

CALIFORNIA COASTAL COMMISSION

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY DIVISION
45 FREMONT STREET
SUITE 2000
SAN FRANCISCO, CALIFORNIA 94105-2219
(415) 904-5200 FAX (415) 904-5400
WWW.COASTAL.CA.GOV



W11

Prepared June 01, 2017 (for the June 07, 2017 Hearing)

To: Commissioners and Interested Parties
From: Alison Dettmer, Deputy Director
Subject: **Energy, Ocean Resources and Federal Consistency Division Deputy Director's Report for June 2017**

The following coastal development permit (CDP) waivers, immaterial CDP amendments, CDP extensions, emergency CDPs, and negative determinations for the Energy, Ocean Resources and Federal Consistency Division are being reported to the Commission on June 07, 2017. Pursuant to the Commission's procedures, each item has been appropriately noticed as required, and each item is also available for review at the Commission's office in San Francisco. Staff is asking for the Commission's concurrence on the items in the Energy, Ocean Resources and Federal Consistency Division Deputy Director's report, and will report any objections received and any other relevant information on these items to the Commission when it considers the report on June 7th.

With respect to the June 7th hearing, interested persons may sign up to address the Commission on items contained in this report prior to the Commission's consideration of this report. The Commission can overturn staff's noticed determinations for some categories of items subject to certain criteria in each case (see individual notices for specific requirements).

Items being reported on June 07, 2017 (see attached)

Immaterial Amendment

- **9-15-0531-A2**, Humboldt Bay Power Plant (HBPP) Final Site Restoration Plan Implementation (1000 King Salmon Ave., Eureka)

Negative Determinations and No Effect Letters

Administrative Items for Federal Consistency Matters

- **ND-0012-17, National Oceanic and Atmospheric Administration, Action: Concur, 5/11/2017**
NOAA Hydrographic Survey of 450 sq. nmi., using high-frequency, multibeam echo sounders and side scan sonars to map the ocean floor, Channel Islands National Marine Sanctuary, Santa Barbara Co.
- **ND-0013-17, Corps of Engineers, San Francisco District, Action: Concur, 5/5/2017**

U.S. Army Corps of Engineers, Bodega Bay Maintenance Dredging, Sonoma Co. Approximately 100,000 cu. yds. would be dredged, with 29,000 cu. yds. disposed of at SF-DODS, and 76,000 cu. yds. disposed at SF-8. Both disposal sites are offshore of San Francisco

Permit Revocation Requests

- **9-15-0228-REV-5**, Southern California Edison Company, Revocation Request by Todd Furuike for Permit Approval of 9-15-0228
- **9-15-0228-REV-6**, Southern California Edison Company, Revocation Request by David Haycraft for Permit Approval of 9-15-0228

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NOTICE OF PROPOSED IMMATERIAL PERMIT AMENDMENT

Coastal Development Permit Amendment No. **9-15-0531-A2**

May 25, 2017

To: All Interested Parties

From: John Ainsworth, Acting Executive Director

Subject: Permit No. **9-15-0531-A2** granted to **Pacific Gas & Electric Company** for:
Implementation of the Final Site Restoration Plan for the Humboldt Bay Power Plant
(HBPP)

Project Site: 1000 King Salmon Ave., Eureka, CA 95503 (APN: 305-131-35)

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):

PG&E proposes to modify the route of the 12kV line included as part of the Humboldt Bay Power Plan Final Site Restoration to provide better access for maintenance equipment. The revised route would originate at a 12kV pole near the corner of Bravo Rd. and King Salmon Ave. From the pole, the line would be placed in an underground conduit that extends approximately 30 feet under disturbed, managed vegetation, to Bravo Road. The line would continue, underground, under Bravo Road for approximately 440 feet and then would turn in a northwesterly direction and follow the alignment of the future approved Independent Fuel Storage Installation entrance road for approximately 310 feet. At the end of this segment, the line would split with one segment continuing underground for approximately 110 feet, connecting into a new above ground transformer adjacent to the Waste Management Building. The second segment would continue northwest for approximately 370 feet, where it would transition aboveground and connect to an existing 12kV pole. The new line would be installed by excavating a trench 4 ft wide and up to 10 ft deep and laying the line within the trench. Two vaults (6 feet wide by 6 feet long by 6 ft deep) will be installed underground beneath paved areas.

Several of the special conditions included in CDP 9-15-0531 require monitoring or the implementation of protection plans based on the proposed project description that did not include the revised 12kV route as described above. This amendment alters some of these requirements such that they will now incorporate the proposed installation of the 12kV line along the revised route. Specifically, the special conditions that will incorporate

Notice of Proposed Immaterial Permit Amendment

9-15-0531-A2

these amended activities include: Special Condition 1 (Stormwater Management Plan), Special Condition 2 (Pre-construction Biological Surveys), Special Condition 3 (Biological Monitoring), and Special Condition 13 (Archeological Resource Protection Plan).

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):

Biological and Marine Resources: The revised 12kV route is located primarily in paved areas. However, the line would traverse under two non-wetland vegetated areas consisting of ruderal herbaceous vegetation, which are currently mowed and maintained on a regular basis. Biological surveys conducted in February 2017 did not find any sensitive species within the construction footprint in these areas, but there are wetland areas adjacent to each vegetated area. To ensure that impacts to biological resources and adjacent wetlands are avoided, PG&E has proposed to conduct pre-construction biological surveys in accordance with **Special Condition #2** and biological monitoring in accordance with **Special Condition #3** to ensure the protection of any sensitive species or habitats. In addition, the measures outlined in the Stormwater Management Plan (SMP) required by **Special Condition #1** extend to all construction activities and thus will be implemented during the installation of the 12kV line along the revised route. The purpose of these measures is to avoid or minimize impacts to coastal waters, wetlands, and biological resources from stormwater runoff.

With these measures in place, the Executive Director has determined that the project will protect sensitive habitat areas and maintain the quality of coastal waters, streams and wetlands, and, for the reasons stated above, will be consistent with Sections 30230, 30231 and 30240 of the Coastal Act.

Hazardous Materials: The 310 foot segment that follows the future proposed route of the ISFSI entrance road traverses an area of possible contamination. Soil sampling data from this area indicated levels of polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs) above screening levels included in the Interim Measures/Removal Action Work Plan (IM/RAW) approved by the California Department of Toxic Substances Control (DTSC). Additional sampling will be conducted to confirm presence of these contaminants. Soil that contains identified contaminants that exceed screening thresholds will be excavated and properly disposed of per the IM/RAW. Any necessary soil remediation will occur prior to installation of the new 12kV line.

In addition, **Special Condition 3** requires PG&E to hire a designated project biologist to implement the protective measures included in the SMP (required by **Special Condition 1**). Implementation of the SMP will ensure that all construction areas, including remediation areas, install appropriate BMPs to ensure that contamination does not spread to adjacent areas through stormwater or other means.

Notice of Proposed Immaterial Permit Amendment

9-15-0531-A2

With the measures proposed by PG&E, and as conditioned, the project will provide adequate protection against oil spills and the release of hazardous substances, will ensure necessary containment and cleanup should a spill occur, and, for the reasons stated above, will be consistent with Section 30232 of the Coastal Act.

Cultural Resources: It is possible that PG&E could encounter native, intact soils during the excavation of the 12kV line along the revised route. Excavating down to native soils increases the likelihood that PG&E will encounter previously unrecorded archeological resources. To minimize potential impacts to any possible cultural resources, PG&E will implement a revised Archeological Resources Protection Plan, required by **Special Condition 13**. Under this Plan, PG&E will employ a cultural monitor to observe the excavation of the 12kV line and to identify and evaluate any cultural resources that are encountered. With this measure included, the proposed project will protect cultural and archeological resources and be consistent with Coastal Act Section 30244.

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

cc: Commissioners/File

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May 11, 2017

Meredith Payne
Physical Scientist
Hydrographic Surveys Division Operations Branch
National Oceanic & Atmospheric Administration
1315 East-West Hwy, SSMC3
Silver Spring, MD 20910

Re: **ND-0012-17** NOAA, Negative Determination, Hydrographic Survey of the Channel Islands National Marine Sanctuary, Santa Barbara and Ventura Cos.

Dear Ms. Payne

The Coastal Commission staff has reviewed the above-referenced negative determination for the a high-frequency hydrographic survey to map the ocean floor within a 450 square nautical mile area within the Channel Islands National Marine Sanctuary. The survey would begin on or about October 1 and would extend to October 31 (with exact dates subject to modification due to unforeseen circumstances). The survey would involve use of high frequency, multibeam echo sounders and side scan sonars. Frequency ranges would be between 100 to 400 kilohertz (kHz). The survey would also include water column profiling, using a Conductivity, Temperature, and Depth (CTD) instrument.

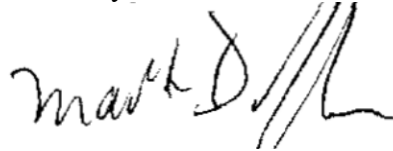
The survey would adhere to Best Management Practices agreed to in consultation with with the National Marine Fisheries Service (NMFS). NOAA's conclusion of no effects on coastal resources is based on the survey's limited scope and temporary nature, as well as the following factors:

1. NOAA would operate the vessels in a manner consistent with all applicable best practices for safety and environmental compliance, including those practices pertaining to noise, air and water discharges, and vehicle maintenance.
2. NOAA would adhere to all posted speed limits, including those designed to protect marine animals and other natural resources.
3. NOAA would operate all echo sounders at frequencies at or above 100 kHz.
4. The CTD instrument would not interact with the seafloor or cause any impact to the water column.
5. No sediment samples would be taken from the seafloor.

6. No other activity that could alter the sea floor is planned.
7. No ancillary construction or instrument work, such as the installation of tide gauges, tide buoys, or benchmarks, would be required.
8. The survey will be conducted in accordance with the pertinent sanctuary regulations for the Channel Island National Marine Sanctuary, under the National Marine Sanctuaries Act.

The Commission staff **agrees** with NOAA's conclusion that the survey will assist in marine conservation efforts, and, with the above measures and monitoring, would not adversely affect coastal zone resources. We therefore **concur** with your negative determination made pursuant to 15 CFR Section 930.35 of the NOAA implementing regulations. Please contact Mark Delaplaine at (415) 904-5289 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark D. Delaplaine". The signature is written in a cursive, somewhat stylized font.

(for) JOHN AINSWORTH
Executive Director

Attachment – Best Management Practices

cc: Ventura District
CINMS
NMFS

1. Minimize vessel disturbance and ship strike potential

- Slow speeds (4 – 8 knots), when mapping
- Reduced speeds (<13 knots) when transiting through ranges of ESA-listed cetaceans (unless otherwise required, e.g., NOAA Sanctuaries)
- Reduced speeds (<13 knots) while transiting through designated critical habitat (unless slower speeds are required, e.g., < 10 knots in right whale critical habitat and management areas)
- Trained observers aboard all vessels; 100% observer coverage
- Species identification keys (for marine mammals, sea turtles, corals, abalone, and seagrasses) available on all vessels

2. Minimize noise

- Reduced speed (see above)
- Multibeam surveys using ≥ 50 kHz frequencies, lowest possible power and ping-rate
- Single beam surveys using ≥ 30 kHz frequencies, lowest possible power and ping-rate, and 12° beam angle.

3. Minimize vessel discharges (including aquatic nuisance species)

- Meet all EPA Vessel General Permits and Coast Guard requirements
- Avoid discharge of ballast water in designated critical habitat
- Use anti-fouling coatings
- Clean hull regularly to remove aquatic nuisance species
- Avoid cleaning of hull in critical habitat
- Avoid cleaners with nonylphenols
- Rinse anchor with high-powered hose after retrieval

4. Minimize anchor impact to corals, abalone, and seagrass

- Use designated anchorage area when available
- Use mapping data to anchor in mud or sand, to avoid anchoring on corals
- Avoid anchoring in abalone habitat (California vessels return to port, rather than anchor)
- Avoid anchoring in seagrass critical habitat
- Minimize anchor drag

5. Avoid collecting bottom samples in seagrass critical habitat

6. Avoid using tertiary tide gauges (i.e., pressure gauge component) throughout the ranges of ESA listed and proposed coral, abalone and seagrass species

7. Cetaceans

- Avoid approaching within 200 yards (182.9 m), 500 yards for right whales
- Avoid critical habitat, when possible
- Avoid using sonar frequencies < 180 kHz, when possible
- Suspend multibeam sonar transmissions of < 125 kHz, when susceptible ESA-listed species (i.e., Southern Resident killer whale and Cook Inlet beluga whale) are within hearing range
- Suspend single beam sonar transmissions of 30 kHz when ESA-listed species are within hearing range

8. Pinnipeds

- Avoid approaching in-water pinnipeds within 100 yards (182.9 m)
- When possible, maintain a vessel distance of at least 3 nautical miles (5.5 km) and a landbased distance of 0.5 miles (0.8 km) of Steller sea lion rookeries listed in 50 CFR 223.202 or Marmot Island
- Avoid nearshore surveys when Steller sea lions are observed onshore
- When possible, suspend sonar transmissions when ESA-listed species are within hearing range

9. Sea turtles

- Avoid approaching within 50 yards

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May 5, 2017

Jessica BurtonEvans
Chief, Environmental Section B
San Francisco District
U.S. Army Corps of Engineers
ATTN: Mark Wiechmann
1455 Market Street
San Francisco, CA 94103-1398

Re: **ND-0013-17** U.S. Army Corps of Engineers Negative Determination, Bodega Harbor Maintenance Dredging Program, Bodega Bay, Sonoma Co.

Dear Ms. BurtonEvans:

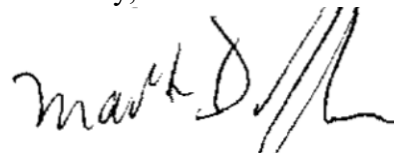
The Corps of Engineers has submitted a negative determination for the maintenance dredging of the federal channels in Bodega Bay, Sonoma County, with disposal at two sites offshore of San Francisco. Bodega Bay maintenance dredging occurs roughly every 12-13 years. The Commission staff previously concurred with negative determinations for Corps Bodega Bay maintenance dredging in 1991 (CD-057-91) and 1980 (CD-006-80). Dredged material in Reach 1, at the entrance channel, is predominantly sand, and the Corps proposes disposal of this material (approximately 32,000 cu. yds.) at SF-8, located roughly 3 to 5.5 nautical miles (nmi) offshore of San Francisco. The remaining material, from Reaches 2 and 3 and the Spud Point Marina, are not predominantly sand, and the Corps would dispose of this material (approximately 69,000 cu. yds.) at the deep water ocean disposal site SF-DODS, located 55 nmi offshore of San Francisco.

The material proposed for SF-DODS disposal has been tested and is suitable for open ocean disposal, and the material proposed for SF-8 disposal is suitable for nearshore disposal. Effects on eelgrass will be minimized by use of a clamshell dredge with an environmental bucket, which reduces turbidity. Pre- and post-dredging eelgrass surveys will be conducted, and if effects cannot be avoided, they will be mitigated in accordance with the NOAA Fisheries 2014 California Eelgrass Mitigation Policy and Implementing Guidelines.

Under the federal consistency regulations (15 CFR 930.35), a negative determination can be submitted for an activity “which is the same as or similar to activities for which consistency determinations have been prepared in the past.” The Commission staff has previously reviewed and authorized similar maintenance dredging of Bodega Bay federal channels (CD-057-91 and CD-006-80), the most recent of which (CD-057-91) also involved disposal at SF-DODS and SF-8.

In conclusion, the Commission staff **agrees** with the Corps' determination that the proposed project will not significantly affect coastal resources and that it is the same as or similar to previously reviewed projects. We therefore **concur** with your negative determination for the project made pursuant to 15 CFR-930.35 of the NOAA implementing regulations. Please contact Mark Delaplaine of the Commission staff at (415) 904-5289 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark D. Delaplaine". The signature is stylized and written in a cursive-like font.

(for) JOHN AINSWORTH
Executive Director

cc: CCC – North Central Coast District (electronic copy only)
EPA Region IX (Brian Ross)

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May 15, 2017

Via Electronic Mail (tf26st@gmail.com)

Todd Furuike

Re: Request for Revocation of Coastal Development Permit No. 9-15-0228

Dear Mr. Furuike,

Coastal Commission staff has received your May 1, 2017 request for the revocation of Coastal Development Permit (CDP) 9-15-0228 (Southern California Edison), approved by the Commission on October 6, 2015. CDP 9-15-0228 authorizes the installation and operation of a new independent spent fuel storage installation at San Onofre Nuclear Generating Station. Your request appears to be based on your belief that the spent fuel storage system would be dangerous or inadequate:

As I read thru the research material on the location of the waste site and the type of canisters being used to contain the nuclear waste, I believe this is an extremely dangerous method to storing this hazardous material.

The grounds for revocation of a CDP are set forth in 14 Cal. Code of Regulations Section 13105 and provide 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;*
- b) Failure to comply with the notice provisions of Section 13054, where the views of the person(s) not notified were not otherwise made known to the commission and could 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 revocation request and decline to initiate revocation proceedings because I have concluded, pursuant to Commission regulations (14 CCR § 13106), that your May 1, 2017 revocation request is patently frivolous and without merit because you neither assert nor provide evidence that the Applicant, Southern California

Edison, either intentionally included inaccurate, erroneous or incomplete information in connection with their coastal development permit application or failed to comply with the notice provisions of Section 13054 of the Commission's regulations.

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,



JOHN AINSWORTH
Executive Director

cc: Kim Anthony, SCE

Street, Joseph@Coastal

From: Todd Furuike <tf26st@gmail.com>
Sent: Monday, May 01, 2017 6:12 PM
To: Street, Joseph@Coastal
Subject: San Onofre

Mr. Joseph Street

I am a very concerned citizen and would like you to help in revoking the SoCal Edison Coastal Development Permit #9-15-0228.

As I read thru the research material on the location of the waste site and the type of canisters being used to contain the nuclear waste, I believe this is an extremely dangerous method to storing this hazardous material.

I strongly urge you to do the right thing for the community and citizens of the southern California area.

Sincerely,

Todd Furuike

Street, Joseph@Coastal

From: Street, Joseph@Coastal
Sent: Wednesday, May 03, 2017 11:23 AM
To: Todd Furuike
Subject: RE: San Onofre

Dear Mr. Furuike,

I've received your comments, and will pass them along to my supervisors.

Can you please clarify if your comments are intended a formal request for the revocation of CDP# 9-15-0228? The Commission's regulations provide for revocation of a permit under certain, very narrow circumstances. If it is your intention to submit a CDP revocation request, I would urge you to first review the relevant regulations, which can be found beginning with Section 13104 of the Commission's regulations (Link: [https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=ID5BADBCOD48711DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=ID5BADBCOD48711DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default))))

Best,
Joe Street

From: Todd Furuike [mailto:tf26st@gmail.com]
Sent: Monday, May 01, 2017 6:12 PM
To: Street, Joseph@Coastal
Subject: San Onofre

Mr. Joseph Street

I am a very concerned citizen and would like you to help in revoking the SoCal Edison Coastal Development Permit #9-15-0228.

As I read thru the research material on the location of the waste site and the type of canisters being used to contain the nuclear waste, I believe this is an extremely dangerous method to storing this hazardous material.

I strongly urge you to do the right thing for the community and citizens of the southern California area.

Sincerely,

Todd Furuike

Street, Joseph@Coastal

From: tf26st@gmail.com
Sent: Wednesday, May 03, 2017 12:19 PM
To: Street, Joseph@Coastal
Subject: Re: San Onofre

Joe

Yes, I am sending you a formal request for the revocation of CDP# 9-15-0228.

Thanks for clarifying

Todd

Sent from my iPhone

> On May 3, 2017, at 11:23 AM, Street, Joseph@Coastal <Joseph.Street@coastal.ca.gov> wrote:

>

> Can you please clarify if your comments are intended a formal request for the revocation of CDP# 9-15-0228?

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May 31, 2017

David Haycraft
P.O. Box 187
San Clemente, CA 92674

Re: Request for Revocation of Coastal Development Permit No. 9-15-0228

Dear Mr. Haycraft,

Coastal Commission staff has received your May 23, 2017 request for the revocation of Coastal Development Permit (CDP) 9-15-0228 (Southern California Edison), approved by the Commission on October 6, 2015. CDP 9-15-0228 authorizes the installation and operation of a new independent spent fuel storage installation at San Onofre Nuclear Generating Station. Your request provides several contentions as to why the permit should be revoked:

The information I have seen shows that the California Coastal Commission's evaluation of the ISFSI project was flawed and deficient. You did not employ an independent expert to advise the Commission on whether there were other spent fuel storage sites. You did not use an expert to determine the feasibility of a relocation transportation plan. You did not retain an expert to determine how long the spent fuel could be safely stored in the pools, and you did not do adequate legal research on the matter

The grounds for revocation of a CDP, as set forth in 14 Cal. Code of Regulations Section 13105, are very narrow:


- 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;*
- b) Failure to comply with the notice provisions of Section 13054, where the views of the person(s) not notified were not otherwise made known to the commission and could 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 revocation request and decline to initiate revocation proceedings because I have concluded, pursuant to Commission regulations (14 CCR § 13106), that your May 23, 2017 revocation request neither asserts nor provides evidence that the Applicant, Southern California Edison, either intentionally included inaccurate, erroneous or incomplete information in connection with its coastal development permit application or failed to comply with the notice provisions of Section 13054 of the Commission's regulations, and thus does not address the legal grounds for revocation cited above.

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 blue ink, appearing to read "John Ainsworth".

JOHN AINSWORTH
Executive Director

cc: Kim Anthony, SCE



**P.O. BOX 187, SAN CLEMENTE, CA 92674-0187
PH: 949-498-5951 FAX: 949-498-9565**

I DEMAND REVOCATION OF CCC PERMIT FOR ISFSI TO SOUTHEN CALIFORNIA EDISON

May 23, 2017

Dayna Bochco
Chairperson
California Coastal Commission
45 Fremont Street #2000
San Francisco, CA 94105

Email to: c/o Joseph.Street@coastal.ca.gov

Re: San Onofre Decommissioning

My name is David Haycraft and I am a 40+ year resident of San Clemente, California. I have now attended several meetings on the topic of decommissioning the San Onofre Nuclear Power Plant (SONGS), and the existing plan to move forward with a "dry caste storage" plan for the spent nuclear waste (Independent Spent Fuel Storage Installation (ISFSI)).

Like many others in the process of "awakening" to this unacceptable plan, I find it absolutely ludicrous that your agency has issued this permit for the ISFSI back in 2015. The information I have seen shows that the California Coastal Commission's evaluation of the ISFSI project was flawed and deficient. You did not employ an independent expert to advise the Commission on whether there were other spent fuel storage sites. You did not use an expert to determine the feasibility of a relocation transportation plan. You did not retain an expert to determine how long the spent fuel could be safely stored in the pools, and you did not do adequate legal research on the matter.

I can only speak for myself, but the underlying (key word: lying) feeling I get from the granting of this permit is that huge amounts of money, power, and influence have been afforded to the members of the CCC, to allow for this to happen at all. I have seen several examples of how difficult it has been for the public, commercial, and even governmental agencies to get permits for projects that have far less environmental impact than burying 3,600,000 lbs of spent nuclear fuel on the edge of the ocean. This in itself tells me that something is awry at the CCC, and the Commission itself has most likely been corrupted.

My understanding is that the most important thing that can be done in your power is to revoke the existing permit for the ISFSI, and not grant any additional permits to Southern California Edison, until the public is comfortable with a plan for the decommissioning of the plant, and the transfer of the spent fuel elsewhere.

It is my privilege and right as a citizen of this community to demand that the CCC REVOKE THIS PERMIT and NOT GRANT ANY ADDITIONAL PERMITS.

Thank you for your consideration,

Sincerely,

David Haycraft
PO Box 187
San Clemente, CA 92674
Cell: 949-842-8308