

CALIFORNIA COASTAL COMMISSION

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November 13, 2023

TO: Coastal Commissioners and Interested Parties

FROM: Dr. Kate Huckelbridge, Executive Director
Cassidy Teufel, Environmental Program Manager
Wesley Horn, Environmental Scientist

SUBJECT: Addendum to Staff Report for Coastal Development Permit No. 9-23-0548/Coastal Certification No. CC-0002-23 (Seren Juno Network Inc.).

The purpose of this addendum is to make minor changes to Special Conditions 1, 15 and 16 in the staff report. Currently in the staff report, these conditions are required to be satisfied before the Coastal Development Permit (CDP) can be issued. The changes in this addendum would provide additional time for the applicant, Seren Juno Network America, Inc. (JUNO), to acquire and provide the necessary performance bond, and to prepare the Spill Prevention and Response Plan and the Critical Operations and Curtailment Plan, prior to the start of scheduled cable installation activities.

~~Strikethrough~~ indicates text deleted from the special conditions pursuant to this addendum and underline indicates text added to the special conditions pursuant to this addendum.

1. **Performance Bond.** ~~PRIOR TO ISSUANCE OF THIS PERMIT~~PRIOR TO COMMENCEMENT OF PROPOSED CONSTRUCTION AND/OR CABLE INSTALLATION ACTIVITIES, the Permittee shall provide a surety bond or other security device guaranteed by the Permittee and acceptable to the Executive Director of the Commission (hereinafter Executive Director), for \$500,000, and naming the Commission as the assured, to guarantee the faithful observance and performance of the applicant of the terms and conditions of this permit. The surety bond or other security device shall be maintained in full force and effect at all times until the cable has been removed pursuant to **Special Condition 12** of this permit.

15. **Spill Prevention and Response Plan.** ~~PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT~~AT LEAST 60 DAYS PRIOR TO THE START OF CABLE INSTALLATION ACTIVITIES, the Permittee shall submit a Project-specific Spill Prevention and Response Plan to the Executive Director for review and approval. The

Plan shall identify the worst-case spill scenario and demonstrate that adequate spill response equipment will be available. The Plan also shall include preventative measures the Permittee will implement to avoid spills and clearly identify responsibilities of onshore and offshore contractors and the Permittee personnel and shall list and identify the location of oil spill response equipment (including booms), appropriate protocols and response times for deployment. Petroleum-fueled equipment on the main deck of all vessels shall have drip pans or other means of collecting dripped petroleum, which shall be collected and treated with onboard equipment. Response drills shall be in accordance with Federal and State requirements. Contracts with off-site spill response companies shall be in place and shall provide additional containment and clean-up resources as needed.

16. **Critical Operations and Curtailment Plan (COCP).** ~~PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT AT LEAST 60 DAYS PRIOR TO THE START OF CABLE INSTALLATION ACTIVITIES,~~ the Permittee shall submit a Final COCP to the Executive Director for approval. The COCP shall define the limiting conditions of sea state, wind, or any other weather conditions that exceed the safe operation of offshore vessels, equipment, or divers in the water; that hinder potential spill cleanup; or in any way pose a threat to personnel or the safety of the environment. The COCP shall provide for a minimum ongoing five-day advance favorable weather forecast during offshore operations. The plan shall also identify the onsite person with authority to determine critical conditions and suspend work operations when needed.