

**2025**

**Annual Report of the Status of Condition C:  
Kelp Reef Mitigation**

**SAN ONOFRE NUCLEAR GENERATING STATION (SONGS)  
MITIGATION PROGRAM**



<https://marinemitigation.msi.ucsb.edu/>

# **Annual Report of the Status of Condition C: Kelp Reef Mitigation**

## **SAN ONOFRE NUCLEAR GENERATING STATION (SONGS) MITIGATION PROGRAM**

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## 1.0 Executive Summary

Condition C of the San Onofre Nuclear Generating Station's (SONGS) coastal development permit requires Southern California Edison (SCE) and its partners to construct an artificial reef that is large enough to support 28 tons of reef fish and a minimum of 150 acres of functioning and sustainable giant kelp (*Macrocystis pyrifera*) forest habitat as partial mitigation for the adverse impacts of SONGS operations to the San Onofre kelp forest. The artificial reef (named Wheeler North Reef) was constructed in phases: an initial small-scale experimental phase used to test different reef designs (Phase 1) and a larger mitigation phase used to meet the mitigation requirement of creating at least 150 acres of kelp forest habitat (Phase 2). Construction of the mitigation phase was completed in 2008 and monitoring of the physical and biological attributes of Wheeler North Reef and two nearby reference reefs (San Mateo and Barn) has been completed annually beginning in 2009. Results of monitoring and additional studies showed that the combined 175-acre configuration of the Phase 1 and 2 reefs was too small for Wheeler North Reef to consistently meet the performance standards pertaining to fish standing stock and area of adult giant kelp. Consequently, the CCC required SCE to remediate this deficiency by expanding the existing Wheeler North Reef (Phase 1 and 2) to include additional acreage. Construction of a 198-acre Phase 3 remediation reef occurred during the summers of 2019 and 2020.

Performance standards for reef substrate, giant kelp, fish, and the benthic community of algae and invertebrates are used to evaluate the success of Wheeler North Reef in meeting the intended goal of replacing the kelp forest resources damaged or lost by SONGS' operations. Absolute performance standards are evaluated only at Wheeler North Reef, whereas relative performance standards are used to compare Wheeler North Reef with the two natural reference reefs. Annual monitoring is done to determine whether Wheeler North Reef has met these standards. The level of monitoring was reduced in 2024 after Wheeler North Reef had met the performance standards in the previous three years in accordance with Condition D of the SONGS permit. The monitoring is overseen by the California Coastal Commission (CCC) and conducted independently of SCE. This report summarizes the monitoring results and the amount of mitigation credit earned through 2025.

Mitigation credit for meeting the relative performance standards and the absolute performance standard pertaining to hard substrate is assigned on an annual basis. The fulfillment of these mitigation requirements is achieved when the number of years of mitigation credit equals the number of years of SONGS Units 2 and 3 operations (= 32 years). The accrual of mitigation credit for these performance standards began in 2019 upon construction of the Phase 3 remediation reef. In 2025, Wheeler North Reef met the absolute performance standard pertaining to hard substrate, the relative performance standard for undesirable and invasive species and eight of the other 11 relative performance standards, which was one more than that met by San Mateo or Barn. Therefore, Wheeler North Reef was deemed to be performing similar to natural reefs because it met the performance standards for

hard substrate and undesirable and invasive species, and at least as many of the other 11 relative performance standards as the lower performing reference reef. Consequently, Wheeler North Reef earned one year of mitigation credit in 2025 for meeting this collective group of performance standards for a cumulative total of seven years of mitigation credit. It needs an additional 25 years of mitigation credit to fulfill its mitigation requirement for these performance standards.

Mitigation credit for the absolute performance standards pertaining to the area of adult giant kelp and the standing stock of reef fish is assigned on a cumulative basis in which the amount of kelp area and fish standing stock supported by Wheeler North Reef in any given year is added to the cumulative total of previous years. Fulfillment for each of these performance standards will occur when the cumulative total for each equals the product of the annual designed target of kelp acres or fish standing stock and the 32 years of SONGS Units 2 and 3 operations. The accumulation of mitigation credit for these two performance standards also began in 2019. In 2025, Wheeler North Reef earned credit for 32 acres of giant kelp for a cumulative total of 308 acres, and 33 tons of reef fish for a cumulative total of 193 tons. It needs an additional 4492 acres of kelp credit and 703 tons of fish standing stock credit to fulfill these two mitigation requirements.

In sum, the monitoring results to date show that Wheeler North Reef has demonstrated considerable promise in meeting many of its objectives. Importantly, it has performed similarly to natural reference reefs across a broad suite of criteria, including kelp area and reef fish standing stock since 2019. The 16 years of performance monitoring of Wheeler North Reef coupled with its ability to consistently meet the performance criteria the past several years is evidence of its ongoing success in meeting its objectives, and provides justification for continuing reduced monitoring that was implemented in 2024. One observation of note is that the multibeam sonar survey of Wheeler North Reef in 2025 showed that footprint of the Phase 3 remediation reef declined by approximately 4% (8 acres) from the previous survey conducted in 2020. Targeted sampling of hard substrate at the Phase 3 reef is planned for 2026 to determine causes for this reduction and the extent to which it is continuing.

Additional information on the rationale, objectives and results of SONGS marine mitigation monitoring, including relevant documents and data can be found at the UCSB SONGS Mitigation Monitoring Program website <https://marinemitigation.msi.ucsb.edu/>.

## 2.0 Introduction

### 2.1 Purpose of Report

This report focuses on Condition C of the San Onofre Nuclear Generating Station's (SONGS) coastal development permit 6-81-330-A (California Coastal Commission 1997), which pertains to mitigation for SONGS impacts to giant kelp (*Macrocystis pyrifera*) and associated biota. Southern California Edison (SCE) and the California Coastal Commission (CCC) have clear and distinct roles in the implementation of Condition C. Under the condition, SCE is required to construct an artificial reef that supports at least 28 tons of reef fish and creates a minimum of 150 acres of functioning and sustainable kelp forest habitat. The CCC is to provide scientific oversight of the monitoring of the artificial reef mitigation that is independent of SCE. This report presents the results from the independent monitoring of the performance of the SONGS artificial reef (hereafter referred to as Wheeler North Reef) from 2009 – 2025 and summarizes the status of the project's compliance with Condition C of the SONGS permit for this period.

### 2.2 Background

#### SONGS Operations

In 1974, the California Coastal Zone Conservation Commission issued a permit (No. 6-81-330-A, formerly 183-73) to SCE for SONGS Units 2 and 3 located on the coast in north San Diego County. Construction of SONGS Units 2 and 3 was completed in 1981. Operation of Units 2 and 3 began in 1983 and 1984, respectively and each unit generated up to 1,100 MW of electric power. Both reactors were shut down in January 2012 due to excessive wear in the cooling tubes of the steam generators, and in June 2013 both units were permanently retired. SCE's operating license has been modified to "possession only" and they are no longer authorized to operate the reactors. Full retirement of the units prior to decommissioning is expected to take several years in accordance with customary practices; actual decommissioning will take many years until completion.

The SONGS Unit 2 and 3 reactors are cooled by a single pass seawater system and have separate intake lines, each 18 feet in diameter, that are located in about 30 feet of water offshore of the power plant. The volume of water taken in each day by these two intake lines when Units 2 and 3 were fully operational was about 2.4 billion gallons, equivalent to a square mile 12 feet deep. Since the shutdown, the flow in each unit has been reduced to about 42 million gallons a day or roughly 2% of the normal operating flow.

The discharge pipe for Unit 2 terminates 8,500 feet offshore, while the discharge pipe for Unit 3 terminates 6,150 feet offshore. The last 2,500 feet of the discharge pipes for Units 2 and 3 consist of a multi-port diffuser that rapidly mixes the cooling water with the surrounding water. The diffusers for each unit contain 63 discharge ports angled offshore that increase the velocity of the discharge. Under normal operations the discharge water was approximately 19°F warmer than the intake water temperature. The diffusers were designed to cool the discharge water by increasing its mixing with ambient seawater at a rate of about ten times the discharge flow. The surrounding water was swept up along with sediments and

organisms and transported offshore at various distances. Mixing caused by the diffuser system resulted in the formation of a turbid plume in the vicinity of the San Onofre kelp forest, which is located adjacent and south of the two diffuser lines.

### SONGS Impacts

A condition of the SONGS permit required study of the impacts of the operation of Units 2 and 3 on the marine environment offshore from San Onofre and mitigation of any adverse impacts. The impact assessment studies found that the SONGS cooling water system for Units 2 and 3 had major adverse impacts to living marine resources, which included:

- Projected reductions in populations of adult fish throughout the Southern California Bight based on losses of fish eggs and immature fish entrained by the cooling water intakes and killed inside the power plant.
- Measured reductions in local populations of adult fish caused by the mortality of fish impinged against the cooling water screens inside the power plant.
- A substantial reduction in the size of the giant kelp forest and its associated community adjacent to the SONGS diffusers.

### Mitigation Requirements

As a result of the impact studies, in 1991 the CCC added new conditions to mitigate the adverse impacts of the power plant on the marine environment that require SCE and its partners to: (1) create or substantially restore at least 150 acres of southern California wetlands as out-of-kind mitigation for the losses of immature fish due to entrainment in the power plant's cooling water system (Condition A), (2) install fish barrier devices at the power plant to reduce the losses of adult fish killed in the plant (Condition B), and (3) construct a 300-acre kelp reef as in-kind mitigation for the loss of giant kelp forest habitat caused by the ocean discharge of the power plant's cooling water (Conditions C). The 1991 conditions also required SCE and its partners to provide the funds necessary for CCC to contract marine scientists to perform technical oversight and independent monitoring of the mitigation projects (Condition D). In 1993, the CCC added a requirement for SCE to partially fund construction of an experimental white sea bass hatchery. Due to the experimental nature of the hatchery, the CCC did not assign mitigation credit to its operation.

After extensive review of new kelp impact studies, in April 1997 the CCC approved amended conditions that revised the kelp mitigation requirements in Condition C. Specifically, the revised Condition C requires SCE to construct an artificial reef large enough to sustain 150 acres of medium-to-high density giant kelp forest (defined as > 4 giant kelp plants per 100 m<sup>2</sup> with 8 or more fronds) that supports 28 tons of reef fish (which could result in a reef larger than 150 acres) together with funding for a mariculture/marine fish hatchery as compensation for the estimated loss of 179 acres of a medium-to-high density kelp forest and its associated biological community resulting from the discharge of cooling water from SONGS Units 2 and 3 (California Coastal Commission 1997). Condition C requirements for the artificial reef consist of two phases, an initial small experimental reef (~25 acres) and a subsequent mitigation reef that is large enough to meet the 150-acre kelp and 28-ton

fish standing stock requirements. The purpose of the Phase 1 Experimental Reef was to determine which combinations of substrate type and substrate coverage would most likely achieve the performance standards specified in the permit. The design of the Phase 2 Mitigation Reef was to be contingent on the results of the Phase 1 Experimental Reef.

The CCC also confirmed in April 1997 its previous finding that independent monitoring and technical oversight were required in Condition D to ensure full mitigation under the permit. Condition D requires SCE and its partners to fund scientific and support staff retained by the CCC to oversee the site assessments, project design and implementation, and monitoring activities for the mitigation projects. Scientific expertise is provided to the CCC by a technical oversight team hired under contract. The technical oversight team consists of Drs. Kathryn Beheshti, Mark Page, Dan Reed, and Rachel Smith, who are research ecologists at the Marine Science Institute, University of California Santa Barbara (UCSB). In addition, a science advisory panel advises the CCC on the design, implementation, monitoring, and remediation of the mitigation projects. Current science advisory panel members include Drs. Richard Ambrose (Professor emeritus, UC Los Angeles), Peter Raimondi (Professor, UC Santa Cruz), and Russell Schmitt (Professor emeritus, UC Santa Barbara). In addition to the science advisors, the technical oversight team is aided by a crew of marine biologists hired under a contract with UCSB to collect and assemble the monitoring data. The technical oversight team is also assisted by independent consultants and contractors on an as needed basis when expertise for specific tasks is required. Of particular note in this regard is Dr. Mark Steele (Professor of Ichthyology, California State University Northridge) who has contributed to studies of fish growth, feeding and reproduction since 2009. The CCC's permanent staff also spends a portion of their time on this program, but their costs are paid by the CCC and are not included in the SONGS mitigation budget.

## 3.0 Project Description

Mitigation for SONGS impacts to the San Onofre kelp forest through the construction of an artificial reef is being done in phases: a short-term, small-scale experimental phase for testing different reef designs (Phase 1), followed by a longer-term, larger-scale mitigation phase that is intended to compensate for the kelp forest resources lost due to SONGS' operations (Phase 2). An additional remediation phase (Phase 3) was constructed in 2019 and 2020 after it was determined that the combined area of the Phase 1 and 2 reefs was insufficient to fully compensate for the lost kelp forest biota. The information gained from the Phase 1 experimental reef was used to design the larger Phase 2 mitigation reef. The design of the Phase 3 remediation reef mirrored that of the Phase 2 reef. The mitigation phase is to have a minimum duration equivalent to the operating life of SONGS Units 2 and 3 including the decommissioning period to the extent there are continuing discharges. In March 2019 the CCC concluded that it is unlikely that the greatly reduced flow following the cessation of SONGS operations in 2013 would continue to cause significant adverse impacts to the kelp forest community off San Onofre, and thus defined the operating life of SONGS as the beginning of 1982 to the end of 2013 (= 32 years).

The CCC decided that the goal of in-kind compensation for kelp forest resources lost due to SONGS operations will most likely be met if: (1) the artificial reef is built near SONGS, but outside its influence to ensure that the compensation for the lost resources occurs locally rather than at a distant location far from the impacts, and (2) the artificial reef is configured to mimic the impacted natural reef at San Onofre, which is a low relief boulder field.

### 3.1 Experimental Phase

The Phase 1 experimental reef was constructed in August and September 1999 on a mostly sand bottom at 13 to 16 m (42 to 52 ft) depth approximately 1 km (0.6 miles) offshore of the city of San Clemente, CA, USA (Figure 3.1.1). It consists of 56 modules clustered at seven locations (eight modules / location) spaced relatively evenly along 3.5 km of coastline encompassing an area of approximately 144 ha (Figure 3.1.2). Each artificial reef module measured roughly 40 m x 40 m and the 56 modules collectively covered about nine hectares (25 acres) of the sea floor when initially constructed.



Figure 3.1.1 Infrared satellite image showing the location of the Phase 1 experimental reef (outlined in yellow) constructed for the SONGS artificial reef mitigation program. The reflectance of the giant kelp surface canopy appears as clusters of red squares, which are the locations of the 56 reef modules shown in Figure 3.1.2.

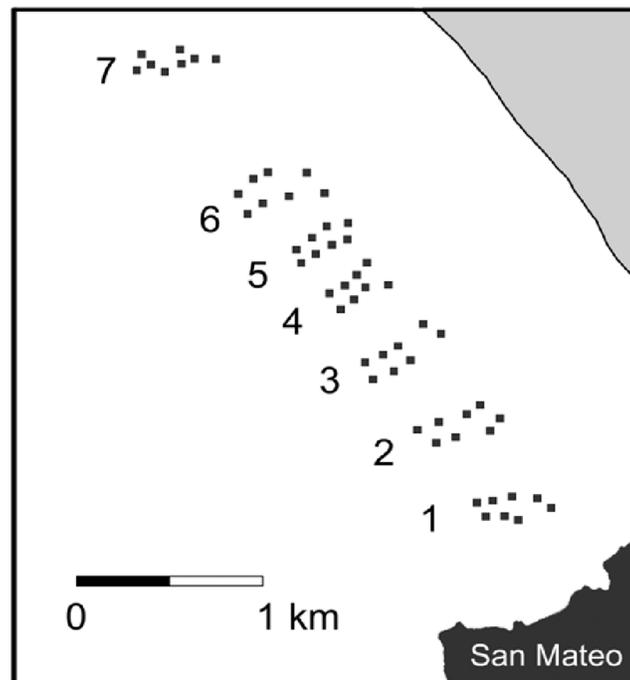


Figure 3.1.2. Design of the Phase 1 Experimental Reef. The black squares represent the 56 modules. Numbers indicate the seven locations.

The modules at each location were built from either quarry rock or concrete rubble and were constructed to form low-lying reefs (i.e., <1 m tall) that mimicked natural reefs in the region. These two types of materials were chosen because: (1) they are the two materials most preferred by the California Department of Fish and Wildlife for building artificial reefs in California (Turner et al. 1969), and (2) little information existed on their relative effectiveness in supporting reef biota. Four modules at each of the seven locations were built from quarry rock and four were built from concrete rubble. These two construction materials differed with respect to their size, shape and specific gravity; the heavier quarry rock was boulder-like in appearance, while the less dense concrete rubble consisted primarily of pieces of flat slabs that tended to be longer, wider, and slightly shorter than quarry rocks (Reed et al. 2004). The different sizes and shapes of the two materials caused rock and concrete modules to differ somewhat with respect to small-scale topography. The slabs used to build concrete modules resulted in modules that had a greater proportion of horizontal substrate and a surface that was slightly more regular than modules constructed from quarry rock (Reed et al. 2004). By design, the amount of quarry rock and concrete rubble used to build the modules was systematically varied to produce a wide range in the bottom coverage of hard substrate (~30 to 90%) on modules of the two reef types within each location. This was done to evaluate the extent to which the bottom coverage of reef substrate influenced the abundance and species richness of colonizing biota.

Five years of post-construction monitoring of the experimental phase were completed in December 2004. Results from the monitoring were quite promising in that all of the artificial reef designs and all seven locations tested showed similar tendencies to meet many of the performance standards established for the mitigation reef (Reed et al. 2005). It was concluded from these findings that a low-relief rubble concrete or quarry rock reef constructed off the coast of San Clemente, California had a good chance of providing adequate in-kind compensation for the loss of kelp forest biota caused by the operation of SONGS Units 2 and 3. These findings formed the basis of the CCC Executive Director's determination that: (1) the mitigation reef be built of quarry rock or rubble concrete having dimensions and specific gravities that are within the range of the rock and concrete boulders used to construct the SONGS experimental artificial reef, and (2) the percent of the bottom covered by quarry rock or rubble concrete on the mitigation reef needed to average at least 42% but no more than 86%. The CCC concurred with the Executive Director's determination for the type and percent cover of hard substrate on October 12, 2005.

### **3.2 Mitigation Phase**

On April 17, 2006 the California State Lands Commission acting on a request from SCE adopted a resolution declaring that the SONGS Mitigation Reef be named in honor of Dr. Wheeler North, a renowned kelp forest ecologist. Construction of the Phase 2 reef was completed in 94 days on September 11, 2008 (Coastal Environments 2008). Approximately 126,000 tons of boulder-sized quarry material was deposited in 18 irregularly shaped polygons that collectively covered 150 acres

of sea floor as determined from a bathymetric survey using multibeam sonar (Figure 3.2.1).

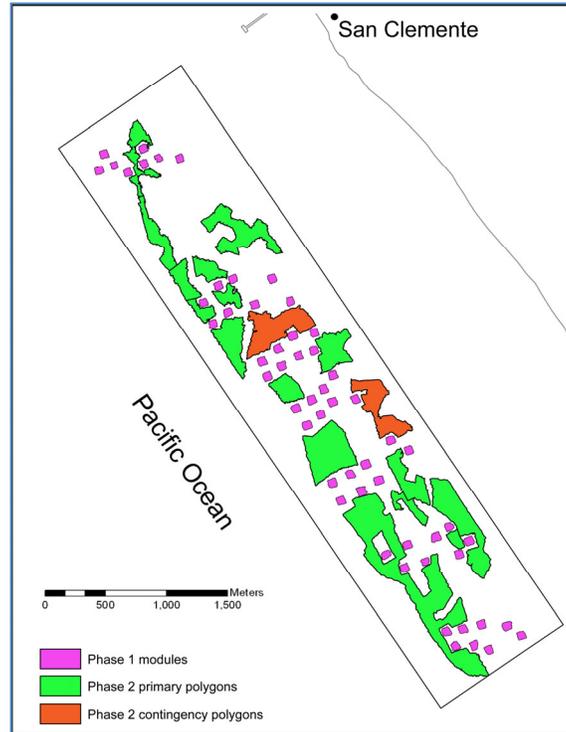


Figure 3.2.1. The 175-acre Wheeler North Artificial Reef, which includes the Phase 1 modules and the Phase 2 primary and contingency polygons.

Boulder length varied from 1 to 4 ft, with an average length of 2.3 ft; width varied from 0.5 to 3 ft, with an average width of 1.8 ft and height varied from 0.5 to 2.5 ft, with an average of 1.4 ft. When added to the experimental reef a total of 175 acres (as estimated from multibeam sonar surveys in 2008 and 2009) of artificial reef were constructed. The CCC found that the average cover of quarry rock on the Phase 2 reef was slightly below the 42% minimum requirement specified in SCE’s Coastal Development Permit (CDP 6-81-330-A). To address this inadequacy, the Executive Director of the CCC accepted a scenario in which 16 of the 18 polygons of the Phase 2 reef comprising 130 acres (hereafter referred to as primary polygons) were combined with the 25 acres of the Phase 1 reef (as determined in 2009, Elwany et al. 2009) to fulfill SCE’s permit requirement that they construct a minimum of 150 acres of reef with an average of at least 42% cover. The remaining two polygons were classified as contingency polygons (Figure 3.2.1.; See Section 4.4).

### 3.3 Remediation Phase

The SONGS Coastal Development Permit requires that independent studies be conducted to develop recommendations for appropriate remedial measures in the event that Wheeler North Reef fails to meet its mitigation requirements. These studies determined that the 175-acre configuration of Wheeler North Reef (Phase 1 + Phase 2) was too small to meet the mitigation requirement for fish standing stock (Reed et al. 2015). Based on these results, the Executive Director of the CCC

notified SCE in May 2016 that that remediation of Wheeler North Reef was necessary for it to meet the conditions of the SONGS permit. On March 7, 2019 following extensive consultation and environmental review, the CCC approved a coastal development permit for the expansion of Wheeler North Reef to bring it into compliance with the performance standards required by the SONGS permit (California Coastal Commission 2019). The approved remediation plan included the construction of up to 210 acres of low-relief, low coverage (~41%) reef in state waters offshore of the City of San Clemente (Coastal Environments 2017). Construction of a 198-acre remediation reef occurred during the summers of 2019 and 2020 and consisted of approximately 151,000 tons of quarried rock covering an average of 45% of the bottom in 20 irregular shaped polygons located at depths of 28 – 49 ft (8.5 -15 m) north and inshore of the existing Wheeler North Reef (Figure 3.3.1). The addition of Phase 3 increased the total footprint area of Wheeler North Reef to 373 acres.



Figure 3.3.1. Map showing the locations of the three phases of Wheeler North Artificial Reef. Phase 1 was constructed in 1999, Phase 2 in 2008 and Phase 3 in 2019 and 2020.

## 4.0 Methods of Project Evaluation

This section briefly describes the general approach used to evaluate the success of Wheeler North Reef in meeting its objective of compensating for the kelp forest resources lost due to SONGS' operations. A more detailed account of the approach and specific methods used can be found in the monitoring plan for the SONGS' reef mitigation project (Reed et al. 2024).

### 4.1 Performance Standards

Performance standards for reef substrate, giant kelp, fish, and the benthic community of algae and invertebrates specified in Condition C are used to evaluate the success of Wheeler North Reef in meeting the intended goal of replacing the kelp forest resources damaged or lost by SONGS operations. Monitoring independent of the permittee is done in accordance with Condition D of the SONGS permit to: (1) determine whether the performance standards established for Condition C are met, (2) determine, if necessary, the reasons why any performance standard has not been met, and (3) develop recommendations for appropriate remedial measures that increase the probability the performance standards will be met in the future. The performance standards fall into two categories: *absolute standards*, which are measured only at Wheeler North Reef and require that the variable of interest attain or exceed a predetermined value that is linked to SONGS' impacts measured at the San Onofre kelp forest, and *relative standards*, which require the value of the variable of interest at Wheeler North Reef be similar to that measured at nearby natural reference reefs. Among other things, these performance standards require Wheeler North Reef to support at least 150 acres of medium-to-high density adult giant kelp, 28 tons of reef-associated fish, and benthic assemblages of algae, invertebrates and fishes that are similar to nearby natural reference reefs.

#### Absolute performance standards

Prior to the construction of the Phase 3 remediation reef, the evaluation of each absolute performance standard in any given year was based on the greater value obtained from either: (1) data collected at Wheeler North Reef that year, or (2) a four-year running average calculated from data collected at Wheeler North Reef for that year and the previous three years. A running average recognizes that short-term fluctuations in kelp forest biota are the norm, and it is used to allow mitigation credit to be given for excess reef biota in good years to compensate for occasional years when values for the biota are slightly below those required by the absolute standards. All absolute standards had to be met in a given year in order for that year to receive mitigation credit.

The manner in which mitigation credit is assigned for the absolute performance standards pertaining to fish standing stock and giant kelp area was changed by the CCC in March 2019 when it approved SCE's plans to construct the Phase 3 remediation reef (California Coastal Commission 2019). The size of the Phase 3 reef was based on calculations of the additional area of reef needed for the expanded Wheeler North Reef (Phases 1, 2, and 3) to eventually sustain a fish standing stock of 28 tons and 150 acres of medium-to-high density giant kelp with 95 % confidence.

The expectation is that it would take some unknown period of time for the standing stock of fish and area of giant kelp to build up to the required levels during which SCE would receive no mitigation credit. To address the uncertainty in this timeline for receiving mitigation credit, the CCC changed the assignment of mitigation credit for the fish standing stock and kelp area performance standards from an all or nothing annual assessment to a cumulative approach that assigned mitigation credit for the standing stock of fish and area of giant kelp supported by the expanded Wheeler North Reef in any given year. Using this approach, fish standing stock and giant kelp area are measured each year and the annual totals for fish standing stock and giant kelp area for that year are added to the cumulative totals of previous years. Fulfillment of the mitigation requirement for fish standing stock occurs when the total accrued tons of fish is equal to the product of the annual design target of 28 tons and the 32 years of operation of SONGS Units 2 & 3 (= 896 tons of reef fish). Similarly, the mitigation requirement for area of giant kelp will be fulfilled when the total area of accrued medium-to-high density adult giant kelp equals the product of the annual design target of 150 acres and the 32 years that SONGS Units 2 and 3 were operating (= 4800 acres of giant kelp). The CCC determined that the implementation of this cumulative approach to assigning mitigation credit was to begin in 2019 upon the installation of the expanded Phase 3 remediation reef. The manner in which mitigation credit is assigned for the absolute performance standard pertaining to the availability of hard substrate was not changed and must be met in a given year for that year to receive mitigation credit.

#### Relative performance standards

The evaluation of each relative performance standard is based solely on a four-year running average calculated from data collected at Wheeler North Reef and the two reference reefs for that year and the previous three years. Only data collected from the Phase 1 modules and the Phase 2 primary polygons are used to evaluate whether Wheeler North Reef meets the relative performance standards. This is because: (1) the combination of the Phase 1 modules and the Phase 2 primary polygons fulfills SCE's permit requirement to construct a minimum of 150 acres of reef with an average of at least 42% cover of rock, (2) this configuration is sufficient for determining whether Wheeler North Reef is performing similarly to natural reefs in the region, and (3) the primary reason for constructing the Phase 3 reef was to increase the aggregate fish standing stock and giant kelp acreage of Wheeler North Reef. The one exception is the relative performance standard for undesirable and invasive species, which uses data collected from all three phases of the artificial reef because of the potential for these species to adversely affect the ecological functioning of all 373 acres of Wheeler North Reef.

An either / or criterion (i.e., using data from either a single year or a four-year running average) was deemed inappropriate in this case because the desired goal for the relative standards is not to achieve a specified value that is linked to estimated losses at the San Onofre kelp forest, but rather to evaluate whether the abundances and numbers of species of kelp forest biota at Wheeler North Reef are similar to those at the reference reefs. This is best accomplished using a short-term (four-year) running average that accounts for natural variation in time.

Natural kelp forests vary greatly in their species composition and abundance through time and across space. Moreover, species interact to affect the abundance and diversity of other species (e.g., a high cover of macroalgae is likely to inhibit the cover and diversity of sessile invertebrates). Consequently, it is likely that the reference reefs will not consistently meet all the relative performance standards in a given year. Therefore, to avoid requiring Wheeler North Reef to perform better than the reference reefs, Wheeler North Reef is required to meet at least as many of the relative standards as the lowest performing reference reef (which by definition is an acceptable measure of comparison) in a given year for that year to receive mitigation credit. The one exception to this rule is the relative performance standard for undesirable and invasive species, which *must be met* in a given year for that year to receive mitigation credit.

#### **4.2 Reference Sites**

Requiring resource values at Wheeler North Reef to be similar to those at natural reefs is based on the rationale that to be successful, Wheeler North Reef must provide similar types and amounts of resources that occur on natural reefs. Resources on natural reefs, however, vary tremendously in space and time. Differences in the physical characteristics of a reef (e.g., depth and topography) can cause plant and animal assemblages to differ greatly among reefs while seasonal and inter-annual differences in oceanographic conditions can cause the biological assemblages within reefs to fluctuate greatly over time. Ideally, the biological assemblages at a successful artificial reef should fluctuate in a manner similar to those at the natural reefs used for reference. One way to increase the odds of this occurring is to select reference reefs that are physically similar to Wheeler North Reef and located relatively close to it. The premise here is that nearby reefs with similar physical characteristics are more likely to support similar biota that fluctuate similarly over time. Thus, in addition to proximity, other criteria used to select the reference reefs included that they: (1) not be influenced by the operation of SONGS, (2) be located at a depth similar to Wheeler North Reef, (3) be primarily low relief, preferably consisting of cobble or boulders, and (4) have a history of supporting giant kelp adults at medium-to-high densities (i.e., > 4 plants per 100 m<sup>2</sup>). The criterion that the reference reefs have a history of supporting giant kelp is important because communities on reefs without giant kelp can differ dramatically from those with kelp. Based on these criteria, the reefs at San Mateo (located adjacent to the southern end of Wheeler North Reef) and Barn (located approximately 12 km south of San Mateo kelp bed) were chosen as reference reefs for evaluating the performance of Wheeler North Reef (Figure 4.2.1).



Figure 4.2.1. Map showing the locations of Wheeler North Artificial Reef and the two natural reefs San Mateo and Barn that are used as reference sites.

Temporal variability, especially of the sort associated with changes in oceanographic conditions, can be accounted for more easily by sampling Wheeler North Reef, San Mateo and Barn concurrently. Concurrent monitoring of the mitigation and reference reefs helps to ensure that regional changes in oceanographic conditions affecting Wheeler North Reef will be reflected similarly in the performance criteria at the reference reefs, since nearby San Mateo and Barn will be subjected to similar regional changes in oceanographic conditions.

### 4.3 Determination of similarity

A requirement of the SONGS permit is that as many of the response variables used to assess the relative performance standards of Wheeler North Reef be “similar” to those at nearby natural reference reefs. Evaluating whether the performance of Wheeler North Reef is similar to that at the San Mateo and Barn reference reefs requires that the mean (or in some cases the median) four-year running average for a given relative performance standard at Wheeler North Reef not be significantly lower than the mean (or median) four-year average of the lower performing of the two reference reefs. Thus, we use a one sample, one tailed approach for all comparisons. Statistical significance is determined using a method that utilizes both a formal probability value (i.e., p-value) and a proportional effect size of the four-year averages. This is generally done by means of a t-test except in the case of the

performance standards pertaining to fish reproductive rates and food chain support, which are based on data collected from varying numbers and sizes of different species of fish rather than data collected from 82 replicate transects. For these two standards a resampling procedure is used to calculate the p-value for determining statistical significance.

The performance at Wheeler North Reef with respect to a given relative performance standard is considered to be worse than the lower of the two reference reefs if the p-value for the comparison is  $\leq$  to the proportional effect size (i.e., the proportional difference between Wheeler North Reef and the lowest performing reference reef (see Reed et al. 2024 for details). The rationale for using the lower of the two reference reefs is that both reference reefs are considered to be acceptable measures of comparison for Wheeler North Reef. Hence, if Wheeler North Reef is performing at least as well as one of the reference reefs, then it should be judged successful. The scaling of the p-value ( $\alpha$ ) to the effect size recognizes sampling error when estimating mean values and balances the probability of a Type I error (falsely concluding that Wheeler North Reef is not similar to the reference reefs when it is) with the probability of a Type II error (falsely concluding that Wheeler North Reef is similar to the reference reefs when it is not).

The above procedure is also applied to San Mateo and Barn to evaluate whether they would have met the relative performance standards. This is done by treating San Mateo (or Barn) as the mitigation reef and using Wheeler North Reef and Barn (or San Mateo) as the two reference reefs. Wheeler North Reef is considered similar to the reference reefs if the number of relative standards met by Wheeler North Reef (not including the standard for undesirable and invasive species) is equal to or greater than the number of relative standards met by either San Mateo or Barn.

The above approach ensures that the assessment of similarity is consistent with the SONGS permit requirement that the performance standards be met without the unreasonable requirement that Wheeler North Reef outperform San Mateo and Barn for every performance standard. Importantly, this approach (1) recognizes that species of different groups of organisms naturally interact and that these interactions can affect whether a performance standard is met, and (2) deals realistically with the inherent variability of nature in a manner that best serves the interests of the public and SCE.

There are provisions in Conditions C and D of the SONGS' coastal development permit to reduce the level of full monitoring to annual site inspections once Wheeler North Reef has demonstrated that it has successfully met the performance standards for three consecutive years upon completion of ten years of full monitoring. The purpose of annual site inspections is to "serve to identify any noncompliance with the performance standards", but with substantially reduced sampling effort and associated costs. Achieving the statistical criteria for determining similarity described above is unlikely in a scenario in which sampling effort is substantially reduced. Therefore, similarity for annual site inspections is determined without inferential statistics and instead is based on a simple among reef comparison of the mean values (rounded to three significant figures) of a performance standard. Monitoring of Wheeler North Reef, San Mateo and Barn has

been reduced to annual site inspections since 2024, after Wheeler North Reef had met the performance standards for three successive years.

Because success in the SONGS permit is defined in terms of meeting the performance standards in successive years, annual site inspections are only applicable to performance standards with a mitigation requirement that is evaluated on an annual basis. This includes all the performance standards except those pertaining to the area of giant kelp and the standing stock of fish, which have mitigation requirements that are evaluated on a cumulative basis.

#### 4.4 General Sampling Design

151 sampling locations, each defined by a fixed 50 m x 20 m area, were established at Wheeler North Reef; 12 transects are in Phase 1, 70 in the primary polygons of Phase 2, 10 in the contingency polygons of Phase 2, and 59 in Phase 3 (Figure 4.4.1). An additional 82 transects were established at both San Mateo and Barn in areas with a history of frequently supporting giant kelp.

Transects on each reef are arranged in pairs with the two transects in each pair spaced 25 m apart. The exceptions to this are transects located on Phase 1 and



Figure 4.4.1. Schematic map of Wheeler North Reef showing the location of the transects (shown as black lines) that are monitored to assess performance standards.

Phase 3 reefs, which are not paired. Pairing of transects is done to increase sampling efficiency. Maps of kelp persistence and hard substrate were used to strategically distribute the 41 transect pairs at San Mateo and Barn across areas of reef known to support giant kelp. Transects at Wheeler North Reef were allocated to the polygons and the existing experimental reef modules in proportion to their area.

Sampling of Wheeler North Reef, San Mateo and Barn is done concurrently from late spring to early autumn (approximately June through October, depending on diving conditions) on an annual basis. Each sampling area is identified by unique differential GPS coordinates that marks the “zero end” of a 50 m transect and a compass heading along which divers lay out a 50 m measuring tape. A 20 m wide swath centered along the 50 m transect defines the sample area at each sampling location. Different sized sampling units (e.g., 0.5 m<sup>2</sup>, 1 m<sup>2</sup>, 20 m<sup>2</sup>, and 150 m<sup>2</sup>) within this sampling area are used to evaluate different performance standards (Figure 4.4.2).

The methods for evaluating performance standards sampled in transects during annual site inspection are the same as those used in full monitoring, but with a reduced sample size (Table 4.1.1). Sampling of the benthic community of algae and invertebrates was added to 15 of the 59 transects on Phase 3 of Wheeler North Reef beginning in 2024. Details of the sampling methods and maps of the sampling locations for full monitoring and annual site inspections are provided in the monitoring plan for the SONGS reef mitigation (Reed et al. 2024).

Type of standard	Performance variable	Full monitoring	Annual site inspections	% reduction
Relative	1. Algal % cover	82 transects, 3 reefs	15 transects, 3 reefs	82
	2. Algal species richness	82 transects, 3 reefs	15 transects, 3 reefs	82
	3. Sessile invertebrate % cover	82 transects, 3 reefs	15 transects, 3 reefs	82
	4. Mobile invertebrate density	82 transects, 3 reefs	15 transects, 3 reefs	82
	5. Invertebrate species richness	82 transects, 3 reefs	15 transects, 3 reefs	82
	6. Resident fish density	82 transects, 3 reefs	15 transects, 3 reefs	82
	7. Young-of-year fish density	82 transects, 3 reefs	15 transects, 3 reefs	82
	8. Fish species richness	82 transects, 3 reefs	15 transects, 3 reefs	82
	9. Fish reproductive rates	collections & lab work of 4 species (n=100 fish/species/reef)	collections & reduced lab work of 2 species (n=25-40 fish/species/reef)	> 80
	10. Fish production	collections & lab work of 5 species (n=100 fish/species/reef)	15 transects, 3 reefs using fish biomass as proxy	100
	11. Fish food chain support	collections & lab work of 2 species (n=100 fish/species/reef)	collections & lab work of 2 species n=25 fish/species/reef)	75
	12. Undesirable/invasive species	151 transects WNR, 82 transects San Mateo and Barn	111 transects WNR, 15 transects San Mateo and Barn reefs	55
Absolute annual	Area of hard substrate	82 transects, WNR only	47 transects, WNR only	43
Absolute cumulative	Giant kelp area & fish standing stock	151 transects, WNR only	111 transects, WNR only	26

Table 4.1.1. Comparison of the sampling effort between full monitoring and annual site inspections for the reef performance standards.

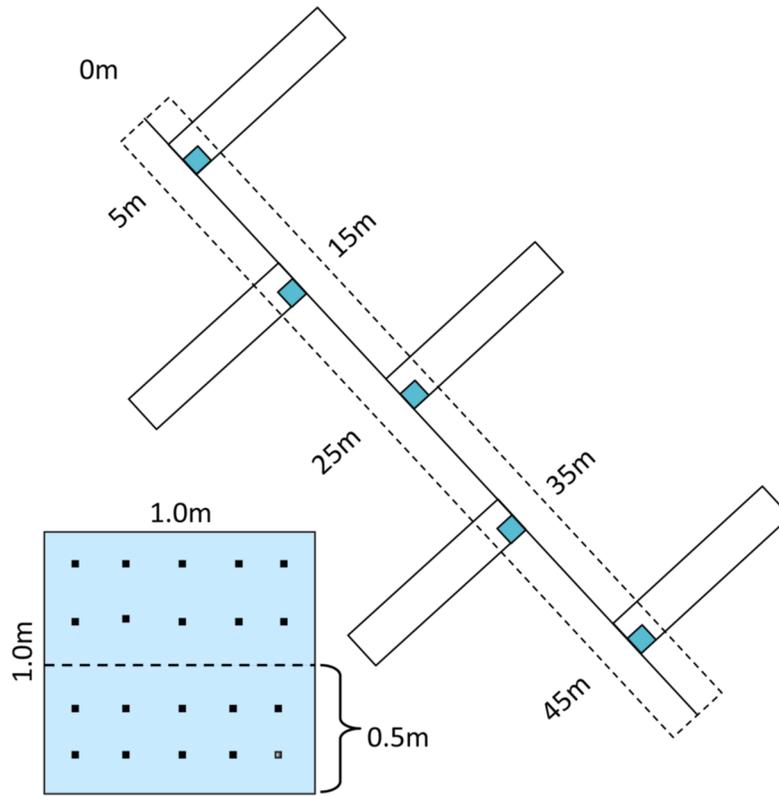


Figure 4.4.2. Schematic diagram of a sampling station. Fish are sampled in 50 m x 3 m band transects that extend 1.5m off the bottom (outlined with a dotted line). Adult giant kelp > 1 m tall, large solitary understory algae, and large mobile invertebrates are counted in the five 10 m x 2 m rectangular quadrats positioned perpendicular to the main transect at 10 m intervals (outlined with solid lines). The percent cover of invertebrates, algae and bottom substrate is estimated using a grid of 20 points in the five 1 m x 1 m quadrats (shown in blue). Smaller mobile invertebrates and small cryptic fish are counted either in 1 m x 1 m or 1 m x 0.5 m quadrats depending on their size and abundance.

## 5.0 Performance Assessment of Wheeler North Reef

Full monitoring of Wheeler North Reef and the two reference reefs began in 2009 and the use of four-year running averages to evaluate the performance standards began in 2012. In 2024 the level of monitoring was reduced to “annual site inspections” and similarity of the Wheeler North Reef to the two reference reefs was based on comparisons of mean values of the performance standards without inferential statistics.

Listed below are the absolute and relative performance standards that are used to evaluate whether Wheeler North Reef meets the goals and objectives of the reef mitigation set forth in Condition C of the SONGS coastal development permit. We describe the methodological approach used to monitor and evaluate each performance standard and present a determination of the performance of Wheeler North Reef for each standard based on the results obtained from these sampling methods. More detailed methods can be found in the monitoring plan for the SONGS reef mitigation project (Reed et al. 2024).

### 5.1 Absolute Performance Standards

*1. AT LEAST 90 PERCENT OF THE EXPOSED HARD SUBSTRATE MUST REMAIN AVAILABLE FOR ATTACHMENT BY REEF BIOTA*

Approach: The percent cover of hard substrate is measured using a uniform grid of 20 points placed within the five 1 m<sup>2</sup> quadrats uniformly positioned along 50 m long transects located on Phases 1 and 2 of Wheeler North Reef (82 transects during full monitoring and 47 transects during annual site inspections; Figure 4.4.2). The observer sights along an imaginary line through each of the points that is perpendicular to the bottom and records the substrate type intercepted by the line extending below the point. Substrates are classified as natural or artificial and categorized as bedrock (continuous rocky reef), mudstone, large boulder (largest diameter ≥ 100 cm), medium boulder (≥ 50 cm and < 100 cm), small boulder (≥ 26 cm and < 50 cm), cobble (≥ 7 cm and ≤ 25 cm), pebble (≥ 2 mm and < 7 cm), sand (< 2 mm), and shell hash. Only bedrock, boulders and cobbles are considered as exposed hard substrate when assessing this performance standard. Hard substrates covered with a thin layer of silt or sand are noted as being silted, but are nonetheless considered available for the attachment of reef biota for the purpose of evaluating this performance standard.

The total area of the exposed hard substrate ( $S$ ) that is available for the attachment of reef biota during any given year  $t$  is determined as:

$$S_t = A_t P_t$$

where  $A_t$  is the total footprint area of Wheeler North Reef in year  $t$ , and  $P_t$  is the proportion of Wheeler North Reef covered by hard substrate in year  $t$ .  $A_t$  is determined from backscatter in the most recent multibeam sonar survey using a horizontal grid size of 0.25 meters with an isobath interval of 0.5 meters as described in Elwany et al. (2014).  $P_t$  is determined from data collected in diver surveys. The proportion of area covered by hard substrate in the as-built condition in

2008 immediately after construction ( $S_0 = A_0P_0$ ) that is remaining at time  $t$  can be expressed as  $S_t/S_0$ . The value of  $S_t/S_0$  based on the current year or a four-year running average of the current year and the preceding three years (whichever is larger) must be  $\geq 0.9$  for Wheeler North Reef to successfully meet this standard.

The reef footprint area used to evaluate this standard includes the Phase 1 modules and the 16 Phase 2 primary polygons, which collectively met the construction criteria of  $\geq 42\%$  cover of rock. The area of the Phase 2 primary polygons in the as-built survey done immediately after construction in 2008 was 130 acres (Elwany et al. 2009). Because the footprint area of the Phase 1 modules was not measured during the 2008 as-built survey, their footprint area measured in 2009 (25 acres) is used as their footprint area in 2008. Hence, the initial footprint area of Wheeler North Reef that is used to evaluate this performance standard ( $A_0$ ) is 155 acres. The mean percent cover of rock of this initial footprint area ( $P_0$ ) was 45.6%.

The footprint area of the artificial reef is not expected to change much from year-to-year. Therefore, multi-beam sonar surveys are done only once every five years and the value for reef footprint area is assumed to remain constant between sonar surveys. Multibeam sonar surveys of Wheeler North Reef were completed in 2009, 2014, 2020, and 2025. Unlike footprint area, the percent of the bottom covered by rock is measured every year by divers.

Results: There was a slight decrease in the combined footprint areas of Phase 1 and Phase 2 in 2009, the year following construction of Phase 2 (Figure 5.1.1a), which was not unexpected as newly deposited rocks tend to settle into the soft sandy bottom. Since then, the footprint area of the Phase 1 modules and the Phase 2 primary polygons of Wheeler North Reef has remained relatively constant ranging from 152.1 to 154.4 acres. The percent cover of rock within the footprint areas of the Phase 1 modules and the Phase 2 primary polygons has fluctuated slightly, ranging from a low of 42% in 2011 to a high of 49% in 2017 (Figure 5.1.1b).

The initial amount of hard substrate at Wheeler North Reef used to judge this performance standard was 70.3 acres in 2008 (Figure 5.1.1c). The 2-acre decrease in footprint area in 2009 coupled with a decline in the percent cover of hard substrate through 2011 (Figure 5.1.1b) resulted in nearly a 10% decrease in the total area of hard substrate on Wheeler North Reef by 2011 (Figure 5.1.1c). The total area of hard substrate returned to near as-built levels by 2013 following an increase in rock coverage and has remained near or slightly above this level through 2025 when it measured 70.8 acres (Figure 5.1.1c). The area of hard substrate in 2025 and the 4-y average from 2022-2025 were nearly identical to that in 2008 following the completion of Phase 2 (Figure 5.1.1d). Thus, Wheeler North Reef met the performance standard for reef area in 2025 regardless of whether the evaluation was based on data from 2025 alone or the four-year running average.

Although the 2025 sonar survey showed little change in footprint area of Phases 1 and 2 since their construction, it revealed a reduction of 8 acres in the footprint area of Phase 3, which reduced the total footprint area of Wheeler North Reef in 2025 from 373 acres to 366 acres. This reduction consisted of a loss of  $\sim 2$  acres of polygon 19 located inshore of the southern-most portion of Phases 1 and 2, and loss

of the remaining 6 acres distributed along the offshore edges of several polygons in the northern portion of Phase 3 (Elwany et al. 2025). These reductions in footprint area were verified with diver observations. The causes for the disappearance of rock (e.g. sinkage of rock into deep sand, accretion from sand deposition) on the Phase 3 modules are unknown at this time.

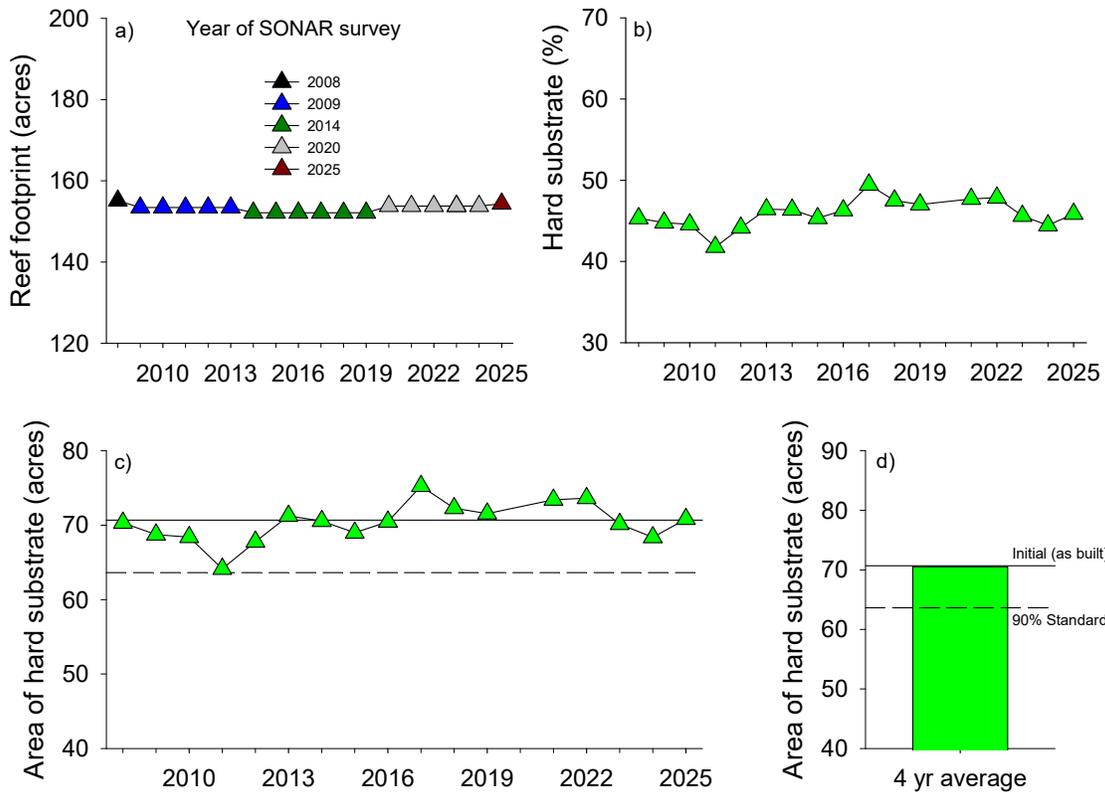


Figure 5.1.1. Variables used to calculate exposed hard substrate. (a) Reef footprint area, (b) Percent cover of hard substrate, (c) Area of exposed hard substrate and (d) the 4-y average (2022 – 2025) of the area of exposed hard substrate. 2020 was excluded from this average due to reduced monitoring imposed by COVID-19

**2. THE ARTIFICIAL REEF(S) SHALL SUSTAIN 150 ACRES OF MEDIUM-TO-HIGH DENSITY GIANT KELP.**

Approach: The abundance of giant kelp is monitored by divers once per year in the summer in five replicate 10 m x 2 m plots arranged at 10 m intervals along 50 m transects at Wheeler North Reef (Figure 4.4.2). The number of transects surveyed for giant kelp on Phases 1, 2 and 3 during full monitoring is 12, 80 and 59; the number of transects on Phase 2 is reduced to 40 transects during annual site inspections (58 transects were sampled for Phase 3 in 2025 because a transect in polygon 19 was outside the footprint area of Wheeler North Reef as determined by the sonar survey).

For the purpose of this performance standard, medium-to-high density giant kelp is defined as >4 adult plants per 100 m<sup>2</sup> of ocean bottom and adult giant kelp plants are defined as having eight or more fronds (these definitions are the same as those

used to assess the impacts of SONGS on giant kelp). The summed total of adult plants in the five 10 m x 2 m quadrats provides an estimate of the number of adult plants per 100 m<sup>2</sup> at each transect. The proportion of transects with a density >4 adult plants per 100 m<sup>2</sup> is used as an estimate of the proportional area of the artificial reef occupied by medium-to-high density giant kelp.

The total area  $A_k$  of Wheeler North Reef occupied by medium-to-high density giant kelp in a given year is determined as:

$$A_k = \sum_{i=1}^n \left( \frac{N_{ki}}{N_{ri}} \right) * A_i$$

where  $n$  = total number of polygons at Wheeler North Reef (Phases 1+2+3),  $A_i$  is the area of a polygon based on the most recent sonar survey,  $N_{ki}$  = number of transects in that polygon with >4 plants per 100 m<sup>2</sup>, and  $N_{ri}$  is the total number of transects sampled in that polygon. All 56 Phase 1 modules are considered to be a single polygon for the purpose of this calculation. We monitor 12 of the 56 modules on Phase 1 for giant kelp and extrapolate out to the entire area of Phase 1.

Unlike the absolute performance standard for hard substrate, the data used to evaluate the absolute performance standard for giant kelp (and fish standing stock, see below) are collected over the entire Wheeler North Reef (Phases 1, 2, and 3). The reason for this is that the requirement for sustaining 150 acres of giant kelp (and a fish standing stock of 28 tons) is not tied to a specific coverage of hard substrate.

The value of  $A_k$  is calculated each year of the monitoring period and summed to that measured in previous years beginning in 2019. The mitigation requirement for giant kelp area will have been met when the total acres of giant kelp accrued by Wheeler North Reef equals the product of the targeted annual value (i.e., 150 acres) and the total years of operation of SONGS Units 2 & 3 (= 32 years), which amounts to 4800 acres of medium-high density adult giant kelp.

**Results:** The area of medium-to-high density adult kelp on Wheeler North Reef in 2025 was estimated to be 32 acres (Figure 5.1.2a), substantially less than the design target of 150 acres established by the CCC. Since 2019, Wheeler North Reef has accumulated a total of 308 of the 4800 acres of medium-to-high density giant kelp required for this performance standard (Figure 5.1.2b). Phase 3 has contributed the majority of medium-to-high density adult kelp observed at Wheeler North Reef since 2022 and 100% of it since 2023. (Figure 5.1.3). The vast majority of medium-to-high density adult kelp observed during this time has been in the northern portion of Phase 3.

Monitoring data show that nearly every acre of the 175-acre Phase 1 and 2 Wheeler North Reef supported medium-to-high density adult giant kelp from 2010 – 2015 (Figure 5.1.3). However, since 2016, the area of adult kelp on Wheeler North Reef has remained below 150 acres and fluctuated erratically, reaching its lowest level of 4 acres in 2020, the year that Phase 3 construction was completed.

Similar declines and erratic fluctuations in adult giant kelp density have been observed at San Mateo and Barn since 2016 (Figure 5.1.4). In fact, no adult giant

kelp has been observed at San Mateo since 2022. These observations suggest that the low giant kelp acreage observed at Wheeler North Reef since 2016 was due to unfavorable conditions for giant kelp growth and recruitment throughout the region rather than unsuitable conditions specific to Wheeler North Reef.

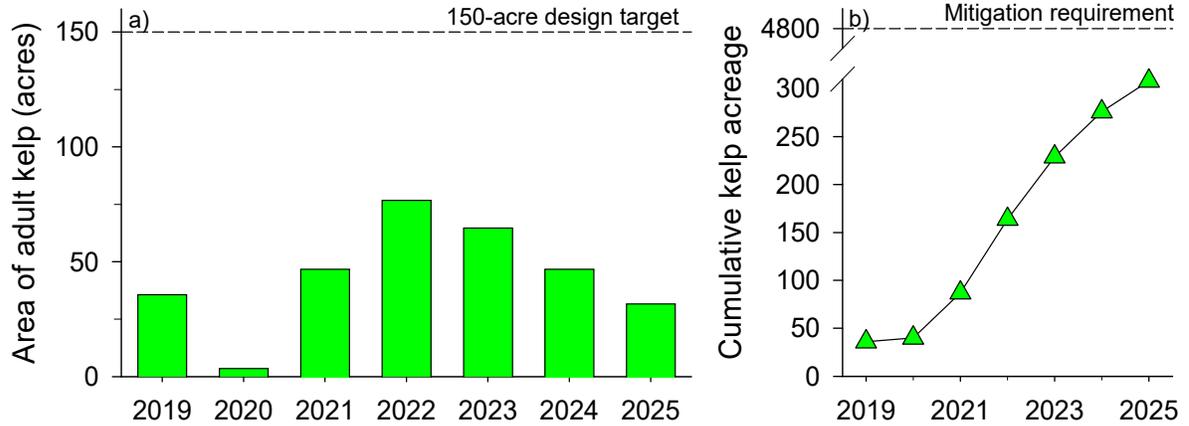


Figure 5.1.2. (a) The number of acres of medium-to-high density adult giant kelp at Wheeler North Reef in 2019 – 2025. (b) Cumulative acres of medium-to-high density adult giant kelp at Wheeler North Reef 2019 – 2025.

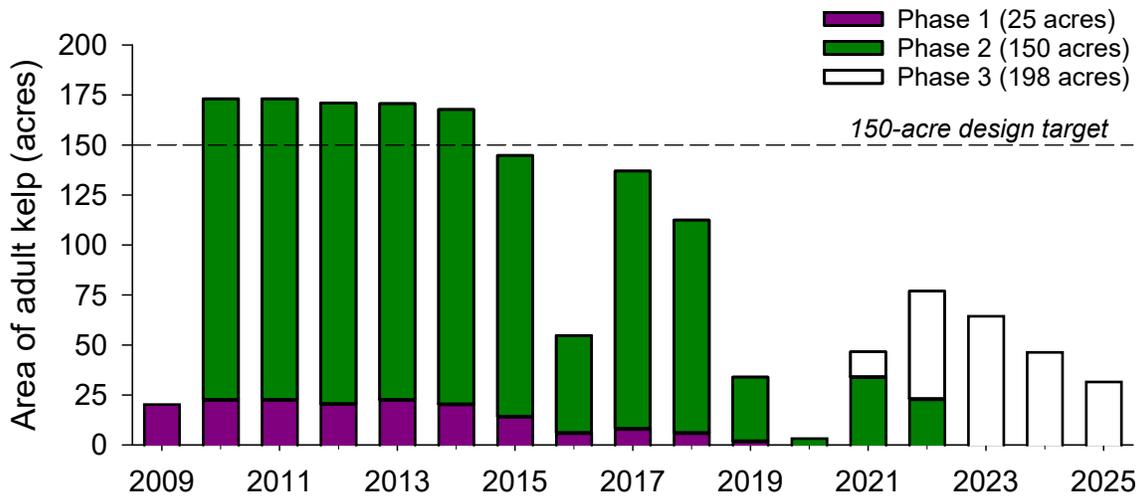


Figure 5.1.3. The number of acres of medium-to-high density adult giant kelp for Phase 1 modules, Phase 2 and Phase 3 polygons at Wheeler North Reef in 2019 – 2025. \*The footprint area of Phase 3 declined to 190 acres in 2025.

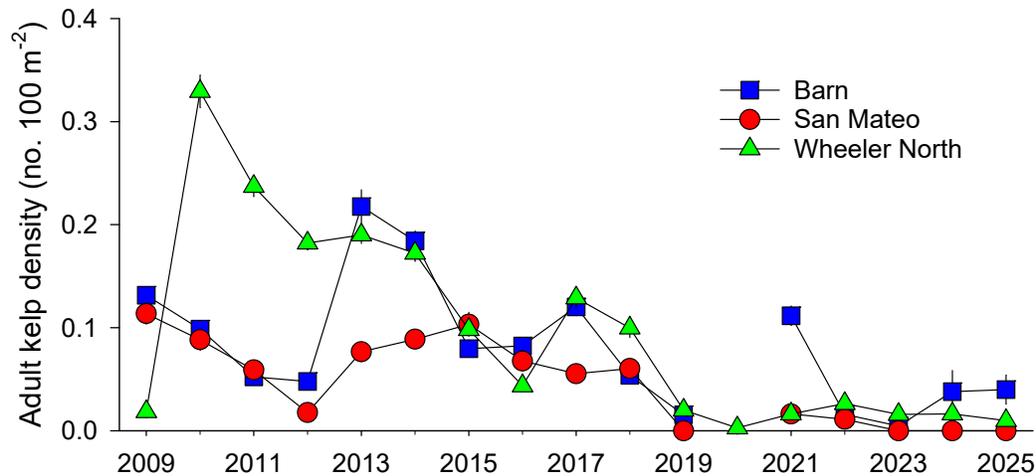


Figure 5.1.4. Mean density of adult giant kelp (*Macrocystis pyrifera*) at Wheeler North Reef, San Mateo and Barn from 2009 – 2025. 2020 data for San Mateo and Barn were excluded due to reduced monitoring imposed by COVID-19 restrictions. Data from Phase 3 are included in values for Wheeler North Reef beginning in 2020. Values for 2024 – 2025 are based on reduced sampling at all three reefs.

3. THE STANDING STOCK OF FISH AT THE MITIGATION REEF SHALL BE AT LEAST 28 TONS.

**Approach:** The standing stock of fish at Wheeler North Reef is estimated using data on the density of bottom-dwelling fish, individual body lengths, and the relationships between fish length and fish mass. The sampling methods and calculations for determining fish standing stock described below are the same as those used by the Marine Review Committee (MRC, 1989) when they determined that SONGS' operations caused a 28-ton reduction in the standing stock of bottom-dwelling kelp bed fish.

Data on fish density and length are recorded on the bottom along 50 m transects at Wheeler North Reef in summer to early autumn of each year. The number of transects surveyed for fish on Phases 1, 2 and 3 during full monitoring is 12, 80 and 59; the number of transects on Phase 2 is reduced to 40 transects during annual site inspections (58 transects were sampled for Phase 3 in 2025 because a transect in polygon 19 was outside the footprint area of Wheeler North Reef as determined by the sonar survey).

Divers count, identify to species, and estimate the total length (to the nearest cm) of each fish observed in a 3 m wide x 1.5 m high x 50 m long volume centered above a measuring tape placed along the bottom and extending the length of each transect (Figure 4.4.2). For aggregating species such as the Blacksmith (*Chromis punctipinnis*) and Salema (*Xenistius californiensis*), the number and mean length of individuals in a group are estimated. Smaller fish that shelter on or near the bottom are recorded in a 2 m wide swath centered along the transect as divers return after completing the sampling of larger more visible fish. Small cryptic species (e.g., cottids, gobies, blennies) are recorded in the five 1 m<sup>2</sup> quadrats used to sample invertebrates and algae. These data are occasionally augmented with data from

additional surveys of fish lengths when more information is needed to accurately characterize population size structure.

Length data are used to assign each fish to one of three life stages (juvenile, subadult, and adult) based on the literature (e.g., Love 2011) or best professional judgment by reef fish experts (e.g., Milton Love UCSB and Mark Steele CSUN). The biomass of each species within a transect is calculated by multiplying the number of fish in each life-stage by the average weight of the life stage and summing over all life stages. Fish weights are estimated from fish lengths using species-specific length-weight regressions obtained either from the literature (Gnose, 1967; Quast, 1968a, 1968b; Mahan, 1985; Wildermuth, 1983; Stepien, 1986; DeMartini et al., 1994, Love, 2011) or from data collected as part of this project.

The biomass densities of all species encountered on a transect are summed to produce an estimate of the total biomass of fish within each transect in units of g wet weight  $m^{-2}$  of ocean bottom. The biomass density of all transects in a polygon are then averaged, converted to US tons per acre, and multiplied by the total area of the polygon (in acres) to obtain the standing stock of fish in that polygon. The standing stock of fish in all polygons (Phases 1, 2 and 3) is summed to obtain an estimate of the total standing stock of bottom-dwelling fish at Wheeler North Reef. For the purpose of this calculation, all 56 Phase 1 modules are considered to be a single polygon and estimates of standing stock are based on data from 12 of the modules.

The standing stock of bottom-dwelling fish at Wheeler North Reef calculated for a given year is added to the cumulative total of previous years. The mitigation requirement for fish standing stock will have been met when the total tons of bottom-dwelling fish accrued by Wheeler North Reef equals the product of the targeted annual value (i.e., 28 tons) and the total years of operation of SONGS Units 2 & 3 (= 32 years), which amounts to 896 tons of fish.

**Results:** The standing stock of fish on Wheeler North Reef in 2025 was estimated to be 33 tons (Figure 5.1.5a). In 2025, Wheeler North Reef had accumulated a total of 193 of the 896 tons of reef fish required for this performance standard (Figure 5.1.5b).

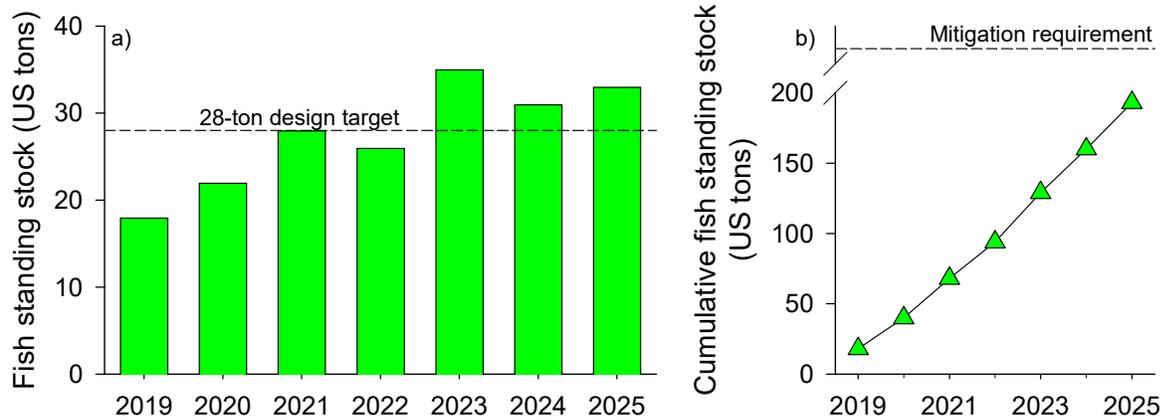


Figure 5.1.5. (a) Estimated standing stock of reef-associated fish at Wheeler North in 2019 – 2025 and (b) cumulative reef fish biomass at Wheeler North Reef in 2019 – 2025.

Wheeler North Reef first met the 28-ton design target for reef fish standing stock in 2021, the year after Phase 3 was constructed (Figure 5.1.6). Approximately 10 of the 28 tons of standing stock reported for 2021 was attributed to Giant Sea Bass. In 2025, Wheeler North Reef supported 33 tons of reef fish with 0 tons from Giant Sea Bass. Six of the 33 tons were at Phase 1, 16 tons at Phase 2 and 11 tons at Phase 3. It is noteworthy that the standing stock of fish on the Phase 1 and 2 reefs did not decline with the addition of the Phase 3 reef in 2020, despite the low abundance of giant kelp on these reefs since then. This indicates that the biomass of fish in the newly constructed Phase 3 expansion reef was additive and there is no evidence that it is having an adverse effect on fish standing stocks of the Phase 1 and Phase 2 reefs. Notably, the standing stock of fish at Wheeler North Reef has been consistently within the range estimated for the two reference reefs when scaled to the area of the Wheeler North Reef (Figure 5.1.7).

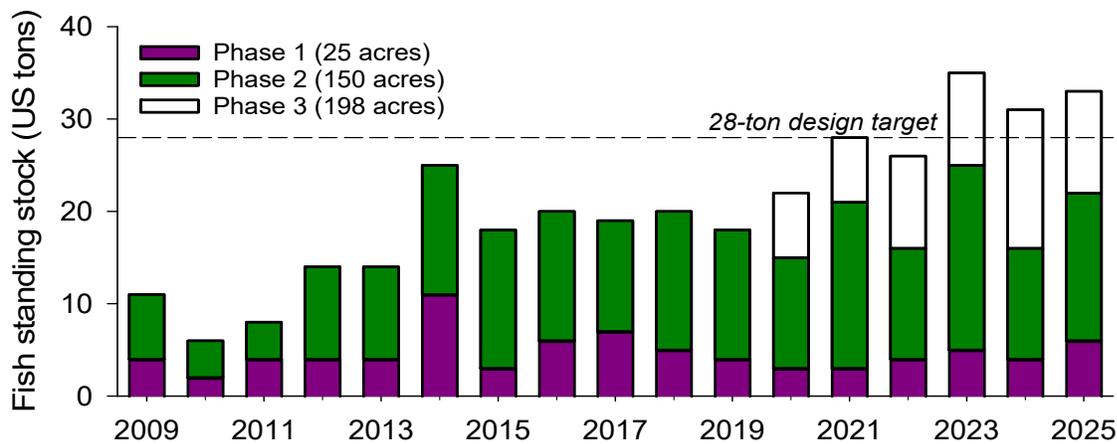


Figure 5.1.6. Estimated standing stock of reef-associated fish for Phase 1 modules, Phase 2 and Phase 3 polygons at Wheeler North Reef in 2019 – 2025. \*The footprint area of Phase 3 declined to 190 acres in 2025.

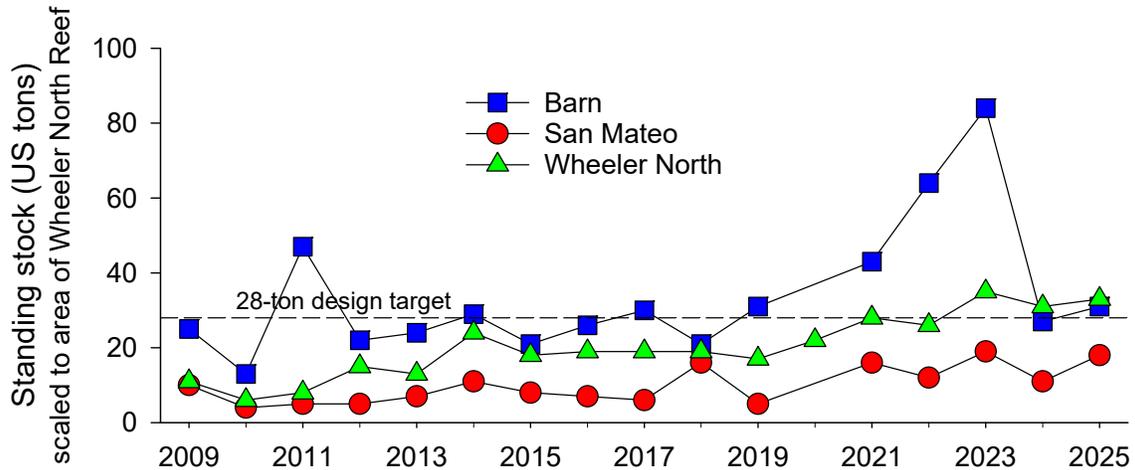


Figure 5.1.7. Mean standing stock of kelp bed fish within 1.5 m of the bottom at Wheeler North Reef, San Mateo and Barn from 2009 – 2025. Values for San Mateo and Barn are scaled to the area of Wheeler North Reef, which changed from 175 acres during 2009 – 2019 to 373 acres from 2020 – 2024 to 366 in 2025. 2020 data for San Mateo and Barn were excluded due to reduced monitoring imposed by COVID-19 restrictions. Data from Phase 3 are included in values for Wheeler North Reef beginning in 2020. Values for 2024 – 2025 are based on reduced sampling at all three reefs.

## 5.2 Relative Performance Standards

### 1. *THE BENTHIC COMMUNITY OF MACROALGAE SHALL HAVE A COVERAGE SIMILAR TO NATURAL REEFS WITHIN THE REGION.*

**Approach:** The cover of reef associated macroalgae and sessile invertebrates provide a measure of the biomass of the benthic community attached to the hard substrate of a reef. Because many species of macroalgae are difficult to count as individuals, their abundance is estimated as percent cover of the bottom. The percent cover of benthic macroalgae at Wheeler North Reef, San Mateo, and Barn is measured annually in the summer in five replicate 1 m<sup>2</sup> quadrats located at 10 m intervals along the 50 m transects (Figure 4.4.2). Percent cover is estimated using a uniform point contact method that consists of noting the identity and relative vertical position of all organisms intersecting 20 uniformly placed points within each quadrat. Using this method, the total percent cover of all species combined can exceed 100%; however, the maximum percent cover possible for any single species cannot exceed 100%. Because the abundance of macroalgae is expressed as percent cover of the bottom (rather than percent cover of the rock on the bottom), the ability of Wheeler North Reef to meet this standard is not only influenced by biological processes that regulate species abundance (i.e., recruitment, growth, mortality), but also by the percent of the bottom covered by rock. For Wheeler North Reef to meet this performance standard, the four-year running average of the percent cover of macroalgae calculated from the current year and the three preceding years must not be less than that of the reference reef with the lower four-year running average of macroalgal cover.

**Results:** The percent cover of macroalgae at Wheeler North Reef was 27% in 2009 and decreased to 9% in 2011 after the surface canopy of giant kelp became fully established (Figure 5.2.1a). Understory algal cover steadily increased to 48% in 2016 coincident with the decline in the abundance of giant kelp and remained at about 40% until 2023 and 2024 when it declined to 28-29%, before increasing to 36% in 2025. Importantly, the percent cover of macroalgae at Wheeler North Reef has been consistently lower than that at the two reference reefs since 2010, with the biggest discrepancy occurring since 2019 when its cover has been about half that of San Mateo and Barn. As a result, the four-year running average cover of macroalgae at Wheeler North Reef in 2025 was lower than that of both reference reefs (Figure 5.2.1b). Consequently, the Wheeler North Reef did not meet this performance standard in 2025.

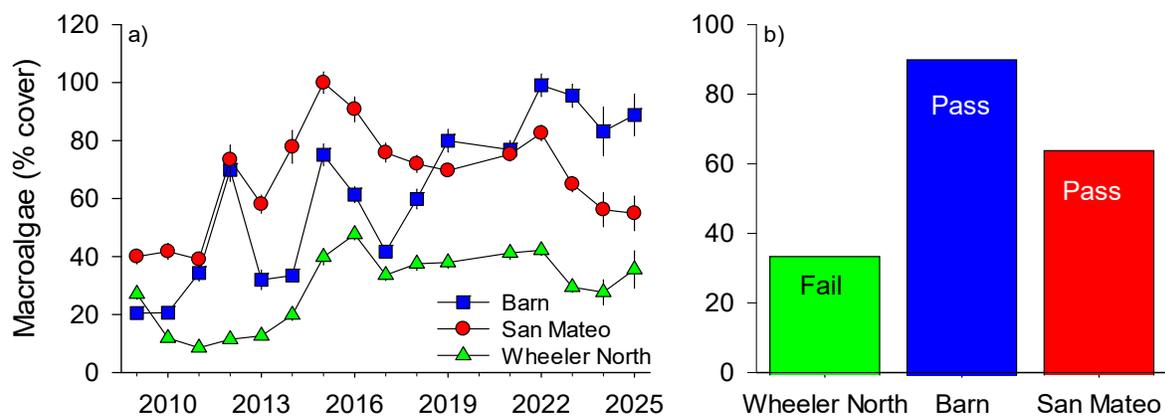


Figure 5.2.1. Percent cover of macroalgae at Wheeler North Reef, San Mateo and Barn. (a) Annual mean ( $\pm 1$  standard error) values for 2009 – 2025, and (b) 4-y average values for 2022 – 2025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

**2. THE NUMBER OF SPECIES OF BENTHIC MACROALGAE SHALL BE SIMILAR TO NATURAL REEFS WITHIN THE REGION.**

**Approach:** Data on the percent cover of macroalgae in the 1 m<sup>2</sup> quadrats are combined with data on the density of larger algal species sampled in the 20 m<sup>2</sup> quadrats to determine the total number of species of macroalgae per transect at Wheeler North Reef, San Mateo, and Barn. These values are averaged over the transects on each reef to provide an estimate of average species richness of macroalgae per transect for each reef. For Wheeler North Reef to meet this performance standard, its four-year running average of number of species of macroalgae per transect must not be less than that of the reference reef with the lower four-year running average.

**Results:** Temporal fluctuations in the average number of macroalgal species per transect at Wheeler North Reef, Barn, and San Mateo largely mirrored those of macroalgal percent cover in that species richness at Wheeler North Reef has been consistently (and often substantially) lower than that at the two reference reefs since 2010 (Figure 5.2.2a vs. Figure 5.2.1a). Consequently, Wheeler North Reef failed to

meet this performance standard in 2025 because its four-year running average of the number of macroalgal species per transect was lower than that of both reference reefs (Figure 5.2.2b). It is worth noting, that the difference in algal species richness between Wheeler North Reef and San Mateo (the lowest performing reference reef) has been relatively small since 2021.

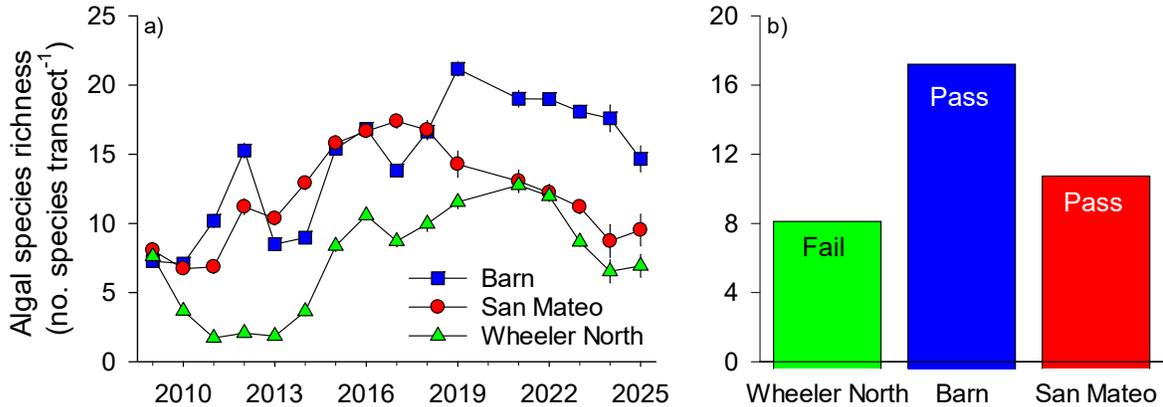


Figure 5.2.2. Species richness of understory macroalgae per 100 m<sup>2</sup> transect at Wheeler North Reef, San Mateo and Barn. (a) Annual mean ( $\pm 1$  standard error) values for 2009 – 2025, and (b) 4-y average values for 2022 – 2025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

**3. THE BENTHIC COMMUNITY OF SESSILE INVERTEBRATES SHALL HAVE A COVERAGE SIMILAR TO NATURAL REEFS WITHIN THE REGION.**

**Approach:** The percent cover of sessile invertebrates is measured at the same time and in the same way as the percent cover of benthic macroalgae. For Wheeler North Reef to meet this performance standard, the four-year running average of the percent cover of sessile invertebrates calculated from the current year and the three preceding years must not be less than that of the reference reef with the lower four-year running average of sessile invertebrate cover.

**Results:** As described in section 7.0, sessile invertebrates and algae compete for space on the bottom and as a result, increases in the percent cover of one group are often accompanied by decreases in the percent cover of the other (Figure 7.3.8). This is the pattern that we have seen at Wheeler North Reef, Barn and San Mateo. The percent cover of sessile invertebrates at Wheeler North Reef in 2009 was about half that at the reference reefs, but increased nearly three-fold by 2012 as the percent cover of macroalgae declined (Figure 5.2.3a vs. Figure 5.2.2a). By contrast, the percent cover of sessile invertebrates hovered around 40% at Barn and San Mateo from 2009 to 2011 before decreasing sharply in 2012 (Figure 5.2.3a); the exact opposite of the pattern observed for the percent cover of macroalgae at these sites (Figure 5.2.2a). The cover of sessile invertebrates at all three reefs was relatively similar and constant from 2017 to 2023 with the exception of a brief decline at Barn in 2019 (Figure 5.2.3a). Sessile invertebrate cover increased in 2024 and 2025 with Barn showing greater increases than Wheeler North Reef and San Mateo.

The four-year running average of sessile invertebrate cover at Wheeler North Reef and Barn in 2025 was higher than that at San Mateo (Figure 5.2.3b). As a result, Wheeler North Reef met this performance standard in 2025.

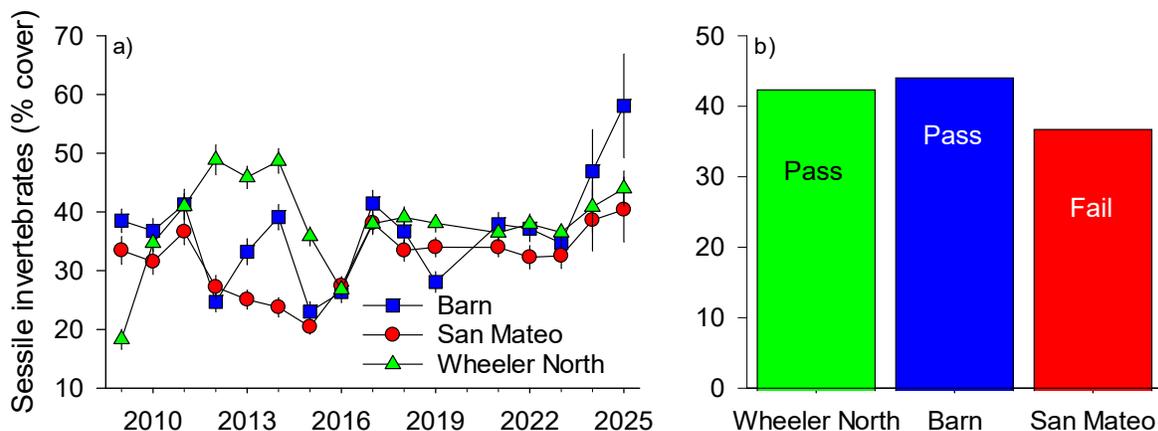


Figure 5.2.3. Percent cover of sessile invertebrates at Wheeler North Reef, San Mateo and Barn. (a) Annual mean ( $\pm 1$  standard error) values for 2009 – 2025, and (b) 4-y average values for 2022 – 2025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

#### 4. THE BENTHIC COMMUNITY OF MOBILE MACROINVERTEBRATES SHALL HAVE A DENSITY SIMILAR TO NATURAL REEFS WITHIN THE REGION.

**Approach:** The number of large solitary mobile invertebrates (e.g., sea stars, sea urchins, and lobsters) are counted in the five 10 m x 2 m plots centered along each 50 m transect. Depending on their size and abundance, smaller solitary mobile invertebrates (e.g., brittle stars, nudibranchs, sea cucumbers) are counted in either a 1 m<sup>2</sup> or a 0.5 m<sup>2</sup> area created by dividing the 1 m<sup>2</sup> quadrats in half using an elastic cord stretched across the frame of the quadrat. Densities are expressed as number per m<sup>2</sup> of ocean bottom. For Wheeler North Reef to meet this performance standard, the four-year running average of the density of benthic mobile invertebrates calculated from the current year and the three preceding years must not be less than that of the reference reef with the lower four-year running average of mobile invertebrate density.

**Results:** Much like the percent cover of sessile invertebrates, the density of mobile invertebrates at Wheeler North Reef was initially low ( $< 10$  m<sup>-2</sup>) in 2009 and increased dramatically ( $> 100$  individuals m<sup>-2</sup>) by 2012 (Figure 5.2.4a). Mobile invertebrate density steadily declined at Wheeler North Reef from 2012 – 2016, largely due to a decrease in the density of brittle stars, which associate with the holdfasts of giant kelp. Since 2016, temporal trends in the density of mobile invertebrates at San Mateo and Barn have largely mirrored those at Wheeler North Reef with Barn usually having lower densities of mobile invertebrates than Wheeler North Reef and San Mateo (Figure 5.2.4a). Densities of mobile invertebrates have been relatively low at all three reefs in recent years. The four-year running average of mobile invertebrate density at Wheeler North Reef in 2025 was greater than Barn

and less than San Mateo (Figure 5.2.4b). As a result, Wheeler North Reef met this performance standard in 2025.

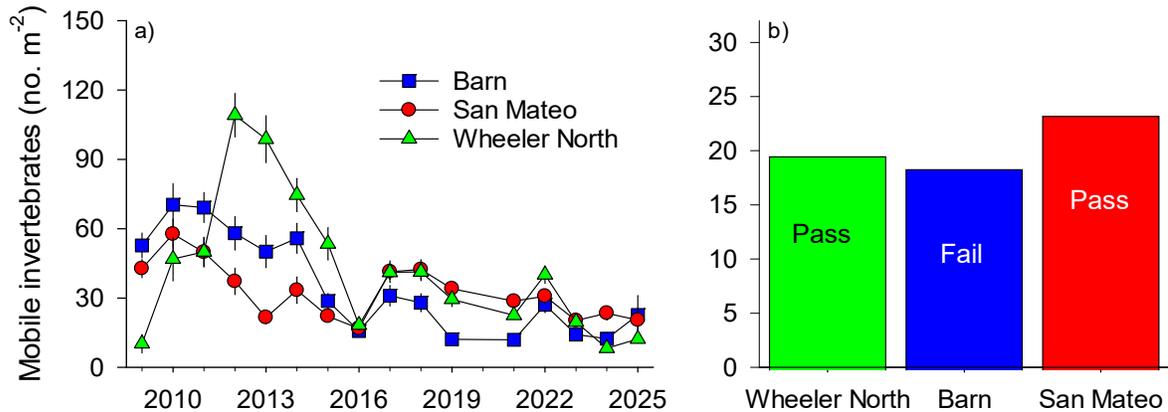


Figure 5.2.4. Density of mobile invertebrates at Wheeler North Reef, San Mateo and Barn. (a) Annual mean ( $\pm 1$  standard error) for 2009 – 2025, and (b) 4-y average values for 2022 – 2025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

**5. THE COMBINED NUMBER OF SPECIES OF BENTHIC SESSILE AND MOBILE INVERTEBRATES SHALL BE SIMILAR TO NATURAL REEFS WITHIN THE REGION.**

**Approach:** Data on the percent cover of sessile invertebrates are combined with data on the density of mobile invertebrates to determine the total number of species of benthic invertebrates (i.e., sessile + mobile combined) on each transect at Wheeler North Reef, San Mateo, and Barn. These values are averaged over the 50 m transects on each reef to provide an estimate of the average number of species of benthic invertebrates per transect at each of the three reefs. For Wheeler North Reef to meet this performance standard, its four-year running average of number of species of benthic invertebrates per transect must not be less than that of the reference reef with the lower four-year running average.

**Results:** The average number of species of benthic invertebrates per transect at the two reference reefs declined slightly from 35 – 40 species in 2009 to about 30 species in 2012. By contrast, species richness increased dramatically at Wheeler North Reef from a low of 14 species per transect in 2009 to 35 species per transect in 2012 (Figure 5.2.5a). Since then, invertebrate species richness at the three reefs has been relatively stable averaging between 29 and 37 species per transect. In 2025 the four-year running average of invertebrate species richness at Wheeler North Reef was slightly less than that at San Mateo and Barn (30 species vs. 32 and 34 respectively for Wheeler North Reef, San Mateo and Barn; Figure 5.2.5b). As a result, Wheeler North Reef failed to meet this performance standard in 2025.

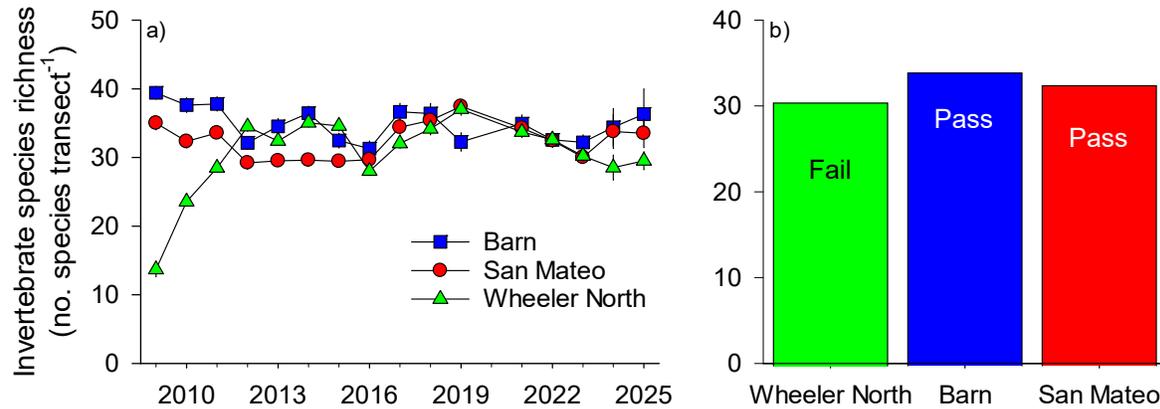


Figure 5.2.5. Species richness of invertebrates per 100 m<sup>2</sup> transect at Wheeler North Reef, San Mateo and Barn. (a) Annual mean ( $\pm 1$  standard error) values for 2009 – 2025, and (b) 4-y average values for 2022 – 2025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

6. *THE RESIDENT FISH ASSEMBLAGE SHALL HAVE A TOTAL DENSITY SIMILAR TO NATURAL REEFS WITHIN THE REGION.*

**Approach:** Data on the density and lengths of resident fishes at San Mateo and Barn are collected using the same methods described above for estimating the standing stock of fish at Wheeler North Reef. Resident fish are defined as reef associated species > 1-year old (fish <1-year old are termed young-of-year). Data on fish lengths are used to classify each individual fish counted as a resident or young-of-year based on published size classes and/or expert knowledge. The number of resident fishes are counted within replicate 50 m long x 3 m wide x 1.5 m tall transects at each reef and averaged to produce an estimate of the density of resident fish at Wheeler North Reef, San Mateo and Barn. For Wheeler North Reef to meet this performance standard, the four-year running average of the density of resident fish calculated from the current year and the three preceding years must not be less than that of the reference reef with the lower four-year running average.

**Results:** In 2009, 1 year after its construction, the density of resident fish at Wheeler North Reef was 50% higher than Barn and 300% higher than San Mateo (Figure 5.2.6a). Since then, fluctuations in fish densities have been relatively similar among the three reefs with the highest densities typically observed at Barn and Wheeler North Reef and the lowest densities at San Mateo. Exceptions to this pattern included spikes in resident fish density at Barn in 2011 and at Wheeler North Reef in 2025. In both of these cases large numbers of several species were observed on a small number of transects. The four-year running average of resident fish density at Wheeler North Reef in 2025 was 40% greater than that at Barn and 300% greater than that at San Mateo (Figure 5.2.6b). Thus, Wheeler North Reef met the performance standard for resident fish density in 2025.

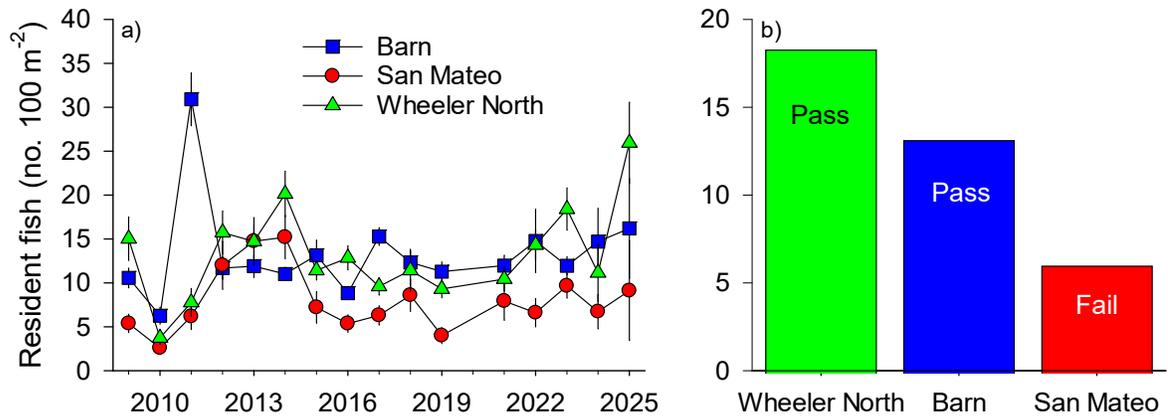


Figure 5.2.6. Density of resident fish at Wheeler North Reef, San Mateo and Barn. (a) annual mean ( $\pm 1$  standard error) values for 2009 – 2025, and (b) 4-y average values for 2022 – 025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

**7. THE DENSITY OF YOUNG-OF-YEAR FISHES (INDIVIDUALS LESS THAN 1-YEAR OLD) SHALL BE SIMILAR TO NATURAL REEFS WITHIN THE REGION.**

**Approach:** Giant kelp forests serve as nursery habitat for a variety of nearshore fishes, and full compensation for the loss of kelp forest habitat caused by the operation of SONGS requires Wheeler North Reef to provide this important ecological function at a level that is similar to that of natural reefs in the region. Data on the density of young-of-year (YOY) fishes at Wheeler North Reef and the reference reefs are collected using the same methods and at the same time as data for resident fishes. The approach used for determining whether the density of YOY fishes at Wheeler North Reef is similar to that at the reference reefs is the same as that used for resident fishes.

**Results:** Densities of YOY fishes in 2009 were 1.7 – 5 times higher at Wheeler North Reef compared to San Mateo and Barn (Figure 5.2.7a) due to a large recruitment of the Blackeye Goby, *Rhinogobius nicholsii*. Since then, mean densities of YOY fish at Wheeler North Reef have fluctuated within or above the range set by San Mateo and Barn. YOY densities declined precipitously at all three reefs in 2016, reflecting the near absence of blackeye gobies. This cool-water species has a life span of about two years and its low regional abundance from 2016 – 2019 reflects low recruitment that may be linked to anomalously warm water during 2015 – 2016. There has been an increasing trend in YOY abundance since 2021, especially at Wheeler North Reef. As a result, the four-year average for YOY density at Wheeler North Reef in 2025 was 50% higher than that at San Mateo and nearly 300% higher than that at Barn (Figure 5.2.7b). Thus, Wheeler North Reef met the performance standard for YOY fish density in 2025.

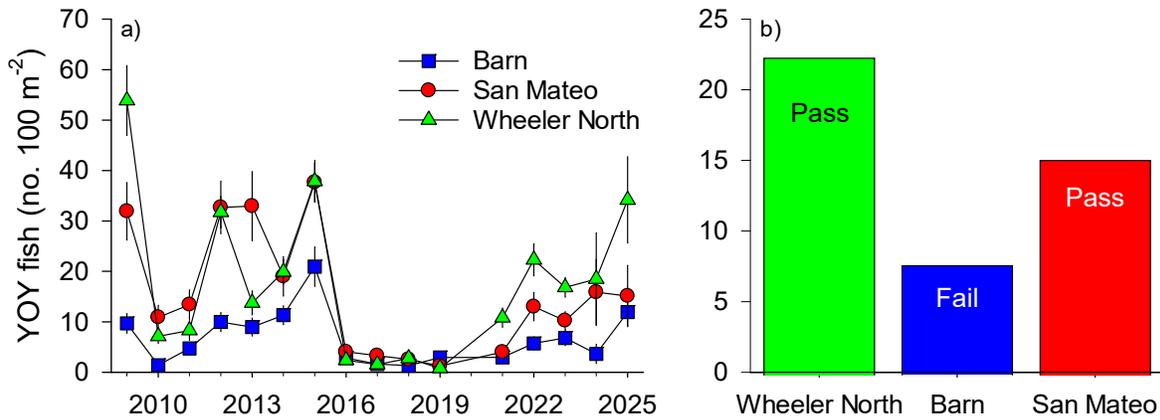


Figure 5.2.7. Density of young-of year fish at Wheeler North Reef, San Mateo and Barn. (a) Annual mean ( $\pm 1$  standard error) values for 2009 – 2025, and (b) 4-y average values for 2022 – 2025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

**8. THE COMBINED NUMBER OF SPECIES OF RESIDENT AND YOUNG-OF-YEAR FISH SHALL BE SIMILAR TO NATURAL REEFS WITHIN THE REGION.**

**Approach:** All fish counted to assess the abundance of resident and young-of-year fish are identified to species. These data are used to calculate the number of species of resident and young-of-year fish combined per transect on each reef. These values are then averaged over the replicate transects on Wheeler North Reef, San Mateo, and Barn to provide an estimate of average species richness of kelp bed fishes for each reef. For Wheeler North Reef to meet this performance standard, its four-year running average of the number of species of kelp bed fish per transect must not be less than that of the reference reef with the lower four-year running average.

**Results:** The mean number of fish species per transect has largely fluctuated synchronously over time at the three reefs (Figure 5.2.8a). In general, Barn and Wheeler North Reef have displayed the highest diversity of fishes and San Mateo has consistently displayed the lowest diversity. The average number of fish species per transect at Wheeler North Reef for the four-year period of 2022 - 2025 was slightly less than that at Barn and substantially higher than that at San Mateo (Figure 5.2.8b). Thus, Wheeler North Reef met the performance standard for fish species number in 2025.

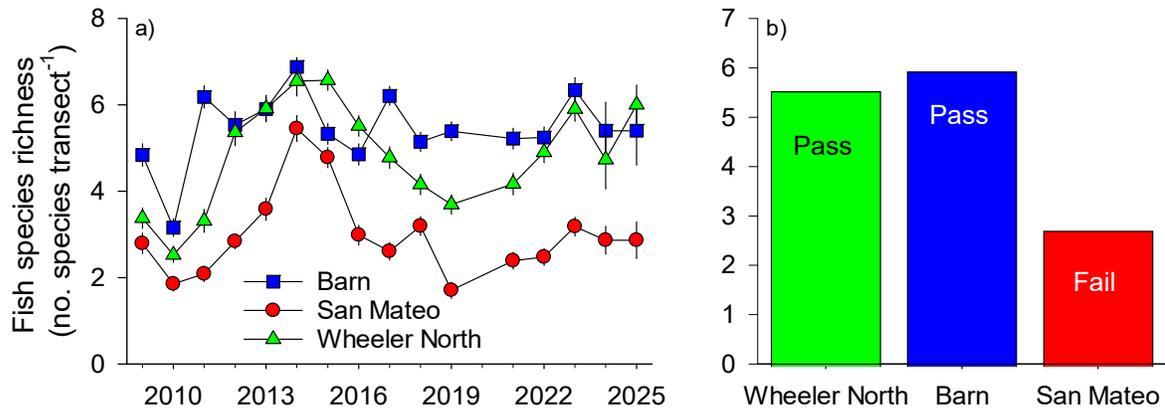


Figure 5.2.8. Species richness of fish per 100 m<sup>2</sup> transect at Wheeler North Reef, San Mateo and Barn. (a) Annual mean ( $\pm 1$  standard error) values for 2009 – 2025, and (b) 4-y average values for 2022 – 2025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

#### 9. FISH PRODUCTION SHALL BE SIMILAR TO NATURAL REEFS WITHIN THE REGION

**Approach:** Estimating fish production on a reef is a difficult and potentially expensive task because it requires knowledge (or scientifically defensible assumptions) of the abundance and size structure of the fish standing stock, coupled with size-specific rates of growth, mortality, reproduction, emigration and immigration. For this reason, a great deal of thought has gone into developing a precise and cost-effective way to evaluate this performance standard. The method selected for estimating fish production to assess this performance standard during full monitoring involves the use of data on biomass density and gonadal growth collected for the purpose of the performance standards pertaining to fish density, fish standing stock, and fish reproductive rates, in combination with data of somatic growth rates obtained from otolith studies. During annual site inspections fish production is more simply estimated from biomass density, which has been shown to be an adequate proxy (see in Reed et al. 2024 for detailed methods).

Fish production is estimated for five target species: Blacksmith, Black Surfperch, Señorita, California Sheephead and Kelp Bass. These species represent the major feeding guilds of fishes in southern California kelp forests and are common to the study region. Blacksmith eat plankton during the day and seek shelter on the reef at night, Black Surfperch and Señorita feed on small invertebrates that live on or near the bottom, California Sheephead feed on larger benthic invertebrates, and Kelp Bass feed primarily on other species of fish. The annual production for each of these species is averaged to obtain an overall mean and standard error of fish production for each of the three reefs. For Wheeler North Reef to meet this performance standard, the four-year running average of fish production calculated from the current year and the three preceding years must not be less than that of the reference reef with the lower four-year running average of fish production.

**Results:** Temporal patterns of reef fish production at Wheeler North Reef mirrored those at San Mateo, but with higher values (Figure 5.2.9a). Fish production at Barn has followed a similar trajectory, but with a notable spike in all five target species in 2011. The four-year running average for fish production at Wheeler North Reef in 2025 was slightly more than that at Barn, and more than twice that at San Mateo. (Figure 5.2.9b). Consequently, Wheeler North Reef met the performance standard for fish production in 2025.

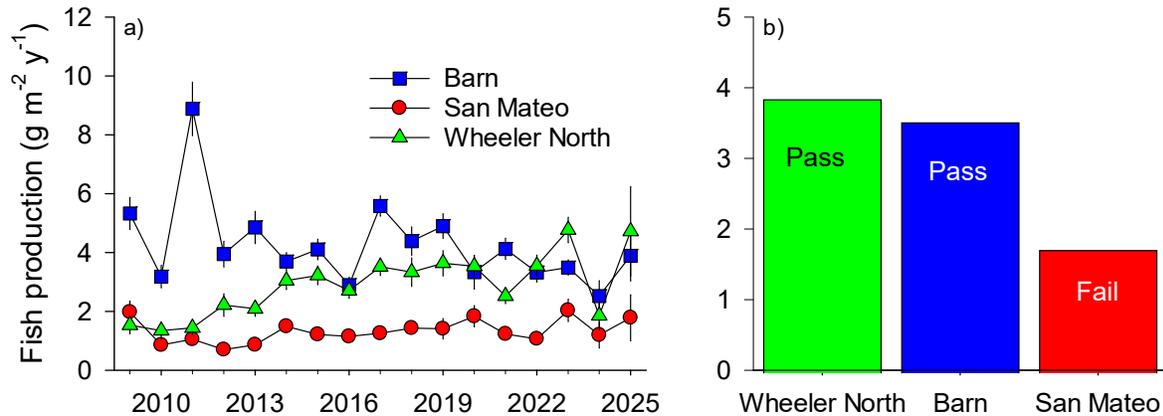


Figure 5.2.9. Fish production at Wheeler North Reef, San Mateo and Barn. (a) Annual mean ( $\pm 1$  standard error) values from 2009 – 2025, and (b) 4-y average values for 2022 – 2025.  $n = 82$  transects for 2009 – 2021 and  $n = 15$  transects for 2022 – 2025.

**10. FISH REPRODUCTIVE RATES SHALL BE SIMILAR TO NATURAL REEFS WITHIN THE REGION.**

**Approach:** The rationale for the performance standard pertaining to fish reproductive rates is that for artificial reefs to be considered successful, fish must be able to effectively reproduce at a level similar to that of natural reefs. During full monitoring a fecundity index is calculated from data on per capita egg production of three targeted reef fish species collected throughout the spawning season (summer through early autumn) and used to determine whether fish reproductive rates at Wheeler North Reef are similar to those at San Mateo and Barn for similar sized individuals. The proportion of females spawning of two of these species (Kelp Bass and California Sheephead) is used to evaluate this performance standard during annual site inspections (see in Reed et al. 2024 for detailed methods). For Wheeler North Reef to meet this performance standard, the four-year running average of fish reproductive rate must not be less than that of the reference reef with the lower four-year running average.

**Results:** Since 2021 the proportion of females observed to be spawning has been higher at Wheeler North Reef than San Mateo or Barn (Fig 5.2.10c) leading to a higher four-year running average at Wheeler North Reef in 2025 compared to the two reference reefs (Fig. 5.2.10d). Consequently, Wheeler North Reef met the performance standard for fish reproductive rate in 2025.

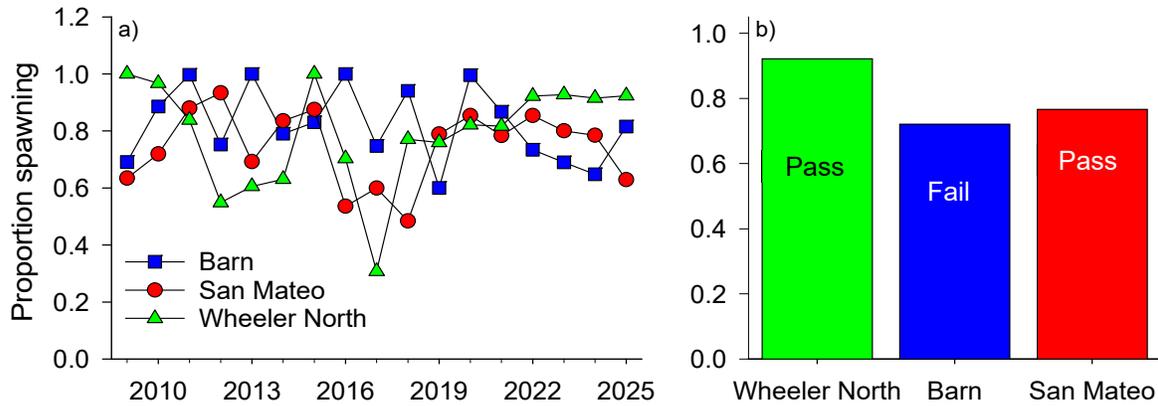


Figure 5.2.10. Proportion of fish spawning at Wheeler North Reef, San Mateo and Barn. (a) Annual values for 2009 – 2025 and (b) 4-y running average for 2022 – 2025.

11. *THE BENTHIC COMMUNITY SHALL PROVIDE FOOD-CHAIN SUPPORT FOR FISH SIMILAR TO NATURAL REEFS WITHIN THE REGION.*

**Approach:** Several different approaches could be taken to evaluate the contribution of the benthic community in supporting the nutritional needs of reef fishes, but the most direct and cost efficient of these approaches involves sampling gut contents in reef fishes that feed on the bottom and are collected for other purposes. Such is the case for the Black Surfperch and the California Sheephead. Both species feed almost exclusively on benthic prey, and individuals of these species are collected for purposes of evaluating the performance standards pertaining to fish reproductive rates and fish production. Once collected, black surfperch and sheephead specimens are placed on ice and transported to the laboratory where they are processed to calculate an index of food chain support (FCS) for each species that is based on the mass of the gut contents relative to the somatic mass of the fish

$$FCS = \frac{g}{b - (r + g)}$$

Where  $g$  = gut content mass,  $b$  = body mass, and  $r$  = gonad mass.

The overall FCS value for the reefs in a given year should represent both species and not be influenced by differences in the number of observations per species, which inevitably varies between species and among reefs. Hence, the average FCS values for both species are averaged to produce a mean FCS Index for each reef and year (see Reed et al. 2024 for detailed methods). For Wheeler North Reef to meet this performance standard, its four-year running average of the mean FCS Index must not be less than that of the reference reef with the lower four-year running average.

**Results:** The mean FCS Index at the three reefs has fluctuated somewhat erratically over time with relatively large swings observed at all three reefs at some point during the 17 years of monitoring (Figure 5.2.11a). This was especially true in 2025 when all three reefs showed a dramatic decrease in the FCS Index.

In most years, the mean FCS at Wheeler North Reef has fallen within or above the range set by the two reference reefs (Figure 5.2.11a). The four-year running averages of the mean FCS Index of the three reefs were very similar in 2025 with Wheeler North Reef having a slightly lower value than San Mateo and a slightly higher value than Barn (Figure 5.2.11b). Consequently, Wheeler North Reef met this performance standard in 2025.

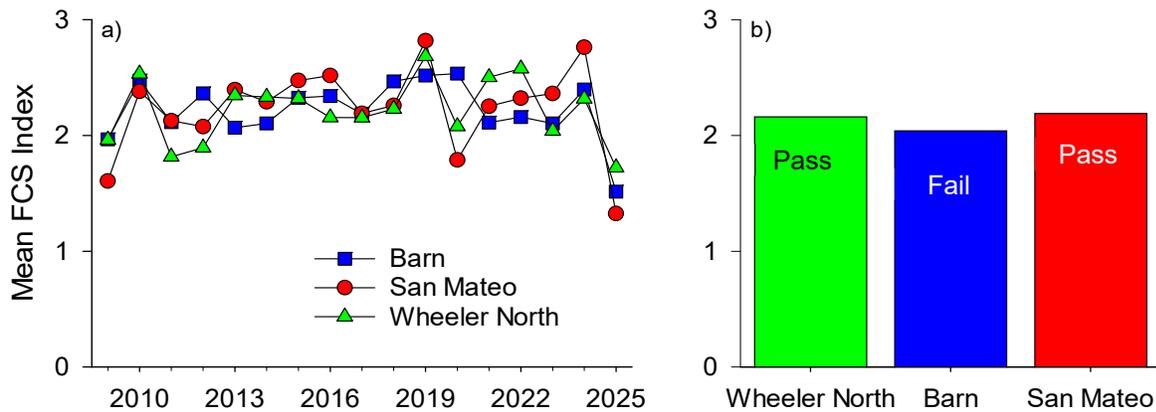


Figure 5.2.11. Mean food chain support (FCS) index at Wheeler North Reef, San Mateo and Barn. (a) Annual values for 2009 – 2025, and (b) 4-y running average for 2022 – 2025.

12. THE IMPORTANT FUNCTIONS OF THE REEF SHALL NOT BE IMPAIRED BY UNDESIRABLE OR INVASIVE BENTHIC SPECIES.

**Approach:** Reefs in southern California provide many important ecological functions that pertain to the production of food and the provision of habitat for reef associated species. Undesirable outbreaks in population abundance of some native species along with the introduction of invasive non-native species have the potential to impair these functions and thus prevent Wheeler North Reef from attaining its mitigation goal of compensating for the loss of kelp forest resources caused by SONGS’ operations. Invasive reef species may include non-native taxa such as the brown seaweed *Sargassum horneri*, which was accidentally introduced from Asia and has become increasingly abundant at some reefs in southern California. Native species that may become undesirable when they attain very high abundances include dense aggregations of sessile invertebrates (e.g., the sea fan *Muricea* spp.) that monopolize space and exclude other species (i.e., giant kelp), and mobile sea urchins that overgraze the bottom and create large deforested areas commonly called sea urchin barrens (Graham et al. 2007, Schiel and Foster 2015). Data on the abundance of potentially undesirable and invasive species are collected as part of the monitoring used to evaluate the biological performance standards pertaining to the benthic community of reef algae, invertebrates and fish.

Important functions refer to the natural physical, chemical and biological processes or services that species play in the ecosystem in which they occur. Unlike discrete properties of species in an ecosystem (e.g., abundance, diversity), functional attributes emphasize rates of physiological or system-level processes (e.g., primary

production, nutrient cycling) or ecological roles (e.g., the provision of structure, buffers to disturbance) that species play in defining an ecosystem. Such functions can be logistically difficult to measure, and quantifying them often requires substantial effort and funding.

Reef fishes are highly valued for their ecological and socioeconomic importance and their production is a highly desirable ecological function. This is especially true for artificial reefs whose role in attracting fish vs. producing fish has long been debated (Bohnsack 1989, Grossman et al. 1997, Pickering and Whitmarsh 1997). Fish production in the case of Wheeler North Reef is one of the relative performance standards by which it is judged and its use in evaluating this performance standard incurs no additional effort or cost. Net primary production (NPP) is one of the more important functions of an ecosystem as it provides the basis for sustaining life on Earth, and NPP by giant kelp forests is among the highest of any ecosystem in the world (Reed and Brzezinski 2009). In contrast to the secondary production by reef fishes, measuring NPP by giant kelp is not required for evaluating the performance of Wheeler North Reef. Although NPP by giant kelp is very time consuming to measure, it can be predicted from more easily obtained data of kelp frond density (Rassweiler et al. 2018), which are routinely collected as part of the evaluation of the performance standard pertaining to giant kelp area.

The secondary production by reef fishes and net primary production by giant kelp were selected as the “important functions” for evaluating this performance standard because of their important ecological roles, the minimal additional effort required to estimate them, and their overall relevance to the objectives of the reef mitigation requirement,

The evaluation of the performance standard pertaining to undesirable and invasive species involves a three-step approach. First, the abundances of undesirable and invasive species at Wheeler North Reef are compared to those at the reference reefs to determine their potential to impair important reef functions. Second, estimates of net primary production by giant kelp and the secondary production of reef fishes at Wheeler North Reef are compared to those at the reference reefs to determine whether these functions at Wheeler North Reef are underperforming relative to the reference reefs. Third, if either net primary production by giant kelp or secondary production by reef fishes are underperforming, then additional analyses and or studies will be done to determine whether the underperformance is caused by impairment from undesirable and invasive species.

Results: Potentially undesirable native species of particular interest for this project are sea fans (*Muricea* spp.), which are known to attain high abundances on artificial reefs in California and exclude other species, including giant kelp (Patton et al. 1996). The percent cover of sea fans at Wheeler North Reef has increased substantially from 1.4% in 2009 to nearly 12% in 2025, while sea fan cover at San Mateo and Barn during this period has not exceeded 3% (Figure 5.2.12a). While the cover of sea fans is high at Wheeler North Reef relative to San Mateo and Barn; it does not appear to be sufficient to substantially impact the abundances of other species in the benthic community (as indicated by the success of Wheeler North Reef in meeting all but two of the relative performance standards). As with sea fans,

high densities of sea urchins can prevent the establishment of giant kelp and other organisms. For example, Arkema et al. (2009) found that giant kelp was absent on reefs where sea urchin densities exceeded 35 m<sup>-2</sup>. Monitoring data from 2009 – 2025 show that sea urchin densities have been consistently low at Wheeler North Reef, averaging <1 individual m<sup>-2</sup> (Figure 5.2.12b). This density is far below that needed to significantly impact giant kelp and other components of the benthic community.

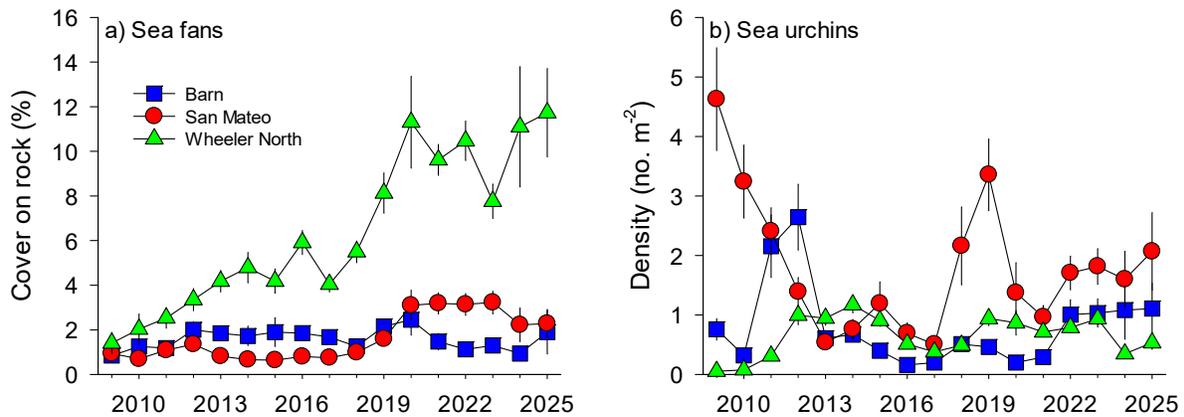


Figure 5.2.12. Mean ( $\pm 1$  standard error) for (a) the percent cover of the sea fan *Muricea* spp. on hard substrate, and (b) the density of sea urchins at Wheeler North Reef, San Mateo and Barn for 2009 – 2025.

Importantly, both NPP by giant kelp and the secondary production by reef fishes on Wheeler North Reef were within the range or higher than that of the reference reefs in all but two of the 16 years of monitoring (Figure 5.2.13a and c). As a result, the four-year running averages for giant kelp NPP and fish production at Wheeler North Reef in 2025 were between those of San Mateo and Barn (Figure 5.2.13b and d). These results indicate that there is no evidence that *Muricea* or sea urchins affected these important ecological functions at Wheeler North Reef in 2025.

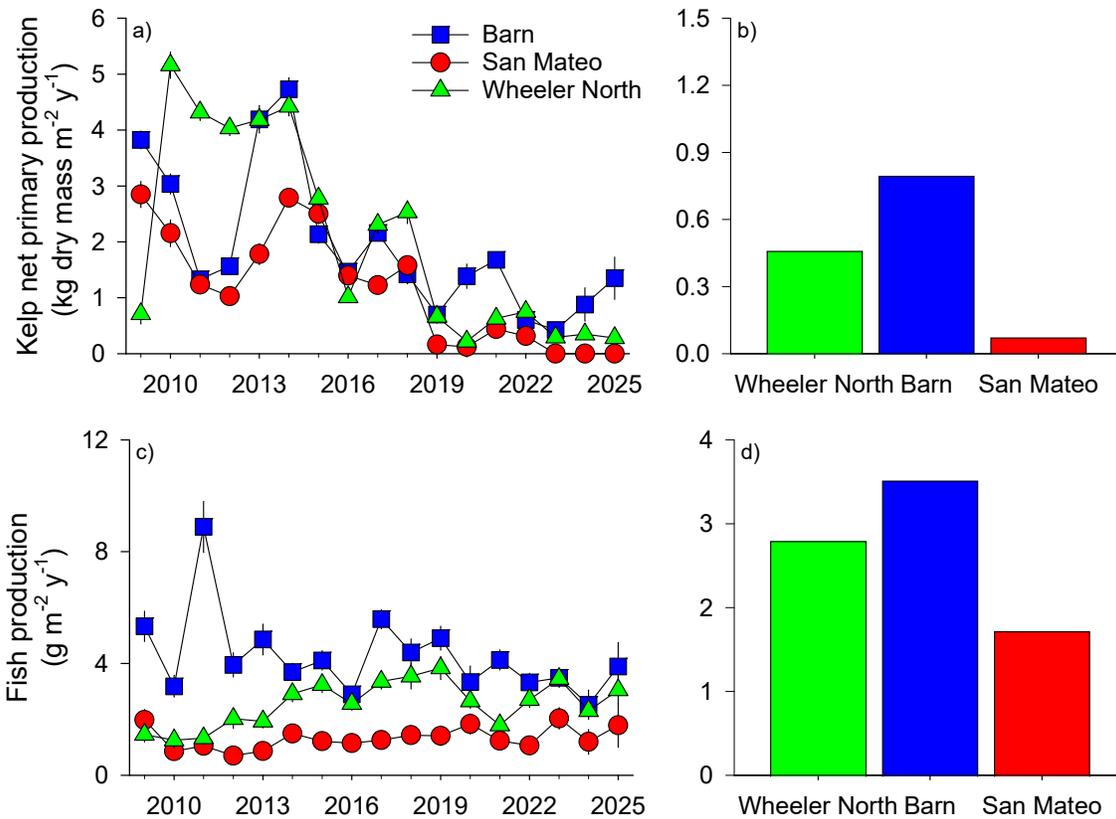


Figure 5.2.13. Giant kelp net primary production at Wheeler North Reef, San Mateo and Barn for: (a) Annual mean ( $\pm 1$  standard error) values for 2009 – 2025 and (b) 4-y average values for 2022 – 2025. Fish secondary production at Wheeler North Reef, San Mateo and Barn for: (c) Annual mean ( $\pm 1$  standard error) values for 2009 – 2025 and (d) 4-y average values for 2022 – 2025.

No non-native species of invasive algae were recorded in the transects sampled at Wheeler North Reef in 2025, which was also the case from 2009 – 2013. A single non-reproductive individual of *Sargassum horneri*, a non-native brown alga that has been expanding throughout southern California and Baja California (Marks et al. 2015), was observed in 2014 and a few more individuals of this species were observed in 2015 – 2018. Furthermore, very few non-native invertebrate species and no non-native fishes have been recorded at Wheeler North Reef since it was constructed.

Based on the above results, we conclude that there is no compelling evidence that undesirable or invasive non-native species impaired important ecological functions of Wheeler North Reef in 2025. Thus, Wheeler North Reef met this performance standard in 2025.

## 6.0 Permit Compliance

### 6.1 Summary of the performance of Wheeler North Reef and earned mitigation credit

Annual mitigation credit: Mitigation credit for Wheeler North Reef is assigned on an annual basis for the absolute performance standard for hard substrate and the relative performance standards. To receive mitigation credit for a given year, Wheeler North Reef must meet the absolute performance standard for hard substrate, the relative performance standard for undesirable and invasive species, and at least as many of the other 11 relative performance standards as the lower performing reference reef. Fulfillment of the mitigation requirement for this collective group of performance standards occurs when the number of years of mitigation credit accrued by Wheeler North Reef equals the total years of operation of SONGS Units 2 & 3 (= 32 years). The accrual of mitigation credit began in 2019 upon construction of the Phase 3 remediation reef.

In 2025, Wheeler North Reef met the absolute performance standard for hard substrate, the relative performance standard for undesirable and invasive species, and eight of the other 11 relative performance standards (Table 6.1.1a), which was one more relative standard met than either San Mateo or Barn (Figure 6.1.1). Wheeler North Reef underperformed relative to the reference reefs with respect to the percent cover and number of species of macroalgae, which it has consistently done since 2012 (Figures 5.2.1 and 5.2.2) and the number of species of invertebrates, which was only slightly lower than the reference reefs (Figure 5.2.5). Notably, Wheeler North Reef has consistently met more relative standards than the lowest performing reference reef since 2019, which is when the accrual of mitigation credit began (Figure 6.1.2)

Wheeler North Reef earned one year of mitigation credit in 2025 for meeting the absolute performance standard for hard substrate, the relative performance standard for undesirable/invasive species and at least as many of the 11 other relative performance standards as the lower performing reference reef. It also earned a year of mitigation credit for meeting this collective group of performance standards in 2019 through 2025 for a total of seven years of mitigation credit (Table 6.1.1a). Wheeler North Reef needs another 25 years of credit in order to fulfill its mitigation requirement for this collective group of performance standards.

a) Annual Performance Standards				
Credit earned in 2025	Yes			
Years of credit earned since 2019	7			
Years of credit required	32			
Years of credit still needed	25			
b) Cumulative Performance Standards				
	2025 Credit	Cumulative credit	Credit required	Credit needed
Giant kelp area	32 acres	308 acres	4800 acres	4492 acres
Fish standing stock	33 tons	193 tons	896 tons	703 tons

Table 6.1.1. Summary of mitigation credit accrued by Wheeler North Reef for performance standards that are assigned mitigation credit on: (a) an annual basis, and (b) a cumulative basis.

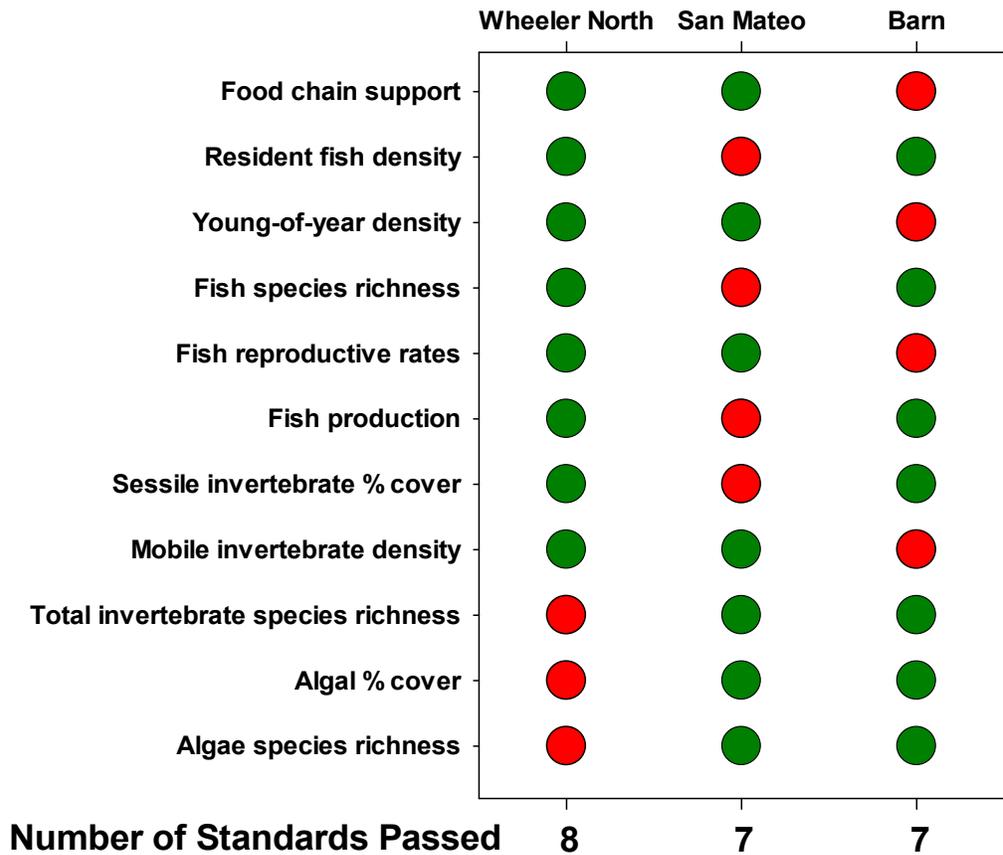


Figure 6.1.2. Summary of the performance of Wheeler North Reef, San Mateo and Barn in meeting the relative performance standards in 2025. A green circle indicates a reef met the performance standard and a red circle indicates a reef failed to meet the performance standard.

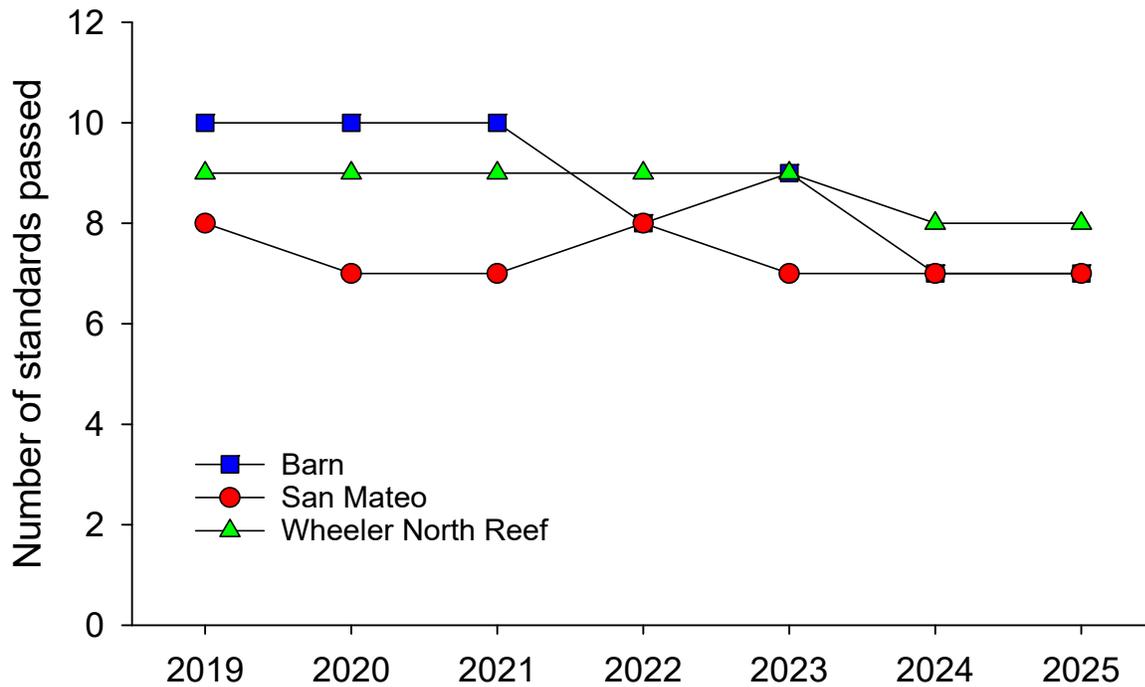


Figure 6.1.2. Number of relative performance standards passed at Wheeler North Reef, San Mateo and Barn from 2019 – 2025.

Cumulative mitigation credit: The absolute performance standards established for giant kelp area and fish standing stock are evaluated on a cumulative basis in which full compensation is based on mitigation for total losses accumulated over time rather than for annualized losses. In this case, the area of giant kelp and the standing stock of fish are measured each year and the annual total for each is added to the cumulative total of previous years. Each standard is evaluated independently, and their mitigation requirement is fulfilled when their cumulative total equals the product of the target value (150 acres for kelp and 28 tons for fish standing stock) and the total years of operation of SONGS Units 2 and 3 (= 32 years). Using this approach, the mitigation requirement for giant kelp area will have been fulfilled when the cumulative kelp area provided by Wheeler North Reef equals 4800 acres (i.e., 150 acres x 32 years). Similarly, the mitigation requirement for reef fish standing stock will have been fulfilled when Wheeler North Reef’s cumulative fish standing stock reaches 896 tons (i.e., 28 tons x 32 years).

In 2025, Wheeler North Reef earned credit for 32 acres of giant kelp for a cumulative total of 308 acres and 33 tons of reef fish for a cumulative total of 193 tons (Table 6.1.1b). It needs an additional 4492 acres of kelp credit and 703 tons of fish standing stock credit to fulfill these two mitigation requirements.

## 7.0 Trends in the Biological Structure of Wheeler North Reef

This section provides a brief summary of temporal patterns of change in the biological attributes of Wheeler North Reef from 2009 – 2025, which represents the 17-year period following the construction of the 150-acre Phase 2 mitigation reef and the 6-year period following the construction of the Phase 3 remediation reef.

### 7.1 Giant kelp

The giant kelp, *Macrocystis pyrifera*, is the world's largest alga and it displays some of the fastest elongation rates of any autotroph on Earth. Once established, small plants grow rapidly into large adult plants that extend through the water column to produce a floating canopy at the sea surface. It is considered the foundation species of the kelp forest because its structural and functional attributes determine the abundance, diversity and stability of the kelp forest community, and modulate critical ecosystem processes (Miller et al. 2018, Castorani et al. 2018, 2021, Lamy et al. 2020). A primary goal in designing Wheeler North Reef was to make it suitable for the establishment, growth, and persistence of giant kelp.

Results from the Phase 1 reef indicated that giant kelp would readily colonize the newly constructed Phase 2 reef and that transplanting kelp would not be needed to ensure its establishment on Wheeler North Reef (Reed et al. 2005). This prediction proved to be true as very high densities of giant kelp recruits (i.e., individuals < 1 m tall) were observed in the summer of 2009 on the Phase 2 polygons (but not the Phase 1 modules), one year after the construction of Phase 2 (Figure 7.1.1). A similar large peak in giant kelp recruitment was observed on both the Phase 1 and 2 reefs in 2015. Giant kelp recruitment has been very low to undetectable in our surveys in years not characterized by these large pulse events. Unlike the Phase 1 and Phase 2 reefs, the initial colonization of Phase 3 reef by giant kelp was not characterized by a large pulse of recruits in the first year following its construction. Instead, low densities of kelp recruits were observed at Phase 3 each year from 2021 through 2025 (Figure 7.1.1). Nonetheless, densities of kelp recruits on Phase 3 were consistently higher than those of Phase 1 and 2 during this time.

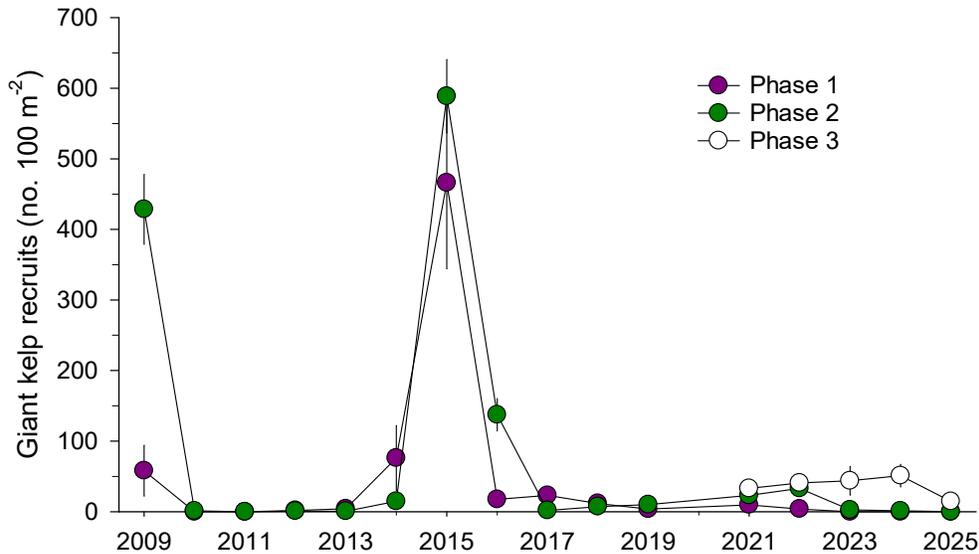


Figure 7.1.1. Mean density ( $\pm 1$  standard error) of newly recruited giant kelp plants at Phases 1, 2, and 3 of Wheeler North Reef. Sampling of recruits did not occur in 2020 due to reduced monitoring.  $n = 12$  transects for Phase 1,  $n = 80$  transects for Phase 2 from 2009 – 2023 and 40 transects for 2024 – 2025, and  $n = 59$  transects for Phase 3 transects for Phases 1, 2 and 3 in all other years except 2025 when  $n = 58$ .

The density of subadult kelp (defined here as individuals with less than 8 fronds > 1 m tall) typically reflects the growth and survival of kelp recruits in the previous or current year. For example, the density of subadult kelp in the Phase 2 polygons increased substantially in 2010 and 2021 in response to pulses in recruitment (in 2009 and 2021), as did the density of subadults in the newly constructed Phase 3 polygons in 2021 and 2022 (Figure 7.1.2). Increases in the abundance of subadults can also result from unfavorable conditions for growth of adult kelp that limits their ability to sustain 8 or more fronds (i.e., adults become subadults). Such was the case for the Phase 1 modules in 2018 when an increase in the density of subadult kelp coincided with a decrease in the density of adult kelp (Figures 7.1.2 vs. 7.1.3) during a sustained period of low recruitment (Figure 7.1). By contrast, subadult densities decreased dramatically in the Phase 2 polygons from 2016-2019 (Figure 7.1.2) following a sustained decline in the density of both recruit and adult kelp suggesting poor conditions for the growth and survival of all life stages (Figures 7.1.1 and 7.1.3). In 2025 subadult giant kelp was universally low across all of Wheeler North Reef with no subadults recorded in transect surveys of Phase 1 and 2 and a mean density of 0.8 subadults per 100 m<sup>2</sup> in Phase 3 (Figure 7.1.2).

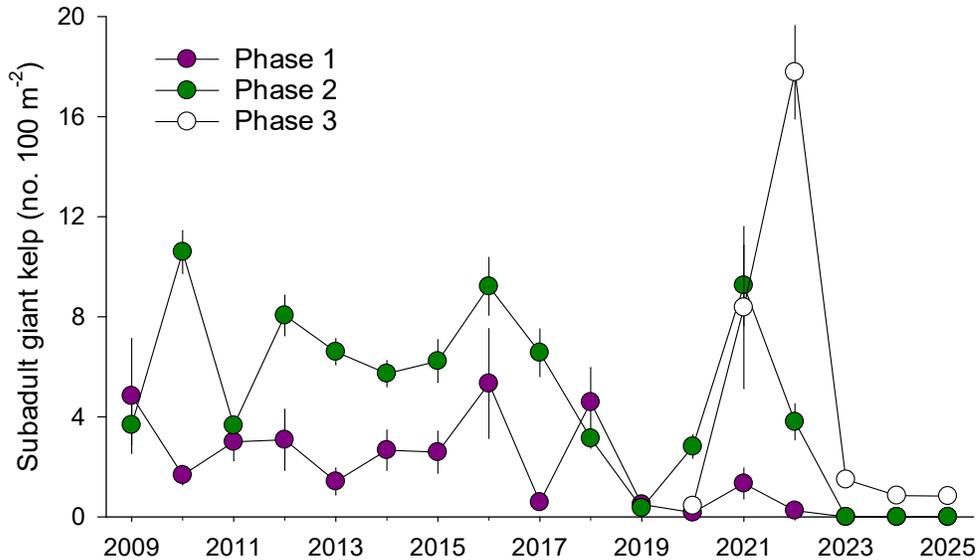


Figure 7.1.2. Mean density ( $\pm 1$  standard error) of subadult giant kelp at Phases 1, 2 and 3 of Wheeler North Reef.  $n = 12$  transects for Phase 1,  $n = 80$  transects for Phase 2 from 2009 – 2023 and 40 transects for Phase 3, and  $n = 59$  transects for Phase 3 except 2025 when  $n = 58$ .

The growth and survivorship of recruit and subadult kelp in turn influences the density of adult kelp (i.e., individuals with 8 or more fronds > 1 m tall). For example, the large kelp recruitment event in the Phase 2 polygons in 2009 led to a large cohort of adult kelp in 2010 that averaged 36 plants per 100 m<sup>2</sup>, which was nearly three-fold higher than the density of adults on the Phase 1 modules (Figure 7.1.3). In the near absence of recruitment, adult densities gradually declined over time and by 2016 had thinned to approximately 3 and 4 individuals per 100 m<sup>2</sup> on the Phase 1 and 2 reefs, respectively (Figure 7.1.3). The large recruitment event in 2015 and corresponding increase in subadults in 2016 on the Phase 1 and 2 reefs caused adult densities in 2017 to increase to 6 and 14 individuals per 100 m<sup>2</sup>, respectively. This moderate spike in the abundance of giant kelp adults, however, was short lived, as adult densities in 2020 declined to near zero in the absence of appreciable recruitment. No adult kelp has been observed on the Phase 1 modules since then, while adult kelp densities in the Phase 2 polygons increased slightly in 2021 and 2022 before returning to zero in 2023 - 2025 (Figure 7.1.3), though a few scattered plants were observed outside of our transects. In contrast, the density of adult giant kelp in the Phase 3 polygons steadily increased to 4 plants per 100 m<sup>2</sup> in 2023 (the lower threshold for medium-to-high density adult giant kelp in the SONGS coastal development permit). Adult densities of giant kelp in the Phase 3 polygons have since declined to ~ 2 plants per 100 m<sup>2</sup> in 2025.

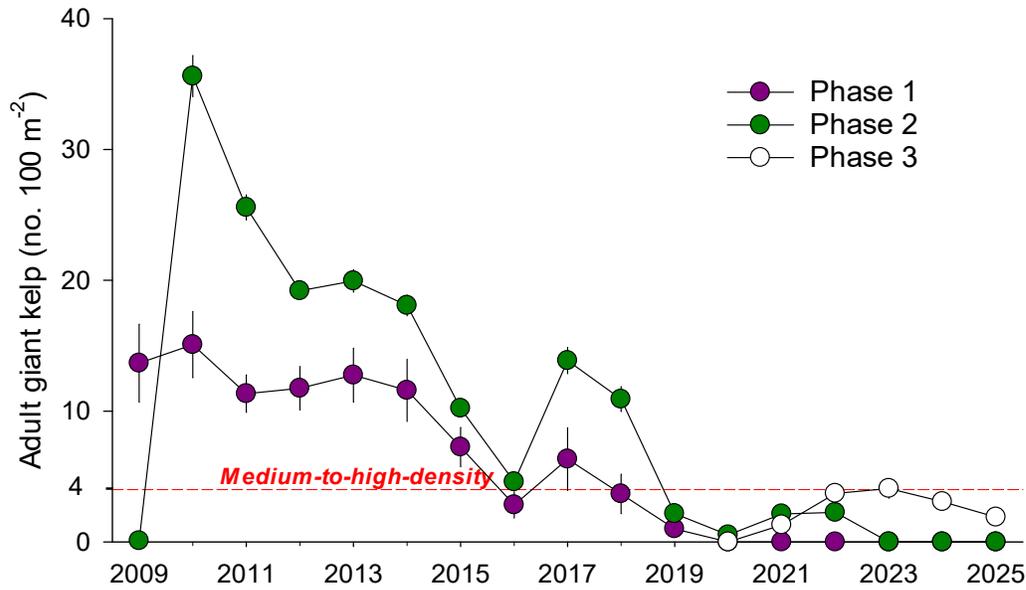


Figure 7.1.3. Mean density ( $\pm 1$  standard error) of adult giant kelp at Phases 1, 2 and 3 of Wheeler North Reef.  $n = 12$  transects for Phase 1,  $n = 80$  transects for Phase 2 from 2009 – 2023 and 40 transects for 2024 – 2025, and  $n = 59$  transects for Phase except 2025 when  $n = 58$ .

Giant kelp plants are made up of individual fronds that consist of a vine-like stipe to which blades are attached via a small gas-filled float. The number of fronds on a plant that are  $> 1$  m tall is a good predictor of plant size as measured in units of mass (Rassweiler et al. 2018). As expected, the average number of fronds per plant increased dramatically in the Phase 2 polygons between 2009 and 2010 as small recruits grew into subadult and adult kelp (Figure 7.1.4). By 2012, giant kelp  $> 1$  m tall (i.e., subadult + adult kelp combined) averaged 21 fronds per plant in the Phase 2 polygons compared to 41 fronds per plant on the older Phase 1 modules. Plant size remained relatively steady on the Phase 1 and 2 reefs before declining precipitously to 8 fronds per plant in 2016 (Figure 7.1.4). The relatively low numbers of fronds per plant observed in 2016 was indicative of the poor growing conditions associated with unusually high ocean temperatures throughout the region in 2014 - 2016 (Cavanaugh et al. 2019). Cooler conditions prevailed in 2017, and by 2019 average plant size on the Phase 1 and 2 reefs increased to 18 and 26 fronds per plant, respectively. The average number of fronds per plant dropped precipitously in 2020 across most of Wheeler North Reef. The low number of fronds per plant observed on Phases 1 and 2 at this time reflected the senescence of older large individuals rather than the emergence of small recruits as most plants had relatively large holdfasts. Similar to Phases 1 and 2, the number of fronds per plant on Phase 3 has steadily increased during the first several years following its construction averaging 19 fronds per plant in 2024 and 2025 (Figure 7.1.4).

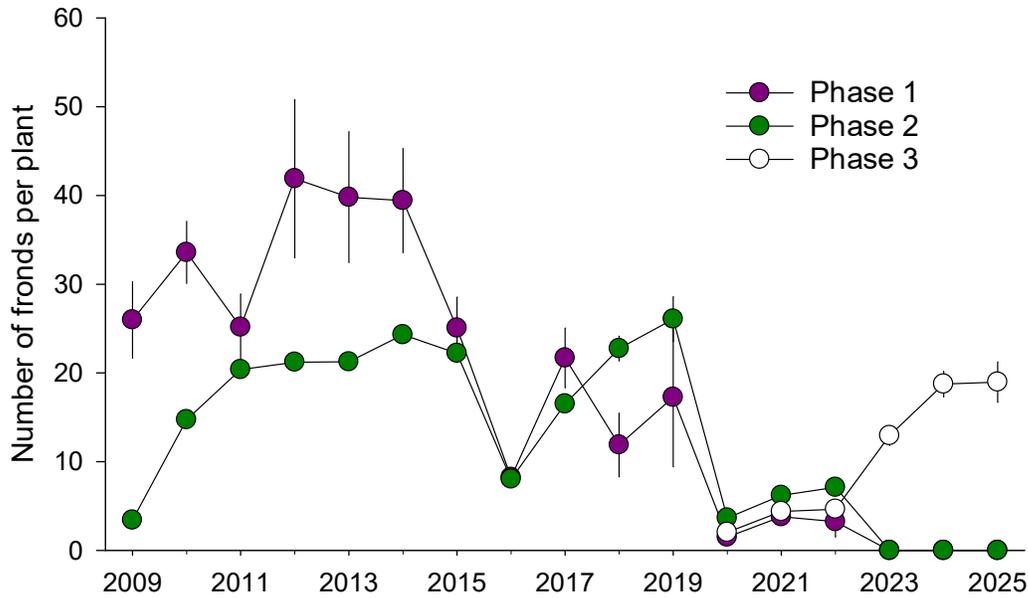


Figure 7.1.4. Mean number ( $\pm 1$  standard error) of fronds per giant kelp plant at Phases 1, 2 and 3 of Wheeler North Reef.  $n = 12$  transects for Phase 1,  $n = 80$  transects for Phase 2 from 2009 – 2023 and 40 transects for 2024 – 2025, and  $n = 59$  transects for Phase 3 except 2025 when  $n = 58$ .

Because giant kelp plants can differ greatly in size from small recruits to large adults, the density of fronds per unit area tends to be a better predictor of its standing biomass than the density of plants (Reed et al. 2009). The biomass of kelp, as indicated by the density of fronds  $\geq 1$  m tall, increased dramatically on the Phase 2 reef to nearly 7 fronds per  $m^2$  by 2010 (two years following construction), which was slightly higher than that on the older Phase 1 modules (Figure 7.1.5). Frond density remained relatively high on both phases of Wheeler North Reef through 2014 before progressively declining to  $< 1 m^{-2}$  in 2016 following a two-year period of anomalous ocean warming (Cavanaugh et al. 2019). This low density of fronds reflected declines in both the density and size of subadult and adult plants (Figures 7.1.2, 7.1.3 and 7.1.4). The increase in the density and size of adult kelp observed in 2017 and 2018 (Figures 7.1.3 and 7.1.4) accounted for the corresponding increases in frond density on the Phase 1 and 2 reefs (Figure 7.1.5). However, this increase was short lived and frond density in 2020 declined to  $< 0.1 m^{-2}$ , its lowest level observed since 2009. The modest increases in subadult densities on the Phase 2 reef in 2021 and 2022 was short-lived as we did not observe any fronds  $\geq 1$  m tall in the Phase 2 transects in 2023 - 2025 (Figure 7.1.5). By contrast, the density of fronds in the Phase 3 polygons hovered around 0.5 to  $1 m^{-2}$  from 2021 - 2025.

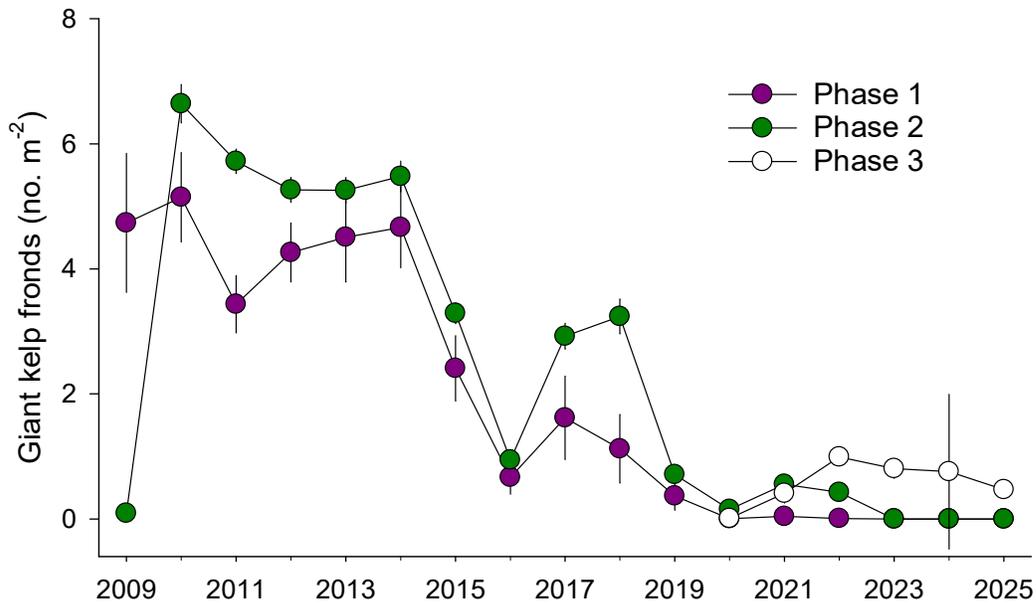


Figure 7.1.5. Mean density ( $\pm 1$  standard error) of giant kelp fronds at Phases 1, 2 and 3 of Wheeler North Reef.  $n = 12$  transects for Phase 1,  $n = 80$  transects for Phase 2 from 2009 – 2023 and 40 transects for 2024 – 2025, and  $n = 59$  transects for Phase 3 except 2025 when  $n = 58$ .

## 7.2 Fish

Much like giant kelp, the abundance of fishes living near the bottom at Wheeler North Reef has fluctuated greatly during the 17 years of monitoring. Reef fish rapidly colonized the Phase 2 reef, with total densities of all species combined averaging about 70 individuals per 100 m<sup>2</sup> in the first year following construction (2009), which was slightly higher than that of the older Phase 1 modules (Figure 7.2.1a). Reef fish densities declined precipitously on both phases of Wheeler North Reef in 2010. Following this decline, fish densities increased steadily on the Phase 1 reef to an average of 91 individuals per 100 m<sup>2</sup> in 2015, which is the highest value recorded in the time series (Figure 7.2.1a). A more moderate increase during this time occurred on the Phase 2 reef where average fish densities peaked at 43 individuals per 100 m<sup>2</sup>. Another abrupt decline in the abundance of fish on the Phase 1 and 2 reefs occurred in 2016 and remained low through 2021 before increasing to 48 and 30 individuals per 100 m<sup>2</sup> in 2024, respectively (Figure 7.2.1a). Densities of fish on the newly constructed Phase 3 reef steadily increased to 20 individuals per 100 m<sup>2</sup> in 2024 before declining to 10 individuals per 100 m<sup>2</sup> in 2025. Fish densities at Phase 3 remain well below those observed at Phases 1 and 2, which averaged 46 and 43 individuals per 100 m<sup>2</sup> in 2025.

The sharp decline in reef fish abundance at Wheeler North Reef in 2016 can be attributed to decreases in the abundance of the Blackeye Goby (Figure 7.2.1b), a small, short-lived ( $\sim 2$  years), cool-water species that lives on the bottom and feeds on small crustaceans. The density of this species, which had consistently been the most numerically abundant species at Wheeler North Reef through 2015, declined dramatically in 2016 and remained regionally uncommon until 2021. Since then,

densities of Blackeye Gobies have increased at Wheeler North Reef especially at Phase 1 and 2 where they averaged 15 and 32 individuals per 100 m<sup>-2</sup>, respectively in 2025.

Other species of reef fish that have historically been relatively abundant at Wheeler North Reef are tropical derivatives that have affinities to warm water. These species include the Blacksmith (a damselfish), Barred Sand Bass, and the wrasses California Sheephead and Señorita (Figure 7.2.1c-f). With the exception of Blacksmith and Señorita on the Phase 1 modules, declines in the densities of these

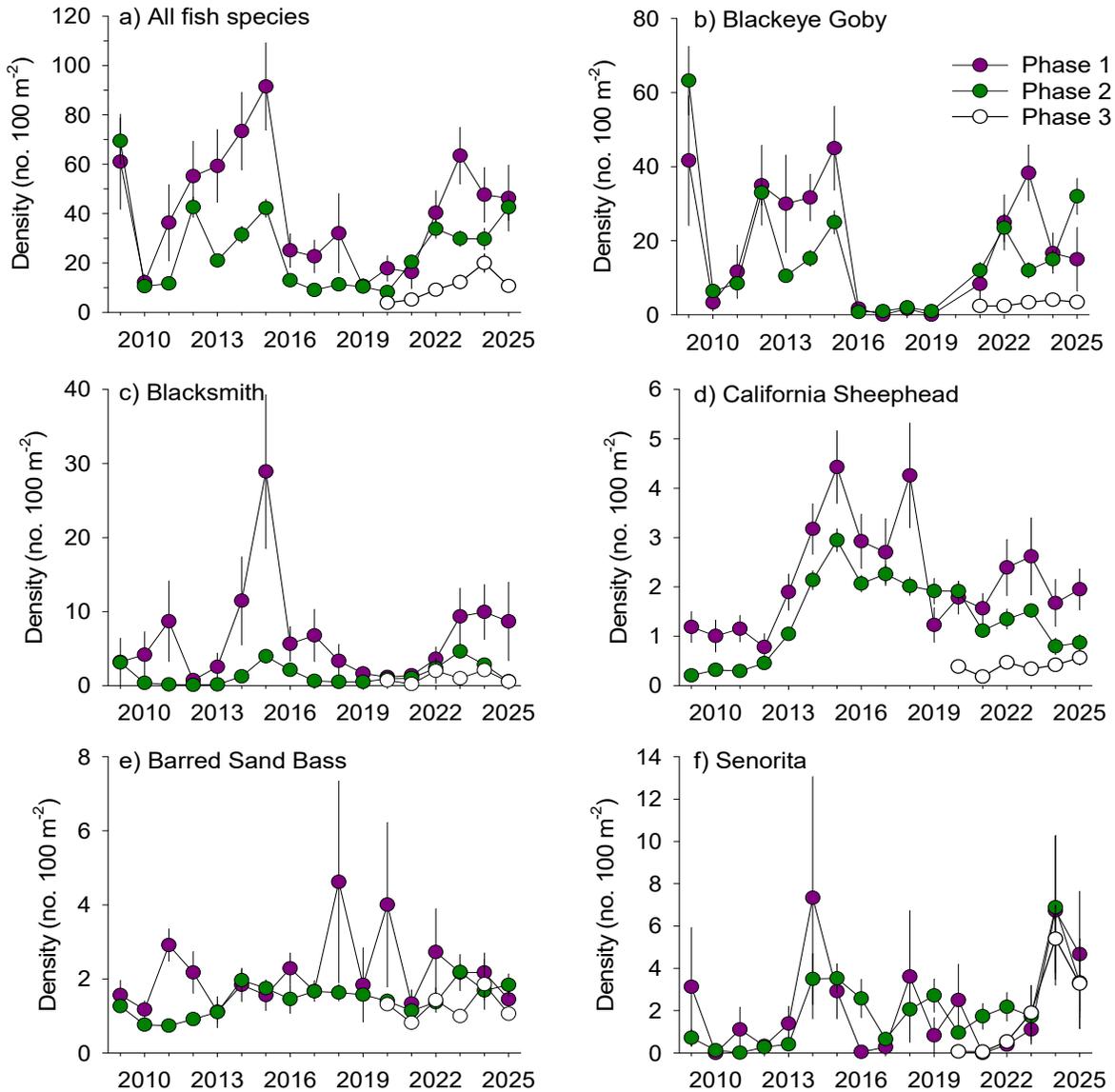


Figure 7.2.1. Mean density ( $\pm 1$  standard error) of fish at Phases 1, 2 and 3 of Wheeler North Reef. (a) All species of reef fish, (b) Blackeye Goby, (c) Blacksmith, (d) California Sheephead (e) Barred Sand Bass and (f) Señorita.  $n = 12$  transects for Phase 1,  $n = 80$  transects for Phase 2 from 2009 – 2023 and 40 transects for 2024 – 2025, and  $n = 59$  transects for Phase 3 except 2025 when  $n = 58$ .

species in 2016 following the warm water event were much less pronounced than those observed for the Blackeye Goby. Collectively, these four species, along with the Blackeye Goby, accounted for 85% of all fish observed on Wheeler North Reef in 2025 (Figure 7.2.2). Large predatory species of fish that are valued ecologically and/or economically such as the Giant Sea Bass (*Stereolepis gigas*) and California Halibut (*Paralichthys californicus*) are also commonly observed at Wheeler North Reef, but because of their large size and high trophic status they are not numerically abundant.

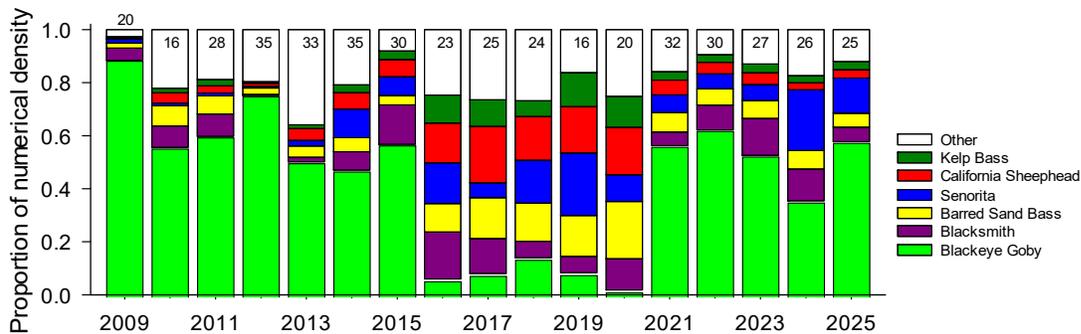


Figure 7.2.2. Proportions of the total abundance contributed by the six most abundant species of reef associated fish and all remaining taxa of reef fish combined (other) at Wheeler North Reef. Numbers in bars indicate the number of “other” species observed in that year. n = 92, 151 and 111 transects for 2009 – 2020, 2021 – 2025, respectively. Sampling of Phase 3 began in 2020.

Because different species of fish vary tremendously in size, it is often desirable to have information on the biomass of fish per unit area (i.e., biomass density) in addition to their numerical density. As observed for numerical density, the biomass density of reef fish on the Phase 1 reef has been consistently higher than that of Phase 2 in all years except 2021 when they converged to a similar value of ~ 30 g per m<sup>2</sup> (Figure 7.2.3a). In 2025, fish biomass density was again higher on the Phase 1 modules (56 g per m<sup>2</sup>) compared to 24 and 12 g per m<sup>2</sup> on Phases 2 and 3, respectively.

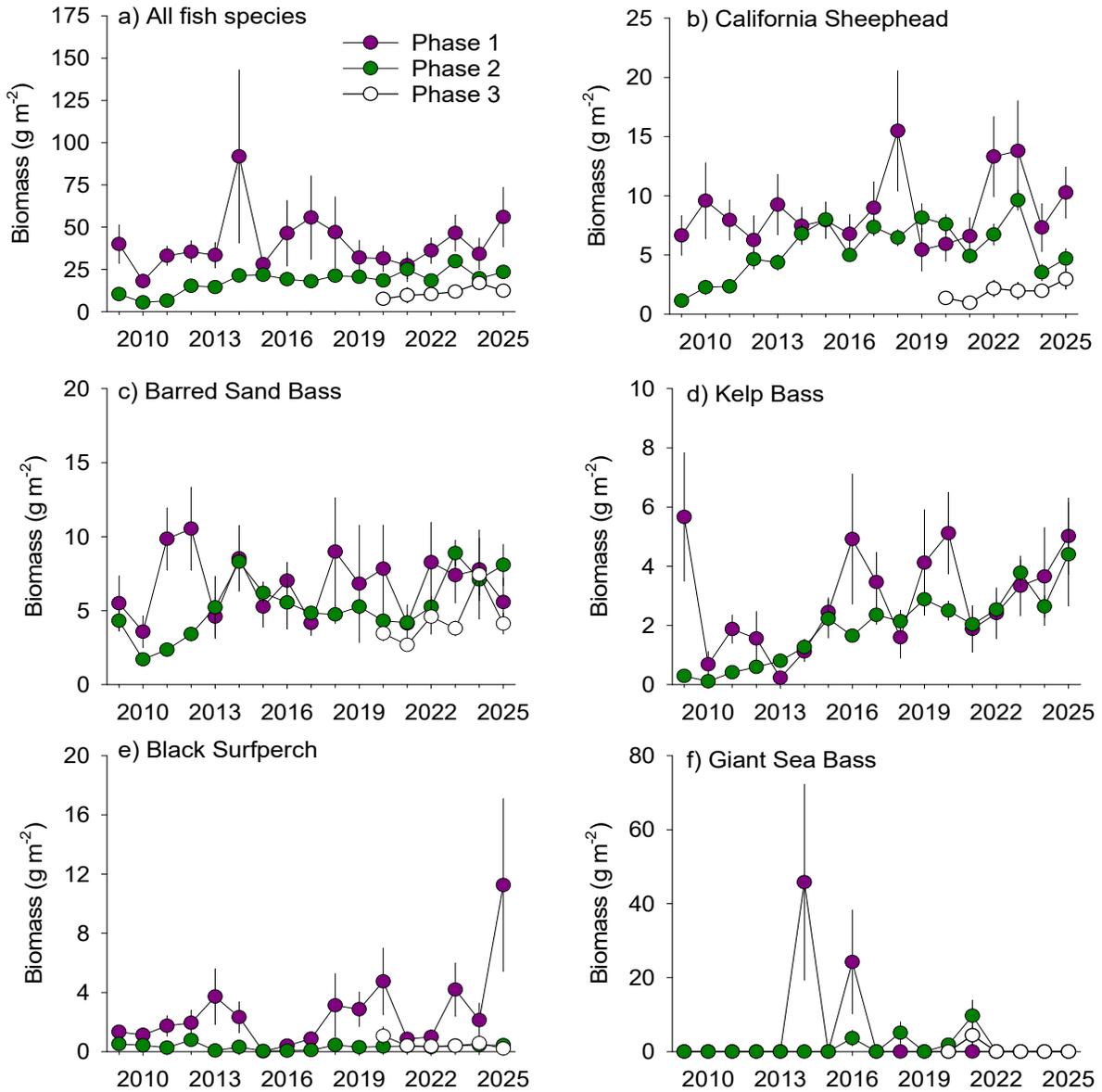


Figure 7.2.3. Mean biomass density ( $\pm 1$  standard error) of fish at Phases 1, 2 and 3 of Wheeler North Reef. (a) All species of reef fish, (b) California Sheephead, (c) Barred Sand Bass, (d) Kelp Bass, (e) Black Surfperch, and (f) Giant Sea Bass.  $n = 12$  transects for Phase 1,  $n = 80$  transects for Phase 2 from 2009 – 2023 and 40 transects from 2024 – 2025, and  $n = 59$  transects for Phase 3 except 2025 when  $n = 58$ .

The relatively low biomass density of fish at Wheeler North Reef in 2009 when the numerical density was extremely high can be explained by the fact that blackeye gobies, which were the most numerically abundant species in 2009, are relatively small ( $\sim 3$  grams in weight) and composed a small proportion of the biomass ( $\sim 10\%$  in 2009). Larger common species such as the California Sheephead, Barred Sand Bass, and Kelp Bass, along with smaller Black Surfperch, which are numerically abundant, have consistently been the most dominant species of reef fish at Wheeler North Reef in terms of biomass density (Figure 7.2.3b-f). In 2025 these four species

collectively accounted for 75% of the total reef fish biomass at Wheeler North Reef (Figure 7.2.4). As mentioned above, Giant Sea Bass are large predatory fish that are occasionally observed during fish surveys at Wheeler North Reef. In years when this occurs, they can account for a substantial portion of reef fish biomass despite their low abundance. No Giant Sea Bass were recorded at Wheeler North Reef in 2025.

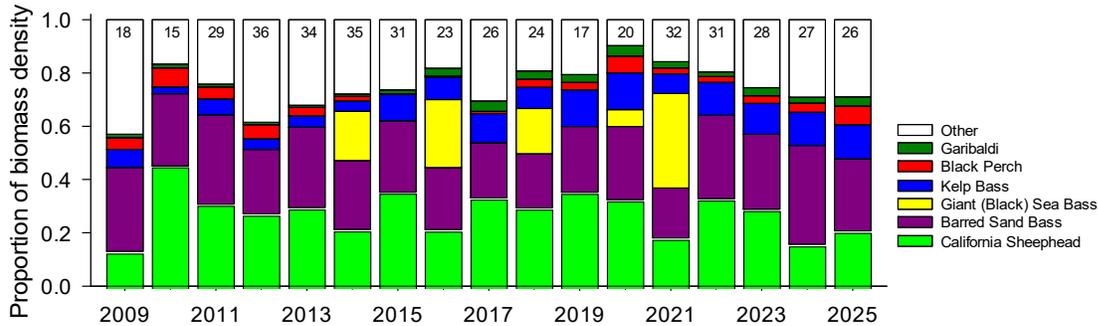


Figure 7.2.4. Proportion of the total reef fish biomass contributed by different taxa at Wheeler North Reef. Numbers in bars indicate the number of “other” species observed in that year. n = 92, 151 and 111 transects respectively, for 2009 – 2019, 2020 – 2023, and 2024 – 2025. Sampling of Phase 3 began in 2020.

### 7.3 Benthos

In addition to giant kelp and fish, the benthic community on the shallow reefs off California typically includes a diverse group of low-lying red, brown and green algae that occur on the bottom beneath the canopy of giant kelp (often referred to as understory algae) and a large number of sessile and mobile invertebrate species. Much like understory algae, sessile invertebrates attach themselves to the reef. However, unlike algae that obtain their nutrition via photosynthesis, sessile invertebrates (which include organisms such as sponges, sea anemones, feather duster worms, bryozoans, bivalves and sea squirts) feed by filtering plankton from the water column.

The amount of rock that becomes occupied by algae and sessile invertebrates tends to increase over time during the normal succession of a kelp forest community. Such has been the case for the Phase 2 reef, which showed a dramatic increase in the percent cover of the benthic community immediately following its construction (Figure 7.3.1). Within three years of being built, >90% of the rock surface of Phase 2 was covered by macroalgae and sessile invertebrates, which was similar to that observed on the older Phase 1 modules. Colonization of the Phase 3 reef by sessile biota was equally rapid as the 98% of the Phase 3 rock was covered by macroalgae and sessile invertebrates in 2025.

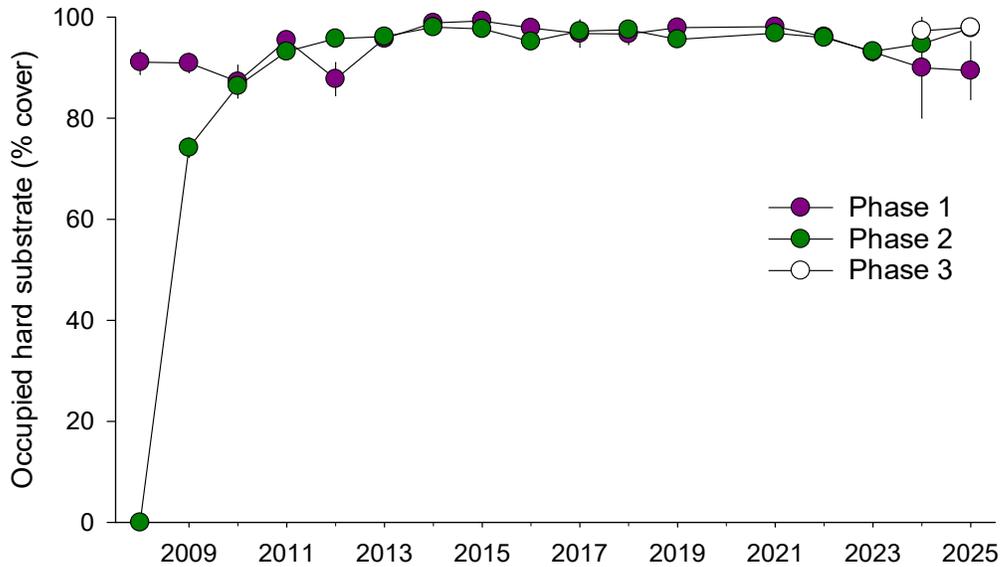


Figure 7.3.1. Mean percent cover ( $\pm 1$  standard error) of hard substrate occupied by sessile reef biota (i.e. macroalgae and sessile invertebrates) at Phases 1, 2 and 3 of Wheeler North Reef.  $n = 12$  and  $80$  transects for Phases 1 and 2, respectively from 2009 – 2023, and  $n = 2, 13,$  and  $15$  transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 data were excluded due to reduced sampling imposed by COVID-19 restrictions.

Macroalgae quickly colonized the newly constructed Phase 2 reef in 2009, attaining an average coverage of 28%, which was very similar to that of the older Phase 1 modules (Figure 7.3.2). Macroalgal percent cover on the Phase 1 and 2 fluctuated synchronously over time up until 2024 when the cover on Phase 1 dropped to 12%, which was less than half of that of Phase 2. This drop may reflect a substantial reduction in sample size from 12 to 2 transects associated with annual site inspections (Table 4.1.1). By contrast the cover of macroalgae at the 15 transects sampled at Phase 3 averaged 82% in 2024 and 55% in 2025, which was substantially higher than that of Phases 1 and 2.

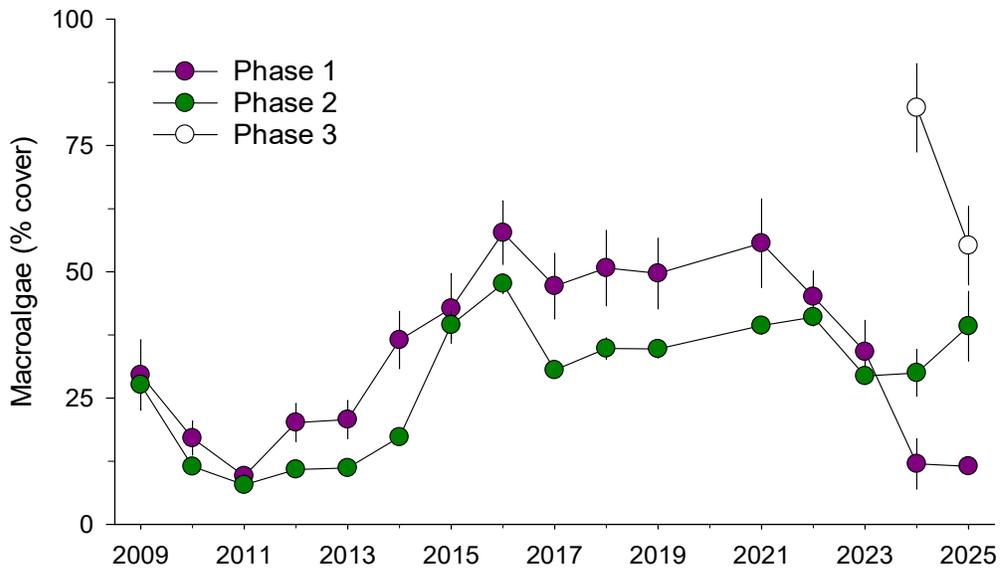


Figure 7.3.2. Mean percent cover ( $\pm 1$  standard error) of macroalgae at Phases 1, 2 and 3 of Wheeler North Reef.  $n = 12$  and  $80$  transects for Phases 1 and 2, respectively from 2009 – 2023 and  $n = 2, 13,$  and  $15$  transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 data were excluded due to reduced sampling imposed by COVID-19 restrictions.

The species composition of the macroalgal community at Wheeler North Reef has changed substantially over time since 2009. Initially, filamentous brown and red algae accounted for most of the benthic cover of macroalgae at Wheeler North Reef (Figure. 7.3.3). This transitioned to giant kelp holdfasts, which dominated the primary space occupied by macroalgae from 2010 through 2014, accounting for up to 85% of the total algal cover. The proportional cover of the foliose red algae *Acrosorium uncatum* and *Rhodymenia* spp. increased substantially following the decline in giant kelp abundance in 2015 and 2016 (Figures 7.1.2 and 7.1.3), and their combined cover constituted 32% to 57% of the total macroalgal cover from 2015 - 2019. The relative percent cover of these two species declined to about 5% in 2023, before increasing to 20 - 25% in 2024 and 2025 when a total of 42 and 45 taxa of macroalgae were observed in the 30 transects sampled.

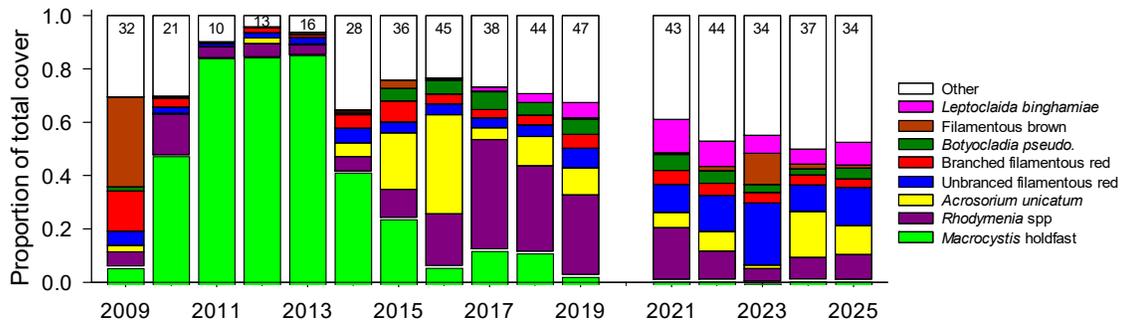


Figure 7.3.3. Proportion of the percent cover of macroalgae contributed by different taxa at Wheeler North Reef. Numbers in bars indicate the number of “other” species observed in that year. Values were derived from data collected from  $n = 12$  and  $80$  transects for Phases 1 and 2, respectively from 2009 – 2023 and  $n = 2, 13,$  and  $15$  transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 data were excluded due to reduced sampling imposed by COVID-19 restrictions.

Large solitary brown algae such as the kelps *Laminaria farlowii* and *Pterygophora californica* are known to be important components of the kelp forest understory and their abundance is best estimated by density rather than percent cover. *Laminaria* and *Pterygophora* initially colonized the Phase 2 reef at relatively high densities in 2009, the year after it was built (Figure 7.3.4). The abundance of these two kelps at Phases 1 and 2 abruptly declined in 2010 and remained low until 2021 and 2022 when high recruitment was observed for both species especially at the Phase 2 polygons. The densities of both species have since declined due to density dependent thinning in 2023. By contrast, the densities of *Laminaria* and *Pterygophora* at Phase 3 in 2024 and 2025 were among the highest ever recorded at any of the phases of Wheeler North Reef.

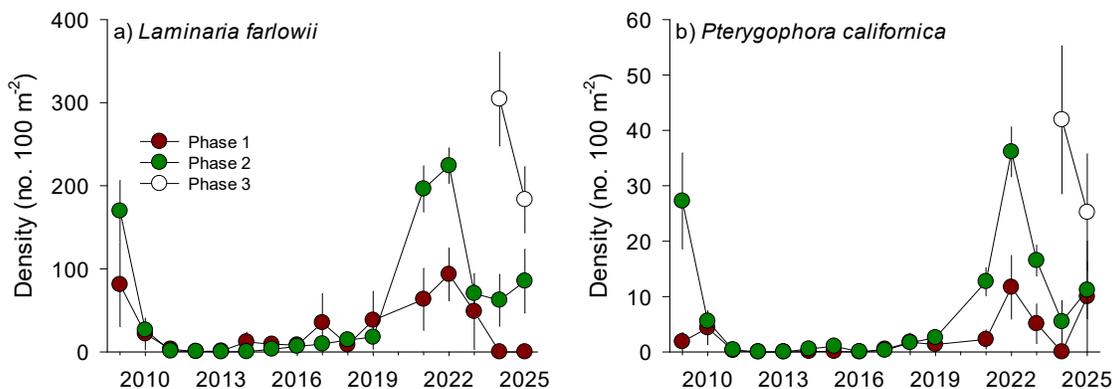


Figure 7.3.4. Mean densities ( $\pm 1$  standard error) of: (a) *Laminaria farlowii* and (b) *Pterygophora californica* at Wheeler North Reef.  $n = 12$  and  $80$  transects for Phases 1 and 2, respectively from 2009 – 2023 and  $n = 2, 13,$  and  $15$  transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 were excluded due to reduced monitoring imposed by COVID-19 restrictions.

As a group, sessile invertebrates were slower to colonize the Phase 2 reef than macroalgae as sessile invertebrate cover in 2009 was less than half that of

macroalgae (Figure 7.3.2 vs. 7.3.5). Unlike macroalgae, whose cover diminished rapidly after initiation colonization, the percent cover of sessile invertebrates increased steadily to 47% in 2012, which was comparable to that of the Phase 1 reef (Figure 7.3.5). Sessile invertebrate cover on both the Phase 1 and 2 reefs fluctuated substantially between 2012 - 2016, but has remained largely constant at ~ 35 to 45% since 2017, which was slightly higher than the average cover of sessile invertebrates at Phase 3 in 2024 and 2025 (Figure 7.3.5).

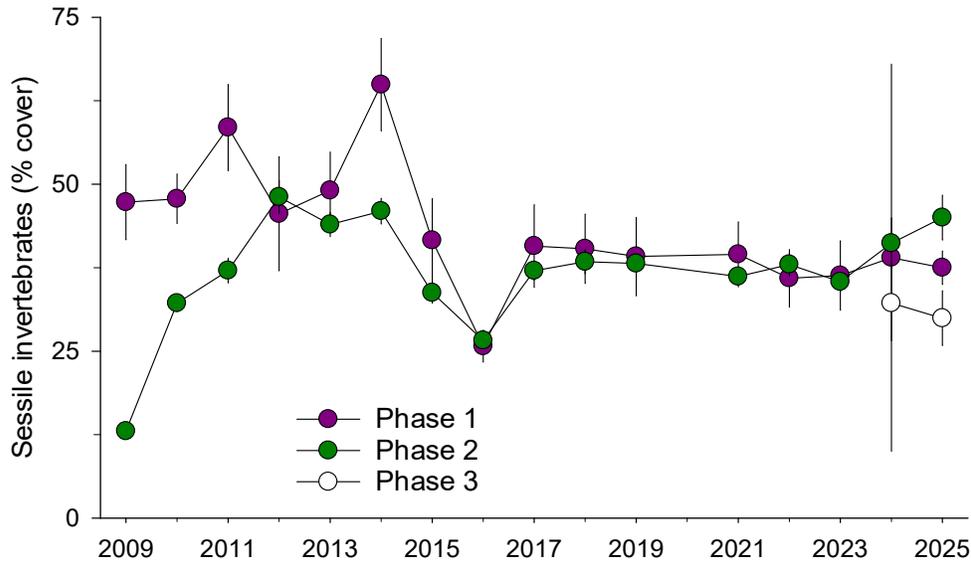


Figure 7.3.5. Mean percent cover ( $\pm 1$  standard error) of sessile invertebrates at Wheeler North Reef from. n = 12 and 80 transects for Phase 1 and 2 from 2009 – 2023 and n = 2, 13, and 15 transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

The mix of common species of sessile invertebrates at Wheeler North Reef has remained largely unchanged since 2019, with the exception that there has been a slight, increase in the proportional cover of the colonial tunicate *Chelyosoma productum* and a decrease in the erect bryozoan *Thalamoporella californica* (Figure 7.3.6). Other taxa of sessile invertebrates that are commonly observed at Wheeler North Reef include the sea fan *Muricea californica*, the colonial tunicate *Pycnoclavella stanleyi*, the colonial sponge *Lucilla nuttingi* and assorted species of encrusting bryozoans and foraminifera. Collectively these eight taxa comprised 50% of the total cover of the 48 taxa of sessile invertebrates recorded at Wheeler North Reef in 2025. Sea fans (*Muricea* spp.) are of particular interest as their density and percent cover have been gradually increasing over time on the older Phase 1 and Phase 2 reefs (Figure 7.3.7) and dense aggregations of sea fans have been associated with an absence of giant kelp on artificial reefs in southern California (Patton et al. 1996).

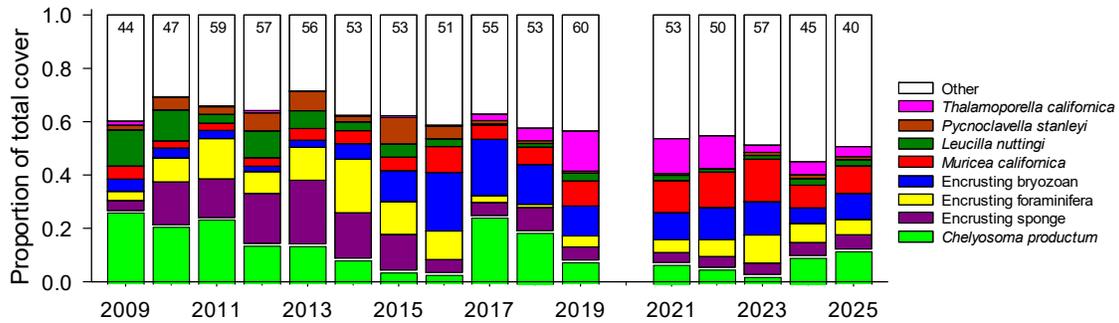


Figure 7.3.6. Proportions of the percent cover of different species of sessile invertebrate taxa at Wheeler North Reef. Numbers in bars indicate the number of “other” species observed in that year. Values were derived from data collected from n = 12 and 80 transects for Phase 1 and 2 from 2009 – 2023 and n = 2, 13, and 15 transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 data were excluded due to reduced sampling imposed by COVID-19 restrictions.

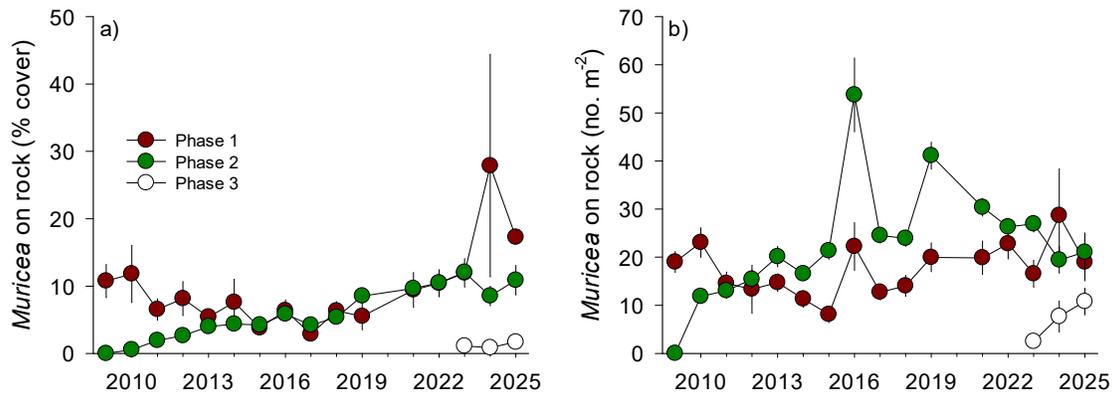


Figure 7.3.7. (a) Mean percent cover ( $\pm 1$  standard error) and (b) mean density ( $\pm 1$  standard error) of *Muricea* on rock at Wheeler North Reef. n = 12 and 80 transects for Phase 1 and 2 from 2009 – 2023 and n = 2, 13, and 15 transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 data was excluded due to reduced sampling imposed by COVID-19 restrictions.

As occupiers of primary space, understory algae and sessile invertebrates compete for hard substrate on the bottom. Understory algae tend to be the stronger competitor except in low light environments where their photosynthesis and growth are suppressed. Such is the case under a dense canopy of the giant kelp, which has a negative effect on understory algae by significantly reducing the amount of light reaching the bottom (Reed and Foster 1984, Castorani et al. 2021). Experiments done at the Phase 1 reef found that giant kelp had an indirect positive effect on sessile invertebrates due to its direct negative effect on understory algae (Arkema et al. 2009). These experiments demonstrated that the relative abundance of understory algae and sessile invertebrates on a reef is greatly affected by the presence of giant kelp. Understory algae are favored in the absence of giant kelp, while sessile invertebrates tend to be favored in the presence of giant kelp (Detmer et al. 2021).

Strong asynchrony in abundance between sessile invertebrates and understory algae, and between understory algae and giant kelp has been observed at Wheeler North Reef from 2009 – 2019 (Figure 7.3.8). The negative covariance observed between the benthic cover of sessile invertebrates and understory algae (its primary competitor for space) and the positive covariance between the cover of sessile invertebrates and the density of giant kelp (which outcompetes understory algae for light) is indicative of the direct and indirect effects of competition among these three groups of primary space holders (Arkema et al. 2009). Interestingly, the percent cover of sessile invertebrates and understory algae has remained relatively constant at Wheeler North since 2019 despite the persistent decline in the density of giant kelp fronds, which suggest factors other than giant kelp are preventing understory macroalgae from out-competing sessile invertebrates.

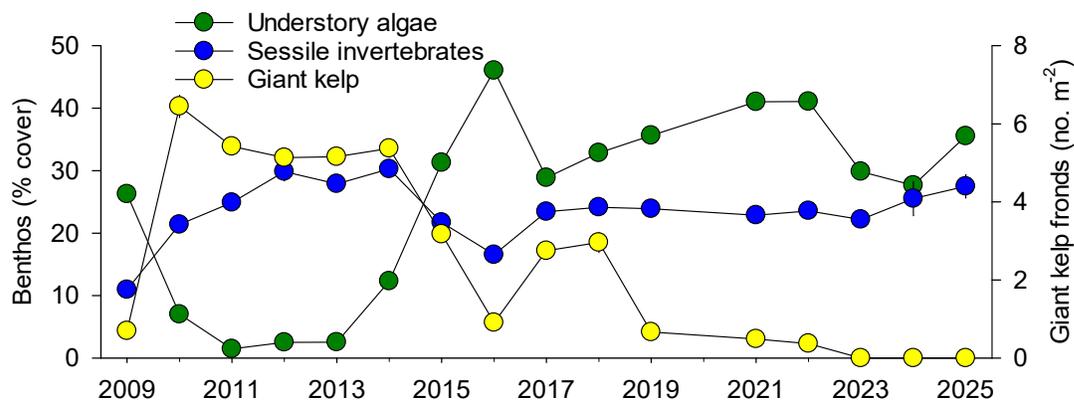


Figure 7.3.8. Comparison of mean percent cover of understory algae and sessile invertebrates (left axis) and mean frond density of adult giant kelp (right axis) at Phase 1 and 2 of Wheeler North Reef.  $n = 15$  transects in 2024 – 2025 and  $n = 92$  transects in all other years. 2020 data were excluded due to reduced sampling imposed by COVID-19 restrictions.

A diverse array of mobile invertebrates is also common in southern California kelp forests, including a variety of herbivorous and predatory snails, octopus, crabs, lobster, and many different kinds of echinoderms (e.g., brittle stars, sea stars, sea urchins, sea cucumbers). Like the coverage of sessile invertebrates, the density of mobile invertebrates in the Phase 2 polygons increased dramatically from  $< 1$  individual per  $m^2$  in 2009 to 117 per  $m^2$  in 2012, which was  $\sim 50\%$  higher than that observed on the Phase 1 modules at that time (Figure 7.3.9). Mobile invertebrates steadily declined on Wheeler North Reef between 2012 and 2016 when densities on both the Phase 1 and 2 reefs plummeted to 15-18 individuals per  $m^2$ . Densities of mobile invertebrates have remained relatively low since then, averaging 3, 14, and 20 individuals per  $m^2$  on the Phase 1, Phase 2 and Phase 3 reefs in 2025, respectively.

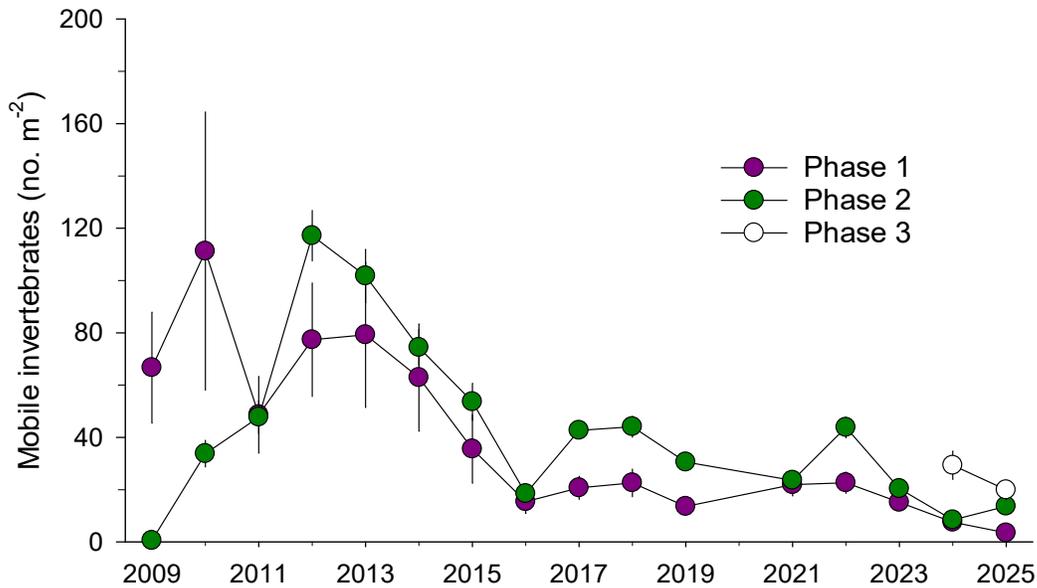


Figure 7.3.9. Mean density ( $\pm 1$  standard error) of mobile invertebrates at Wheeler North Reef.  $n = 12$  and  $80$  transects for Phase 1 and 2 from 2009 – 2023 and  $n = 2$ ,  $13$ , and  $15$  transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 data were excluded due to reduced monitoring imposed by COVID-19 restrictions.

The brittle star, *Ophiothrix spiculata*, has consistently been the most abundant species of mobile invertebrate at Wheeler North Reef, accounting for 42 - 90% of all mobile invertebrates recorded since 2009 except 2025 when its proportional abundance declined to 29% (Figure 7.3.10). Brittle stars commonly inhabit the holdfasts of giant kelp and the changes in the density of brittle stars at Wheeler North Reef has been associated with a corresponding change in the proportional cover of giant kelp holdfasts (Figure. 7.3.3). Aside from brittle stars, hermit crabs, the cone snail *Conus californicus*, and the whelk *Pteropurpura festiva* have consistently been among the most abundant mobile invertebrates at Wheeler North Reef, with hermit crabs showing a noticeable increase in 2025. Collectively these four species accounted for 76% of the mobile invertebrates recorded from 49 taxa in 2024.

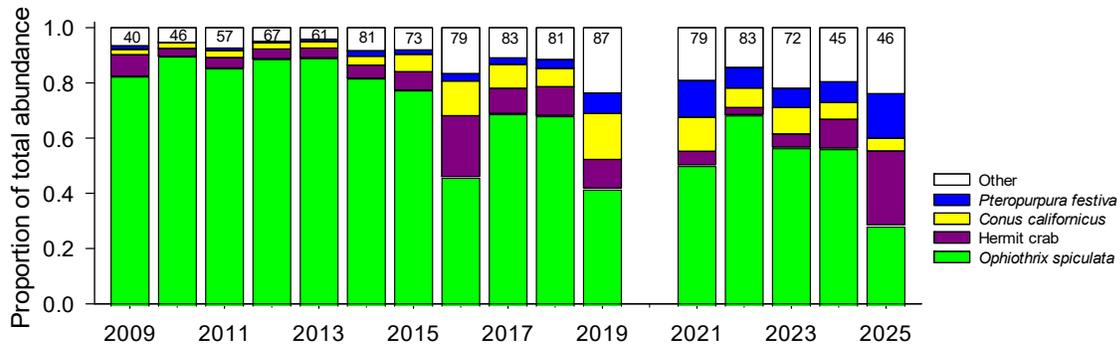


Figure 7.3.10. Proportions of different taxa of benthic mobile invertebrates at Wheeler North Reef. Numbers in bars indicate the number of “other” species observed in that year. Values were derived from data collected from  $n = 12$  and  $80$  transects for Phase 1 and 2 from 2009 – 2023 and  $n = 2, 13,$  and  $15$  transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 were excluded due to reduced monitoring imposed by COVID-19 restrictions.

Larger species of common mobile invertebrates (e.g., spiny lobster, sea urchins, sea stars, and large gastropods), while not as abundant as smaller species of mobile invertebrates, are common at Wheeler North Reef and their foraging activities can play a disproportionate role in structuring the kelp forest community. Of particular note is the California spiny lobster (*Panulirus interruptus*), a top predator in the kelp forest that is actively targeted by commercial and recreational fishermen. Lobster densities on Phases 1 and 2 of Wheeler North Reef increased nearly 20-fold from 0.1 per 100 m<sup>2</sup> in 2009 to 5 per 100 m<sup>2</sup> in 2016. Lobster densities remained relatively abundant through 2023, at which point they declined sharply to near zero in 2024 and recovered to 0.5 and 1 per 100 m<sup>2</sup> in 2025 at Phase 1 and Phase 2, respectively (Figure 7.3.11). Interestingly densities of lobster and sea urchins in 2024 and 2025 at Phase 3 where kelps were most abundant (Figures 7.1.5 and 7.3.4) were among the highest levels ever recorded for Wheeler North Reef. Initially, the bat star (*Patiria miniata*) and spined sea stars (*Pisaster* spp.) were common benthic invertebrate predators at Wheeler North Reef. However, they all but disappeared in 2015 due to an epidemic outbreak of a wasting disease that led to mass mortalities of at least 20 species of sea stars from Alaska to Mexico (Hewson et al. 2014). Sea star populations at Wheeler North Reef and elsewhere in California have yet to fully recover from this epidemic.

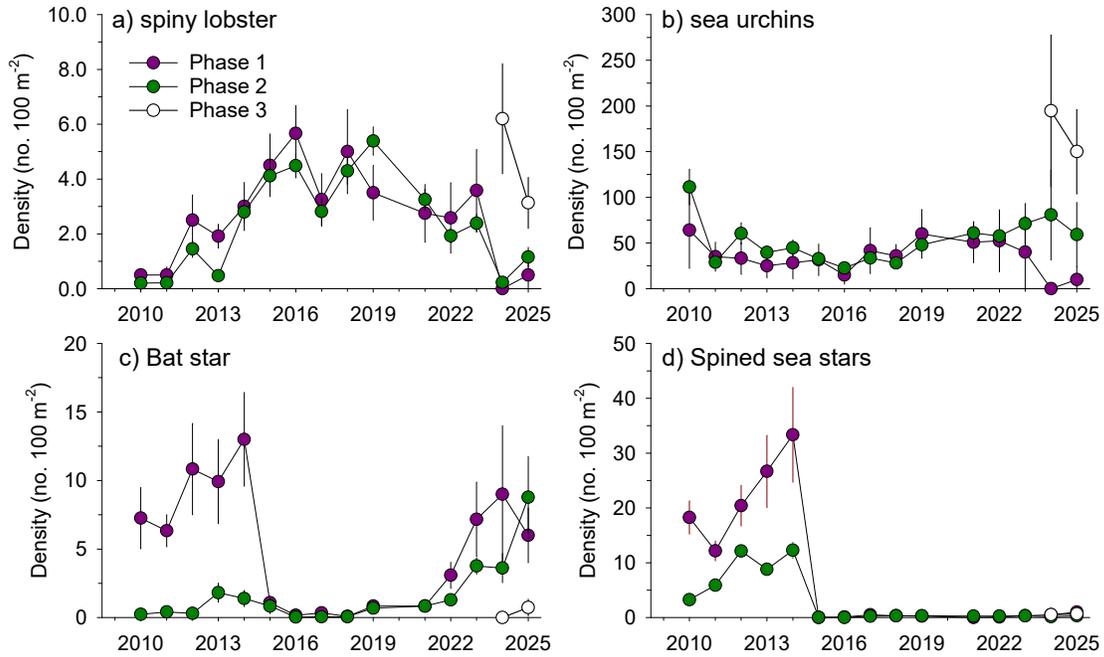


Figure 7.3.11. Mean densities ( $\pm 1$  standard error) of: (a) spiny lobster, (b) red and purple sea urchins, (c) bat star and (d) spined sea stars on Wheeler North Reef.  $n = 12$  and  $80$  transects for Phase 1 and 2 from 2009 – 2023, and  $n = 2, 13,$  and  $15$  transects for Phase 1, 2, and 3 in 2024 – 2025. 2020 were excluded due to reduced monitoring imposed by COVID-19 restrictions.

## 8.0 Future Monitoring Plans

Monitoring of the performance standards at Wheeler North Reef, San Mateo and Barn will continue in 2026 at a reduced level as required by the SONGS's coastal development permit. This reduced level is warranted because there are provisions in the SONGS's permit to reduce the level of monitoring once the Wheeler North Reef has demonstrated that it has successfully met the performance for a three-year period following 10 years of monitoring. Reduced monitoring of Wheeler North Reef and the reference reefs began in 2024 and will continue until either: (1) the mitigation requirement is fulfilled, or (2) reduced monitoring indicates that Wheeler North Reef is no longer meeting the performance standards as described in the Monitoring plan for the SONGS' reef mitigation project (Reed et al. 2024), requiring a return to full monitoring.

Targeted sampling of hard substrate at the edges of select polygons of the Phase 3 reef is planned for 2026 to determine causes for the reduction in footprint area and the extent to which it is continuing.

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