

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
 SAN FRANCISCO, CA 94105-2219
 VOICE AND TDD (415) 904-5200
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ENERGY, OCEAN RESOURCES, AND FEDERAL CONSISTENCY DIVISION REPORT
FOR THE
OCTOBER 6, 2015 MEETING OF THE CALIFORNIA COASTAL COMMISSION
TO: Commissioners and Interested Parties
**FROM: Alison Dettmer, Deputy Director
 Energy, Ocean Resources & Federal Consistency**
DE MINIMIS WAIVER

APPLICANT	PROJECT	LOCATION
9-15-1344-W City of Los Angeles	Excavate, deconstruct, and remove from the beach for offsite disposal an abandoned 77-foot steel hulled vessel.	Playa del Rey Los Angeles County

IMMATERIAL AMENDMENT

APPLICANT	PROJECT	LOCATION
9-13-0500-A1 Hog Island Oyster Company	Install 5,125 sq. ft. of additional paving, relocate the building site, construct 11 additional parking spaces, and modify the design, location, configuration of the septic pre-treatment system and leach field.	Samoa Peninsula Humboldt County

PERMIT REVOCATION REQUEST

APPLICANT	PROJECT	LOCATION
9-15-0162-REV Southern California Edison Company	Request by Donna Gilmore of San Onofre Safety to revoke the Commission approval for CDP No. 9-15-0162.	San Onofre Nuclear Generating Station (SONGS) San Diego County



NEGATIVE DETERMINATION

APPLICANT	PROJECT	LOCATION
ND-0032-15 Department of the Navy	Complete or Partial Closure of Defense Fuel Support Point Action: Concur, 9/28/2015	San Pedro, Los Angeles Co.

NO EFFECTS DETERMINATION

APPLICANT	PROJECT	LOCATION
NE-0007-15 North County Transit District	Geotechnical Investigations for the San Elijo Lagoon Double-Track Project Action: No Effects, 9/28/2015	Solana Beach, San Diego Co.



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September 18, 2015

Coastal Development Permit De Minimis Waiver Coastal Act Section 30624.7

Based on the project plans and information provided in your permit application for the development described below, the Executive Director of the Coastal Commission hereby waives the requirement for a Coastal Development Permit pursuant to Section 13238.1, Title 14, California Code of Regulations. If, at a later date, this information is found to be incorrect or the plans revised, this decision will become invalid; and, any development occurring must cease until a coastal development permit is obtained or any discrepancy is resolved in writing.

Waiver: 9-15-1344-W

Applicant: City of Los Angeles

Location: Beach west of 64th Ave., Playa del Rey, Los Angeles County.

Proposed Development: The proposed project involves the use two excavators to excavate, deconstruct, and remove from the beach for offsite disposal a 77-foot steel hulled vessel. The vessel ran aground in February 2014, has been abandoned by its owner, and is now approximately 80% covered in sand near the edge of the high tide line. The vessel would be excavated in sections and deconstructed using an excavator mounted metal-shearing attachment. Steel sections would be transported across the beach to a visqueen lined temporary stockpile area designated and secured with chain-link fence. Once vessel deconstruction is complete, traffic along the beach bike trail would be temporarily detoured along Pacific Ave. between Culver Blvd. and Ballona Creek and stockpiled material would be loaded in roll-off bins and carried across the beach to Pacific Ave. for loading onto a transport truck. Approximately 10 to 15 bins would be loaded in this way and all would be transported offsite to an authorized metal recycling or disposal facility. The project is anticipated to take two weeks to complete. Staging and equipment storage during this time would take place in the seaward section of the public beach access parking lot between the end of Pacific Ave. and Ballona Creek.

Rationale:

- No beach excavation would occur within two weeks of the final predicted 2015 spawning event of the California grunion (*Leuresthes tenuis*).
- Prior to the start of on-beach project activities, a qualified biological monitor would survey for the presence of western snowy plovers (*Charadrius nivosus nivosus*) in the work areas. If western snowy plovers are observed, on-beach project activities would not begin until the plovers leave the area.
- The temporary detour of the beach bicycle path would be limited to the minimum possible period during project work hours for no more than two days and would not occur during weekend or holiday periods.

Coastal Development Permit De Minimis Waiver

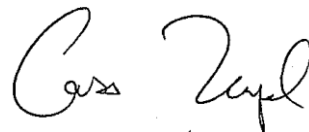
9-15-1344-W

- Any ADA-designated parking spaces occupied by project staging would be replaced with temporarily designating additional ADA parking spaces in an adjacent area of the beach access parking lot.
- To the extent possible, project activities would be limited to weekdays during the hours between 8AM and 5PM.
- Unless necessary for safety purposes, no artificial beach lighting would be used.
- Proposed excavation and deconstruction work would be carried out during mid- to low-tide periods and no in-water use of heavy equipment or machinery would occur.
- All vehicle, machinery, and equipment maintenance, fueling, and cleaning, would occur outside of beach areas.
- Prior to accessing beach areas, all equipment, vehicles, and machinery would be cleaned and inspected for leaks. Any leaks or known maintenance issues on equipment, vehicles, and machinery would be addressed prior to use in beach areas.
- All debris and metal resulting from vessel deconstruction would be collected and removed from the beach for offsite recycling or disposal at an authorized facility.
- Onsite security would be provided at the project site after work hours.
- For public safety, the project site would be temporarily marked with caution tape until project completion.
- Spill response equipment would be maintained onsite and project personnel with appropriate response training would be available to address unanticipated spills.
- Visual monitoring would be carried out during all vessel deconstruction and removal activities and any signs of contaminated materials at or around the vessel would trigger a thorough and immediate clean up response consistent with the project's spill containment and response plan.

The proposed development will not adversely impact coastal resources, public access, or public recreation opportunities, and is consistent with past Commission actions in the area and Chapter Three policies of the Coastal Act.

This waiver will not become effective until reported to the Commission at its October 2015 meeting and the site of the proposed development has been appropriately noticed, pursuant to 13054(b) of the California Code of Regulations. The enclosed Notice Card shall remain posted at the site until the waiver has been validated and no less than seven days prior to the Commission hearing. If four (4) Commissioners object to this waiver of permit requirements, a coastal development permit will be required.

Charles Lester,
Executive Director



Cassidy Teufel
Senior Environmental Scientist

cc: File

CALIFORNIA COASTAL COMMISSION

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NOTICE OF PROPOSED IMMATERIAL PERMIT AMENDMENT

Coastal Development Permit Amendment No. **9-13-0500-A1**

September 23, 2015

To: All Interested Parties

From: Charles Lester, Executive Director

Subject: Coastal Development Permit No. **9-13-0500** granted to **Hog Island Oyster Company** for: installation of shellfish nursery rafts, floating upwelling systems (FLUPSYs), and associated equipment on and adjacent to an existing pier and the construction and operation of an onshore shellfish hatchery, shellfish seed setting facility, office, algae greenhouse, covered work area, and seed washing facility.

Project Site: Samoa Peninsula, Humboldt County.

The Executive Director of the California Coastal Commission has reviewed a proposed amendment to the above referenced permit, which would result in the following change(s):

Installation of 5,125 square feet of additional paving, relocation of the building site, construction of 11 additional parking spaces, approximately 2,500 cubic yards of additional grading, an increase in the total onshore project square footage of 5,625 square feet and modifications to the design, location and configuration of the septic pre-treatment system and leach field.

FINDINGS

Pursuant to 14 Cal. Admin. Code Section 13166(b) this amendment is considered to be IMMATERIAL and the permit will be amended accordingly if no written objections are received within ten working days of the date of this notice. If an objection is received, the amendment must be reported to the Commission at the next regularly scheduled Commission hearing. This amendment has been considered "immaterial" for the following reason(s):

- The proposed changes to the size, location, and configuration of the onshore project elements that were approved by the Commission in CDP No. 9-13-0500 (all of which have yet to be constructed) would not result in any activities in or adjacent to sensitive habitat areas or wetlands.
- No trees, bushes or other major vegetation exist within the proposed project footprint or would be removed as part of the proposed activities.
- The applicant has developed and would implement an erosion control and soil loss prevention plan that incorporates Humboldt County approved construction best management

Notice of Proposed Immaterial Permit Amendment

9-13-0500-A1

practices such as the use of silt fencing and fiber rolls around areas of ground disturbance and construction equipment cleaning.

- Additional proposed grading, paving, and construction activities would not increase construction traffic, truck trips to and from the site, the construction period or the operation and use of the facility approved in CDP No. 9-13-0500.
- Proposed modifications to the septic pre-treatment system and leach field have been reviewed and approved by both the North Coast Regional Water Quality Control Board and the Humboldt County.
- With the proposed relocation of the building site it would remain at least 180 feet from the edge of the earthen bank bordering Humboldt Bay, nearly twice the setback distance required under local zoning regulations. Other than the installation of temporary erosion control devices such as fiber rolls, no proposed activities would occur within this setback area.

If you have any questions about the proposal or wish to register an objection, please contact Cassidy Teufel at the phone number provided above.

cc: Commissioners/File

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October 1, 2015

Donna Gilmore
San Onofre Safety
205 La Salle
San Clemente, CA 92672

Re: **Request for Revocation of Coastal Development Permit No. 9-15-0162**

Dear Ms. Gilmore,

Coastal Commission staff has received your September 1, 2015, request for the revocation of Coastal Development Permit (CDP) #9-15-0162 (Southern California Edison (SCE)), approved by the Commission on August 13, 2015. CDP 9-15-0162 authorizes the installation and operation of a new chiller-based cooling system to serve the existing spent fuel pools at San Onofre Nuclear Generating Station Units 2 and 3 (referred to as Spent Fuel Pool Island (SFPI) Project). Your request for revocation asserts that SCE falsely assured the Commission that the chiller-based cooling “system met design basis safety standards” and that the Commission was unaware that the Nuclear Regulatory Commission (NRC) was “requiring” SCE to “submit a License Amendment Request.” (See Attached.) It is my understanding that you also have submitted a second request for revocation of CDP 9-15-0162. This letter responds solely to your initial September 1, 2015 revocation request and your subsequent revocation request will be reviewed independently.

The grounds for revocation of a CDP that apply to the assertions you make are set forth in 14 Cal. Code of Regulations Section 13105 as follows:

- a) Intentional inclusion of inaccurate, erroneous or incomplete information in connection with a coastal development permit application, where the Commission finds that accurate and complete information would have caused the Commission to require additional or different conditions on a permit or deny an application;*

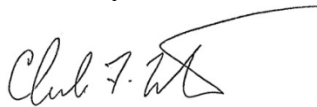
Commission regulations (14 CCR 13106) grant the Executive Director the authority to review a revocation request and decline to initiate revocation proceedings if he determines that the request is patently frivolous and without merit.

I have reviewed the grounds for revocation stated in your September 1, 2015 request and decline to initiate revocation proceedings because I have determined that the request is patently frivolous and without merit since the assertions you make are directly contradicted in the record of the permit proceedings.

Contrary to your assertions, SCE informed the Commission of its intention to request an amendment to its NRC operating license in its August 7, 2015 letter to the Commission (Attached here and included in the August 11 staff report addendum). SCE's August 7, 2015 letter expressly stated that the license amendment was being submitted to the NRC in part to allow for the operation of an SFPI system meeting lower seismic design standards than the SONGS Units 2 and 3 design basis because the license for a retired plant is less stringent than the license for an operating plant. Therefore, I am declining to initiate revocation proceedings because I have concluded, pursuant to Commission regulations (14 CCR § 13106), that your September 1, 2015 revocation request is patently frivolous and without merit.

If you have questions about this matter, please contact Alison Dettmer, Deputy Director, or Joseph Street, Environmental Scientist, in the Energy and Ocean Resources and Federal Consistency Division, at (415) 904-5240.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles F. Lester", with a long horizontal flourish extending to the right.

CHARLES F. LESTER
Executive Director

cc: Kim Anthony, SCE

From: [Donna Gilmore](#)
To: [Street, Joseph@Coastal](mailto:Street,Joseph@Coastal)
Cc: [David Peffer](#); [Scott Atwater](#); [Rick Morgal](#); [Toni Iseman](#); [Rita Conn](#)
Subject: San Onofre Spent Fuel Island Chiller System - Revocation of Commission decision needed for Application No. 9-15-0162
Date: Tuesday, September 01, 2015 2:44:42 PM

At the 8/13/2015 Chula Vista Coastal Commission meeting, Edison assured the Commission that this system met design basis safety standards. One of the Commissioners even asked you to assure her that the seismic standards were adequate (I don't recall her or your exact words). However, it was clear this was important to her and may have been the deciding factor on her vote and the other Commissioners' votes, since it's an obvious critical issue and generated much discussion at the meeting. I have since learned that an NRC inspector rejected the NRC 50.59 process that Edison told us they would use to install this system. Instead the NRC Inspector is requiring Edison submit a License Amendment Request. This process can take 12 to 18 months, according to the NRC. Edison is attempting to expedite this process with the NRC to 6 months, but there are no critical reasons to do so, since decommissioning is not dependent on this installation. This is a Capital Project, not a Decommissioning required project.

Below is a link to Edison's License Amendment Request that essentially lowers seismic safety standards for cooling the pools.

Amendment Applications 270 and 255, Proposed Changes to Specific Regulatory Guide Commitments, San Onofre Nuclear Generating Station, Units 2 and 3, LAR, August 20, 2015
<https://adamswebsearch2.nrc.gov/webSearch2/view?AccessionNumber=ML15236A018>

Please consider revoking the Commission approval, based on this critical information that was not available at the time the decision was made. A permit should not be granted until there are assurances that this system meets required and appropriate seismic standards. The fact the NRC has indicated this system doesn't meet design basis standards should be all the Commission needs to reevaluate their decision.

Numerous comments were made by concerned citizens, including myself, about this chiller system at the meeting. Using Commercial Grade systems without appropriate redundancies, defense in depth and adequate seismic standards is not acceptable, but Edison and Commission staff assured the Commission that the system met design basis earthquake standards. Based on the recent NRC action, that is clearly not the case.

Thank you,
Donna Gilmore
SanOnofreSafety.org
949-204-7794



August 7, 2015

Dr. Joseph Street
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: SCE Comments on the Staff Report for CDP Application #9-15-0162, Item Th15a

Dear Dr. Street,

On behalf of its co-owners (San Diego Gas & Electric Company, the City of Anaheim and the City of Riverside), Southern California Edison Company (SCE) submits the enclosed comments on the Staff Report for the Spent Fuel Pool Island (SFPI) Project. We appreciate the opportunity to review and thank you for generating a thorough Staff Report recommending approval of the Project. SCE agrees with the overall analysis and findings contained in the Staff Report and offers these minor comments as clarifications.

The attached table includes comments that primarily pertain to technical information and clarification of specific statements. In addition, SCE wishes to clarify the role of the U.S. Nuclear Regulatory Commission (NRC) in its evaluation and inspection of the SFPI system. The Staff Report includes the following statement on page 8:

“NRC staff has communicated to Coastal Commission staff that the project is being reviewed under Section 50.59 screening criteria, and that the NRC would conduct an inspection of the facility after project completion.”

SCE now has more current information regarding the NRC’s review of the Project. SCE has recently determined that a license amendment will be submitted to the NRC before the existing spent fuel pool cooling equipment is fully retired. The license for an operating plant includes certain requirements that are more stringent than is needed for a permanently shutdown plant. When a plant is retired, the operating license is amended to reflect the reduced safety risks associated with a shutdown plant. All decommissioning plants undergo license amendment processes to address various site-specific changes to the plant. SONGS has already obtained

approval of license amendments, including the “Permanently Defueled Emergency Plan” and the “Permanently Defueled Technical Specifications.”

With respect to the spent fuel pools, at an operating nuclear plant freshly offloaded fuel is routinely added to the pools to cool. At SONGS, the fuel has been cooling for approximately 3.5

years and the heat load is significantly lower now than it was while the plant was operating (representing a more than 90 percent reduction in heat load). However, the current license still contains requirements for a cooling system that supports the higher heat loads for an operating plant. This includes a commitment to design spent fuel pool cooling equipment to withstand a design basis seismic event, which is unnecessarily conservative for a permanently shutdown plant.

At SONGS now, as a result of the reduced heat load, response time to any interruption in cooling has increased from a few hours during normal plant operation to more than five days. Therefore, applying the more restrictive operating plant seismic design criteria is no longer needed for the spent fuel pool’s ancillary cooling equipment (however, the spent fuel pool structure itself would continue to meet the NRC’s seismic design criteria). The proposed SFPI equipment will be installed in accordance with seismic design requirements specified by the California Building Code. Several other shutdown plants have used a similar approach in applying non-seismic design criteria for spent fuel pool cooling modifications.

To implement this approach, SCE is preparing a license amendment that will be reviewed in accordance with the NRC’s exclusive jurisdiction over the safety and other radiological aspects of the Project. The license amendment only addresses whether the SFPI can entirely replace the current cooling system. Therefore, the license amendment is not necessary for installation of the SFPI; however, the existing cooling system will remain available pending approval of the license amendment. It is anticipated that the license amendment process will take approximately six months and will be conducted in parallel with the installation and testing of the SFPI. Upon approval of the license amendment, SCE would permanently retire the existing cooling system.

To proceed with installation of the Project, SCE is seeking approval of the Coastal Development Permit. The CCC is reviewing potential environmental impacts of the Project and authorizing the construction activities associated with installation of the SFPI system. CCC Staff has concluded that the Project is consistent with the Coastal Act. Therefore, SCE requests that the CCC approve the application as recommended by Staff.



Thank you for considering our comments. If you have any questions, please feel free to contact me at (626) 302-8553 or via email at kim.anthony@sce.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kim Anthony", with a long horizontal flourish extending to the right.

Kim Anthony
Environmental Project Manager
SONGS Decommissioning Projects

Encl: SCE Comments on SFPI Staff Report

CC VIA EMAIL:

Tom Luster, CCC
Louise Warren, CCC
Tom Palmisano, SCE
Ron Pontes, SCE
Linda Anabtawi, SCE
Colin Lennard, SCE
David Asti, SCE

Elizabeth Cason, SDG&E
Bob Tang, City of Riverside
Roy Xu, City of Riverside
Steve Sciortino, City of Anaheim
Carrie Thompson, City of Anaheim
Michael DeMarco, SDG&E

SCE Comments on SFPI Staff Report

No.	CCC SFPI Staff Report	SCE Comment
1	Page 1, Summary: "...represents a preliminary step in the decommissioning of SONGS Units 2 and 3..."	To clarify, the proposed project is not a step in the decommissioning process. The purpose of the proposed project is more accurately described as an important interim measure that helps set the stage for decommissioning SONGS Units 2 and 3. In concert with the other Cold & Dark modifications, the SFPI helps achieve a safe operating configuration in preparation for decommissioning.
2	Page 5, Section III, Special Condition 1: "...SCE shall submit, for the Executive Director's review and approval, an Inspection and Maintenance Plan for the SFPI system."	SCE is concerned that the language of this condition implies that any subsequent changes or modifications to the Inspection and Maintenance Plan would also have to be reviewed and approved by the Executive Director before implementation. SCE requests that this condition be revised to state that SCE will notify staff and provide a copy of the revised Plan for the CCC's records if the Plan is significantly modified following its initial submittal to the CCC.
3	Page 5, Section IV.A, Background: "SCE permanently ceased operation of SONGS Units 2 and 3 in June 2013 and has begun the process of plant decommissioning."	To clarify, SCE has not begun the process of plant decommissioning. SCE is in the preparatory stages of decommissioning and will obtain all required permits for the project prior to commencement of major decommissioning activities.
4	Page 5, Section IV.A, Background: "SCE has stated that the proposed Spent Fuel Pool Island (SFPI) cooling system would facilitate plant decommissioning because it is smaller, simpler..."	Same as Comment No. 1.
5	Page 6, Section IV.A, Background: "While no other plant is currently using a system configuration identical to that proposed at SONGS..."	The Rancho Seco and Crystal River nuclear plants have very similar systems/configurations to that of the proposed project.

6	<p>Pages 10, Section IV.C, Reduced Seawater Intake: “At present, the daily intake of ocean water at SONGS is approximately 98 MGD...”</p>	<p>Although SONGS is capable of withdrawing a maximum of 98 MGD under the current pump configuration, SONGS has, in fact, been withdrawing a substantially reduced volume of ocean water.</p>
7	<p>Page 10, Section IV.C, Reduced Seawater Intake: “...results in the mortality of large numbers of marine organisms, both through entrainment in the intake stream and through impingement against the intake screens.”</p>	<p>Since the plant shutdown, entrainment was significantly reduced with a 96-97% reduction in flow rate. In addition, no animals (fish or otherwise) have been impinged. The mortality of large numbers of marine organisms is no longer a concern due to the reduction of flow. SCE requests that this discussion be revised to clarify that there is no impingement currently occurring at SONGS, and the proposed project would result in even further reductions of entrainment.</p>
8	<p>Page 10, Section IV.C, Operational Discharges, footnote 2: “...discharges approximately 98 million gallons per day...”</p>	<p>Same as Comment No. 6.</p>
9	<p>Page 11, Section IV.C, Reduced Seawater Intake: “...to approximately 48 MGD.”</p>	<p>Once again, the 48 MGD represents a maximum capability and SONGS would withdraw a lower volume of seawater once the SFPI is implemented, due to the modified pump configuration.</p>
10	<p>Page 11, Section IV.C, Reduced Seawater Intake: “This reduction in ocean water would result in commensurate reductions in entrainment and impingement impacts on marine organisms...”</p>	<p>Same as Comment No. 7.</p>

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September 28, 2015

David Baillie
Installation Environmental Program Director
Naval Weapons Station Seal Beach
800 Seal Beach Blvd.
Seal Beach, CA 90740-5000

Subject: Negative Determination ND-0032-15 (Complete or Partial Closure of Defense Fuel Support Point, San Pedro, Los Angeles County)

Dear Mr. Baillie:

The Coastal Commission staff has reviewed the above-referenced negative determination. The Navy proposes to partially or completely close the Defense Fuel Support Point (DFSP) facilities in San Pedro. DFSP is comprised of the 341-acre Main Terminal inland of the coastal zone in north San Pedro, the nine-acre Marine Terminal including Pier 12 in the Port of Long Beach, and nine off-site pipelines between the two terminals. The facilities include storage tanks, pipelines, pump houses, loading racks, and other structures. The DFSP was placed in a temporary closure status in May 2014 and storage tanks and pipelines were cleaned, isolated, and secured. Under the proposed closure scenarios, the fuel infrastructure would be disconnected and closed in place, abandoned in place, dismantled, and/or demolished. The proposed project does not include property disposal or reuse of the two sites.

The Commission staff **agrees** that the proposed closure of the DFSP will not adversely affect coastal resources. We therefore **concur** with your negative determination made pursuant to 15 CFR 930.35 of the NOAA implementing regulations. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark D. Lester".

(for)

CHARLES LESTER
Executive Director

cc: CCC - South Coast District
Deb McKay, U.S. Navy

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September 28, 2015

Rob Rundle
SANDAG
401 B Street, Suite 800
San Diego, CA 92101-4231

Subject: No Effects Determination NE-0007-15 (Geotechnical Investigations for the San Elijo Lagoon Double-Track Project, Encinitas and Solana Beach, San Diego County)

Dear Mr. Rundle:

The Coastal Commission staff has reviewed the above-referenced no-effects determination. SANDAG proposes to undertake geotechnical investigations over several days in early October 2015 in support of the proposed San Elijo Lagoon double-track project. The purpose of the testing program is to more accurately profile the ground layers along the railroad embankment and verify the location and depth of existing utilities at locations along the alignment of the double-track project. The Commission's Executive Director previously concurred with a no-effects determination (NE-0001-14) in January 2014 for similar work in the railroad right-of-way (ROW) adjacent to the existing main line track. SANDAG now proposes four geotechnical borings east of the railroad embankment, 14 hand auger borings along the toe of the existing embankment, and 11 potholes along an existing access road and track alignment. All the proposed work will take place within the railroad ROW, and wetland and coastal sage scrub habitat will be avoided to the maximum extent practicable when selecting test sites. Based on vegetation mapping conducted for the proposed double-track project, approximately 87 square-feet of wetland vegetation, primarily pickleweed habitat, would be temporarily affected by three of the geotechnical borings, four of the hand auger borings, and eight of the potholes. All boring holes and potholes will be backfilled immediately after testing is completed and the ground surface restored to pre-disturbance conditions. Given that the proposed work will occur outside the breeding season of listed species, noise associated with the project will not create adverse impacts to those species using disturbed coastal sage scrub habitat within project area. In conclusion, the Commission staff agrees with SANDAG's no-effects determination that the proposed geotechnical work will not adversely affect coastal resources. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Lester".

(FL)

CHARLES LESTER
Executive Director

cc: CCC – San Diego Coast District
Erich Lathers. BRG Consulting, Inc.