DEFERRED

MINUTE ITEM
64

A 58

S 37

06/14/99
W 40792
J. Planck
G. Walker

Calendar Item C64 was moved to the Regular Calendar for further discussion. Member Connell felt the Commission was not prepared to render a decision and Alternate Member Porini agreed. Chair Bustamante asked that staff go back and provide additional information and bring it back to the next meeting.

Item attached

CALENDAR PAGE	
MINUTE PAGE	005913

CALENDAR ITEM
C64

A 58

06/14/99
W 40792
J. Planck
G. Walker

S 37

CONSIDER ADOPTION OF MITIGATED NEGATIVE DECLARATION AND APPROVAL OF THE ABANDONMENT AND REMOVAL OF AN OIL AND GAS DRILLING AND PRODUCTION MAN-MADE ISLAND, BELMONT FIELD, ORANGE COUNTY

LESSEE:

Exxon Company, U.S.A.
Downtown Production Organization
800 Bell, 14th Floor
Houston, TX 77002

AREA, TYPE LAND AND LOCATION:

Belmont Island is a man-made oil drilling and production island located on State Oil & Gas Lease No. PRC 186, on State tide and submerged lands, offshore Orange County. The facility is located at latitude 33°43' 18.19"N and longitude 118°07' 28.77W, approximately 8,100 feet offshore of the city of Seal Beach, California, and directly offshore of the Alamitos Bay Marina entrance and the mouth of the San Gabriel River, in approximately 42 feet of water (as shown on Exhibit A).

BACKGROUND:

Belmont Island was originally constructed between 1953 and 1954, and had major repairs after being damaged by the violent storms of 1983. During the life of the island, production totaled approximately 28 million barrels of oil and 24 billion cubic feet of natural gas. The island was shut down in 1995, and all the wells have been abandoned, including removal of the downhole equipment and cement plugging of the wellbores to State regulatory requirements. The buried oil and gas pipelines to shore have been purged and flushed.

Exxon plans to decommission the island structure and remove everything down

to the seafloor (mudline). All structural supports and well casings will be cut off at or below the mudline. The work will be done in the manner and under conditions specified in the proposed Mitigated Negative Declaration ND 694, SCH 99031117 (as shown in Exhibit B).

Prior to submitting the final decommissioning plan for Belmont Island, Exxon representatives participated in pre-application meetings with a number of agencies responsible for issuing permits for the project or for resource protection. These meetings included Commission staff, the California Coastal Commission, the Army Corps of Engineers, the California Department of Fish & Game (CDF&G), and the Regional Water Quality Control Board.

There was considerable support for an artificial reef being left at the site as an alternative to the deconstruction of the island. After review by the Staff and CDF&G of further studies and biological surveys, the artificial reef concept was not considered viable. The main issues were lack of sufficient water depth, proximity to the local harbors and marinas, poor water quality (due to the San Gabriel River and the Long Beach Harbor) and other general liability issues. However, some of the materials may be transported and used to enhance the current CDF&G's "Bolsa Chica Artificial Reef" (in federal waters off Huntington Beach).

The eight island "components" (Caisson Core, North Wharf, East Wharf, South Tower, Boat Landing, Strut Supports, Pipelines, and Power Cable) will be removed in an orderly and logical fashion, considering the relevant engineering, safety and environmental parameters of the project. The project will use conventional marine construction and decommissioning procedures and equipment to remove the offshore facility. Concrete structures will be cut or broken into transportable pieces and removed. Steel components will be extracted, torch or mechanically cut, as appropriate, at or below the seafloor. Wooden and concrete piles will be extracted, saw cut or severed, at or below the seafloor. The rip-rap rock protection surrounding the caisson core, and the sand and rock which fills the caisson, will also be removed.

Some of the caisson fill is contaminated with hydrocarbons. The proposal is to erect a trestle for a crane to remove the contaminated soil and place it in lined

receptacles for disposal at an approved site onshore. None of the lifts of this soil will be over the open water. The three buried oil and gas pipelines, which have already been flushed, will be flushed again with seawater and will be field screened to determine residual hydrocarbon contamination (not to exceed 15 ppm) prior to abandonment in place. The eight inch (8") oil line will be filled with grout from the shore to the 15' MLLW (mean lower low water) depth. All severed pipeline ends will be buried.

The project is anticipated to take approximately thirty weeks to complete. Commission staff will oversee the project to ensure that decommissioning of the island is done in accordance with and adherence to the mitigation measures, the approved work and contingency plans, the lease terms, and all applicable rules and regulations of the Commission and other permit stipulations.

STATUTORY AND OTHER REFERENCES:

A. Public Resources Code sections: Division 6, Parts 1 and 2; Division 13

B. Title 3, California Code Regulations, section Division 3; Title 14 California Code or Regulations section: Division. 6

OTHER PERTINENT INFORMATION:

1. Pursuant to the Commission's delegation of authority and the State CEQA Guidelines (Title 14, California Code of Regulations, section 15025), the Staff has had prepared a Proposed Mitigated Negative Declaration (MND) identified as EIR ND 694, State Clearinghouse Number 99031117. The Proposed Negative Declaration was prepared and circulated for public review pursuant to the provisions of the CEQA.

   During the public comment period, staff received letters from the California Coastal Commission, the California Department of Fish and Game, the California Regional Water Quality Control Board, the California Department of Conservation, the California Department of Transportation, the American Sportfishing Association, and Mr. Rimmon C. Fay, Ph.D. The major concerns of each agency and staff's responses are summarized below. Staff's detailed responses to each comment received have been furnished to the Commission and to each commentor (Exhibit D)

California Coastal Commission
The Coastal Commission staff submitted questions/concerns about the contamination in the core, the depth of cutting of the structural components, creosote, plugging and burial of the offshore pipelines, wastewater, containment for materials (to prevent excess discharge into the marine waters), lighting issues, sediment issues, water contamination and testing, sediment contamination, air quality, biological resources, oil spill prevention, and interference with recreational uses of the area.

Department of Fish and Game
The Department supported the option of reusing the caisson's exterior rip-rap protection to augment and enhance the Departments Bolsa Chica Artificial Reef.

This alternative disposal method is considered in the MND, and a final determination of use will be made by the Department of Fish and Game. Such reuse will allow re-establishment of marine habitat lost as a result of the island removal.

California Regional Water Quality Control Board
The Board letter outlined its understanding of the project and the associated permitting requirements. It noted that the MND required that all work would be conducted in accordance with a 401 Certification issued by the Board. It stated that such a Certification would not be required if the U.S. Army Corps of Engineers issued a Letter of Permission.

It is our current understanding that the U.S. Army Corps of Engineers is planning to issue a Letter of Permission under Section 10 of the Rivers and Harbors Act of 1899 and, therefore, a water quality certification under Section 401 of the Clean Water Act is not necessary.

Department of Conservation
The Division of Oil, Gas and Geothermal Resources requires that a written approval from the Division's District Supervisor be obtained prior to removing the conductor casings. It should be noted that all the wells have

been abandoned previously according to Division and Commission regulations.

Acquiring other necessary permits is currently underway, and the final plan for conductor removal has been submitted to both agencies and is being reviewed for compliance with the MND, agency rules and regulations, and lease terms.

Department of Transportation
The Department reviewed the MND and had no comments.

American Sportfishing Association
The American Sportfishing Association was concerned with the loss of habitat, and claimed that the Department of Fish and Game considered the site to be appropriate for an artificial reef and requested that the island not be removed until a more thorough study was done.

As stated in the body of this document, there was considerable support for an artificial reef being left at the site as an alternative to the deconstruction of the island. After review of further studies and biological surveys by the staff and CDF&G, the artificial reef concept was not considered viable. The main issues were lack of sufficient water depth, proximity to the local harbors and marinas, poor water quality (due to the San Gabriel River and the Long Beach Harbor) and other general liability issues. However, some of the materials may be transported and used to enhance the current CDF&G's "Bolsa Chica Artificial Reef" (in federal waters off Huntington Beach) [See response also to Department of Fish and Game].

Mr. Rimmon C. Fay, Ph.D.
Dr. Fay also made a compelling argument for turning the site into an artificial reef, and had concerns about the disposition of the marine organisms that currently inhabit the site.

2. This activity involves lands identified as possessing significant environmental values pursuant to Public Resources Code, section 6370 et

seq. Based upon the staff's consultation with the Department of Fish and Game and through the CEQA process, it is the staff=s opinion that the project, as proposed, is consistent with the use classification.

EXHIBITS:

1. Location Map
2. Mitigated Negative Declaration
3. Mitigation Monitoring Plan
4. Comments and Responses

PERMIT STREAMLINING ACT DEADLINE:

January 21, 2000

RECOMMENDED ACTION

IT IS RECOMMENDED THAT THE COMMISSION:

CEQA FINDINGS:

1. CERTIFY THAT A PROPOSED NEGATIVE DECLARATION, ND 694, STATE CLEARING HOUSE No. 99031117, WAS PREPARED FOR THIS PROJECT PURSUANT TO THE PROVISIONS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA), AS SHOWN IN EXHIBIT B, ATTACHED HERETO, AND THAT THE COMMISSION HAS REVIEWED AND CONSIDERED THE INFORMATION CONTAINED THEREIN AND THE COMMENTS RECEIVED IN RESPONSE THERETO.

2. ADOPT THE MITIGATED NEGATIVE DECLARATION AND DETERMINE THAT THE PROJECT, AS APPROVED, WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT.

3. ADOPT THE MITIGATION MONITORING PLAN, AS CONTAINED IN EXHIBIT C ATTACHED HERETO.

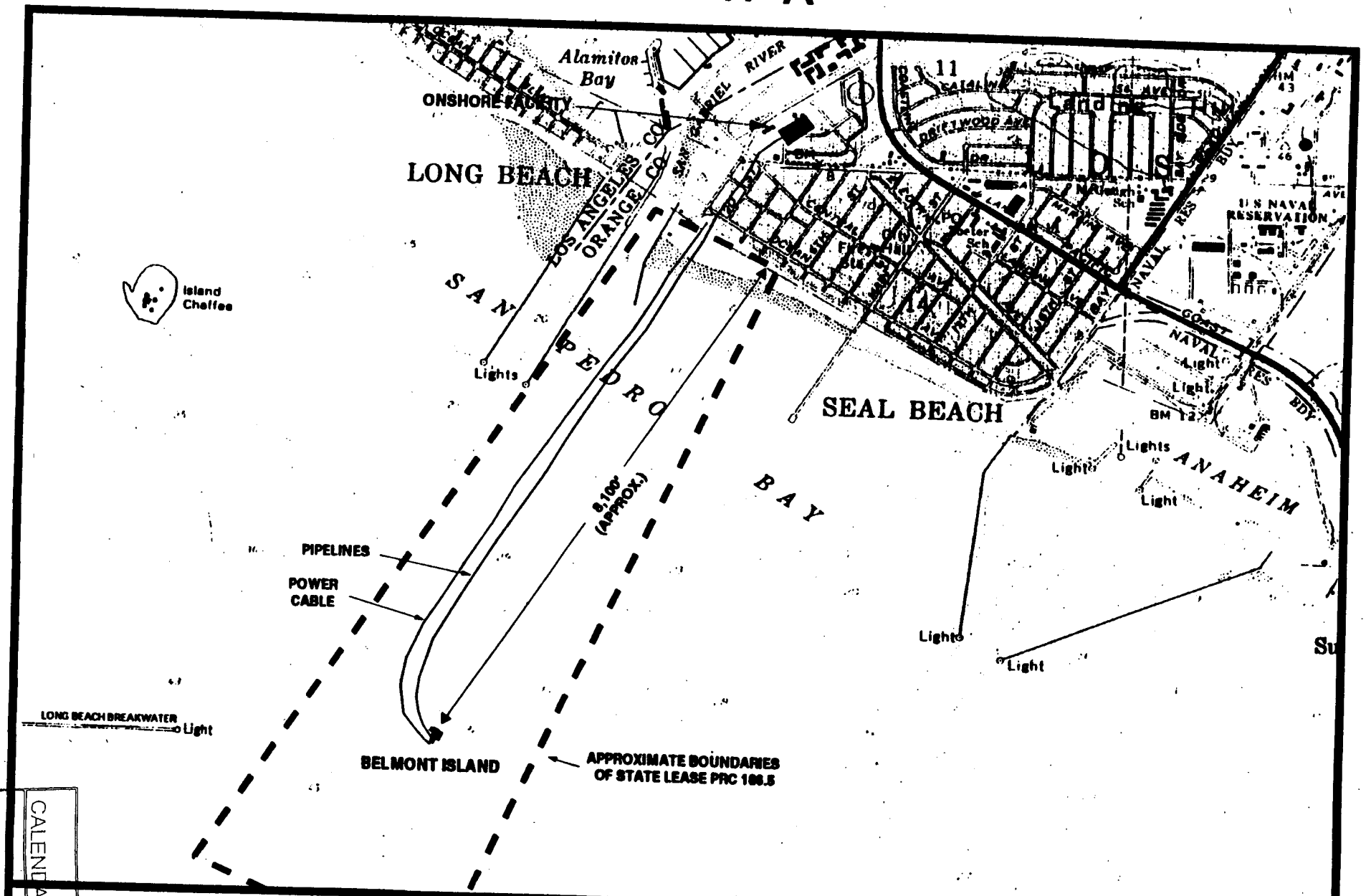
4. FIND THAT THIS ACTIVITY IS CONSISTENT WITH THE USE CLASSIFICATION DESIGNATED FOR THE LAND PURSUANT TO PUBLIC RESOURCES CODE, SECTION 6370 ET. SEQ.

AUTHORIZATION:

1. APPROVE, IN THE MANNER DESCRIBED IN THE DOCUMENTATION CONTAINED IN EXHIBITS B AND C, THE REMOVAL OF THE MAN-MADE ISLAND KNOWN AS "BELMONT ISLAND" FROM STATE OIL & GAS LEASE NO. PRC 186, TOGETHER WITH THE ABANDONMENT OF THE ASSOCIATED OIL AND GAS PIPELINES, WITH DISPOSAL OF THE ISLAND STRUCTURAL MATERIALS AT APPROVED ONSHORE DISPOSAL SITES, OR AT OFFSHORE ARTIFICIAL REEFS AS DIRECTED AND SUBSEQUENTLY APPROVED BY THE CALIFORNIA DEPARTMENT OF FISH & GAME.

2. AUTHORIZE STAFF TO TAKE ALL ACTIONS NECESSARY TO IMPLEMENT THIS PROJECT CONSISTENT WITH: (1) THE COMMISSION=S RULES AND REGULATIONS; (2) SOUND ENGINEERING PRACTICES; AND (3) MAXIMUM FEASIBLE PROTECTION OF THE ENVIRONMENT.

EXHIBIT A



BELMONT ISLAND DECOMMISSIONING PROJECT

FIGURE 1.2-1

PROJECT SITE LOCATION

EXXON

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EXXON BELMONT ISLAND DECOMMISSIONING PROJECT
MITIGATION MONITORING PROGRAM

Mitigation Measure	Implementation	Monitoring	Compliance Verification	Effectiveness
GEOLOGY AND SOILS				
G-1 Flyover anchoring techniques will be implemented. All anchors from the barge or vessel will be "flown" to their predesignated locations and will be raised and lowered using a crown line or similar method.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure during anchoring operations.	The CSLC will verify compliance with Exxon based on periodic site visits during anchoring operations.	
WATER QUALITY				
WQ-1 Basic oil spill equipment (e.g., absorbent boom, inflatable boat, etc.) will be maintained on the site for the duration of the offshore activities.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
WQ-2 A containment system will be installed underneath the wharf decks to minimize the potential for introduction of demolition materials into the water during deck removal operations.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits during deck removal operations.	
WQ-3 Exxon will develop a plan for the removal, containment, transportation, treatment and disposal of impacted core materials.	The Exxon Environmental Compliance Coordinator will prepare a Materials Handling Plan and submit it CSLC. The Exxon Environmental Compliance Coordinator will ensure plan implementation during the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	The CSLC will review and approve the Materials Handling Plan prior to final project approval. CSLC will verify compliance with Exxon based on periodic site visits.	
WQ-4 Exxon will provide surface craft and crews with appropriate spill response capabilities to patrol the subsea pipeline route during flushing and grouting operations. In the event of leakage, operations will be halted until the pipeline is repaired and operations can be safely resumed.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure during pipeline flushing and grouting.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits during pipeline flushing and grouting.	

EXHIBIT B

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EXXON BELMONT ISLAND DECOMMISSIONING PROJECT
MITIGATION MONITORING PROGRAM CONTINUED

Mitigation Measure	Implementation	Monitoring Criteria	Compliance and Verification	Exceptions
AIR QUALITY				
AQ-1 All diesel-fired engines will be maintained in good condition and in proper tune as per manufacturer's specifications.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
AQ-2 Engine timing for the ICEs will be retarded 4 degrees (when feasible) to reduce combustion temperatures and, consequently, thermal NOx production (estimated 20-30% reduction).	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
AQ-3 Decommissioning activities will be performed in the most efficient manner possible to limit the number of diesel-fired equipment operating at the same time.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
AQ-4 If specifically required by SCAQMD, certain decommissioning activities may be suspended during health advisories or Stage 1 smog alerts.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in the event that a Stage 1 smog alert is announces by SCAQMD..	The CSLC will verify compliance with Exxon if Stage 1 smog alerts are announced by SCAQMD.	
BIOLOGICAL RESOURCES				
BR-1. To a avoid impacts to sensitive aquatic species existing within the surrounding marine environment, a containment system will be installed underneath the wharf decks to minimize the potential for introduction of demolition materials into the water during deck removal operations.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits and compliance monitoring.	

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EXXON BELMONT ISLAND DECOMMISSIONING PROJECT
MITIGATION MONITORING PROGRAM CONTINUED

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
BR-2. Flyover anchoring techniques will be implemented to avoid impacts to hard-bottom habitat areas supporting sensitive biological resources (as described in the previous G-1).	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure during anchoring operations.	The CSLC will verify compliance with Exxon based on periodic site visits during anchoring operations.	
BR-3. During the site safety training of project personnel, personnel will be informed of the protected status of the Garibaldi and Exxon's no fishing policy.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
BR-4. A Marine Wildlife Contingency Plan will be implemented which was developed to avoid marine mammal impacts. The plan includes: • Relevant site history data including seasonal occurrence; • Procedures to avoid impacts; • Procedures to follow should a collision occur. • Trained crew avoidance. • Use of observers on the vessel.	The Exxon Environmental Compliance Coordinator will ensure plan implementation during the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	CSLC will verify compliance with the plan based on periodic site visits.	
HAZARDS				
H-1. Exxon's site safety plan for the project will include safe handling procedures for lead based paints.	The Exxon Environmental Compliance Coordinator will prepare safe handling procedures for lead-based paint and submit it CSLC. The Exxon Environmental Compliance Coordinator will ensure that these procedures are implemented during the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	The CSLC will review and approve the safe handling procedures for lead-based paint prior to final project approval. CSLC will verify compliance with Exxon based on periodic site visits.	

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EXXON BELMONT ISLAND DECOMMISSIONING PROJECT
MITIGATION MONITORING PROGRAM CONTINUED

Mitigation Measure	Implementation	Monitoring Criteria	Verification	Procedures
H-2. Exxon will recycle the steel and concrete at a facility permitted to accept lead-based paint covered material or disposed of such material in an appropriately permitted waste facility.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits and compliance monitoring.	
H-3. A battery operated navigation lighting and fog horn system will be installed on the island for use upon termination of electrical power to the island.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits and compliance monitoring.	
H-4. A Critical Operations and Curtailment Plan and Oil Spill Contingency Plan will be implemented during decommissioning work at the island.	A Final Critical Operation and Curtailment Plan and Oil Spill Contingency Plan will be prepared and submitted to the CSLC for review and approval. These measures and procedures will be implemented throughout the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	CSLC will review and approve these plans prior to final approval of the project. CSLC will verify compliance with the plans based on periodic site visits.	
H-5. Exxon will develop plan for the removal, containment, transportation, treatment and disposal of impacted core materials. The plan will specifically address the following: • Possibility that portions of the concrete floor and underlying grout of the central core may be impacted by hydrocarbons; • Assessment of the underlying layer of gravel after the sand has been removed for the presence of petroleum hydrocarbons, and; • Prevention and response measures to address spillage of hydrocarbon impacted materials into the water.	The Exxon Environmental Compliance Coordinator will prepare a Materials Handling Plan and submit it CSLC. The Exxon Environmental Compliance Coordinator will ensure plan implementation during the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	The CSLC will review and approve the Materials Handling Plan prior to final project approval. CSLC will verify compliance with Exxon based on periodic site visits.	

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COMMENTS AND RESPONSES

In accordance with the California Environmental Quality Act (CEQA) presented below is a list of parties who submitted written comments regarding the Draft Negative Declaration and Initial Study (ND/IS) for the Exxon Belmont Island Decommissioning Project. Whenever feasible, responses to comments have been incorporated into the text of the ND/IS.

PARTIES THAT SUBMITTED WRITTEN COMMENTS ON THE DRAFT ND/IS

California Coastal Commission – Lilli Ferguson

Department of Fish and Game – Dewayne Johnston

California Regional Water Quality Control Board – Scott Dawson

Department of Conservation – Jason Marshall

Department of Transportation – Robert F. Joseph

American Sportfishing Association – Daniel Frumkes

Rimmon C. Fay, Ph.D.

Commentor: California Coastal Commission – Lilli Ferguson, Coastal Program Analyst, Manager of the Energy and Ocean Resources Division

Date: April 23, 1999

Response:

1. For information on the removal, containment, transportation, treatment, and disposal of hydrocarbon impacted caisson core materials, including Cellar No. 2, please refer to the ND/IS Section 1.4.2.6 Remove Hydrocarbon Impacted Fill, Well Conductors and Wooden Piles and Section 1.4.3 Disposal Procedures. Operations outlined within these sections of the ND/IS identify the exact procedures to be followed during the removal process of these various materials. It is anticipated that all contaminated water encountered within the caisson core during excavation activities will be vacuumed out and disposed of with the same standard of care as the contaminated fill material (i.e., enclosed in containment bins specifically designed for the offshore transport of hazardous or hydrocarbon impacted substances). All contaminated water will be disposed of at a certified onshore disposal facility.

2. The standard of care established by the State Lands Commission (SLC) is 5 feet below natural bottom for removal of all miscellaneous materials from the seafloor within the 15-foot mean low low water (mllw) line or shallower. Offshore of the 15 mllw line all structures and miscellaneous debris must be removed down to "natural bottom". Exxon's work plans are consistent with these standards. The remaining sheet piles will be cut off at or below natural bottom depending on seafloor surface conditions at the time of removal. Since the Belmont Island facility is located in approximately 45 feet of water, is not within a trawl zone, impacts associated with fisheries and other potential bottom snagging are not expected to occur. Additionally, the caisson core fill material will be removed down to natural bottom, therefore, a large depression is not anticipated to be left within the center of the caisson core after decommissioning of the facility. In compliance with the requirements of the SLC and DOG, Exxon proposes to cut the well conductors 5 feet below the mudline through utilization of a high-pressure water jet. This technique utilizes a high-pressure water pump, grit entrainment system and a rotating jet. A post abandonment survey will be conducted to confirm the bottom conditions following the islands removal.

3. It is believed that some pilings used to construct the facility were treated with creosote. Removal and handling of creosote coated piles will be conducted in accordance with State and Federal guidelines.

4. Exxon proposes to cut or extract pilings in accordance with the SLC guidelines. Should a pile break during extraction, it will be cut at or below mudline using divers. Please also refer to response item # 2 above.

5. During facility construction, the pipeline bundle was maneuvered to its offshore terminus via a pipe sled. It is believed that the pipe sled apparatus is still intact. Therefore, the pipe sled

is currently proposed as the termination point for the pipeline bundle at this time. If the pipe sled is determined absent, then divers will expose cut and rebury the pipelines at a safe distance outside of the existing island rip-rap mound to ensure that re-exposure will not occur during island removal.

6. The pipeline bundles within the onshore facility will be terminated as part of the onshore facility's decommissioning project, which is a separate project from the offshore decommissioning project. All above-ground tanks and associated production equipment associated with the former Belmont Island onshore facility located at 101 Marina Drive, Seal Beach were previously disassembled per the discretionary approval of the California Coastal Commission on May 14,1997. Exxon is currently working cooperatively with Unocal to complete the assessment and remediation of the project site. These activities will be coordinated with the Regional Water Quality Control Board and the City of Seal Beach.

7. SLC does not have a standard policy specifying the depth below the natural bottom at which abandoned pipelines should be buried. Rather, SLC reviews individual projects and determines the depth at which abandoned pipelines are buried on a case-by-case basis.

8. Exxon is not able to estimate the total amount of cooling water to be utilized during the proposed project. Containment procedures have been included in the project design to contain this cooling water and minimize discharge to the surrounding ocean. Exxon is working with the RWQCB to address these issues.

9. At this time, Exxon is not able to estimate the maximum amount of paint, concrete, and steel cuttings that could be released to marine waters during the proposed project. The containment system to be used beneath the wharf decks during decommissioning activities will consist of a temporary plywood structure with wood based supports covered with a dense, heavy-duty plastic sheeting (i.e., visqueen). Exxon will contain all paint, concrete and steel cuttings and/or scrap debris which have the potential to enter marine waters during the decommissioning project by implementing these containment structures.

10. Decommissioning of the facility will involve crews working 10 to 12 hour shifts per day. During the winter months these activities may occur after dark requiring the some use of artificial lighting. It is anticipated that most work activities conducted during daylight hours and that minimal work will be conducted under the artificial lighting. As discussed in page 3-47 of the ND/IS, if required all night-time lighting will be focused on the work area and will not create significant adverse impacts.

11. Please refer to previous response # 6.

12. The interior of the 8-inch pipeline from the onshore section through the inter-tidal zone will be grouted to provide for future long-term stability and structural integrity. Due to its smaller diameter, the 3-inch pipeline will not be grouted. Pipeline diameters become a factor during the grouting process due to the high pressure needed to force the grout to the terminus or predetermined point within the pipeline. Essentially, smaller diameter pipelines (i.e., 3-inch or less) require the use of high pressures which have the potential to rupture the lines during

the grouting process. Therefore, SLC and other agencies have agreed to abandonment of the smaller diameter pipelines in place without grouting.

Based upon recent communications, the City of Seal Beach and the SLC concurrence with the decision to leave the pipelines in place along the beach and surf zone due to the fact that the pipelines are buried at depths of 9 feet or greater. Pipeline abandonment will also avoid impacts to public access and public recreation opportunities due to major excavation activities associated with pipeline removal throughout the surf zone and upper beach area of Seal Beach. In addition, abandonment of the pipelines in place will avoid impacts to biological resources potentially existing within the inter-tidal zone and offshore region of the pipeline corridor. In place abandonment of the power cable would likewise avoid these impacts. For these reasons, removal of the pipelines and power cable through the surf zone is not considered to be an environmentally preferable alternative. Perforating pipelines, as an alternative to grouting has not been considered by Exxon due to past directions given by the SLC engineering staff.

13. The side-scan sonar survey results included in the Project Execution Plan confirm the pipeline and power cable are buried as they approach the island itself. Diver surveys and past repair work on the onshore and offshore portions of the pipelines have also indicated that the lines are buried. This burial has been verified up to 9 feet in some areas. Due to the deposition conditions found at the site mainly deposited from the San Gabriel River mouth, pipeline exposure is not expected. There are no recorded reports of pipeline or power line exposure across the beach. It should also be noted that Seal Beach has conducted beach sand enhancement programs at the beach.

14. This comment is noted. Page 2-1 has been corrected to indicate that the State Lands Commission is the lead agency for the proposed project.

15. Please refer to response # 6, which provides additional information on the onshore facility. The onshore facility decommissioning is a separate project from the offshore facility decommissioning. Further description of the onshore facility is not necessary to evaluate the land use/planning impacts of the proposed offshore decommissioning project.

16. CEQA requires that proposed projects be evaluated for consistency with applicable environmental plans and policies. Because the proposed project could impact the coastal zone, Coastal Act policies apply to the project. The evaluation contained on pages 3-3 through 3-6 is therefore an essential part of the ND/IS. This evaluation is intended to provide information to decision-makers, and in no way should be construed as findings of the California Coastal Commission with respect to the proposed project's consistency or inconsistency with Coastal Act policies.

17. The potential effects on sediment transport from the proposed removal of Belmont Island were evaluated in a coastal processes analysis completed by Moffat & Nichol Engineers in March 1998. As indicated in this analysis, Belmont Island does not currently affect shoreline processes (including sediment transport), nor would its removal result in any affect. This

report is presented as Appendix E of the Belmont Island Decommissioning Project Execution Plan (July 1998).

18. The seafloor surrounding the Belmont Island facility is primarily composed of soft-bottom habitat and migratory sand. No hard-bottom habitat and/or substrate exist within the proposed derrick barge anchoring areas located along the southeast side of the island. Thus, there are no areas supporting kelp growth and other vegetation that have the potential to be impacted by anchoring activities. Anchoring activities may have the potential to impact various soft-bottom habitat invertebrates existing within the vicinity of the island (e.g., sand dollar beds, tube worms, sea pens, sea pansies, etc.). However, soft-bottom marine invertebrates are generally short-lived and affected by seasonal changes. Additionally, the soft-bottom habitat areas located within the confluence of the San Gabriel River and the Long Beach Harbor (i.e., Los Angeles Basin watershed) are generally degraded due to poor water quality and rapid sedimentation rates. Due to the short life span of these species, overall poor water quality, and resulting low species diversity at the site, substantial impacts to soft-bottom marine invertebrates are not anticipated to occur. In addition, the proposed decommissioning of the facility and associated anchoring activities at the site will be short-term in nature, minimizing the potential for impact occurrence.

    As indicated in 1.6 Mitigation Incorporated into the Project of the ND/IS, flyover anchoring techniques would be implemented as part of the project, which would eliminate unnecessary anchor wire or chain contact with the seafloor. The minor, temporary disturbance of bottom sediments that would result from anchoring would not have a substantial adverse effect with respect to geologic conditions or sediment transport.

19. Information on the removal, containment, transportation, treatment, and disposal of hydrocarbon impacted caisson core materials is contained in the ND/IS. See 1.4.2.6 Remove Hydrocarbon Impacted Fill, Well Conductors and Wooden Piles in 1.0 Project Overview, and 1.6 Remove Hydrocarbon Impacted Fill, Well Conductors and Wooden Piles in Appendix A, Description of Decommissioning Procedures. These sections identify the exact procedures to be followed during the removal process of these various materials. It is anticipated that all contaminated water encountered within the caisson core during excavation activities will be vacuumed out and disposed of with the same standard of care as the contaminated fill material (i.e., enclosed in containment bins specifically designed for the offshore transport of hazardous or hydrocarbon impacted substances). All contaminated water will be disposed of at an approved onshore disposal facility. The exact laboratory method used to test removed water for contamination will be determined in consultation with the responsible regulatory agencies.

20. Environmental assessments conducted for the Belmont Island facility include a preliminary environmental assessment conducted by Fugro West in 1996, and an additional environmental assessment performed by Padre in 1997. Neither assessment analyzed the caisson core materials for PCB's due to the fact that the only potential PCB containing component within the facility were several electrical transformers, which were previously removed from the site.

21. The only material to be considered for aquatic disposal are portions of the rock rip-rap located along the base of the caisson structure. The rock rip-rap has been in contact with the water since construction of the Belmont Island facility in 1953, and is free of hydrocarbon contamination. In addition, this rock rip-rap is a host to an assortment of aquatic marine species that will benefit from aquatic disposal.

22. Sediment borings were collected at a number of locations around the island with a Vibracore Unit in July 1997. Although no chemical analysis was conducted, visual inspection of the sample cores did not identify hydrocarbon contamination in any of the sample boring locations. Due to the local and regional currents, proximity of the project site to the Long Beach Harbor and San Gabriel River mouth, and the lack of visual evidence of hydrocarbon staining, it is highly unlikely that hydrocarbons, metals, or other hazardous material contamination that resulted due to island based operations will be uncovered during proposed island decommissioning operations. Based upon the results of the Environmental Assessments conducted for the Belmont Island facility, only portions of the top layer of sand within the central core of the facility are impacted with petroleum hydrocarbons (concentrations of 1,000 ppm in some areas). Samples collected at lower depths within the core did not indicate substantial contamination levels. In addition, the low levels of CAM 17 metals found within the central core indicate that heavy metal impacted material is not an issue of concern at the Belmont Island facility. With this information, it is highly unlikely that existing sediments surrounding the island contain substantial hydrocarbon and/or heavy metal contamination due to past oil production at the facility.

It is believed that some pilings used to construct the facility were treated with creosote. In the case of the Mobil Seacliff Piers Complex in Ventura County, California, lab results of sediment samples taken from various locations adjacent to creosote treated pilings indicated no hydrocarbon contamination. Additionally, these samples indicated that the sediment at the Seacliff Pier Complex contained low levels of CAM 17 metals representative of normal background concentrations within a seafloor environment. Based on this data at a similar facility, contamination is not expected in sediments surrounding the pilings at Belmont Island.

23. The abandoned electrical cable would slowly corrode and decay over time, which would result in the release of materials into surrounding sediments. However, underground electrical cables are very common, are composed of relatively non-toxic elements, and are not typically considered a concern with respect to contamination. The cable is buried in sediments, and is not in contact with the ocean. Toxic levels of contamination would not be expected to result from the long-term corrosion of the electrical cable.

24. As stated in the ND/IS, only equipment that has a valid South Coast Air Quality Management District (SCAQMD) operating permit and/or registration under the California Statewide Portable Equipment Registration Program (Program) will be utilized for this project. SCAQMD permitted equipment will comply with all permit conditions and applicable SCAQMD rules and regulations (i.e., Rules 401, 402, 404, 431.2, and 1110.2). The temporary short-term emissions from the proposed decommissioning equipment would not pose a threat to the attainment or maintenance of local air quality. Based on this information

and recent correspondence with the SCAQMD, the proposed project will not require formal approval from the SCAQMD.

25. Belmont Island is a permitted facility in the SCAQMD, although not currently operational. Decommissioning of the facility will result in the permanent removal of the potential emissions associated with the islands operations.

26. As indicated on page 3-26 of the ND/IS, project support vessels that may be operating at any given time would include a derrick barge, large tugboat, small tugboat, materials barge, and dive support vessel. The project site is located outside of the Port of Long Beach and the Port of Los Angeles, and support vessels would operated within the recognized Traffic Separation Scheme. The minor level of marine traffic associated with the project would not result in a significant impact. Therefore, no mitigation is necessary. A Notice of Mariners will be issued for vessel operations associated with the project.

27. Notification of NOAA of Belmont Island will be coordinated through the U.S. Coast Guard Long Beach Office. Upon completion of the project, Exxon will forward a notice to the USCG that the island has been successfully removed. Any additional information required by the USCG or NOAA will be provided as required.

28. As indicated in response # 18 above, the seafloor areas that would be affected by the proposed project area composed of soft-bottom habitat and migratory sand. The project would not have substantial effects to hard-bottom marine habitat. Marine surveys such as those requested by the commentor typically focus on hard-bottom habitat, which often support long-lived, diverse marine communities. Soft-bottom habitat areas are generally short-lived, affected by seasonal changes, and generally do not support high species diversity. Further, the soft-bottom habitat areas located within the confluence of the San Gabriel River and the Long Beach Harbor (i.e., Los Angeles Basin watershed) are generally degraded due to poor water quality and rapid sedimentation rates. It is not expected that a new survey of the area would provide valuable new information, as soft-bottom habitat conditions present during a new survey would be likely to change before commencement of the decommissioning project. Based on the above, a new marine survey of potentially affected areas is not necessary.

29. Project activities conducted at night would likely be limited to work on the island itself and decks of the barges. All activities proposed as part of the project, including those that would be conducted at night, have been evaluated in the ND/IS.

30. Belmont Island has not been observed as a significant roosting site for marine birds. During numerous site visits, few if any birds have been observed on the island or adjacent water surface areas. This observation is surprising considering the limited activity taking place on the island. The nearest alternative roosting and foraging site for brown pelicans exists along the Long Beach Harbor breakwaters located just west of the Belmont Island facility. Additionally, least terns and other bird species also utilize the Long Beach Harbor area for roosting and foraging areas. Least terns have also been identified foraging and roosting within the Bolsa Chica Beach State Park area. The Long Beach Harbor breakwaters

provide long stretches of habitat conducive to roosting and foraging, free of human disturbance and predation. According to recent avian studies conducted within Long Beach Harbor, the middle breakwater accounted for over 48 percent of all observed birds within the harbor. Based on this information, removal of the Belmont Island facility is not anticipated to result in impacts to the availability of roosting and feeding opportunities for bird species within the vicinity of the island.

31. As indicated in the ND/IS (p.3-38), a Marine Wildlife Contingency Plan (included as Appendix D of the ND/IS) will be implemented during the project. The Marine Wildlife Contingency Plan includes the employment of trained wildlife observers, training of crew, procedures to avoid impacts to marine mammals, procedures to follow should an collision with a marine mammal occur, etc. Implementation of this plan will minimize potential impacts to marine mammals, including migrating gray whales. Due to the heavy vessel traffic associated with the LA/LB Harbors, it is unlikely that marine mammals including gray whales will be adversely effected by project operation.

32. The project execution plan submitted by Exxon and reviewed in the ND/IS includes a number of procedures and plans to conduct the proposed decommissioning. SLC has reviewed these plans and procedures and believes that they adequately address the potential environmental hazards associated with the project. Additional review and approval the selected decommissioning contractors work plans, critical operations and safety plan, oil spill contingency plan, and hazardous material handling plans is currently underway by the SLC engineering division in Long Beach. Final project approval by SLC is contingent on the successful completion of this review process. The SLC believes the ND/IS adequately addresses the Hazards.

33. An oil spill contingency plan is included as Appendix C of the ND/IS. In addition, Appendix A outlines the individual project components including their potential oil spill risk and associated prevention measures. As stated above, a detailed oil spill contingency plan is being completed and will be submitted for review and approval by the SLC Engineering Division.

34. Exxon has provided the following information regarding the Shell Beta pipeline and procedures designed to ensure operations do not result in an impact to this pipeline.

The existing Aera-Beta 16-inch pipeline is located approximately 400 feet southwest of the Exxon Belmont Island Facility. The 16-inch pipeline extends west and terminates within Long Beach Harbor. Based upon recent communications with Fugro West, Inc., the pipeline is buried below the seafloor sediment from Belmont Island until it comes ashore within the Long Beach Harbor. The 16-inch pipeline contains a 22,000-barrel total capacity. In the event of a pipeline rupture, the worst case oil spill scenario as determined by utilizing the Mineral Management Service Guidelines, is estimated at approximately 2,200-barrels. However, during the decommissioning activities of the proposed project, the derrick barge will be anchored southeast of the Belmont Island Facility with the direct intent of avoiding impacts to existing lines. This measure in conjunction with the fact that the 16-inch pipeline is buried along its length will ensure the avoidance of pipeline rupture hazards throughout

the proposed project. To ensure that project relating anchoring will avoid impacts to the pipeline, the contractor will plot its location on all vessel navigation systems. Divers will be dispatched to the pipeline and buoys will be attached along the pipeline within the project area. Using the onboard navigation systems and the anchoring procedures outlined in the Project Execution Plan, impacts to the Aera-Beta pipeline will be avoided.

35. See Response No. 33.

36. See Response No. 34. As noted, the worst case spill event would result from an anchor hitting the Aera Beta pipeline.

37. For major spill events, Exxon would rely on Clean Coastal Waters for offshore spill response capabilities. The nearest Clean Coastal Waters Facility is located at Berth 57 within Long Beach Harbor. According to facility personnel, there are 2 levels of response to emergency oil spill incidents (initial and primary). The initial response vessel can respond to an oil spill at the Belmont Island Facility within approximately 30 minutes. The primary response vessel Clean Waters One can respond within 45 minutes. SLC, CDF&G OSPR and USCG have determined that CCW has adequate equipment and manpower to respond to a major spill event in the project area.

38. Onshore pipelines have been flushed and are currently free of hydrocarbons. Prior to conducting grouting and cutting work, Exxon has proposed to flush these lines again. These procedures, including secondary containment equipment placed at the site are adequate to minimize the potential of an onshore release. Should a release occur secondary containment available at the site is adequate isolate these releases.

39. See Response No. 38.

40. See Response No. 38.

41. See Response No. 38.

42. The island is located approximately 8,100 feet offshore of Seal Beach and there is no public access allowed to the facility. Additionally, water depths surrounding the island are in excess of 40 feet, as such the island does not support breaking waves during periods of heavy swell and is non-conducive to surfing and all other wave-riding recreational activities.

43. Exxon currently retains a private parking area within the marina, therefore, no public parking spaces will be occupied by project related vehicles during the proposed decommissioning project. Staging and/or stockpiling of materials and equipment will not interfere with beach access or public parking during the proposed project. All staging will occur when the Long Beach Harbor or at Exxon's onshore facility.

44. A Notice to Mariners is proposed by the applicant and the SLC will require that such notices be filed with the Coast Guard.

45. The SLC has provided responses to the individual concerns. Please see these responses regarding the potential cumulative impacts.

Commentor: Department of Fish and Game – DeWayne Johnston

Date: April 22, 1999

Response:

Prior to submitting a final decommissioning plan for Belmont Island, Exxon representatives participated in pre-application meetings with a number of agencies responsible for issuing permits or for resource protection. These meetings included the State Lands Commission, California Coastal Commission, Army Corps of Engineers, California Department of Fish and Game and Regional Water Quality Control Board. During these meetings alternatives for island decommissioning were identified and discussed, including complete removal, reuse, and artificial reef use. Considerable support for the artificial reef alternative was identified from a number of these agencies.

As a result of this interest, Exxon initiated an artificial reef design process in consultation with the CDF&G Artificial Reef Program staff. Site specific studies were conducted by Exxon including bathymetry, seafloor features, bottom sediment characterization, and biological surveys. CDF&G biologists also conducted dive surveys of the island to evaluate the existing biological community at the site. An artificial reef specification was then developed in accordance with the design guidelines contained in the CDF&G Nearshore Sport Fish Habitat Enhancement Program "Artificial Reef Plan for Sport Fish Enhancement". These guidelines including information on desired water depths, reef materials, water quality, proximity to potential user groups, proximity to other natural reefs, and navigational safety.

The detailed reef specification report was reviewed with the SLC and CDF&G to discuss design, permitting and lease transfer issues. During this meeting the concern of adequate water depth and associated navigation safety was identified. The CDF&G recommend a minimum of 60 feet of water, while the island currently sits in 45 feet of water. Due to the sites proximity to the Long Beach Harbor, Alamitos Bay Marina and the Seal Beach Naval Station concerns regarding vessel safety were identified. A secondary concern discussed was poor water quality due to the San Gabriel River and Long Beach Harbor. Due to the liability issues associated with the navigational concern (inadequate water depth at the site) it was agreed by the SLC, CDF&G and Exxon that construction of an artificial reef at the site was not desirable. Exxon has stated that the rock rip-rap located at the site is available for reuse at an approved artificial reef site or for use in a permitted marine construction project. Such a reuse will allow re-establishment of marine habitat lost during the island removal.

Commentor: California Regional Water Quality Control Board – Scott Dawson.

Date: May 4, 1999

Response:

Board letter outlines their understanding of the project and the associated permitting requirements. Exxon is working with the RWQCB and other agencies to acquire the necessary permits to conduct the proposed operations.

Commentor: Department of Conservation – Jason Marshall

Date: April 30, 1999

Response:

Thank you for your comments, no response required.

Commentor: Department of Transportation – Robert F. Joseph

Date: April 23, 1999

Response:

Thank you for your comments, no response required.

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Commentor: American Sportfishing Association – Daniel Frumkes

Date: May 1, 1999

Response:

Thank you for your comments. Please see response to the California Department of Fish and Game letter.

Commentor: Rimmon C. Fay, Ph.D.

Date: April 21, 1999

Response:

Thank you for your comments. Please see response to the California Department of Fish and Game letter.

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MINUTE PAGE 005941

EXHIBIT C

W 4(/92

EXXON BELMONT ISLAND DECOMMISSIONING PROJECT
MITIGATION MONITORING PROGRAM

Mitigation Measure	Implementation	Monitoring Criteria	Compliance and Verification	Effectiveness
GEOLOGY AND SOILS				
G-1 Flyover anchoring techniques will be implemented. All anchors from the barge or vessel will be "flown" to their predesignated locations and will be raised and lowered using a crown line or similar method.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure during anchoring operations.	The CSLC will verify compliance with Exxon based on periodic site visits during anchoring operations.	
WATER QUALITY				
WQ-1 Basic oil spill equipment (e.g., absorbent boom, inflatable boat, etc.) will be maintained on the site for the duration of the offshore activities.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
WQ-2 A containment system will be installed underneath the wharf decks to minimize the potential for introduction of demolition materials into the water during deck removal operations.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits during deck removal operations.	
WQ-3 Exxon will develop a plan for the removal, containment, transportation, treatment and disposal of impacted core materials.	The Exxon Environmental Compliance Coordinator will prepare a Materials Handling Plan and submit it CSLC. The Exxon Environmental Compliance Coordinator will ensure plan implementation during the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	The CSLC will review and approve the Materials Handling Plan prior to final project approval. CSLC will verify compliance with Exxon based on periodic site visits.	
WQ-4 Exxon will provide surface craft and crews with appropriate spill response capabilities to patrol the subsea pipeline route during flushing and grouting operations. In the event of leakage, operations will be halted until the pipeline is repaired and operations can be safely resumed.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure during pipeline flushing and grouting.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits during pipeline flushing and grouting.	

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EXXON BELMONT ISLAND DECOMMISSIONING PROJECT
MITIGATION MONITORING PROGRAM CONTINUED

Mitigation Measure	Implementation	Monitoring Criteria	Compliance and Verification	Effectiveness
AIR QUALITY				
AQ-1 All diesel-fired engines will be maintained in good condition and in proper tune as per manufacturer's specifications.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
AQ-2 Engine timing for the ICEs will be retarded 4 degrees (when feasible) to reduce combustion temperatures and, consequently, thermal NOx production (estimated 20-30% reduction).	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
AQ-3 Decommissioning activities will be performed in the most efficient manner possible to limit the number of diesel-fired equipment operating at the same time.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
AQ-4 If specifically required by SCAQMD, certain decommissioning activities may be suspended during health advisories or Stage 1 smog alerts.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in the event that a Stage 1 smog alert is announces by SCAQMD..	The CSLC will verify compliance with Exxon if Stage 1 smog alerts are announced by SCAQMD.	
BIOLOGICAL RESOURCES				
BR-1. To a avoid impacts to sensitive aquatic species existing within the surrounding marine environment, a containment system will be installed underneath the wharf decks to minimize the potential for introduction of demolition materials into the water during deck removal operations.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits and compliance monitoring.	

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CALENDAR PAGE 006450

EXXON BELMONT ISLAND DECOMMISSIONING PROJECT
MITIGATION MONITORING PROGRAM CONTINUED

Mitigation Measure	Implementation	Monitoring Criteria	Compliance and Verification	Effectiveness
BR-2. Flyover anchoring techniques will be implemented to avoid impacts to hard-bottom habitat areas supporting sensitive biological resources (as described in the previous G-1).	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure during anchoring operations.	The CSLC will verify compliance with Exxon based on periodic site visits during anchoring operations.	
BR-3. During the site safety training of project personnel, personnel will be informed of the protected status of the Garibaldi and Exxon's no fishing policy.	The Exxon Environmental Compliance Coordinator will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits.	
BR-4. A Marine Wildlife Contingency Plan will be implemented which was developed to avoid marine mammal impacts. The plan includes: • Relevant site history data including seasonal occurrence; • Procedures to avoid impacts; • Procedures to follow should a collision occur. • Trained crew avoidance. • Use of observers on the vessel.	The Exxon Environmental Compliance Coordinator will ensure plan implementation during the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	CSLC will verify compliance with the plan based on periodic site visits.	
HAZARDS				
H-1. Exxon's site safety plan for the project will include safe handling procedures for lead based paints.	The Exxon Environmental Compliance Coordinator will prepare safe handling procedures for lead-based paint and submit it CSLC. The Exxon Environmental Compliance Coordinator will ensure that these procedures are implemented during the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	The CSLC will review and approve the safe handling procedures for lead-based paint prior to final project approval. CSLC will verify compliance with Exxon based on periodic site visits.	

CALENDAR PAGE 00451
MINUTE PAGE 00544

EXXON BELMONT ISLAND DECOMMISSIONING PROJECT
MITIGATION MONITORING PROGRAM CONTINUED

Mitigation Measure	Implementation	Monitoring Criteria	Compliance and Verification	Effectiveness
H-2. Exxon will recycle the steel and concrete at a facility permitted to accept lead-based paint covered material or disposed of such material in an appropriately permitted waste facility.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits and compliance monitoring.	
H-3. A battery operated navigation lighting and fog horn system will be installed on the Island for use upon termination of electrical power to the Island.	Exxon's Marine Contractor will be responsible for implementation of this measure.	The Exxon Environmental Compliance Coordinator will monitor implementation of this measure in conjunction with his/her regular duties.	The CSLC will verify compliance with Exxon based on periodic site visits and compliance monitoring.	
H-4. A Critical Operations and Curtailment Plan and Oil Spill Contingency Plan will be implemented during decommissioning work at the island.	A Final Critical Operation and Curtailment Plan and Oil Spill Contingency Plan will be prepared and submitted to the CSLC for review and approval. These measures and procedures will be implemented throughout the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	CSLC will review and approve these plans prior to final approval of the project. CSLC will verify compliance with the plans based on periodic site visits.	
H-5. Exxon will develop plan for the removal, containment, transportation, treatment and disposal of impacted core materials. The plan will specifically address the following: • Possibility that portions of the concrete floor and underlying grout of the central core may be impacted by hydrocarbons; • Assessment of the underlying layer of gravel after the sand has been removed for the presence of petroleum hydrocarbons, and; • Prevention and response measures to address spillage of hydrocarbon impacted materials into the water.	The Exxon Environmental Compliance Coordinator will prepare a Materials Handling Plan and submit it CSLC. The Exxon Environmental Compliance Coordinator will ensure plan implementation during the project.	The Exxon Environmental Compliance Coordinator will monitor implementation of the plan in conjunction with his/her regular duties.	The CSLC will review and approve the Materials Handling Plan prior to final project approval. CSLC will verify compliance with Exxon based on periodic site visits.	

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CALENDAR PAGE 000152

EXHIBIT D

W 40792

COMMENTS AND RESPONSES

In accordance with the California Environmental Quality Act (CEQA) presented below is a list of parties who submitted written comments regarding the Draft Negative Declaration and Initial Study (ND/IS) for the Exxon Belmont Island Decommissioning Project. Whenever feasible, responses to comments have been incorporated into the text of the ND/IS.

PARTIES THAT SUBMITTED WRITTEN COMMENTS ON THE DRAFT ND/IS

California Coastal Commission – Lilli Ferguson

Department of Fish and Game – Dewayne Johnston

California Regional Water Quality Control Board – Scott Dawson

Department of Conservation – Jason Marshall

Department of Transportation – Robert F. Joseph

American Sportfishing Association – Daniel Frumkes

Rimmon C. Fay, Ph.D.

CALENDAR PAC 000453
MINUTE PAGE 005946

Commentor: California Coastal Commission – Lilli Ferguson, Coastal Program Analyst, Manager of the Energy and Ocean Resources Division

Date: April 23, 1999

Response:

1. For information on the removal, containment, transportation, treatment, and disposal of hydrocarbon impacted caisson core materials, including Cellar No. 2, please refer to the ND/IS Section 1.4.2.6 Remove Hydrocarbon Impacted Fill, Well Conductors and Wooden Piles and Section 1.4.3 Disposal Procedures. Operations outlined within these sections of the ND/IS identify the exact procedures to be followed during the removal process of these various materials. It is anticipated that all contaminated water encountered within the caisson core during excavation activities will be vacuumed out and disposed of with the same standard of care as the contaminated fill material (i.e., enclosed in containment bins specifically designed for the offshore transport of hazardous or hydrocarbon impacted substances). All contaminated water will be disposed of at a certified onshore disposal facility.

2. The standard of care established by the State Lands Commission (SLC) is 5 feet below natural bottom for removal of all miscellaneous materials from the seafloor within the 15-foot mean low low water (mllw) line or shallower. Offshore of the 15 mllw line all structures and miscellaneous debris must be removed down to "natural bottom". Exxon's work plans are consistent with these standards. The remaining sheet piles will be cut off at or below natural bottom depending on seafloor surface conditions at the time of removal. Since the Belmont Island facility is located in approximately 45 feet of water, is not within a trawl zone, impacts associated with fisheries and other potential bottom snagging are not expected to occur. Additionally, the caisson core fill material will be removed down to natural bottom, therefore, a large depression is not anticipated to be left within the center of the caisson core after decommissioning of the facility. In compliance with the requirements of the SLC and DOG, Exxon proposes to cut the well conductors 5 feet below the mudline through utilization of a high-pressure water jet. This technique utilizes a high-pressure water pump, grit entrainment system and a rotating jet. A post abandonment survey will be conducted to confirm the bottom conditions following the islands removal.

3. It is believed that some pilings used to construct the facility were treated with creosote. Removal and handling of creosote coated piles will be conducted in accordance with State and Federal guidelines.

4. Exxon proposes to cut or extract pilings in accordance with the SLC guidelines. Should a pile break during extraction, it will be cut at or below mudline using divers. Please also refer to response item # 2 above.

5. During facility construction, the pipeline bundle was maneuvered to its offshore terminus via a pipe sled. It is believed that the pipe sled apparatus is still intact. Therefore, the pipe sled

is currently proposed as the termination point for the pipeline bundle at this time. If the pipe sled is determined absent, then divers will expose cut and rebury the pipelines at a safe distance outside of the existing island rip-rap mound to ensure that re-exposure will not occur during island removal.

6. The pipeline bundles within the onshore facility will be terminated as part of the onshore facility's decommissioning project, which is a separate project from the offshore decommissioning project. All above-ground tanks and associated production equipment associated with the former Belmont Island onshore facility located at 101 Marina Drive, Seal Beach were previously disassembled per the discretionary approval of the California Coastal Commission on May 14,1997. Exxon is currently working cooperatively with Unocal to complete the assessment and remediation of the project site. These activities will be coordinated with the Regional Water Quality Control Board and the City of Seal Beach.

7. SLC does not have a standard policy specifying the depth below the natural bottom at which abandoned pipelines should be buried. Rather, SLC reviews individual projects and determines the depth at which abandoned pipelines are buried on a case-by-case basis.

8. Exxon is not able to estimate the total amount of cooling water to be utilized during the proposed project. Containment procedures have been included in the project design to contain this cooling water and minimize discharge to the surrounding ocean. Exxon is working with the RWQCB to address these issues.

9. At this time, Exxon is not able to estimate the maximum amount of paint, concrete, and steel cuttings that could be released to marine waters during the proposed project. The containment system to be used beneath the wharf decks during decommissioning activities will consist of a temporary plywood structure with wood based supports covered with a dense, heavy-duty plastic sheeting (i.e., visqueen). Exxon will contain all paint, concrete and steel cuttings and/or scrap debris which have the potential to enter marine waters during the decommissioning project by implementing these containment structures.

10. Decommissioning of the facility will involve crews working 10 to 12 hour shifts per day. During the winter months these activities may occur after dark requiring the some use of artificial lighting. It is anticipated that most work activities conducted during daylight hours and that minimal work will be conducted under the artificial lighting. As discussed in page 3-47 of the ND/IS, if required all night-time lighting will be focused on the work area and will not create significant adverse impacts.

11. Please refer to previous response # 6.

12. The interior of the 8-inch pipeline from the onshore section through the inter-tidal zone will be grouted to provide for future long-term stability and structural integrity. Due to its smaller diameter, the 3-inch pipeline will not be grouted. Pipeline diameters become a factor during the grouting process due to the high pressure needed to force the grout to the terminus or predetermined point within the pipeline. Essentially, smaller diameter pipelines (i.e., 3-inch or less) require the use of high pressures which have the potential to rupture the lines during

the grouting process. Therefore, SLC and other agencies have agreed to abandonment of the smaller diameter pipelines in place without grouting.

Based upon recent communications, the City of Seal Beach and the SLC concurrence with the decision to leave the pipelines in place along the beach and surf zone due to the fact that the pipelines are buried at depths of 9 feet or greater. Pipeline abandonment will also avoid impacts to public access and public recreation opportunities due to major excavation activities associated with pipeline removal throughout the surf zone and upper beach area of Seal Beach. In addition, abandonment of the pipelines in place will avoid impacts to biological resources potentially existing within the inter-tidal zone and offshore region of the pipeline corridor. In place abandonment of the power cable would likewise avoid these impacts. For these reasons, removal of the pipelines and power cable through the surf zone is not considered to be an environmentally preferable alternative. Perforating pipelines, as an alternative to grouting has not been considered by Exxon due to past directions given by the SLC engineering staff.

13. The side-scan sonar survey results included in the Project Execution Plan confirm the pipeline and power cable are buried as they approach the island itself. Diver surveys and past repair work on the onshore and offshore portions of the pipelines have also indicated that the lines are buried. This burial has been verified up to 9 feet in some areas. Due to the deposition conditions found at the site mainly deposited from the San Gabriel River mouth, pipeline exposure is not expected. There are no recorded reports of pipeline or power line exposure across the beach. It should also be noted that Seal Beach has conducted beach sand enhancement programs at the beach.

14. This comment is noted. Page 2-1 has been corrected to indicate that the State Lands Commission is the lead agency for the proposed project.

15. Please refer to response # 6, which provides additional information on the onshore facility. The onshore facility decommissioning is a separate project from the offshore facility decommissioning. Further description of the onshore facility is not necessary to evaluate the land use/planning impacts of the proposed offshore decommissioning project.

16. CEQA requires that proposed projects be evaluated for consistency with applicable environmental plans and policies. Because the proposed project could impact the coastal zone, Coastal Act policies apply to the project. The evaluation contained on pages 3-3 through 3-6 is therefore an essential part of the ND/IS. This evaluation is intended to provide information to decision-makers, and in no way should be construed as findings of the California Coastal Commission with respect to the proposed project's consistency or inconsistency with Coastal Act policies.

17. The potential effects on sediment transport from the proposed removal of Belmont Island were evaluated in a coastal processes analysis completed by Moffat & Nichol Engineers in March 1998. As indicated in this analysis, Belmont Island does not currently affect shoreline processes (including sediment transport), nor would its removal result in any affect. This

report is presented as Appendix E of the Belmont Island Decommissioning Project Execution Plan (July 1998).

18. The seafloor surrounding the Belmont Island facility is primarily composed of soft-bottom habitat and migratory sand. No hard-bottom habitat and/or substrate exist within the proposed derrick barge anchoring areas located along the southeast side of the island. Thus, there are no areas supporting kelp growth and other vegetation that have the potential to be impacted by anchoring activities. Anchoring activities may have the potential to impact various soft-bottom habitat invertebrates existing within the vicinity of the island (e.g., sand dollar beds, tube worms, sea pens, sea pansies, etc.). However, soft-bottom marine invertebrates are generally short-lived and affected by seasonal changes. Additionally, the soft-bottom habitat areas located within the confluence of the San Gabriel River and the Long Beach Harbor (i.e., Los Angeles Basin watershed) are generally degraded due to poor water quality and rapid sedimentation rates. Due to the short life span of these species, overall poor water quality, and resulting low species diversity at the site, substantial impacts to soft-bottom marine invertebrates are not anticipated to occur. In addition, the proposed decommissioning of the facility and associated anchoring activities at the site will be short-term in nature, minimizing the potential for impact occurrence.

    As indicated in 1.6 Mitigation Incorporated into the Project of the ND/IS, flyover anchoring techniques would be implemented as part of the project, which would eliminate unnecessary anchor wire or chain contact with the seafloor. The minor, temporary disturbance of bottom sediments that would result from anchoring would not have a substantial adverse effect with respect to geologic conditions or sediment transport.

19. Information on the removal, containment, transportation, treatment, and disposal of hydrocarbon impacted caisson core materials is contained in the ND/IS. See 1.4.2.6 Remove Hydrocarbon Impacted Fill, Well Conductors and Wooden Piles in 1.0 Project Overview, and 1.6 Remove Hydrocarbon Impacted Fill, Well Conductors and Wooden Piles in Appendix A, Description of Decommissioning Procedures. These sections identify the exact procedures to be followed during the removal process of these various materials. It is anticipated that all contaminated water encountered within the caisson core during excavation activities will be vacuumed out and disposed of with the same standard of care as the contaminated fill material (i.e., enclosed in containment bins specifically designed for the offshore transport of hazardous or hydrocarbon impacted substances). All contaminated water will be disposed of at an approved onshore disposal facility. The exact laboratory method used to test removed water for contamination will be determined in consultation with the responsible regulatory agencies.

20. Environmental assessments conducted for the Belmont Island facility include a preliminary environmental assessment conducted by Fugro West in 1996, and an additional environmental assessment performed by Padre in 1997. Neither assessment analyzed the caisson core materials for PCB's due to the fact that the only potential PCB containing component within the facility were several electrical transformers, which were previously removed from the site.

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21. The only material to be considered for aquatic disposal are portions of the rock rip-rap located along the base of the caisson structure. The rock rip-rap has been in contact with the water since construction of the Belmont Island facility in 1953, and is free of hydrocarbon contamination. In addition, this rock rip-rap is a host to an assortment of aquatic marine species that will benefit from aquatic disposal.

22. Sediment borings were collected at a number of locations around the island with a Vibracore Unit in July 1997. Although no chemical analysis was conducted, visual inspection of the sample cores did not identify hydrocarbon contamination in any of the sample boring locations. Due to the local and regional currents, proximity of the project site to the Long Beach Harbor and San Gabriel River mouth, and the lack of visual evidence of hydrocarbon staining, it is highly unlikely that hydrocarbons, metals, or other hazardous material contamination that resulted due to island based operations will be uncovered during proposed island decommissioning operations. Based upon the results of the Environmental Assessments conducted for the Belmont Island facility, only portions of the top layer of sand within the central core of the facility are impacted with petroleum hydrocarbons (concentrations of 1,000 ppm in some areas). Samples collected at lower depths within the core did not indicate substantial contamination levels. In addition, the low levels of CAM 17 metals found within the central core indicate that heavy metal impacted material is not an issue of concern at the Belmont Island facility. With this information, it is highly unlikely that existing sediments surrounding the island contain substantial hydrocarbon and/or heavy metal contamination due to past oil production at the facility.

    It is believed that some pilings used to construct the facility were treated with creosote. In the case of the Mobil Seacliff Piers Complex in Ventura County, California, lab results of sediment samples taken from various locations adjacent to creosote treated pilings indicated no hydrocarbon contamination. Additionally, these samples indicated that the sediment at the Seacliff Pier Complex contained low levels of CAM 17 metals representative of normal background concentrations within a seafloor environment. Based on this data at a similar facility, contamination is not expected in sediments surrounding the pilings at Belmont Island.

23. The abandoned electrical cable would slowly corrode and decay over time, which would result in the release of materials into surrounding sediments. However, underground electrical cables are very common, are composed of relatively non-toxic elements, and are not typically considered a concern with respect to contamination. The cable is buried in sediments, and is not in contact with the ocean. Toxic levels of contamination would not be expected to result from the long-term corrosion of the electrical cable.

24. As stated in the ND/IS, only equipment that has a valid South Coast Air Quality Management District (SCAQMD) operating permit and/or registration under the California Statewide Portable Equipment Registration Program (Program) will be utilized for this project. SCAQMD permitted equipment will comply with all permit conditions and applicable SCAQMD rules and regulations (i.e., Rules 401, 402, 404, 431.2, and 1110.2). The temporary short-term emissions from the proposed decommissioning equipment would not pose a threat to the attainment or maintenance of local air quality. Based on this information

and recent correspondence with the SCAQMD, the proposed project will not require formal approval from the SCAQMD.

25. Belmont Island is a permitted facility in the SCAQMD, although not currently operational. Decommissioning of the facility will result in the permanent removal of the potential emissions associated with the islands operations.

26. As indicated on page 3-26 of the ND/IS, project support vessels that may be operating at any given time would include a derrick barge, large tugboat, small tugboat, materials barge, and dive support vessel. The project site is located outside of the Port of Long Beach and the Port of Los Angeles, and support vessels would operated within the recognized Traffic Separation Scheme. The minor level of marine traffic associated with the project would not result in a significant impact. Therefore, no mitigation is necessary. A Notice of Mariners will be issued for vessel operations associated with the project.

27. Notification of NOAA of Belmont Island will be coordinated through the U.S. Coast Guard Long Beach Office. Upon completion of the project, Exxon will forward a notice to the USCG that the island has been successfully removed. Any additional information required by the USCG or NOAA will be provided as required.

28. As indicated in response # 18 above, the seafloor areas that would be affected by the proposed project area composed of soft-bottom habitat and migratory sand. The project would not have substantial effects to hard-bottom marine habitat. Marine surveys such as those requested by the commentor typically focus on hard-bottom habitat, which often support long-lived, diverse marine communities. Soft-bottom habitat areas are generally short-lived, affected by seasonal changes, and generally do not support high species diversity. Further, the soft-bottom habitat areas located within the confluence of the San Gabriel River and the Long Beach Harbor (i.e., Los Angeles Basin watershed) are generally degraded due to poor water quality and rapid sedimentation rates. It is not expected that a new survey of the area would provide valuable new information, as soft-bottom habitat conditions present during a new survey would be likely to change before commencement of the decommissioning project. Based on the above, a new marine survey of potentially affected areas is not necessary.

29. Project activities conducted at night would likely be limited to work on the island itself and decks of the barges. All activities proposed as part of the project, including those that would be conducted at night, have been evaluated in the ND/IS.

30. Belmont Island has not been observed as a significant roosting site for marine birds. During numerous site visits, few if any birds have been observed on the island or adjacent water surface areas. This observation is surprising considering the limited activity taking place on the island. The nearest alternative roosting and foraging site for brown pelicans exists along the Long Beach Harbor breakwaters located just west of the Belmont Island facility. Additionally, least terns and other bird species also utilize the Long Beach Harbor area for roosting and foraging areas. Least terns have also been identified foraging and roosting within the Bolsa Chica Beach State Park area. The Long Beach Harbor breakwaters

provide long stretches of habitat conducive to roosting and foraging, free of human disturbance and predation. According to recent avian studies conducted within Long Beach Harbor, the middle breakwater accounted for over 48 percent of all observed birds within the harbor. Based on this information, removal of the Belmont Island facility is not anticipated to result in impacts to the availability of roosting and feeding opportunities for bird species within the vicinity of the island.

31. As indicated in the ND/IS (p.3-38), a Marine Wildlife Contingency Plan (included as Appendix D of the ND/IS) will be implemented during the project. The Marine Wildlife Contingency Plan includes the employment of trained wildlife observers, training of crew, procedures to avoid impacts to marine mammals, procedures to follow should an collision with a marine mammal occur, etc. Implementation of this plan will minimize potential impacts to marine mammals, including migrating gray whales. Due to the heavy vessel traffic associated with the LA/LB Harbors, it is unlikely that marine mammals including gray whales will be adversely effected by project operation.

32. The project execution plan submitted by Exxon and reviewed in the ND/IS includes a number of procedures and plans to conduct the proposed decommissioning. SLC has reviewed these plans and procedures and believes that they adequately address the potential environmental hazards associated with the project. Additional review and approval the selected decommissioning contractors work plans, critical operations and safety plan, oil spill contingency plan, and hazardous material handling plans is currently underway by the SLC engineering division in Long Beach. Final project approval by SLC is contingent on the successful completion of this review process. The SLC believes the ND/IS adequately addresses the Hazards.

33. An oil spill contingency plan is included as Appendix C of the ND/IS. In addition, Appendix A outlines the individual project components including their potential oil spill risk and associated prevention measures. As stated above, a detailed oil spill contingency plan is being completed and will be submitted for review and approval by the SLC Engineering Division.

34. Exxon has provided the following information regarding the Shell Beta pipeline and procedures designed to ensure operations do not result in an impact to this pipeline.

    The existing Aera-Beta 16-inch pipeline is located approximately 400 feet southwest of the Exxon Belmont Island Facility. The 16-inch pipeline extends west and terminates within Long Beach Harbor. Based upon recent communications with Fugro West, Inc., the pipeline is buried below the seafloor sediment from Belmont Island until it comes ashore within the Long Beach Harbor. The 16-inch pipeline contains a 22,000-barrel total capacity. In the event of a pipeline rupture, the worst case oil spill scenario as determined by utilizing the Mineral Management Service Guidelines, is estimated at approximately 2,200-barrels. However, during the decommissioning activities of the proposed project, the derrick barge will be anchored southeast of the Belmont Island Facility with the direct intent of avoiding impacts to existing lines. This measure in conjunction with the fact that the 16-inch pipeline is buried along its length will ensure the avoidance of pipeline rupture hazards throughout

the proposed project. To ensure that project relating anchoring will avoid impacts to the pipeline, the contractor will plot its location on all vessel navigation systems. Divers will be dispatched to the pipeline and buoys will be attached along the pipeline within the project area. Using the onboard navigation systems and the anchoring procedures outlined in the Project Execution Plan, impacts to the Aera-Beta pipeline will be avoided.

35. See Response No. 33.

36. See Response No. 34. As noted, the worst case spill event would result from an anchor hitting the Aera Beta pipeline.

37. For major spill events, Exxon would rely on Clean Coastal Waters for offshore spill response capabilities. The nearest Clean Coastal Waters Facility is located at Berth 57 within Long Beach Harbor. According to facility personnel, there are 2 levels of response to emergency oil spill incidents (initial and primary). The initial response vessel can respond to an oil spill at the Belmont Island Facility within approximately 30 minutes. The primary response vessel Clean Waters One can respond within 45 minutes. SLC, CDF&G OSPR and USCG have determined that CCW has adequate equipment and manpower to respond to a major spill event in the project area.

38. Onshore pipelines have been flushed and are currently free of hydrocarbons. Prior to conducting grouting and cutting work, Exxon has proposed to flush these lines again. These procedures, including secondary containment equipment placed at the site are adequate to minimize the potential of an onshore release. Should a release occur secondary containment available at the site is adequate isolate these releases.

39. See Response No. 38.

40. See Response No. 38.

41. See Response No. 38.

42. The island is located approximately 8,100 feet offshore of Seal Beach and there is no public access allowed to the facility. Additionally, water depths surrounding the island are in excess of 40 feet, as such the island does not support breaking waves during periods of heavy swell and is non-conducive to surfing and all other wave-riding recreational activities.

43. Exxon currently retains a private parking area within the marina, therefore, no public parking spaces will be occupied by project related vehicles during the proposed decommissioning project. Staging and/or stockpiling of materials and equipment will not interfere with beach access or public parking during the proposed project. All staging will occur when the Long Beach Harbor or at Exxon's onshore facility.

44. A Notice to Mariners is proposed by the applicant and the SLC will require that such notices be filed with the Coast Guard.

45. The SLC has provided responses to the individual concerns. Please see these responses regarding the potential cumulative impacts.

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Commentor: Department of Fish and Game – DeWayne Johnston

Date: April 22, 1999

Response:

Prior to submitting a final decommissioning plan for Belmont Island, Exxon representatives participated in pre-application meetings with a number of agencies responsible for issuing permits or for resource protection. These meetings included the State Lands Commission, California Coastal Commission, Army Corps of Engineers, California Department of Fish and Game and Regional Water Quality Control Board. During these meetings alternatives for island decommissioning were identified and discussed, including complete removal, reuse, and artificial reef use. Considerable support for the artificial reef alternative was identified from a number of these agencies.

As a result of this interest, Exxon initiated an artificial reef design process in consultation with the CDF&G Artificial Reef Program staff. Site specific studies were conducted by Exxon including bathymetry, seafloor features, bottom sediment characterization, and biological surveys. CDF&G biologists also conducted dive surveys of the island to evaluate the existing biological community at the site. An artificial reef specification was then developed in accordance with the design guidelines contained in the CDF&G Nearshore Sport Fish Habitat Enhancement Program "Artificial Reef Plan for Sport Fish Enhancement". These guidelines including information on desired water depths, reef materials, water quality, proximity to potential user groups, proximity to other natural reefs, and navigational safety.

The detailed reef specification report was reviewed with the SLC and CDF&G to discuss design, permitting and lease transfer issues. During this meeting the concern of adequate water depth and associated navigation safety was identified. The CDF&G recommend a minimum of 60 feet of water, while the island currently sits in 45 feet of water. Due to the sites proximity to the Long Beach Harbor, Alamitos Bay Marina and the Seal Beach Naval Station concerns regarding vessel safety were identified. A secondary concern discussed was poor water quality due to the San Gabriel River and Long Beach Harbor. Due to the liability issues associated with the navigational concern (inadequate water depth at the site) it was agreed by the SLC, CDF&G and Exxon that construction of an artificial reef at the site was not desirable. Exxon has stated that the rock rip-rap located at the site is available for reuse at an approved artificial reef site or for use in a permitted marine construction project. Such a reuse will allow re-establishment of marine habitat lost during the island removal.