

**CALIFORNIA COASTAL COMMISSION**

45 FREMONT, SUITE 2000  
SAN FRANCISCO, CA 94105-2219  
VOICE AND TDD (415) 904-5200  
FAX (415) 904-5400



# Th 6

**ENERGY, OCEAN RESOURCES, AND FEDERAL CONSISTENCY DIVISION REPORT**  
**FOR THE**  
**JANUARY 10, 2008 MEETING OF THE CALIFORNIA COASTAL COMMISSION**

**TO:** Commissioners and Interested Parties

**FROM:** Alison Dettmer, Deputy Director  
Energy, Ocean Resources & Federal Consistency

EMERGENCY PERMIT		
APPLICANT	PROJECT	LOCATION
<b>E-07-012-G</b> Pacific Operators Offshore, Inc.	Replace a 2,400 feet-long section of a damaged submarine power cable to restore electrical power to Platforms Hogan and Houchin.	Offshore Carpinteria to Platform Hogan Santa Barbara Channel



## CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000  
SAN FRANCISCO, CA 94105-2219  
VOICE AND TDD (415) 904-5200  
FAX (415) 904-5400



## EMERGENCY PERMIT

**December 19, 2007**

**Applicant:** Pacific Operators Offshore, Inc.

**Emergency Permit No.:** E-07-012-G

**Project Description:** Emergency replacement of a 2,400' section of a damaged submarine power cable to restore electrical power to Platforms Hogan and Houchin.

**Location of Emergency Work:** Approximately 1.5-2 miles offshore of the City of Carpinteria in the Santa Barbara Channel (PRC 3150).

**Background:** Pacific Offshore Operators, Inc. (POOI) owns and operates a 17 KV submarine power cable that provides electricity to offshore oil platforms Hogan and Houchin. The 6" diameter cable extends 19,000 feet from the Carpinteria shoreline in Santa Barbara County along the seafloor through California State Leases PRC 3133 and 3150 and terminates at Platform Hogan, located in federal lease OCS-P0166. A section of the power cable within PRC 3150 is in immediate need of replacement following damage to the external protective coating. POOI is proposing to replace 2,400 feet of damaged cable that lies within 110 to 120 feet of water below the Mean Lower Low Water (MLLW) line upon sedimentary seafloor. The closest structure to the cable is an oil pipeline located approximately 1,000 feet to the east.

**History:** The original power cable was installed in 1968 to provide electricity to offshore oil platforms. In November 2007, during a remotely operated vehicle (ROV) survey, POOI became aware of damage to a portion of the existing submarine cable. The cable had most likely become damaged during commercial trawling activity in the area. On December 11, 2007, POOI submitted an Emergency Permit application to the Coastal Commission to repair the damaged power cable.

**Work Proposed:** The work consists of replacing a 2,400-foot long section of the existing submarine power cable with new cable to reestablish grid power to the platforms. Following a detailed inspection of the cable damage by divers, the cable will be lifted onto a work barge and the damaged section cut, replaced and sealed. Once the replacement cable is spliced and successfully tested, the cable will be placed back on the seafloor within the existing lease corridor in a manner that will minimize sediment disturbance. A final power test will be made prior to the barge leaving.

POOI will contract with Associated Pacific Constructors, Inc. to complete the cable inspection, repair and replacement using two vessels, a derrick barge and a tug-supply boat. A crane and reel

will be mounted onto the barge which will also support dive operations. The barge will use a four-point anchor system and set four separate anchor spreads along the length of the damaged section. Anchor locations will be pre-plotted to avoid existing man-made structures; no natural rock features have been observed within the area. To avoid future damage, this section of the cable will be re-buried to a maximum depth of 3 feet using a standard seaplow device.

The proposed cable replacement is anticipated to take seven days to complete. POOI will notify the Executive Director when project operations commence. The project will be carried out from 6 a.m. to 6 p.m. Monday through Sunday. There will be at most 18 workers on site at any time. Project-related vessel trips over the 7-day work period will total approximately 30 roundtrips with the tug shuttling crew and supplies back and forth to the mainland 4 times per day.

**Mitigation for Potential Adverse Effects to Coastal Resources:** The project activities will occur in an already disturbed area (the cable corridor) along the seafloor, which is predominantly sedimentary. POOI has included in its project description several mitigation measures designed to avoid or minimize potential adverse effects to coastal resources, including the following:

- Seafloor disturbance: POOI proposes to reduce turbidity and impacts to the marine and benthic environment by minimizing the number of anchor sets, employing an anchor-assist vessel to place and recover barge anchors, and pre-plotting the anchor locations away from known pipelines and natural rock features. In addition, an anchor plan will be developed prior to anchor placement and the vessels will be provided with DGPS navigation services to assure proper placement. All cable replacement activities, except vessel anchoring, will be limited to the area within the existing cable corridor.
- Public Notice of Project Activities: A Notice to Mariners will be provided by the project contractor (Associated Pacific Constructors, Inc.) and notices to fishermen will be posted in the Ventura, Channel Islands, and Santa Barbara Harbors. In addition, the Joint Oil/Fisheries Liaison Officer will be notified at least 5 days prior to initiation of offshore activities to allow notification of appropriate parties of the project.
- Spill Prevention and Response: The contractor will implement a Spill Containment and Clean-up Plan for the project which outlines measures to take during emergency spills as well as spill equipment that will be onboard the project vessels.

**Other Approvals:** POOI has notified the appropriate agencies including State Lands Commission, County of Santa Barbara, and the City of Carpinteria (none of whom require discretionary action) and applied to the Army Corps of Engineers for their authorization of the project.

**Executive Director's Determination:** This permit constitutes approval of the emergency work you or your representatives have requested to undertake at the location listed above. I understand from your information that an unexpected occurrence in the form of extensive damage to a submarine power cable resulting in power failure at Platforms Hogan and Houchin requires immediate action to prevent or mitigate loss or damage to life, health, property or

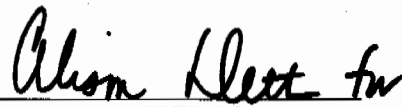
essential public services, and is therefore necessary to avert an “emergency” within the meaning of that term as defined in the Commission’s administrative regulations. (14 Cal. Code of Regulations (CCR) § 13009).

The Executive Director hereby finds that:

- (a) An emergency exists which requires action more quickly than permitted by the procedures for administrative or ordinary permits and the development can and will be completed by February 29, 2008, unless extended pursuant to the terms of the permit;
- (b) Public comment on the proposed emergency action has been reviewed as time allows; and
- (c) As conditioned, the proposed work would be consistent with the requirements of the California Coastal Act of 1976.

Therefore, pursuant to authority conferred by Public Resources Code § 30624 and 14 CCR §§ 13136 – 13143, I hereby grant an emergency permit for the proposed work, subject to the attached conditions.

Very Truly Yours,

  
PETER M. DOUGLAS  
Executive Director

#### CONDITIONS OF EMERGENCY PERMIT

- 1. This permit is not valid until a copy of the permit is signed by the permittee or authorized agent, acknowledging receipt of the permit and the acceptance of the terms and conditions, is returned to the Commission office.
- 2. The authorization conferred by this emergency permit to conduct the activities described in the application shall expire on February 29, 2008 unless, at least 72 hours before that date, Pacific Operators Offshore, Inc. (POOI) applies for and the Executive Director grants for good cause, an extension of that expiration date.
- 3. POOI shall not deviate from the operations, timing, or sequence of operations specified in the application unless and until authorized by the Executive Director.
- 4. Within 30 days of completing the onsite work, and no later than March 31, 2008, POOI shall submit to the Coastal Commission a regular coastal development permit application to authorize the activities approved herein.

**Construction Methods and Activities:**

5. No activities to widen or change the footprint of the power cable corridor shall occur without additional written approval of the Executive Director.
6. Best Management Practices (BMPs) for cable pick-up and lay-down activities shall be implemented to minimize sedimentation of surrounding waters.
7. All construction work shall occur only between the hours of 6 a.m. and 6 p.m.

**Marine Mammal Protection:**

8. This emergency permit does not authorize harassment, disturbance, or other forms of “take” of marine mammals.
9. Due to the concurrent gray whale migration season and the known presence of other marine mammals in the project area, a minimum of two (2) approved marine mammal monitors shall be employed in complementary shifts throughout project operations. The marine mammal monitors shall be approved by the Executive Director prior to project commencement. The monitors shall ensure that POOI and its contractors fully comply with the conditions of this permit related to biological protection.
10. Project operations, particularly cable pick-up and lay-down, shall be suspended if any marine mammals are observed within a 1000-foot radius of the cable. In the event that a monitor determines a mammal has entered this zone, the monitor shall have the authority to suspend project activities until the mammal has passed outside of this zone. Operations may resume once the mammals are outside of this safety zone. The marine mammal monitors will be responsible for monitoring this zone during project activities aboard a separate mobile vessel, such as a skiff. This will allow the monitors to safely guide any marine mammals away from the project site to prevent entanglement with the cable as it is suspended in the water column.
11. An initial ramp-up period shall occur when starting any machinery capable of generating underwater noise above 160 dB to avoid potential impacts to marine mammals that may be undetected within the safety zone.
12. Any vessel lighting shall be directed in such a way as to reduce potential impacts to marine mammals and other wildlife while maintaining safe work conditions.
13. POOI shall maintain a daily log of project activities that includes the observations of the approved marine mammal monitors. They shall record in that log both written and photographic descriptions of any observed or potential effects of the project on species of concern. The log shall also include descriptions of any spills, releases, or debris that affects coastal waters along with a description of the measures taken to address these events. Within thirty days of project completion, and no later than March 31, 2008, POOI shall

submit to the Executive Director a written report incorporating the above information and pre- and post-disturbance photographs.

**Spill Prevention and Response:**

14. POOI and its contractors shall adhere to the measures in the Oil Spill Contingency Plan submitted on December 14, 2007. If there is a spill or hazardous material release (including oil, fuel, other petroleum products, or any hazardous chemicals), POOI shall immediately contact Coastal Commission staff member Ellen Faurot-Daniels at 415/904-5285 or 415/201-5792 (pager), as well as the other contacts required in the project's spill plan, and shall provide via facsimile (415-904-5400) a daily log that fully describes the incident.
15. During the project, POOI shall have at the project site adequate spill response equipment to immediately respond to the maximum credible spill onboard or on the water. Spill response equipment should include absorbent boom of sufficient size to surround the project vessels in the event of an oil spill during vessel refueling.
16. POOI shall install protective barriers under all heavy equipment onboard project vessels to insure that fuel or fluid leaks do not contaminate marine waters.
17. Equipment shall be inspected daily for fuel or fluid leaks. Leaking equipment shall be repaired or replaced immediately.

**Acknowledgment:**

The undersigned permittee acknowledges receipt of this permit and agrees to abide by all terms and conditions thereof.

The undersigned permittee acknowledges that Government Code § 818.4 which states in pertinent part that “A public entity is not liable for injury caused by issuance ... of any permit ...” applies to this permit.

**IMPORTANT:** THIS PERMIT IS NOT VALID UNLESS AND UNTIL A COPY OF THE PERMIT WITH THE SIGNED ACKNOWLEDGMENT HAS BEEN RETURNED TO THE COMMISSION OFFICE. 14 CCR § 13158(a).

By: \_\_\_\_\_  
Signature of Permittee

Date: \_\_\_\_\_