




United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
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May 23, 2012

Memorandum

To: Regional Supervisor, Office of Field Operations

From: Kenneth Seeley
Regional Environmental Officer 

Subject: Finding of No Significant Impact (FONSI), Beta Offshore Proposal
Platform Edith to Platform Elly Cable Installation Project
(Leases OCS-P 0296 and OCS-P 0300), Beta Unit, Offshore Los Angeles County

The Environmental Enforcement Division has reviewed the Beta Offshore proposal to install a submarine power cable between Platforms Edith and Elly, which are located offshore of Los Angeles County (Leases OCS-P 0296 and OCS-P 0300). This proposal was submitted on January 31, 2012 and revised on March 12, 2012.

The Bureau of Ocean Energy Management (BOEM) provided their Environmental Assessment of Beta Offshore's proposal in May 2012 (attached). Based on this assessment, we have determined that the installation of the subsea power cable, as described, will not result in significant environmental impacts provided Beta Offshore fulfills the environmental protection commitments submitted as part of their proposal and complies with all required mitigations and conditions of approval.

The Proposed Action.

Beta Offshore proposes to install a 34.5 kV alternating current (AC) submarine power cable approximately 2.6 km (8500 ft) long in 49 to 77 m (161 to 255 ft) water depths on Leases OCS-P 0296 and OCS-P 0300. This new power cable will supply electricity to offshore oil and gas facilities within the Beta Unit (Platforms Elly, Ellen, and Eureka) and reduce Beta Operating's reliance on diesel generators. The project will utilize a cable lay barge towed by two vessels to reduce impacts to the marine environment by eliminating anchoring activities and reducing the number of construction vessels needed for construction operations. It is estimated that all offshore installation activities will take approximately 42 days to complete, with actual cable installation taking 3 days. The work is expected to commence and be completed sometime during the second and third quarter of 2012. Additional detail is included in the attached EA.

Summary of Impact Analyses and Conclusions.

It has determined that the following environmental resources could be potentially affected by the proposed project: air quality, water quality, benthic resources, fishes and Essential Fish Habitat (EFH), coastal and marine birds, marine mammals and sea turtles, commercial fishing, and marine transportation. The EA assessed the project's potential effects on these resources and performed a cumulative analysis of the expected impacts from the proposed project when added incrementally to past, present, and reasonably foreseeable projects. The BOEM concluded that potential environmental impacts from the proposed project will be insignificant based on significance criteria used in the analyses and the negligible incremental increase of the proposed action to cumulative impacts.

The proposed action is not expected to result in significant environmental impacts to the coastal and marine resources with implementation of the mitigation measures identified in the EA. Equipment and emissions from the installation activities have been reviewed and analyzed pursuant to South Coast Air Quality Management District (SCAQMD) rules and regulations and the SCAQMD has made the determination that no air quality permit is required for the activities associated with the proposed Project. The installation of the subsea power cable would cause only a small increase in turbidity and impacts to water quality, benthic communities and fishes and would be short-term, localized and insignificant. No biologically significant benthic areas have been noted in the project area. The project activities will not have significant impacts to marine mammals, birds, fishes, endangered species or EFH. The impacts from artificial lighting and project-generated noise from the proposed activities are considered to be insignificant to marine birds. Impacts on annual commercial fisheries landings for key species in regional fishing grounds associated with the Los Angeles area are not expected. No impacts to marine vessel traffic and transportation are expected as a result of the project.

Determination of Significance

Air Quality: SCAQMD has determined the vessel engines and mobile source emissions from the project are exempt from permit pursuant to *Rule 219 (a)(2) – Equipment Not Requiring a Written Permit Pursuant to Regulation* and will not affect regional air quality. All additional equipment utilized for the project will be currently under an existing SCAQMD permit. Therefore, SCAQMD has determined that no new air quality permits are required for the project. Crew and supply boat emissions are already covered under the current Permit to Operate (PTO) for Beta Offshore. The potential impacts to air quality resulting from the proposed power cable installation are considered to be insignificant and in compliance with SCAQMD Rules and Regulations to the maximum extent feasible.

Water Quality: The installation of the power cable would cause only a small increase in turbidity. This will raise sediment into the water column which would settle out relatively quickly with minimal changes to water quality. Impacts to water quality would be short-term, localized, and insignificant.

Benthic Resources: The Project spans through the outer edge and upper slope on the San Pedro Shelf with seafloor sediments within the Project area being primarily sand and muddy sand which hold distinct benthic faunal communities. Beta Offshore's mitigation strategy, project design, and pre- and post-construction surveys will ensure that seafloor disturbance is minimized. Overall, disturbances from the power cable installation will be localized and minimal and the effects would not be expected to extend out of the existing installation corridor. The proposed project would have negligible loss of soft bottom habitat and changes to soft bottom species abundance and composition and will not have significant impacts on the benthic environment.

Fishes and Essential Fish Habitat (EFH): The proposed project activities may cause bottom disturbance and increased turbidity which could result in potential impacts to fish and EFH. The proposed activities from the project are predicted to generate only minimal and short term impacts to benthic habitats, and cause a negligible increase in suspended materials over a short time frame. The National Marine Fisheries Service (NMFS) was consulted informally and concurred that the proposed project will have no effect on EFH. Therefore, the activities associated with the proposed project will not have significant impacts to fishes or EFH.

Marine and Coastal Birds: Artificial lighting associated with night operations could attract marine birds to the project area, several of which may have special-status designations. Effects to birds will be minimized by implementing the lighting mitigation measures identified in the EA. Due to the short duration, location, and the time of year the project will be carried out, it is unlikely that any marine bird species will be affected by project-related noise. While the potential for marine birds to be attracted to the area, the implementation of the mitigation measures identified in the EA to reduce the effects of artificial lighting on coastal and marine birds will result in these effects being insignificant.

Marine Mammals and Sea Turtles: The impacts to marine mammals and sea turtles from the proposed power cable laying activities from the risk of vessel strike and noise is considered highly unlikely and insignificant. The NMFS was consulted informally and concurred that the proposed project would not result in increased risk or significant impacts to marine mammals or sea turtles.

Commercial Fishing: The effects of the proposed power cable installation activities on major commercial fisheries are considered insignificant and are not expected to result in space use conflicts or lost fishing time or gear with the mitigations and notifications identified in the EA. Beta Offshore's commitment to notify the U.S. Coast Guard prior to initiating activities will further ensure there will be no significant impacts on commercial fishing.

Marine Transportation: The potential impacts to marine transportation from the proposed project are considered insignificant due to the lack of a significant increase in

additional vessel traffic resulting from the Project, the small number of vessels involved, and the limited scope, geographic footprint and duration of the installation activities.

Finding Statement

Based on the evaluation of Beta Offshore's proposal and the potential impacts discussed in the attached EA, we have determined that concurrence with Beta Offshores Platform Edith to Platform Elly Cable Installation Project, (the Proposed Action) will not significantly affect the quality of the human environment pursuant to the National Environmental Policy Act §102 (2)(C) and therefore no Environmental Impact Statement is required.

Attachment