

CALIFORNIA COASTAL COMMISSION

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



F 3

DATE: June 12, 1998

TO: COASTAL COMMISSIONERS
AND INTERESTED PARTIES

FROM: MARK DELAPLAINE, FEDERAL CONSISTENCY SUPERVISOR

RE: NEGATIVE DETERMINATIONS ISSUED BY THE EXECUTIVE
DIRECTOR [Note: Executive Director decision letters are attached]

PROJECT #:	ND-030-98
APPLICANT:	Immigration and Nationalization Service
LOCATION:	Imperial Beach Border Patrol Station, San Diego Co.
PROJECT:	Construction of two new structures and vehicle support facilities, and expansion of vehicle parking areas
ACTION:	Concur
ACTION DATE:	6/1/1998

PROJECT #:	ND-047-98
APPLICANT:	Department of Energy
LOCATION:	Coastal waters offshore of San Francisco Bay
PROJECT:	Shipment of spent nuclear fuels to Concord
ACTION:	Object
ACTION DATE:	6/4/1998

PROJECT #:	ND-053-98
APPLICANT:	Coast Guard
LOCATION:	Fort MacArthur, San Pedro, Los Angeles Co.
PROJECT:	Expansion of an existing building
ACTION:	Concur
ACTION DATE:	6/1/1998

PROJECT #:	ND-055-98
APPLICANT:	Navy
LOCATION:	Naval Amphibious Base, Coronado, San Diego Co.
PROJECT:	Construction of new structure for craft storage
ACTION:	Concur
ACTION DATE:	5/29/1998

PROJECT #:	ND-057-98
APPLICANT:	Navy
LOCATION:	Naval Construction Battalion Center, Port Hueneme, Ventura Co.
PROJECT:	Construction of an Automotive Vehicle Maintenance facility and vehicle holding shed
ACTION:	Concur
ACTION DATE:	6/1/1998

PROJECT #:	NE-058-98
APPLICANT:	Caltrans
LOCATION:	Route 101 Bridge at McBrindle Creek, Humboldt Co.
PROJECT:	Excavation of 60 cubic yards of sediment
ACTION:	No effect
ACTION DATE:	6/1/1998

PROJECT #:	NE-061-98
APPLICANT:	San Luis Obispo County
LOCATION:	Cayucos Creek Road, Cayucos, San Luis Obispo Co.
PROJECT:	Road repair
ACTION:	No effect
ACTION DATE:	6/1/1998

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TELEPHONE AND TDD (415) 904-5200



June 1, 1998

Rich Diefenbeck, Director
Facilities and Engineering Division
U.S. Dept. of Justice
Immigration and Nationalization Service
425 I St., N.W., Room 2060
Washington D.C. 20536

RE: **ND-30-98** Negative Determination, Immigration and Nationalization Service (INS),
Improvements to Imperial Beach Border Patrol Station, San Diego

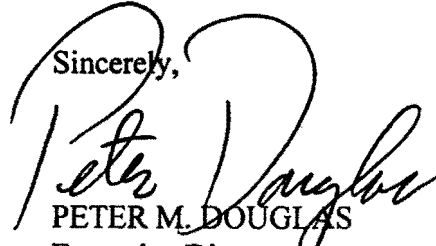
Dear Mr. Diefenbeck:

The Coastal Commission staff has received the above-referenced negative determination for the construction of various improvements to the Imperial Beach Border Patrol Station, north of the Tijuana River and just east of the Imperial Beach Naval Outlying Landing Field in San Diego. The improvements would consist of two new structures, vehicle support facilities, and expansion of parking lots. The improvements are needed due to increased numbers of border Patrol agents. The existing facility was originally developed for 160 agents in 1985; this number has increased to 387 agents (and 15 support staff). The improvements are also intended to accommodate an anticipated future additional 57 agents.

Construction activities would be limited to existing developed and disturbed areas. No environmentally sensitive habitat would be affected. The new parking areas are already used for parking but are currently unpaved. The entire facility would be elevated above the 100 year flood plain. No scenic public views would be adversely affected. The project would improve runoff and water quality impacts, because: (1) Best Management Practices would be incorporated during construction; (2) building and parking lot runoff would be captured and directed into the City of San Diego's storm water drain, which would reduce sedimentation into the Tijuana River; and (3) pollutants from vehicle wash and repair facilities would be directed into the City's sewer system. Night-time lighting would be shielded to avoid effects of night lighting on wildlife to the south along the Tijuana River. No cultural resources have been identified at the site.

In conclusion, the Coastal Commission staff **agrees** that the proposed project will not adversely affect coastal zone resources. We, therefore, **concur** with your negative determination made pursuant to 15 C.F.R. Section 930.35(d). If you have any questions, please contact Mark Delaplaine of the Coastal Commission staff at (415) 904-5289.

Sincerely,



PETER M. DOUGLAS
Executive Director

cc: San Diego Area Office
NOAA
Assistant Counsel for Ocean Services
OCRM
California Department of Water Resources
Governors Washington D.C. Office
Ogden Environmental
Commander, Naval Base San Diego

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
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June 4, 1998

David G. Huzienga
Acting Deputy Assistant Secretary for
Nuclear Materials and Facility Stabilization
Office of Environmental Management
Department of Energy
Washington, D.C. 20585

Subject: ND-47-98, Department of Energy Shipments of Spent Nuclear Fuels to Concord
Naval Weapons Station Via California Coastal Waters

Dear Mr. Huzienga:

The Coastal Commission staff has reviewed the negative determination and supporting materials submitted by the Department of Energy (DOE) for transportation via California coastal waters of up to 5 shipments of spent nuclear fuel to the Concord Naval Weapons Station, Concord, California, and up to approximately 231 shipments of spent nuclear fuel to Charleston, South Carolina. We understand that the shipments consist of training, research, isotope, and general atomic (TRIGA) spent fuel and target materials consisting of highly enriched uranium that can be used to make nuclear weapons, and that the authorization for such shipments will expire in 2009.

For the reasons set forth below, we believe the DOE's proposal poses significant risks to California's coastal and marine resources, and that Coastal Act policies set forth in sections 30001.5, 30230, 30232, and 30234.5, discussed in more detail below, are specifically implicated. Therefore, we do not agree with the DOE's negative determination and hereby give notice that submittal of a consistency determination is required.

Risks Posed to California's Coastal Resources

The Commission staff has considered the DOE's assurances that the risk of accidental release of radioactive materials into the environment during transportation is negligible, and statistically would result in a "less than one in one billion chance of a future cancer death for a maximally exposed individual," should such a release occur. The staff recognizes that the spent fuel would be packaged in specially designed "accident-resistant" steel casks and that the DOE believes there is "less than a one in ten million chance of the release of a transportation cask's contents into the marine environment."

Despite such assurances, however, Commission staff remains concerned that it is not possible to ensure that the proposed shipments will pose no significant risk to coastal resources. Although the risk of upset calculated on the basis of maritime shipping accident rates and other similar probabilities appears to be small, the risk is not zero. Thus, a catastrophic release of radioactive materials into the coastal environment cannot be ruled out.

California Coastal Act Policies Affected by DOE's Proposal

The California Coastal Act of 1976 (California Public Resources code, Section 30000 et seq.) contains the enforceable policies of the federally approved California Coastal Management Program ("CCMP") under the federal Coastal Zone Management Act. Coastal Act section 30001.5 states in pertinent part that:

The Legislature further finds and declares that the basic goals of the state for the coastal zone are to:

(a) Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources.

(b) Assure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the state.

The imposition upon California's coastal environment of an avoidable risk of a radioactive release is inconsistent with the fundamental principles of coastal zone protection set forth in section 30001.5 of the Coastal Act. In addition, Commission staff believes that the possible release of radioactive materials, however statistically remote the DOE may consider the likelihood of such a release to be, renders the DOE's negative determination inadequate when considered in light of the policies set forth in Coastal Act sections 30230, 30232, and 30234.5, discussed below.

Risks to California's Fishing Industries

Commission staff is particularly concerned about the proposed project's potential impacts on California's commercial and recreational fishing industries. The Coastal Act specifically protects California's marine resources under the provisions of section 30230, which requires that uses of the marine environment shall be carried out in a manner that sustains the biological productivity of coastal waters and that protects California's fisheries for long-term commercial, recreational, scientific, and educational purposes. Further, Coastal Act section 30232 states in pertinent part that:

Protection against the spillage of ... hazardous substances shall be provided in relation to any development or transportation of such materials.

Finally, Coastal Act section 30234.5 requires protection of California's fisheries:

The economic, commercial, and recreational importance of fishing activities shall be recognized and protected.

The DOE proposal clearly places California's fisheries at risk. The DOE states that if a containment cask sinks anywhere in U.S. coastal waters (within the 12-mile territorial limit), it will be recovered, regardless of depth. Yet Appendix C of the Final Environmental Impact Statement, "Marine Transport and Associated Environmental Impacts," states on page C-25, paragraph three, that: "... (lost cask) recovery, even in coastal waters, cannot be guaranteed..." Thus, the DOE admits that the protection of California's marine resources from exposure to highly radioactive materials is impossible to guarantee. Moreover, the loss of a cask in or near California's coastal waters, regardless of actual levels of radioactive release that would occur, could result in a widespread public perception that California's commercial and sport fisheries had become or could be contaminated by radioactive materials. Public avoidance of California's seafood and seafood products, as well as a concomitant decline in recreational fishing, would cause statewide economic losses and could have a particularly adverse effect on California's commercial fisheries dependent on near shore production.

Use of California Port of Entry May Be Unnecessary

In light of these serious potential impacts on California's coastal environment, Commission staff believes that the alternative of longer term storage, closer to the origins of the wastes, would avoid risks of release in California's coastal environment. The DOE analysis affirms that the wastes would be transported overland to a temporary management site in Idaho. No permanent storage site for nuclear waste disposal has been authorized. Therefore, the wastes will have to be transported yet again at some undisclosed time in the future to a final disposal site. The second, and ultimate, need to transport the materials to a final storage site will compound the risk of release to the environment of the radioactive materials. Thus, the Commission staff believes that managing the wastes temporarily at an overseas location would minimize the transportation of the materials, thereby avoiding exposure of the coastal environment to attendant risks, which, however statistically remote, could be significant. Further, the potentially doubled risk of an inland release of radioactive materials would be substantially lessened by postponing the transport of such materials until an adequate permanent repository is available.

Need For Analysis of Consolidated Port Alternative

Furthermore, the Commission staff believes that the DOE did not define or adequately review the alternative of consolidation of ports of entry to a single port. According to the DOE, the vast majority--**231 shipments**--of the spent nuclear fuel under this program will enter the United States through Charleston, South Carolina (bound for storage in Savannah, Georgia), and only **5 shipments** are proposed to be shipped through California's coastal waters to the Concord Naval Weapons Center. Consolidation of the port of entry to the Charleston site would have several important advantages over the current proposed alternative, such as consistently utilizing personnel experienced in the routine handling of the casks, tested infrastructure, tested methodologies for safe offloading of the spent nuclear fuel, and regularly scheduled arrivals of spent nuclear fuel shipments. It is clear from the DOE documentation that at the Concord facility, the irregularly scheduled, episodic offloading of spent nuclear fuel would directly conflict with the normal handling of highly explosive materials at the facility. In addition, the spent nuclear fuel would inevitably become a second tier material in terms of handling procedures and shipment arrival scheduling. This could result in offloading delays, thereby increasing the risks posed by the shipments of spent nuclear fuels to California's coastal environment.

We note that Figure C-6, shown on page C-11 of Appendix C of the Final Environmental Impact Statement, "Marine Transport and Associated Environmental Impacts," shows that the DOE has already determined that consolidated shipping routes relying on passage through the Panama Canal would be feasible. We further note that the consolidation of the 5 shipments presently under consideration for delivery to California with the 231 already scheduled for such delivery represents only an approximately 2 percent increase in the proposed South Carolina shipments. On the other hand, the shipment of even 5 deliveries of spent nuclear fuel to a California port represents a 100 percent increase in hazardous cargo deliveries to California (and to the associated inland destinations and transportation corridors) beyond the number of such shipments (TRIGA spent fuels) that would otherwise be received. The California port cannot serve as the consolidated alternative due to the overall shipping route considerations illustrated in Figure C-6, cited above.

We do not support simply redirecting impacts to otherwise unaffected environmental settings (the so-called "Not-In-My-Back-Yard" response). We do not, however, believe that such an effect would result from the implementation of the consolidated shipment alternative. The approximately 2 percent increase in shipments to South Carolina (5 shipments in addition to the 231 shipments proposed) that would result from the consolidated alternative is minimal when compared with the significant risks posed to California's coastal resources by the DOE proposal. Such risks would be avoided altogether by consolidating the destination of the spent fuel shipments at one port. The South Carolina port proposed by the DOE to receive 231 cargo loads of spent nuclear fuel would be subject to the same general level of risk and environmental

impacts regardless of whether 5 additional shipments are redirected from the Concord Naval Weapons Station. Yet the elimination of the Concord Naval Weapons Station destination that the Coastal Commission staff recommends for consideration completely avoids risks of radioactive contamination, as well as all other identified adverse environmental impacts of the DOE proposal to: 1) California's marine environment, 2) inland areas comprising the transportation corridor of the Idaho-bound cargo, and 3) Idaho facilities identified for the temporary storage of the nuclear wastes. And, as we have already pointed out, the risks to California's coastal environment posed by the handling of 5 irregularly-scheduled shipments at the Concord Naval Weapons Station are much higher than the risks associated with allowing experienced South Carolina personnel, relying on well-tested procedures honed through the handling of 231 other spent nuclear fuel shipments, to handle the same 5 shipments.

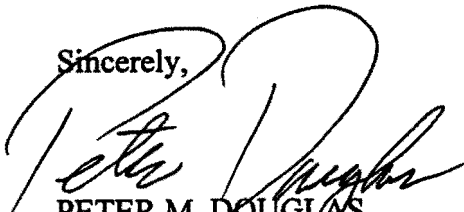
The DOE does not have an ultimate disposal site available for final storage of the TRIGA spent nuclear fuel, as we have noted previously. Commission staff believes the resultant need to ship the TRIGA spent nuclear fuels to such a final disposal site once one is authorized in the future underscores the benefits of consolidating shipment and temporary management at the Savannah River facility. Should a "new" technology be developed in the interim to treat the material, consolidated temporary storage would permit the most effective and efficient implementation of such technology. All of these potential benefits, combined with the complete avoidance of risk to California's economically critical coastal environment underscore the importance of the consolidated alternative that has not been evaluated by the DOE so far.

Conclusion: Consistency Determination Required

In conclusion, the Commission staff **disagrees** with your determination that the proposed shipments will not affect California's coastal zone. We therefore **object** to your negative determination made pursuant to 15 CFR Section 930.35(d). Consequently, a consistency determination will need to be submitted to the Coastal Commission for this project. The consistency determination should analyze potential impacts on marine resources in the event of a catastrophic release of steel casks and/or loss of the radioactive contents into the environment. The analysis should also evaluate: 1) the benefits of retaining the radioactive wastes of concern at an overseas facility and avoiding all risks to the marine environment until a permanent storage facility for radioactive wastes is identified, constructed, and permitted within the United States, and 2) the benefits of consolidating the ports of entry to include only the Charleston, South Carolina port combined with the temporary management of the TRIGA material at DOE's Savannah River facility.

Once we receive your submittal, the staff will review it, prepare a staff recommendation, and schedule a public hearing before the Coastal Commission at the earliest possible time. Please contact me or Susan Hansch, Deputy Director, at (415) 904-5244 if you have any questions regarding this matter.

Sincerely,



PETER M. DOUGLAS
Executive Director

cc: Governor Pete Wilson
Douglas Wheeler, Secretary for Resources Agency
Coastal Commissioners
Rick Frank, Matt Rodriguez, Jamee Jordan Patterson, Attorney General's Office
Will Travis, BCDC
NOAA
Assistant Counsel for Ocean Services
OCRM
California Department of Water Resources
Governor's Washington, D.C. Office
Department of the Navy, Attn: John H. Kennedy

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June 1, 1998

Alice Coneybeer
U.S. Coast Guard
Eleventh Coast Guard District
Coast Guard Island, Bldg. 54D
Alameda, CA 94501-5100

RE: **ND-53-98** Negative Determination, Coast Guard, Expansion of Vessel Traffic Center, Fort MacArthur, San Pedro, City and County of Los Angeles

Dear Ms. Coneybeer:

The Coastal Commission staff has received the above-referenced negative determination for the expansion of the Coast Guard's Vessel Traffic Center, at the Marine Exchange, located at 3601 South Gaffey St. at Fort MacArthur in San Pedro. The project consists of a 2600 sq. ft., 2-story addition to an existing building. The addition will maintain the same roofline and exterior design as the existing building; therefore visual effects will be minimal. No environmentally sensitive habitat will be affected. The project will benefit the marine environment by improving vessel traffic management, through improved visual surveillance, electronic ship tracking, and other safety features.

We wish to clarify the statement in the Coast Guard's Environmental Assessment (p. 9, and repeated on p. 27), which states that the project site is 2 miles from the coastline and therefore outside the coastal zone. South Gaffey St. enters the coastal zone at its intersection with 25th St. in San Pedro. Our cursory review of our maps indicate 3601 Gaffey to be approximately 10 blocks seaward of the coastal zone boundary. Nevertheless, we agree with the remainder of your analysis that the project will not affect the coastal zone, in part because the project site is located on federal land, which is, by definition, excluded from the coastal zone, and in part due to the fact that the project will be located within a highly developed area and is compatible in scale with the surrounding existing development.

CALIFORNIA COASTAL COMMISSION

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May 28, 1998

Pat McCay
South Bay Area Focus Team
Department of the Navy
Southwest Division
Naval Facilities Engineering Command
2585 Callagan Hwy., Bldg. 99
San Diego, CA 92136-5198

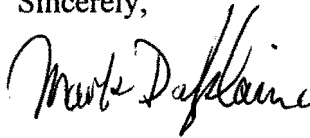
RE: **ND-55-98** Negative Determination, Navy Operational Storage Facility, Naval Amphibious Base (NAB), Coronado, San Diego Co.

Dear Mr. McCay:

The Coastal Commission staff has received the above-referenced negative determination for the construction of an Operational Storage Facility near the northeastern corner of the Naval Amphibious Base (NAB) in Coronado. The project would be a one-story building within an existing developed portion of the base. The project would not affect any scenic coastal public views, environmentally sensitive habitat or marine resources, public access and recreation, or any other coastal resources.

Therefore, we **agree** with your conclusion that the project will not adversely affect any coastal resources, and we hereby **concur** with your negative determination for this project made pursuant to Section 15 CFR 930.35(d) of the NOAA implementing regulations. Please contact Mark Delaplaine at (415) 904-5289 if you have any questions.

Sincerely,


(for) PETER M. DOUGLAS
Executive Director

cc: San Diego Area Office
NOAA
Assistant Counsel for Ocean Services
OCRM
California Department of Water Resources
Governors Washington D.C. Office
City of Coronado

CALIFORNIA COASTAL COMMISSION

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June 1, 1998

LCDR H.A. Bouika
Environmental, Fire and Safety Director
Department of the Navy
Naval Construction Battalion Center
1000 23rd Ave.
Port Hueneme, CA 93043-4301

RE: **ND-57-98** Negative Determination, Automotive Vehicle Maintenance Facility and
Vehicle Holding Shed, Naval Construction Battalion Center (NCBC), Port Hueneme,
Ventura County

Dear LCDR Bouika:

The Coastal Commission staff has received the above-referenced negative determination for the construction of an Automotive Vehicle Maintenance Facility and a Vehicle Holding Shed near the Marina Gate in the western portion of the NCBC. The facilities would be one story, 25 ft. high, and would be located within an existing developed area of the base. Their appearance would be similar in height and design to existing nearby industrial-type structures. No scenic public views would be affected. The project site contains no environmentally sensitive habitat. Public access and recreation would not be affected by the project. The project would not involve any discharges into marine waters.

We **agree** with the Navy that the project will not affect coastal resources, and we therefore **concur** with your negative determination made pursuant to Section 15 CFR 930.35(d) of the NOAA implementing regulations. Please contact Mark Delaplaine at (415) 904-5289 if you have questions.

Sincerely,

A handwritten signature in black ink that reads "Peter Douglas".

PETER M. DOUGLAS
Executive Director

cc: Ventura Area Office
NOAA
Assistant Counsel for Ocean Services
OCRM
Governors Washington D.C. Office
California Department of Water Resources
Jim Raives

CALIFORNIA COASTAL COMMISSION

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June 1, 1998

Deborah Harmon, Chief
Environmental Management
North Region
Caltrans, District 1
P.O. Box 3700
Eureka, CA 95502-3700

Re: **NE-58-98** "No Effects" Determination, Caltrans, Sediment Removal, McBrindle Creek/Highway 101, Humboldt County (Caltrans File No. 1-HUM-101-114.6)

Dear Ms. Harmon:

The Coastal Commission staff has received Caltrans' request for after-the-fact authorization of a repair project related to emergency storm damage in Humboldt County. The project would ordinarily be within the Coastal Commission's appeals jurisdiction (for a County-issued coastal development permit). However the County considers the project exempt from these permit requirements based on repair and maintenance provisions of the County's Local Coastal Program. The Coastal Commission nevertheless retains federal consistency authority because the project requires a federal (Army Corps) permit and may involve federal funding.

The project consisted of removal of 60 cu. yds. of sediment from the channel underneath the Highway 101 bridge over McBrindle Creek. The sediment removal was necessary to protect Highway 101 from flooding. Caltrans coordinated with the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and the California Dept. of Fish and Game. These agencies indicated the activity would not adversely affect environmentally sensitive habitat, and they did not seek any mitigation measures.

Due to the lack of adverse impacts we believe it is appropriate to waive federal consistency jurisdiction for this after-the-fact emergency project. Based on this waiver we agree with Caltrans' "No Effects" determination; therefore no consistency certification needs to be submitted for this project. Please call Mark Delaplaine of my staff at (415) 904-5289 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Douglas".
PETER DOUGLAS
Executive Director

cc: North Coast Area Office
NOAA
OCRM
California Dept. of Water Resources
Governors Washington, D.C. Office
RWQCB, North Coast Region
U.S. Army Corps of Engineers, S.F. District
CCC: Dickey, Bowers, Scholl, Fuchs, Raives

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AND TDD (415) 904-5200

**JURISDICTION LETTER**

Date: June 1, 1998

Jill Ogren
San Luis Obispo County
Engineering Department
County Government Center, Room 207
San Luis Obispo, CA 93408

Project: Emergency Repairs, #M302 Cayucos Creek Rd., inland of Cayucos, San Luis
Obispo County

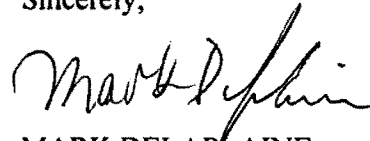
Coastal Commission file no. (if applicable) NE-061-98
U.S. Army Corps of Engineers Notice No. (if applicable) RGP 52
If a nationwide permit, NWP number _____

The Coastal Commission staff has received your request to identify Commission jurisdiction regarding the federal consistency process. Pursuant to the federal Coastal Zone Management Act (CZMA), a federal agency cannot issue a permit for an activity, either in or out of the coastal zone, that affects land and water uses or natural resources of the coastal zone until the applicant has complied with the requirements of Section 307(c)(3)(A) of the CZMA. (16 USC Section 1456[c][3][A].) These requirements can be met by receiving a Commission concurrence with a consistency certification prepared by the applicant or conclusion that the activity does not affect the coastal zone. Alternatively, these requirements can be satisfied by the issuance of a Commission approved coastal development permit. Since the federal consistency authority cannot be delegated to local governments, a coastal development permit issued by a local agency does not replace the requirement for a consistency certification. However, if an activity is within the Ports of San Diego, Long Beach, Los Angeles, or Port Hueneme and is identified in the Commission certified Port Master Plan, then no consistency certification is necessary.

The Coastal Commission staff has reviewed the information submitted for the above-referenced projects, and has concluded as follows:

The Coastal Commission declines to assert federal consistency jurisdiction, due to the fact that the project is located over 1 mile inland of the coastal zone and would not affect the coastal zone.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Delaplane". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

MARK DELAPLAINE
Federal Consistency Supervisor

cc: Santa Cruz Area Office
Corps of Engineers, Ventura Field Office (Tiffany Welch)
Jim Raives