

CALIFORNIA COASTAL COMMISSION

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**F 4****ENERGY, OCEAN RESOURCES, AND FEDERAL CONSISTENCY DIVISION REPORT**

FOR THE

JUNE 17, 2011 MEETING OF THE CALIFORNIA COASTAL COMMISSION

TO: Commissioners and Interested Parties

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

IMMATERIAL AMENDMENT

APPLICANT	PROJECT	LOCATION
E-09-011-A1 Rincon Island Limited Partnership (RILP)	Install <i>via pile-driving</i> 20-inch diameter full-length steel jackets over the existing 16-inch steel pilings on the Rincon Island causeway.	Rincon Island Oil Production Facility, Ventura County



NOTICE OF PROPOSED IMMATERIAL PERMIT AMENDMENT

E-09-011-A1

TO: All Interested Parties

FROM: Peter M. Douglas, Executive Director

DATE: June 7, 2011

SUBJECT: Application to amend Coastal Development Permit E-09-011 to carry out piling jacketing procedures on an existing causeway connecting Punta Gorda to the Rincon Island oil production facility within the Mussel Shoals area of Ventura County.

The Executive Director has determined that the project change described herein may be approved as an immaterial amendment to the above-referenced coastal development permit (CDP). The amendment would result in a minor change to the CDP, which allowed the Rincon Island Limited Partnership (RILP) to carry out repairs to the Rincon Island causeway.

Background: A 2,732 foot-long causeway provides vehicle and pedestrian access to Rincon Island and supports oil, natural gas, and utility lines that transit from shore to and from the island's oil and gas production facilities. That causeway is supported by approximately 120 pilings. On August 12, 2010, the Commission approved CDP E-09-011 that authorizes in part (a) reinforcement of 38 pilings above the waterline with steel sleeves (via welding) and (b) removal and replacement of one piling (which requires pile-driving).

However, during a May 2011 inspection, RILP and State Lands Commission (SLC) staff discovered that corrosion on the causeway pilings has progressed significantly since the last inspections were carried out (three years ago) and now includes degradation on pilings below the waterline at the point of contact with the seabed. Repairs to the sections of pilings below the waterline cannot be carried out by welding steel sleeves without the installation of temporary cofferdams and use of dredging equipment. An alternative solution, which RILP proposes in this amendment application and is the least environmentally damaging alternative, is to place larger diameter hollow steel piling jackets over and around the existing damaged pilings.

Requested Amendment: In this amendment application, RILP proposes to repair between 15-48 degraded pilings by installing *via pile-driving* 20-inch diameter full-length steel jackets over and around the existing 16-inch steel pilings. To install the jackets over the existing pilings, RILP would make use of the same methodology and techniques approved in CDP E-09-011 for



the replacement of a single pile. RILP will use a crane mounted on the causeway to set the new steel pile in place and pile drive it into position. Pile jackets would be installed on the causeway incrementally in conjunction with the repair/replacement of damaged pile caps and lateral bracing that is authorized in CDP E-09-011. Because the current condition of the causeway does not allow it to support vehicle traffic or heavy machinery such as a crane, the repair work would proceed from the shoreward landing seaward to ensure that the causeway section that would support the crane is sufficiently reinforced and stabilized before the crane is brought into position. RILP anticipates approximately one or two pile-driving events per day during this phase of the repair project. Installing jackets around the degraded pilings instead of welding “sleeves” is anticipated to result in the completion of the overall causeway repair project within less time than originally estimated.

The SLC staff supports this amendment request.

Findings: The proposed amendment has been deemed “immaterial” because the original permit contemplated some pile-driving and includes commitments from the applicant and conditions of approval to minimize potential adverse effects. These include:

- In E-09-011, RILP committed to carry out a variety of measures to minimize sound levels associated with pile driving. These noise impact minimization measures include a commitment to ensure that all vehicles and machinery are equipped with functioning exhaust systems and mufflers; to carry out the loudest activity – pile driving – between 10am and 4pm; to notify nearby residents at least seven days prior to initiating pile driving; to limit engine idling times to less than 30 minutes; and to limit pile driving to the minimum necessary to complete the project (less than 30 minutes total per day). Additionally, RILP will continuously move the equipment spread required for the proposed causeway repairs. The equipment spread would follow the work crew as it moves progressively farther offshore on the causeway, thus increasing the distance between the equipment and shore and thus reducing the sound levels received at onshore sites. Although pile-driving noise may affect beach users, it will be temporary and lessen as the repair work moves further seaward on the causeway.
- Pile driving in near-shore waters could adversely affect marine mammals and marine wildlife due to increased underwater sound levels. To minimize this risk, the Commission required in Special Conditions 1 and 2 of CDP E-09-011 that RILP use marine mammal monitors approved by the Executive Director during pile driving activities and that the monitors establish a 500 foot marine mammal safety zone around the activity, as well as a gradual ramp-up of sound levels. The monitor(s) is to suspend pile driving work if any marine mammals are observed within a 500 foot radius of the pile driving activity until the marine mammal has passed outside of this protection zone. Special Condition 2 also requires that pile driving occur at low tide, to the maximum extent feasible, to reduce the underwater area affected by elevated sound levels.

Immaterial Permit Amendment

Pursuant to the California Code of Regulations—Title 14, Division 5.5, Volume 19, section 13166(b)—the Executive Director has determined this amendment to be IMMATERIAL.

Pursuant to section 13166(b)(1), if no written objection to this notice of immaterial amendment is received at the Commission office within ten (10) working days of mailing said notice, the determination of immateriality shall be conclusive and the amendment shall be approved.

Pursuant to section 13166(b)(2), if a written objection to this notice of an immaterial amendment is received within ten (10) working days of mailing notice, and the executive director determines that the objection does not raise an issue of conformity with the Coastal Act or certified local coastal program if applicable, the immaterial amendment shall not be effective until the amendment and objection are reported to the Commission at its next regularly scheduled meeting. If any three (3) Commissioners object to the executive director's designation of immateriality, the amendment application shall be referred to the Commission for action as set forth in section 13166(c). Otherwise, the immaterial amendment shall become effective.

Pursuant to section 13166(b)(3), if a written objection to this notice of an immaterial amendment is received within ten (10) working days of mailing notice, and the executive director determines that the objection does raise an issue of conformity with the Coastal Act or a certified local coastal program if applicable, the immaterial amendment application shall be referred to the Commission for action as set forth in section 13166(c).

If you wish to register an objection to this notice, please send the objection in writing to Cassidy Teufel at the above address. If you have any questions, you may contact him at (415) 904-5502 or via email at cteufel@coastal.ca.gov.