MCAQMD in an amount sufficient to offset the project's ROG and NO_X emissions that exceed the applicable MCAQMD significance

thresholds. The offset quantity shall be calculated using MCAQMD-approved emission factors and methodologies.

MCAQMD shall apply the funds exclusively to eligible ROG or NO_X reducing projects and the MCAQMD's administrative costs, which may include but are not limited to:

- Replacement or retrofit of diesel engines (stationary or mobile)
- Agricultural pump engine electrification
- Woodstove change out programs
- Incentives for low ROG and NO_X equipment or vehicles
- Other MCAQMD approved emission reduction programs that meet state and federal criteria for surplus reductions

The Applicant shall provide documentation to CSLC from MCAQMD demonstrating receipt of funds, identification of the potential emission reduction project(s) to be funded, and the estimated ROG and NOX reductions sufficient to offset the project's ROG and NOX emissions that exceed the applicable MCAQMD significance threshold. If MCAQMD determines that additional reductions are needed to fully offset the Project's ROG and NOX emissions, the Applicant shall notify CSLC staff and provide supplemental funding to MCAQMD until the performance standard is met.

Monitoring/Reporting Action: Provide documentation to CSLC from MCAQMD demonstrating receipt of funds, identification of the potential emission reduction project(s) to be funded, and the estimated ROG and NOX reductions sufficient to offset the project's ROG and NOX emissions that exceed the threshold

Effectiveness Criteria: Offset ROG and NOx emissions within the North Coast Air Basin

Responsible Party: Applicant or their designee

Timing: No later than 30 days after the completion of Project-related activities

1.4.2 BIOLOGICAL RESOURCES

***Potential Impact:* Special status marine mammal species**

MM BIO-1: Pre-Activity Worker Environmental Training. A marine wildlife monitor (MWM) approved by the National Marine Fisheries Service (NMFS) will conduct a pre-Project marine wildlife training seminar for all Project personnel working in the offshore work areas prior to initiation of Project work activities. The MWM credentials shall be provided to CSLC staff for concurrence no later than 30 days prior to the training. The purpose of the seminar is to educate Project personnel on the identification of marine wildlife in the Project area and to provide an overview of the wildlife mitigation measures that will be implemented during the Project. Specifically, the training seminar will include, but will not be limited to, the following:

- Review of a presentation or pamphlet developed for the Project on the most common types of marine wildlife likely to be encountered in the Project area and the types of Project activities that have the most potential for affecting wildlife, with emphasis on marine mammals
- Identification of marine wildlife expected to occur in the Project area and periods of occurrence within the offshore work areas including their general habits, distribution, and methods to avoid impacts
- Overview of the Marine Mammal Protection Act, Endangered Species Act, California Endangered Species Act, and California Fish and Game Code, the agencies responsible for enforcement of these acts and regulations, and penalties associated with violations of the acts and regulations
- Procedures to be followed during mobilization/demobilization, and transiting of Project vessels, anchoring of Project vessels, and throughout cable removal activities
- Reporting requirements in the event of an inadvertent collision and/or injury to marine wildlife
- A listing of contact numbers for easy access should an inadvertent collision or injury occur.

The monitor will maintain a log of all Project personnel who attend the training and provide the most current version upon request to CSLC. If

new personnel join the Project after the initial training, a new training must be provided to those new workers and their attendance recorded. The complete log will be submitted to CSLC upon Project completion.

Monitoring/Reporting Action: Submit MWM credentials to CSLC staff for concurrence and maintain a log of all Project personnel who attend the training

Effectiveness Criteria: All contractors and employees involved with the Project complete the program to be trained in identification of marine wildlife and to provide an overview of the wildlife mitigation measures

Responsible Party: Applicant or their designee and CSLC

Timing: Prior to and throughout offshore Project work activities

Potential Impact: **Special status marine mammal, turtle, and bird species**

MM BIO-2: National Marine Fisheries Service (NMFS)–Approved Marine Wildlife Monitor. A marine wildlife monitor (MWM) approved by the National Marine Fisheries Service (NMFS) will be present during offshore cable removal activities. Monitors shall be trained in identification of federally protected marine species and recognition of behavioral traits that indicate disturbance, aggression, and other adverse responses that may be elicited during human activities in the marine environment. Monitors shall be able to identify marine mammals, turtles, and birds protected by state or federal laws (marine wildlife) from the cable recovery vessel (CRV) and support vessels during all marine cable removal activities. The MWM credentials shall be provided to CSLC staff for concurrence no later than 30 days prior to cable removal activities.

Monitors shall be positioned at the best available vantage points with an unobstructed 360-degree view of the water or the widest field of view possible, subject to safety considerations. Monitors shall observe the area around Project vessels to facilitate the maintenance of a safe distance (328 feet [100 meters]) between Project vessels and marine wildlife.

Monitors will use night-vision lenses during nighttime removal activities so that close-range marine wildlife can be observed and appropriate

measures taken to avoid interactions. If marine wildlife is observed within 328 feet (100 meters) of Project vessels, the monitor shall notify the crews and progress will slow or cease until the animal has moved a safe distance from the cable and support vessels. If an encounter occurs during cable removal operations, the monitor will slow or stop progress and monitor the cable for signs of potential contact with the marine wildlife. Monitors shall have the authority to halt operations, if suspending operations will not jeopardize the safety of the crew or the work vessels, until the risk of a conflict has passed.

Project personnel will carefully contain and remove garbage and food waste from Project vessels to minimize attracting predatory and scavenging birds. If an injured bird is discovered on a vessel, the bird will be transported on the next returning work vessel to an approved wildlife care facility. If the bird is listed under the federal Endangered Species Act or California Endangered Species Act or designated Fully Protected under the California Fish and Game Code, the injury shall be reported as soon as possible to U.S. Fish and Wildlife Service and/or the California Department of Fish and Wildlife, respectively. The nearest approved wildlife care facility will be contacted upon transport of the bird. The incapacitated bird will be reported on the daily monitoring summary report and added to a cumulative log submitted to CSLC at the completion of the Project.

The monitor team shall provide daily sighting reports to the appropriate regulatory agencies (NMFS, USFWS, and/or CDFW, depending on the species involved), as well as a written report to CSLC as well as NMFS, USFWS, and/or CDFW within 30 days of completion of Project activities in State waters. The reports shall detail the monitoring observations including species observed, avoidance measures taken to prevent interactions with federally protected species during installation, and a summary of incidents, if any.

Monitoring/Reporting Action: Submit MWM credentials to CSLC staff for concurrence, submit daily sighting reports to the appropriate regulatory agencies (NMFS, USFWS, and/or CDFW depending on the species involved), and submit a written report to CSLC as well as NMFS, USFWS, and/or CDFW upon Project completion

Effectiveness Criteria: Facilitate safe distance between Project vessels and marine wildlife; observe close-range mammals and take appropriate measures to avoid interactions; minimize attracting predatory and scavenging birds; transport injured birds discovered on a vessel (if occurs)

Responsible Party: Applicant or their designee

Timing: Prior to and throughout cable removal activities

Potential Impact: **State or federally protected marine mammal, turtle, and bird species**

MM BIO-3: Modify Vessel Operations. Vessels operating within 328 feet (100 meters) of marine mammals, turtles, and birds protected by state or federal laws (marine wildlife) will modify operations and implement the following measures:

- Vessels shall maintain a minimum distance of 328 feet (100 meters) from the sighting location, unless the animal(s) pursue, approach, or otherwise refuse to move away from the vessel despite the efforts of crew to establish separation.
- Vessels shall not be permitted to cross directly in front of, or intersect, the path of sighted individuals.
- If marine wildlife are passing alongside the ship, the vessel operator shall maintain a steady heading and constant speed that is not faster than the sighted individuals' speed, maintaining the 328-foot (100-meter) buffer unless the individuals' behavior makes this infeasible as described above.
- If sighted individuals demonstrate defensive or disturbed actions, the vessel shall reduce speed until the approved marine wildlife monitor (MWM) determines that the animal (s) has calmed and/or moves outside of the 328-foot (100-meter) buffer. Suspending operations or taking the vessel out of gear will occur if it does not jeopardize the safety of the crew or the work vessels.

If marine wildlife comes within 328 feet (100 meters) of the vessels during cable removal, the approved MWM will have the authority to suggest modifications in vessel operations and cable removal until the animal moves safely out of the area or remains unobserved for 15 minutes.

Monitoring/Reporting Action: Observe for marine wildlife within 328 feet (100 meters) and modify vessel operations accordingly

Effectiveness Criteria: Compliance with vessel operations modification measures if marine wildlife is observed within 328 feet (100 meters) of a vessel

Responsible Party: Applicant or their designee

Timing: Throughout cable removal activities

Potential Impact: **Entanglement of marine wildlife**

MM BIO-4: Avoid Anchor Impacts to Marine Wildlife. Immediately prior to lowering the anchors into position, the approved marine wildlife monitor (MWM) will survey the Project area for the presence of any marine wildlife. Upon approval from the MWM that the Project area is clear of marine wildlife, the anchoring of the Project vessel may proceed. In the event that marine wildlife is identified within the Project area, anchoring procedures will be delayed until the animal(s) move a safe distance from the Project area, as determined by the MWM. In the event that a marine mammal or sea turtle becomes entangled in any anchor chain or lines, the Project team will stop all work and consult the captain and winch operator for guidance on what actions can be safely taken to address the entanglement (e.g., slacking or cutting the line). The MWM shall immediately notify National Marine Fisheries Service (NMFS) and/or California Department of Fish and Wildlife (CDFW) and request guidance on appropriate response measures. The MWM will ensure that those response measures are implemented, as allowed by the captain based on safety of the crew and vessel.

Immediately following any disentanglement effort, a verbal report shall be made to the regulatory agencies (CSLC, NMFS, U.S. Fish and Wildlife Service, and/or CDFW depending on the species involved), followed by a written report.

Monitoring/Reporting Action: Notify and request guidance from NMFS and/or CDFW if wildlife becomes entangled; provide verbal report to regulatory agencies, followed by a written report after any disentanglement efforts

Effectiveness Criteria: Survey for marine wildlife prior to lowering anchors; delay anchoring if marine wildlife is present; stop work if entanglement occurs

Responsible Party: Applicant or their designee

Timing: Prior to lowering anchors into position and throughout offshore Project activities

Potential Impact: Vessel Lighting

MM BIO-5: Vessel Lighting. The number and wattage of lights will be limited to the minimum necessary for complying with U.S. Coast Guard safety and navigation standards. Searchlights may be used occasionally for short-term navigation and safety reasons.

Monitoring/Reporting Action: Observe lighting for compliance

Effectiveness Criteria: Lighting minimized

Responsible Party: Applicant or their designee

Timing: Throughout offshore Project activities

***Potential Impact:* Marine sensitive natural communities**

MM BIO-6: Marine Safety and Anchoring Plan. The Applicant will prepare and implement a Marine Safety and Anchoring Plan for any marine vessels requiring anchoring. The Plan shall be submitted to CSLC for approval at least 30 days prior to the initiation of Dive Support Vessel (DSV) activities. The Plan shall describe the offshore work activities for which vessel anchoring is required, including anchoring arrangements, and general procedures for deploying and recovering anchors. Anchoring locations shall avoid Habitat Areas of Particular Concern (HAPC) (i.e., hard bottom and rocky substrates, canopy kelp). The Plan shall include:

- The positioning of anchors used to anchor support vessels to locations that avoid damage to HAPC from the anchors. If alternative anchor sites without HAPCs cannot be identified, consultation with U.S. Fish and Wildlife Service and National Marine Fisheries Service shall be required prior to finalization of the Plan.
- Additional protective measures such as anchor deployment speeds (to avoid impacts to epifaunal fishes and invertebrates).

- A requirement for the Applicant to provide visual evidence (i.e., photos) that the anchors and related equipment have been fully recovered. The Plan shall also include a requirement to conduct post-Project bathymetric surveys if evidence cannot be provided showing that anchors and related equipment are fully recovered. Any such surveys must be completed within 1 month after anchors have been removed to verify that no Project debris is present. The anchoring plan will specify that the area must be returned to pre-project conditions if Project-related debris is present in the post-Project survey.

Monitoring/Reporting Action: Submit Marine Safety and Anchoring Plan to CSLC

Effectiveness Criteria: Avoid damage to HAPC; consult with USFWS and NMFS if needed

Responsible Party: Applicant or their designee

Timing: Prior to and throughout offshore Project activities

Other applicable mitigation measures for potential impacts to biological resources

MM HAZ-1: Vessel Waste Management Plan, MM HAZ-2: Shipboard Oil Pollution Emergency Plan (see Hazards and Hazardous Materials)

1.4.3 CULTURAL RESOURCES

Potential Impact: **Discovery of shipwrecks or seafloor anomalies**

MM CUL-1: Prepare and Implement an Avoidance Plan for Marine Archaeological Resources. The Applicant or their designee shall incorporate an Avoidance Plan into the Marine Safety and Anchoring Plan (MM BIO-6) to avoid all identified shipwrecks or seafloor anomalies identified in the pre-project geophysical study (Seafloor Surveys, Inc. 1999), which was conducted prior to the JUS S8 and JUS S9 cable installations.

Monitoring/Reporting Action: Submit avoidance plan to CSLC

Effectiveness Criteria: Reduced impacts to marine archaeological resources (if found)

Responsible Party: Applicant or their designee

Timing: Prior to and throughout offshore Project activities

Potential Impact: **Unanticipated discovery of human remains**

MM CUL-2: Unanticipated Discovery of Human Remains. If human remains are encountered, all provisions provided in California Health and Safety Code section 7050.5 and California Public Resources Code section 5097.98 shall be followed. Work shall stop within 100 feet of the discovery, and both an archaeologist and CSLC staff must be contacted within 24 hours. The archaeologist shall consult with the County Coroner. If human remains are of Native American origin, the County Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of this determination, and a Most Likely Descendent shall be identified. No work is to proceed in the discovery area until consultation is complete and procedures to avoid or recover the remains have been implemented.

Monitoring/Reporting Action: Notifications/consultations with County Coroner and NAHC (if applicable), copy to CSLC

Effectiveness Criteria: Reduced impacts to human remains (if found)

Responsible Party: Applicant or their designee and CSLC

Timing: Throughout Project work activities

1.4.4 CULTURAL RESOURCES – TRIBAL

Potential Impact: **Unanticipated discovery of marine tribal cultural resources**

MM TCR-1: Tribal Cultural Awareness Training. Prior to or concurrent with Dive Support Vessel (DSV) mobilization within the JUS S9 Montaña offshore work area, the Applicant's DSV contractor and divers shall participate in a tribal cultural resources awareness training program developed by a qualified archaeologist familiar with the cultural resources that may be found offshore of San Luis Obispo County. If requested by a consulting Native American tribe within 30 days following CSLC's approval of the Project, the Applicant shall notify CSLC of the request and accommodate the tribe's participation in the development of the training program materials, tribal concurrence/approval of the training program materials, and/or tribal participation in the training session. The Applicant shall submit the training program materials to CSLC no later than 30 days prior to conduit excavation activities.

The training will be conducted by a qualified archaeologist, and, if timely requested by a consulting Native American tribe, the tribe may have a Tribal Representative(s) participate at the training. Subsequent training sessions would be required to accommodate any new personnel that participate in conduit excavation activities.

The purpose of the training will be to educate DSV personnel as to the sensitivity of tribal cultural resources in the project area, including the possibility of exposing tribal cultural resources, guidance on recognizing such resources, and direction on work stoppage if a potential resource is encountered. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans, consistent with Native American tribal values and customs.

The training shall include, at a minimum:

- A brief overview of the cultural sensitivity of the Project site and surrounding area;
- What resources could potentially be identified during excavation around the conduit exit point;
- The protocols that apply in the event unanticipated tribal cultural resources are identified, including the requirement to stop work and communicate the potential discovery to CSLC; and,
- Consequences (including, but not limited to, cultural, legal, and regulatory consequences) in the event of noncompliance.

If a potential tribal cultural resource is encountered, DSV diver excavation activities shall halt and CSLC will be immediately notified. Excavation activities shall not continue until the find(s) can be properly evaluated in consultation with CSLC staff and any participating Tribes. Evidence of compliance with the training requirements of this mitigation measure shall be documented within pre-Project compliance documentation materials prior to commencement of marine activities in the JUS S9 Montaña offshore work area and submitted to CSLC upon completion of the training.

Monitoring/Reporting Action: Stop work and notify CSLC if needed; submit evidence of compliance with mitigation measure and completion of training to CSLC

Effectiveness Criteria: Reduced impacts to tribal cultural resources; educate DSV personnel as to the sensitivity of tribal cultural resources in the project area

Responsible Party: Applicant or their designee and CSLC

Timing: Prior to or concurrent with DSV mobilization within the JUS S9 Montaña offshore work area

1.4.5 HAZARDS AND HAZARDOUS MATERIALS

Potential Impact: **Hazardous waste products**

MM HAZ-1: Vessel Management Plan. The Applicant shall prepare a Vessel Waste Management Plan, which will require that all vessels be equipped to collect, contain, and treat waste products, including solid waste, and petroleum/hazardous waste. All debris falling into the water must be documented by time, date, location, and recovery action taken. This Plan shall be submitted to CSLC for approval 30 days prior to the initiation of marine vessel activities. All documented incidents shall be reported to CSLC and other relevant agencies in a final report at the end of cable removal activities in State waters.

Monitoring/Reporting Action: Submit Vessel Management Plan to CSLC; submit final report

Effectiveness Criteria: Reduced risk of hazards from waste products

Responsible Party: Applicant or their designee

Timing: Prior to and throughout marine vessel activities

Potential Impact: **Spills of hazardous materials**

MM HAZ-2: Shipboard Oil Pollution Emergency Plan. The Applicant shall prepare Shipboard Oil Pollution Emergency Plans (SOPEPs) that must be implemented during Project operations and submitted to CSLC for approval 30 days prior to the initiation of Project work activities. The SOPEPs must be compliant with the International Convention for the

Prevention of Pollution from Ships (MARPOL) Annex I (Prevention of Pollution by Oil) and V (Prevention of Pollution by Garbage from Ships). The SOPEPs must contain preventative measures and procedures that will be followed in the event of a spill in the marine environment and will include at a minimum:

- Purpose and need for the plan
- Assessment of potential hazards
- Spill Prevention and containment
- Emergency response procedures
- Reporting procedures to the CSLC and other relevant agencies
- Closing of the spill incident
- Spill notification contact list

Monitoring/Reporting Action: Submit SOPEPs to CSLC

Effectiveness Criteria: Mitigation of inadvertent spills (if occurs)

Responsible Party: Applicant or their designee

Timing: Prior to and throughout offshore Project activities

***Potential Impact:* Encounter munitions and explosives of concern (MEC)**

MM HAZ-3: Munitions and Explosives of Concern Response Plan- San Luis Obispo County. The Applicant shall prepare a Munitions and Explosives of Concern (MEC) Response Plan that shall be submitted to the County of San Luis Obispo and the California State Lands Commission (CSLC) for review and approval 30 days prior to the initiation of Project work activities. The MEC Response Plan shall require the following actions during Project operations, unless the California Department of Toxic Substances Control (DTSC) has communicated in advance to CSLC that certain or all actions are no longer necessary.

- MEC Awareness Training: Prior to or concurrent with Dive Support Vessel (DSV) mobilization within the JUS S9 Montaña offshore work area, the Applicant's DSV contractor and divers shall participate in a MEC awareness training conducted by a U.S. Department of Defense Explosives Safety Board (DDESB)

Technical Paper (TP) 18 qualified Unexploded Ordnance (UXO) technician that covers the MEC conditions known at the Baywood Park Training Area, including how MEC may appear in buried, degraded, or partially exposed states. The training shall reinforce the Recognize, Retreat, Report (3R) safety protocol to ensure workers understand proper response procedures if MEC is encountered. Upon completion of the training, a worker training log shall be submitted to CSLC.

- On-Site UXO Support: During DSV operations, two DDESB TP 18 qualified technicians shall be present to provide real-time evaluation and guidance during diver-excavation, cable exposure and conduit exit work where MEC may be present.
- Stop-Work and Emergency-Response Procedures: Upon encountering any object or condition that resembles MEC, work shall halt, the area shall be secured, and personnel shall follow procedures provided during MEC awareness training. Initial notification shall be made by calling 911 to reach the San Luis Obispo County Bomb Squad. The applicant shall notify CSLC of any incidents that require a stop work order within 24 hours of the incident, and shall notify CSLC when work resumes.
- MEC Safety Integration and Work-Resumption Controls: The Plan shall explain how MEC safety requirements will be implemented throughout project execution, including management of hazard zones, communication pathways, and reinforcement of 3R procedures. The Plan shall also specify that work may not resume in a suspected MEC area until a TP 18 qualified UXO technician has evaluated the condition and confirmed the area is safe. The Plan shall also describe coordination procedures with the United States Army Corps of Engineers Los Angeles District.

Monitoring/Reporting Action: Submit MEC Response Plan to the County of San Luis Obispo and CSLC; submit worker training log to CSLC; stop work and notify CSLC if needed

Effectiveness Criteria: Reduce and mitigate potential encounters with MEC

Responsible Party: Applicant or their designee

Timing: Prior to and throughout DSV operations in the JUS S9 Montaña offshore work area

1.4.6 HYDROLOGY AND WATER QUALITY

Applicable mitigation measures for potential impacts to hydrology and water quality

MM HAZ-1: Vessel Waste Management Plan, MM HAZ-2: Shipboard Oil Pollution Emergency Plan (see Hazards and Hazardous Materials)

1.4.7 RECREATION

***Potential Impact:* Interaction with recreational vessels**

MM REC-1: Advanced Local Notice to Mariners. At least 15 days prior to initiation of Project work activities at each location, a Local Notice to Mariners (www.dco.uscg.mil/Featured-Content/Mariners/Local-Notice-to-Mariners-LNMs/Southwest-District/) shall be submitted the U.S. Coast Guard (USCG) (www.pacificarea.uscg.mil/Our-Organization/Southwest-District/Prevention-Division/LnmRequest/)/and posted to the USCG for the following marine activities:

1. Starting offshore cable removal activities
2. Any Project-related marine work impacting the users in the Pacific Ocean

A copy of the published notice shall be provided immediately to CSLC. The Notice shall include the following:

- The requirements of the U.S. Submarine Cable Act (47 U.S.C. section 25) for anglers to avoid deploying gear within 1 nautical mile (nm) of a vessel engaged in cable installation and within 0.25 nm of a buoy marking the location of a cable.
- The location of Project work areas, including cable route coordinates.
- The size and type of equipment that will be performing the work, and any distinguishing marks or flags that will enable boaters to identify the vessels.
- The name and radio call signs for working vessels.
- 24-hour telephone numbers of on-site contact representatives.
- The schedule for completing the Project.

The Applicant will provide this information directly to the Harbormaster at Morro Bay, Point Arena Harbor, and the Morro Bay, Port San Luis, and Manchester Commercial Fishermen's Associations, other local anglers who request it, and to the Cable Multi-Agency Coordinating Committee.

Monitoring/Reporting Action: Publication of notice, copy to CSLC

Effectiveness Criteria: Reduction of potential impacts to recreational vessels

Responsible Party: Applicant or their designee

Timing: Prior to Project work activities and throughout offshore Project activities

Potential Impact: **Interaction with recreational vessels**

MM REC-2: Advanced Notice to Ocean Users. The Applicant shall submit to CSLC and post public notices at least 30 days prior to initiation of Project work activities at the following locations:

1. Montaña de Oro State Park
2. Manchester State Park

A copy of the published notice shall be provided immediately after posting to CSLC. The Notice shall include the following:

- A location map of Project work areas, including cable route coordinates.
- The size and type of equipment, and photos of the vessels, that will be performing the work as well as any distinguishing marks or flags that will enable ocean recreational users to identify the vessels.
- 24-hour telephone numbers of on-site contact representatives.
- The Project's activity schedule at and/or offshore of each State Park.

Monitoring/Reporting Action: Publication of notice, submit notice to CSLC

Effectiveness Criteria: Reduction of potential impacts to recreational vessels

Responsible Party: Applicant or their designee

Timing: Prior to Project work activities and throughout offshore Project activities

1.4.8 TRANSPORTATION

Applicable mitigation measures for potential impacts to transportation

MM REC-1: Advanced Local Notice to Mariners (see Recreation)