

# Staff Report 46

## APPLICANT:

---

AT&T Enterprises, LLC

## PROPOSED ACTION:

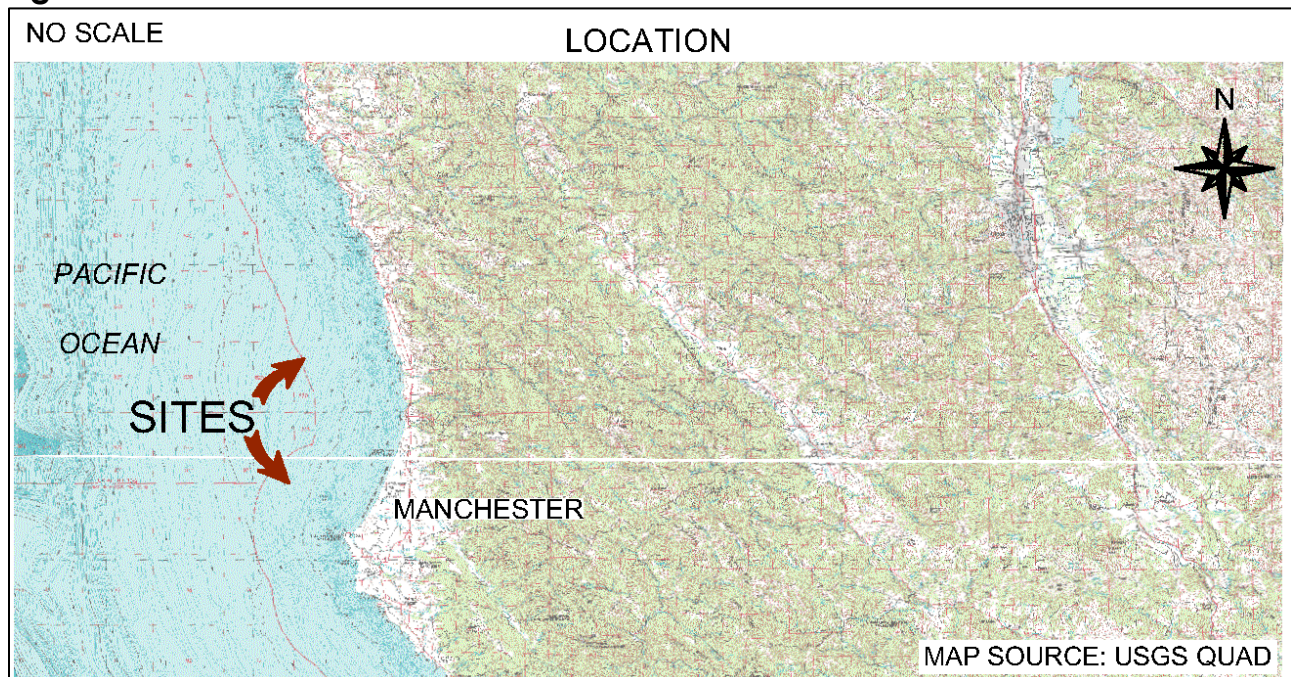
---

Issuance of two General Leases – Right-of-Way Use.

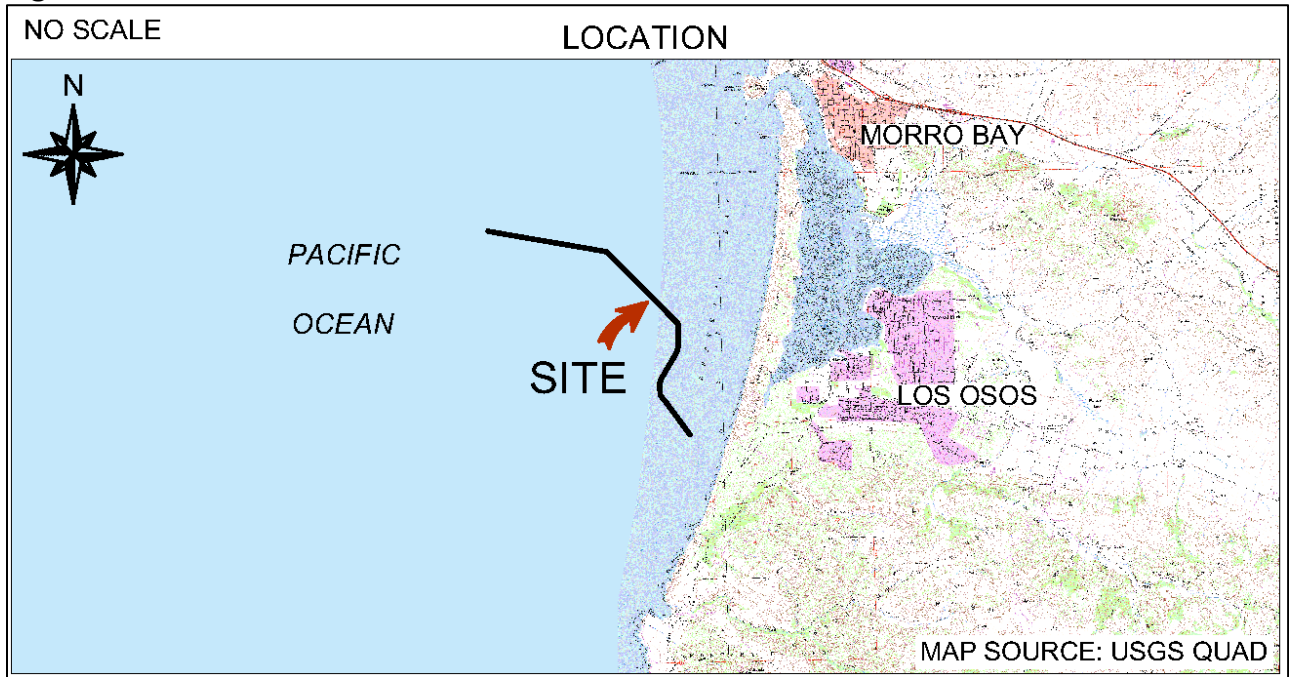
## AREA, LAND TYPE, AND LOCATION:

Sovereign land in the Pacific Ocean, offshore of Manchester State Beach, Mendocino County (as shown in Figure 1a), and offshore of Montaña de Oro State Park in Los Osos, San Luis Obispo County (as shown in Figure 1b).

**Figure 1a. Lease 8203 Location**



**Figure 2b. Lease 8204 Location**



**AUTHORIZED USE:**

**Lease 8203:** Maintenance of five existing non-operational 5-inch-diameter steel conduits; and the decommissioning and removal of two 1.2-inch-diameter fiber-optic cables (segments 8 and 9 of the Japan-U.S. Fiber-Optic Cable Network as shown in Figure 2a).

**Lease 8204:** The decommissioning and removal of a portion of one 1.2-inch-diameter fiber-optic cable (south end of segment 9 of the Japan-U.S. Fiber-Optic Cable Network as shown in Figure 2b).

Figure 3a. Lease 8203 Site Map

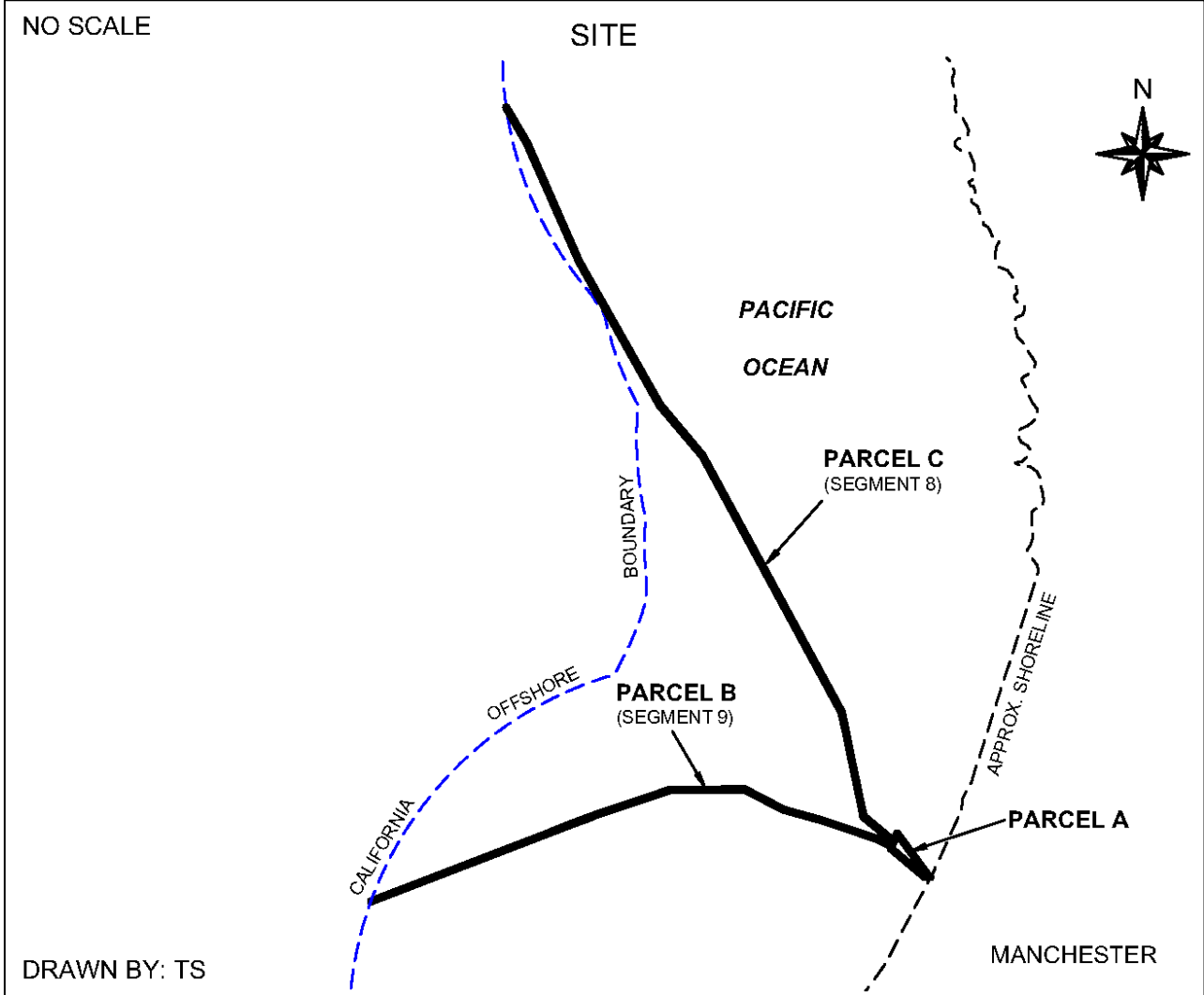
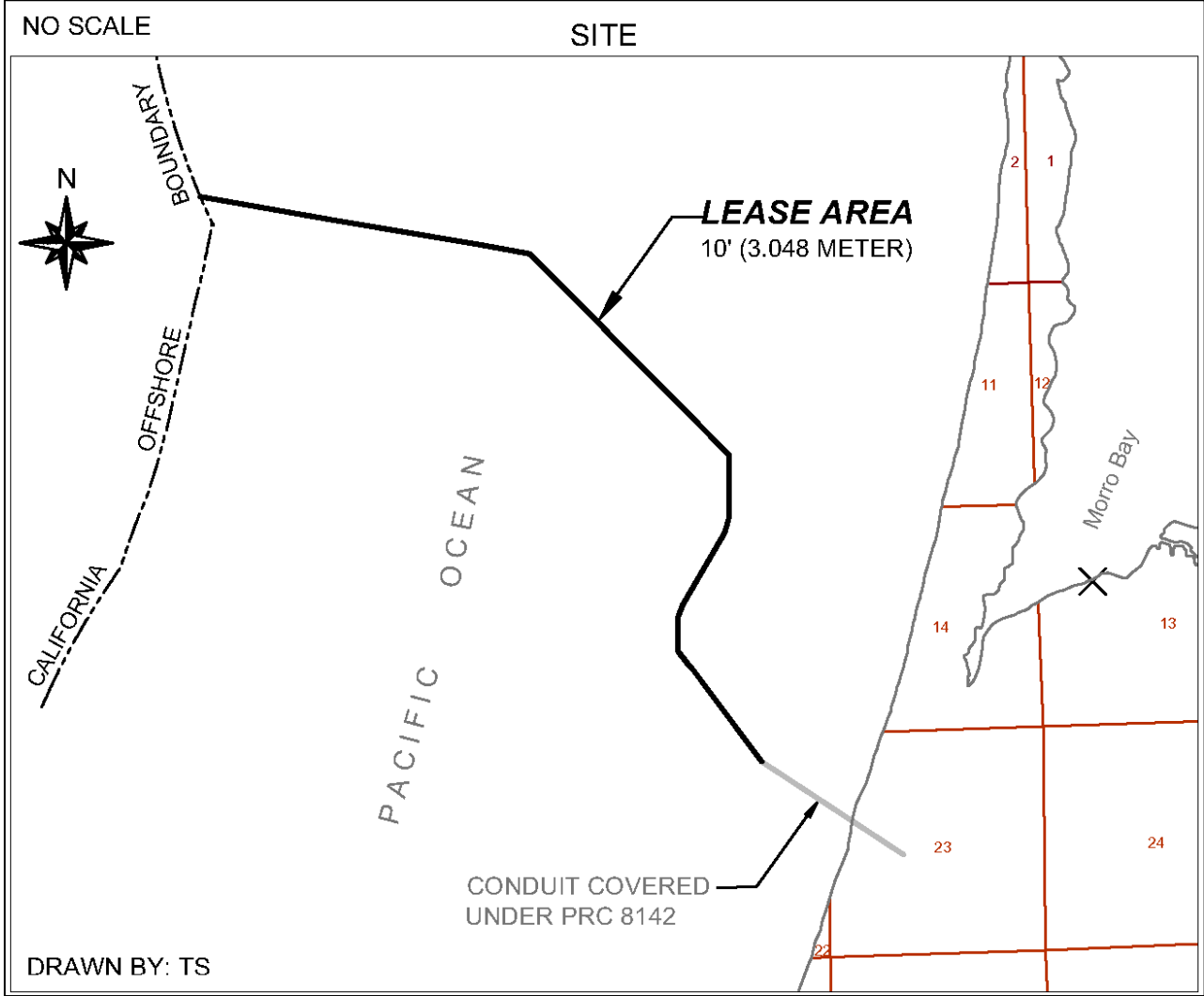


Figure 4b. Lease 8204 Site Map



NOTE: This depiction of the lease premises is based on unverified information provided by the Applicant or other parties and is not a waiver or limitation of any State interest in the subject or any other property.

**TERM:**

10 years, beginning July 1, 2026.

**CONSIDERATION:**

**Lease 8203:** \$412,335 per year, with an annual Consumer Price Index adjustment and the State reserving the right to fix a different rent periodically during the lease term, as provided for in the lease.

**Lease 8204:** \$115,043 per year, with an annual Consumer Price Index adjustment and the State reserving the right to fix a different rent periodically during the lease term, as provided for in the lease.

**SPECIFIC LEASE PROVISIONS:**

- Liability insurance in an amount no less than \$1,000,000 per occurrence (for each of the two leases).
- Bond or other surety in the amount of \$3,100,000 (for each of the two leases).
- Lessee agrees to be bound by and fully carry out, implement, and comply with all mitigation measures and reporting obligations applicable to the Lessee as set forth in the Mitigation Monitoring Program.
- Any future use or modification to the improvements will require prior Commission review and approval.
- Lessee shall prepare and submit a Cable Recovery Plan (CRP) based on all relevant up-to-date cable information and cable recovery information.
- Lessee and its contractors are required to ensure cable recovery operations are performed in a safe and efficient manner during severe weather conditions, implement severe weather contingency and curtailment plans, and conduct cable recovery operation during an appropriate weather window.
- Lessee shall reimburse any and all reasonable expenses incurred by Lessor or its staff in managing the Lease.
- Lease 8203: Upon Lessor's staff review and approval of decommissioning post-completion reports, Lessee's authorized use of the lease premises shall be reduced to the remaining conduits and cable segments in the conduits upon notice from Lessor acknowledging removal of the cables outside of the conduits. Lessor shall then revise the lease exhibits as necessary to accurately reflect the removed improvements.
- Lease 8204: Upon review and approval of decommissioning post-completion reports described in paragraphs 7 through 9 by Lessor's Executive Officer or designee, this Lease shall terminate upon notice from Lessor acknowledging removal of the cable, either in its entirety or waterward of the conduit identified in Lease 8142, a General Lease – Right-of-Way Use to MCI International LLC.

- Lease 8204: If a section of the cable remains within the conduit identified in Lease 8142 after cable decommissioning, Lessee shall continue to be the sublessee under Lease 8142 until Lease 8142 is amended to provide differently.
- Lease 8204: Lessee shall ensure a geophysical survey of the nearshore work areas along the cable route is performed by a permittee of Lessor's Offshore Geophysical Survey Program.

## **STAFF ANALYSIS AND RECOMMENDATION:**

---

### **AUTHORITY:**

Public Resources Code sections 6005, 6106, 6216, 6301, 6501.1, and 6503; California Code of Regulations, title 2, sections 2000 and 2003.

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

On October 29, 2010, the Commission authorized a General Lease – Non-Exclusive Right-of-Way Use to AT&T Corp. (AT&T) for use of five 5-inch-diameter steel conduits and two fiber optic cables (segments 8 and 9 of the Japan-U.S. Fiber-Optic Cable Network) within two steel conduits (Lease 8203, [Item 50](#)), and a General Lease – Non-Exclusive Right-of-Way Use to AT&T for use of a fiber optic cable, identified as the south end of segment 9 of the Japan-U.S. Fiber Optic Cable Network (Lease 8204, [Item 51](#)).

While AT&T's overall project would take place across the Pacific Ocean between Japan and California, including both federal and international waters, the Commission's lease approval is limited to portions of the cables within the state's offshore boundary, which extends to approximately 3 nautical miles offshore. The three fiber-optic cable segments that are the subject of this Commission action are no longer in service but were part of the Japan-U.S. Cable Network System (the System). The System included the construction of five 5-inch-diameter steel conduits offshore of Manchester State Beach, Mendocino County, and the installation of two fiber optic cable segments identified within the System as "Segment 8" (S8) and "Segment 9" (S9). S8 served as a direct link from Japan to the United States, where it makes landfall at Manchester State Beach. The north end of S9 extends out from Manchester into federal waters where it continues south, following the coastline. The south end of S9 re-enters state waters offshore of Morro Bay and makes landfall using an existing conduit under Lease 8142 at Montaña de Oro State Park in Los Osos, San Luis Obispo County.

Each cable has an associated steel conduit where the cable enters the seafloor and travels under the surf zone to connect to the onshore telecommunication networks at the onshore landing or utility access point. The conduits are buried to a maximum depth of 70 feet below the seafloor and onshore.

The Applicant proposes to remove the S8 and both S9 cable segments within state waters. For the S8 and S9 segments offshore Mendocino County, the cables would be removed using a dive team to expose and cut them at the conduit exit points on the seafloor, and each segment would then be recovered by a cable recovery vessel (CRV) that would store and transport the cable for recycling. The cable segments within the conduits would remain. For the S9 cable segment offshore of San Luis Obispo County, the Applicant proposes to cut it at the onshore utility access point within Montaña de Oro State Park and pull it from the conduit using a tugboat, with later removal by the CRV.

### **LEASE 8203 PRIOR ACTIONS**

On August 17, 2017, the Commission authorized a revision of rent ([Item 20](#)). On December 3, 2018, the Commission authorized an amendment of lease to change the cable burial survey schedule provision from a 5-year interval, to requiring surveys only upon a qualifying event, such as a gear snag or earthquake, that could expose the cable ([Item 4](#)). On June 23, 2020, the Executive Officer authorized the continuation of rent ([Executive Officer's Report](#)). The lease expired on June 30, 2025. Since then, AT&T has been paying monthly holdover rent.

### **LEASE 8204 PRIOR ACTIONS**

On August 14, 2012, the Commission authorized a correction to change the Lease number that was incorrectly assigned under a prior authorization ([Item 63](#)). On June 28, 2016, the Commission authorized a revision of rent ([Item 57](#)). On December 3, 2018, the Commission authorized an amendment of lease to change the cable burial survey schedule provision from a 5-year interval, to requiring surveys only upon a qualifying event, such as a gear snag or earthquake, that could expose the cable ([Item 51](#)). On June 23, 2020, the Executive Officer authorized the continuation of rent ([Executive Officer's Report](#)). The lease expired on June 30, 2025. Since then, AT&T has been paying monthly holdover rent.

### **DECOMMISSIONING**

In 2024, AT&T restructured and changed its name to AT&T Enterprises, LLC. The Applicant is now applying for the removal of the fiber optic cables. The cables were taken out of service in June 2023. The proposed project would cut and

remove the non-operational cable segments waterward of the conduits in San Luis Obispo and Mendocino County from the Commission's jurisdiction. In addition, in San Luis Obispo County, the cable segment inside the conduit would be cut from its onshore landing and removed by tugboat. The Applicant proposes to leave the conduits under Lease 8203 in place. Geophysical surveys would be completed along the cable segment under Lease 8204 at a distance approximately 0.5 to 2 miles from shore to identify locations of sensitive habitat, such as hard-bottom habitat, and confirm anchor locations, as necessary. AT&T has confirmed that the surveys will be conducted by a permittee of the Commission's Low-Energy Offshore Geophysical Permit Program, which authorizes surveys of the kind the permittee will perform for this decommissioning project. The permit was issued under the Offshore Geophysical Permit Program Update Mitigated Negative Declaration (State Clearinghouse No. 2013072021).

A portion of the cable under Lease 8204 lies within a conduit that is owned by and under Lease 8142, a General Lease – Right-of-Way Use to MCI International LLC, which is not a part of this action. AT&T is a sublessee under Lease 8142. The portion of cable within the conduit is under both Lease 8204 and Lease 8142, although AT&T pays rent for the state land occupied by the cable only under Lease 8204, not Lease 8142. The decommissioning project proposes to remove the entire cable, including the portion within the conduit (Lease 8142). Lease 8204 would be terminated upon removal of the cable, either in its entirety or waterward of the conduit, following Commission staff's review and approval of decommissioning post-completion reports. If the cable cannot be removed from the conduit, AT&T shall continue to be the sublessee under Lease 8142.

The proposed leases do not alienate the State's fee simple interest or permanently impair public rights. In addition, the leases are limited to 10-year terms and do not grant the lessee exclusive rights to the lease premises. The cables would be removed from the Commission's jurisdiction, and the existing conduits are located below the seafloor. They do not significantly alter the land or permanently impair public rights.

Additionally, the proposed leases require the lessee to maintain a surety bond or other security and to insure the lease premises and indemnify the State for any liability incurred as a result of the lessee's activities thereon. The leases also require the payment of annual rent to compensate the people of the State for the occupation of the public land involved.

**CALIFORNIA ENVIRONMENTAL QUALITY ACT:**

The Commission is the lead agency for the project pursuant to CEQA (Pub. Resources Code, § 21000 et seq.) and conducted an Initial Study to determine if the Project may have a significant effect on the environment (CEQA Guidelines, § 15063). Although the Initial Study identified potentially significant impacts to air quality, biological resources, cultural resources, cultural resources - tribal, hazards and hazardous materials, hydrology and water quality, recreation, and transportation, mitigation measures were proposed and agreed to by the Applicant prior to public review that would avoid or mitigate the identified potentially significant impacts “to a point where clearly no significant effects would occur” (CEQA Guidelines, § 15070, subd. (b)(1)). Consequently, the Initial Study concluded that “there is no substantial evidence, in light of the whole record before the agency, that the Project as revised may have a significant effect on the environment” (CEQA Guidelines, § 15070, subd. (b)(2)), and a Mitigated Negative Declaration (MND) was prepared.

Pursuant to the Commission's delegation of authority and the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15025), staff prepared an MND identified as CSLC MND No. 820, State Clearinghouse No. 2026041109. The proposed MND and Initial Study were circulated for at least a 30-day public review period from April 23, 2026, to May 22, 2026, and staff received 2 comment letters:

- California Department of Toxic Substances Control (DTSC): DTSC stated that the Project area located in San Luis Obispo County is within the boundary of the Baywood Park Training Area (BPTA) hazardous materials site and is under DTSC regulatory oversight. DTSC notes that the BPTA site contains risk of encountering munitions and explosives of concern (MEC) in onshore soils and shallow offshore sediments. As the Project requires shallow sediment excavation to cut and remove cables in the offshore work area in vicinity of the BPTA, DTSC recommended the inclusion of a Construction Support Plan mitigation measure which would require MEC Awareness Training, on-site unexploded ordnance (UXO) support, stop work and emergency response procedures, MEC safety integration and work-resumption controls, and soil management requirements to reduce MEC-related risks during Project activities.
- California Department of Fish and Wildlife (CDFW): CDFW stated the Project's removal of fiber optic cables from the Point Arena State Marine Conservation area is considered an allowable activity as “operation, maintenance, or repair” of a pre-existing artificial structure. CDFW also identified concerns with any

future, unrelated cable installations in the Project area. In addition, CDFW requested that any special status species or natural communities detected during Project surveys be added to the California Natural Diversity Database consistent with California Public Resources Code, section 21003, subdivision (e).

Staff revised the MND in response to DTSC's comments to update Section 3.10, Hazards and Hazardous Materials, to include additional information on the BPTA, to revise the environmental analysis related to MEC, and to add a new mitigation measure (MM HAZ-3) to the MND. Staff did not include DTSC's recommendation regarding soil management requirements, as Project activities do not include any onshore excavation. No revisions to the MND are required in response to comments from CDFW. Staff determined that these changes do not constitute a "substantial revision," as defined in CEQA Guidelines section 15073.5, subdivision (b), and that recirculation of the MND prior to Commission consideration is not required pursuant to CEQA Guidelines section 15073.5, subdivision (c).

Based upon the Initial Study, the draft Final MND, and the comments received in response thereto, there is no substantial evidence that the project will have a significant effect on the environment (California Code of Regulations, title 14, section 15074, subdivision (b)). A Mitigation Monitoring Program has been prepared in conformance with the provisions of CEQA (Pub. Resources Code, § 21081.6), and is contained in the attached Exhibit A.

### **CLIMATE CHANGE:**

*The following text is excerpted from Section 4.1 – Climate Change and Sea Level Rise, in the AT&T Cable Network Decommissioning (JUS S8 and JUS9) Project Mitigated Negative Declaration.*

Climate change is having and will continue to have widespread impacts on California's environment, water supply, energy consumption, public health, and economy. Many impacts already occur, including increased fires, floods, severe storms, and heat waves (LCI 2018). Documented effects of climate change in California include increased average, maximum, and minimum temperatures; decreased spring runoff to the Sacramento River; shrinking glaciers in the Sierra Nevada; sea level rise at the Golden Gate Bridge and in San Francisco Bay; warmer temperatures in Lake Tahoe, Mono Lake, and other major lakes; and plant and animal species found at changed elevations (LCI 2018).

The climate crisis and rising sea levels are impacting coastal California now. As underscored in the [State of California Sea Level Rise Guidance](#) (Ocean Protection

Council 2024), the combination of extreme weather events and the persistent and accelerating rise in sea levels will lead to increased coastal hazards, such as wave runup, storm surges, flooding, and erosion. Shorelines will move inland due to rising seas, exposing more of the natural and human-built environment to coastal hazards. The resulting damage will occur repeatedly and incrementally over years and, in extreme cases, over the span of a few large winter storms. However, the cable decommissioning activities are anticipated to take place outside of storm season and for a very limited time, from July through September 2026, and the Project is therefore unlikely to be affected by coastal climate change impacts, such as sea-level rise, wave runup, persistent flooding, and erosion. The cable conduits that will remain in place after the Project is completed are buried at a maximum depth of 70 feet below the ground and will not be subject to climate change impacts.

### **CONCLUSION:**

For all the reasons above, staff believe issuance of the proposed leases will not substantially impair the public rights to navigation, fishing, and commerce, or substantially interfere with the Public Trust needs and values at this location, at this time, and for the terms of the leases; and is in the best interests of the State.

### **OTHER PERTINENT INFORMATION:**

---

1. Approval or denial of the application is a discretionary action by the Commission. Each time the Commission approves or rejects a use of sovereign land, it exercises legislatively delegated authority and responsibility as trustee of the State's Public Trust lands as authorized by law. The lessee also has no right to a new lease or to renewal of any previous lease.
2. This action is consistent with the "Leveraging Technology" and "Meeting Evolving Public Trust Needs" Strategic Focus Areas of the [Commission's 2021-2025 Strategic Plan](#).
3. This activity involves lands identified as possessing significant environmental values pursuant to Public Resources Code section 6370, *et seq.*, but such activity will not affect those significant lands. Based upon participation from the agency nominating such lands through the CEQA review and permitting process, it is staff's opinion that the project, as proposed, is consistent with its use classification.

4. Termination of Lease 8204, upon staff's verification of completion of decommissioning activities, is not a project as defined by CEQA because it is an administrative action that will not result in direct or indirect physical changes in the environment.

Authority: Public Resources Code section 21065 and California Code of Regulations, title 14, sections 15060, subdivision (c)(3), and 15378, subdivision (b)(5).

5. Staff recommends that the Commission find that issuance of the lease for the Lease 8203 conduits is exempt from the requirements of CEQA as a categorically exempt project. The project is exempt under Class 1, Existing Facilities; California Code of Regulations, title 14, section 15301.

Authority: Public Resources Code section 21084 and California Code of Regulations, title 14, section 15061.

## **APPROVALS REQUIRED:**

---

- U. S. Army Corps of Engineers
- California Coastal Commission
- Regional Water Quality Control Board

## **EXHIBIT:**

---

A. Mitigation Monitoring Plan

## **RECOMMENDED ACTION:**

---

It is recommended that the Commission:

### **CEQA FINDING:**

Certify that the MND, CSLC MND No. 820 (June 2026), State Clearinghouse No. 2026041109, was prepared for this project pursuant to the provisions of CEQA, that the Commission has reviewed and considered the information contained therein and in the comments received in response thereto, and that the MND reflects the Commission's independent judgment and analysis.

Adopt the MND and determine that the project, as approved, will not have a significant effect on the environment.

Adopt the Mitigation Monitoring Program, as contained in the attached Exhibit A.

Find that issuance of the lease for the Lease 8203 conduits is exempt from the requirements of CEQA pursuant to California Code of Regulations, title 14, section 15061 as a categorically exempt project, Class 1, Existing Facilities; California Code of Regulations, title 14, section 15301.

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

Find that the proposed leases will not substantially impair the public rights to navigation, fishing, and commerce or substantially interfere with Public Trust needs and values at this location, at this time and for the term of the leases; and is in the best interests of the State.

**SIGNIFICANT LANDS INVENTORY FINDING:**

Find that this activity is consistent with the use classification designated by the Commission for the land pursuant to Public Resources Code section 6370 et seq.

**AUTHORIZATION:**

1. Lease 8203: Authorize issuance of a General Lease – Right-of-Way Use to the Applicant beginning July 1, 2026, for a term of 10 years, for five existing non-operational 5-inch-diameter steel conduits with two 1.2-inch-diameter fiber optic cable segments; for the decommissioning and removal of two 1.2-inch-diameter fiber-optic cables (segments 8 and 9 of the Japan-U.S. Fiber-Optic Cable Network); annual rent in the amount of \$412,335 with an annual Consumer Price Index adjustment, and the State reserving the right to fix a different rent periodically during the lease term, as provided for in the lease; liability insurance in an amount no less than \$1,000,000 per occurrence; and bond or other surety in the amount of no less than \$3,100,000.
2. Lease 8204: Authorize issuance of a General Lease – Right-of-Way Use to the Applicant beginning July 1, 2026, for a term of 10 years, for the decommissioning and removal of one 1.2-inch-diameter fiber-optic cable (south end of segment 9 of the Japan-U.S. Fiber-Optic Cable Network); annual rent in the amount of \$115,043 with an annual Consumer Price Index adjustment, and with the State reserving the right to fix a different rent periodically during the lease term, as provided for in the lease; liability insurance in an amount no less than \$1,000,000

per occurrence; and bond or other surety in the amount of no less than \$3,100,000.

3. Lease 8204: Delegate to the Executive Officer the authority to terminate the General Lease – Right-of-Way Use pursuant to the lease's terms, upon Commission staff's review and approval of decommissioning post-completion reports to be submitted by Lessee following project completion, including acceptance of a quitclaim deed from the lessee if necessary.
4. Authorize the Executive Officer or designee to replace exhibits in Lease 8203 and Lease 8204 upon Lessee's submission, and staff's review and approval, of plans detailing cable removal, following project completion.

**Exhibit A**

---

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

<b>Potential Impact: Project activities emissions in SLOAPCD jurisdiction</b>
---

**MM AQ-1a: Reactive Organic Gases (ROG) + Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> and DPM emission offset credits have been purchased to offset the Project's ROG + NO<sub>x</sub> and DPM emissions that exceed their respective SLOAPCD construction significance thresholds.

**Monitoring/Reporting Action:** Provide evidence that ROG + NO<sub>x</sub> and DPM emission offset credits have been purchased

**Effectiveness Criteria:** Offset ROG + NO<sub>x</sub> and DPM emissions within SLOAPCD jurisdiction

**Responsible Party:** Applicant or their designee

**Timing:** Prior to the commencement of Project-related activities

<b>Potential Impact: Project activities emissions in MCAQMD jurisdiction</b>
--

**MM AQ-1b: Reactive Organic Gases (ROG) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> 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<sub>x</sub> 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<sub>x</sub> 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<sub>x</sub> 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 NO<sub>x</sub> reductions sufficient to offset the project's ROG and NO<sub>x</sub> emissions that exceed the applicable MCAQMD significance threshold. If MCAQMD determines that additional reductions are needed to fully offset the Project's ROG and NO<sub>x</sub> 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 NO<sub>x</sub> reductions sufficient to offset the project's ROG and NO<sub>x</sub> emissions that exceed the threshold

**Effectiveness Criteria:** Offset ROG and NO<sub>x</sub> 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

<b>Potential Impact: Special status marine mammal, turtle, and bird species</b>
---

**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

<b>Potential Impact: State or federally protected marine mammal, turtle, and bird species</b>
---

**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

<b>Potential Impact: Entanglement of marine wildlife</b>
--

**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

<b>Other applicable mitigation measures for potential impacts to biological resources</b>
---

**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

<b>Potential Impact: Discovery of shipwrecks or seafloor anomalies</b>
--

**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

<b>Potential Impact: Hazardous waste products</b>
---

**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

<b>Potential Impact: Spills of hazardous materials</b>
--

**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

<b>Potential Impact: Encounter munitions and explosives of concern (MEC)</b>
--

**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

<b>Applicable mitigation measures for potential impacts to hydrology and water quality</b>
--

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

#### 1.4.7 RECREATION

<b>Potential Impact: Interaction with recreational vessels</b>
--

**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/](http://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/](http://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

<b>Potential Impact: Interaction with recreational vessels</b>
--

**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**

<b>Applicable mitigation measures for potential impacts to transportation</b>
---

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