



## **California State Lands Commission**

### **June 23, 2020 Executive Officer's Report**

It is critical to consider, reflect and talk about the protests against racial injustices, prompted by the murder of George Floyd, that are happening around the entire United States in city after city, and across the globe. It is essential to talk about this movement for racial justice and equity because it is important to the people in California that we serve, and as a state agency the California State Lands Commission is part of the system, or one of the systems, that needs to change. Many voices in this movement have reminded us that to make change, to break apart the structures that uphold and perpetrate racism, we need to look back through time, and re-learn our own history, so that we build something new and truly better and anti-racist for our future. It is a deep history that is painful and sad. We owe it to one another to do that work, to educate ourselves, to truly listen and understand, and to look at it plainly and in the light. Racism is intentional and pervasive. It has been normalized, and as individuals we've often been conditioned and desensitized to its immorality. The more you train your eye to see racism clearly, in all its blatant displays and subtle expressions, the stronger your vision becomes to also imagine the ways we can dismantle it and move toward a truly equitable society without systemic structural and institutional racism.

California has a deep and complex history of racism. As a state, we have made major strides towards progress, but there is still much work to be done to address the legacy of racism in our state. If we consider our history, and many present-day examples, we must conclude that is not true. Most recently, as seen in the COVID-19 pandemic, Black Americans have died at three times the rate of white Americans. And then there is redlining, a housing policy that discriminated against Black Californians and urban neighborhoods and gave exclusive privileges to white Californians. Redlining was prevalent in many California cities from the 1930s until recently. Housing segregation led to inequitable access to our natural resources and public lands, including our beaches and parks, which

has had disproportionate impacts on public health. Housing segregation is one of many factors that has also impacted our education system. Our schools have significant gaps in achievement between students of color and white students. The negative consequences of inequities in school often follow people for the rest of their lives. And of course, the criminal justice and policing system reflect the consequences of systemic racism, where the imprisonment rate in California for Black American men is ten times the imprisonment rate for white men.

The echoes of California's history are reverberating through our state now, as they have many times before, in the voices demanding justice for George Floyd, all the victims of police brutality and institutionalized violence, and calling for an end to the societal inequalities that produced them, with truly equal treatment for all people. Conversations about the racial inequities embedded in our systems and institutions on a national, state, and local level have, yet again, been elevated into the spotlight. These voices reflect trauma, sadness, heartbreak, anger, exhaustion and anguish. To ignore or minimize these conversations is irresponsible and unconscionable. To remain silent about racism is to be complicit. Recent events demand that we educate ourselves, listen to one another, acknowledge this pain, and have courage to speak the truth. They demand that we develop and implement real strategies to achieve change, with measurable and significant outcomes.

Governor Newsom spoke recently about the work we must and will do together, as Californians, to change what is considered 'normal'. Change can feel uncomfortable, but racism has never been comfortable. Engage in the conversations and in the work that needs to be done, especially when it is uncomfortable. Let's keep these bright lights on racism and the fight for justice and equality so that our vision for the future is never again blurred by complacency or faded memories or privilege.

For the members of the public reading this, I want to affirm the Commission's commitment to racial justice and equality. We are a part of this system, as a government agency, and we must and can do much more and work harder, to make a new normal and disavow racist policies, practices, and work culture. Commission staff has been involved for the last two years in the Government Alliance on Race and Equity, a collaboration with the organization Race Forward. Through this program, we have learned much more about structural racism in our state and throughout government. We have also developed a racial equity action plan to guide us through concrete steps that will fundamentally change our approach to the stewardship of public lands and

increase diversity among our staff. The plan targets the conventions of our innerworkings—for example, we must understand implicit bias better and the changes we can make to our hiring practices and workforce development to actively confront and remove implicit bias from those processes, and many others. We are examining our role in providing equitable public access and creating spaces that are truly respectful and inclusive of all the people in California. And we are creating more learning opportunities for our staff. Lasting change is rooted in sustained learning. We have a long journey in front of us, and we may, and likely already have, make mistakes along the way. We recognize that our progress has been slow. We welcome your ideas, your stories, and your constructive criticisms. We will hold ourselves accountable and we hope you will hold us accountable as well.

### **COVID-19 Commission Staff Management and Response**

As California reopens, the Commission is preparing for more colleagues to return to the workplace. Consistent with Governor Newsom's direction, our goal is that most of our staff continue to telework. The California Department of Public Health (CDPH) released new guidance that requires Californians to wear face coverings in most settings outside the home. The guidance stresses that the best way for us to prevent illness is to avoid being exposed to the virus. To do this, among other things, requires that all employees and visitors to state facilities must wear face coverings. The Governor emphasized that, **"Simply put, we are seeing too many people with faces uncovered – putting at risk the real progress we have made in fighting the disease."** Wearing a face covering can save lives and help keep our economy moving forward. CDPH also created a [Q+A webpage](#) for the Stay at Home orders that lets the public know which phase we are in based on county and which sectors are open based on that phase. We continue to encourage staff to frequently wash their hands and physically distance. We have installed sneeze guards at our facility reception counters and are using taped distance reminders to help staff visualize 6 feet of distance. And we continue to communicate with each of our office's property management on cleaning protocols in high-traffic areas.

Contact tracing is vital to the safe reopening of California. Consistent with direction from Governor Newsom, the Commission redirected 5 percent of its workforce toward this effort. As California Natural Resources Agency Secretary Wade Crowfoot recently said, **"Contact tracers, by keeping people safe from infection and reducing contagion within and across communities, are absolutely essential to this effort. Their work will allow our families, communities, and state to return to our normal lives—and stay there. When the story is written about how**

**California battled this unprecedented global crisis, contact tracers will be recognized among the heroes that helped us meet this moment.”** The Commission is incredibly appreciative and proud of our staff who have been redirected to keep Californians safe and healthy while reopening our economy.

### **COVID-19 Rent and Application Expense Deferral Program**

At its April 2020 meeting, the Commission approved a [COVID-19 Rent and Application Expense Deferral Program](#). Since then, staff has received 18 applications. Staff have approved seven applications, declined four, and seven applications are incomplete.

The approved applications were for rent deferral and totaled \$18,492 in annual rent. Five of those leases are in Lake Tahoe, one is in Marin County (Greenbrae Boardwalk), and one is in the Sacramento Delta. Six were recreational leases and one was a commercial lease. Below are the specific details of each lease:

- **Point Buckler Club (Lease No. 9181)** – General Lease – Recreational Use, in Annie Mason Slough, Suisun Bay, adjacent to Buckler Island; for a boat dock and appurtenant facilities; 10-year lease expiring in October 2024. Annual rent: \$1,320 with an annual CPI adjustment.
- **Daniel and Susan Cockrum, Trustees (Lease No. 8418)** – General Lease – Recreational Use, adjacent to 949 Lakeview Avenue, South Lake Tahoe; for one buoy; 10-year lease expiring in August 2022. Annual rent: \$377.
- **Kenji Yamamoto and Nancy Kelly, Trustees (Lease No. 9249)** – General Lease – Recreational Use, adjacent to 121 Greenbrae Boardwalk, Larkspur; for dock and appurtenant facilities; 20-year lease expiring in December 2035. Annual rent: \$138 with an annual CPI adjustment.
- **The Garwood Building, a California LP (Lease No. 5402)** – General Lease – Recreational Use, adjacent to 4998 North Lake Boulevard, Carnelian Bay, Lake Tahoe; for restaurant accommodation pier and 14 buoys and three marker buoys; 10-year lease expiring in May 2022. Annual rent: \$3,955.
- **William and Marilyn Sutton, Trustees (Lease No. 5510)** – General Lease – Recreational Use, adjacent to 4523 West Lake Boulevard, Lake Tahoe; for two mooring buoys; 10-year lease expiring in July 2024. Annual rent: \$858 with an annual CPI adjustment.
- **Roger and Vicki Kahn, Trustees and Janice Corda, Trustee (Lease No. 7953)** – General Lease – Recreational Use, adjacent to 1360 and 1370 North Lake Boulevard, near Tahoe City, Lake Tahoe; for joint-use pier, two boat lifts, and four buoys; 10-year lease expiring in March 2027. Annual rent: \$2,554 with an annual CPI adjustment.

- **North Tahoe Cruises, Inc. (Lease No. 8663)** – General Lease – Commercial Use, adjacent to 950 North Lake Boulevard, near Tahoe City, Lake Tahoe; for commercial operation of the Tahoe Gal tour boat; 20-year lease expiring in December 2025. Annual Rent: \$9,291 against a percentage of gross revenue generated.

Of the four declined applications, three were for rent deferrals and one was for an expense deferral. They were declined because they did not qualify since the annual rent exceeded \$10,000. The three applicants have since applied for a lease amendment. The total annual rent for these commercial leases is \$182,602. Two of those items are on today's agenda as [Item 56](#).

### ***Legislative Process and the State Budget***

The California Legislature, like many state Legislatures, is grappling with a rapidly changing landscape as it endeavors to complete its work under compressed timelines and amid a global pandemic and cataclysmic racial injustices. After an unprecedented two-month hiatus, policy committees resumed hearings in May. Legislators decided to hold many of their bills because of the budget outlook and the shortened legislative calendar. When policy hearings resumed, the agendas were much shorter and fewer bills were heard.

Around the time that the Legislature resumed committee hearings, the Administration announced that the global pandemic had caused a \$54 billion budget deficit. A \$5.6 billion surplus evaporated, seemingly overnight. And now layered on top of the pandemic and the ensuing economic recession is widespread protesting against systemic structural and institutional racism following the tragic deaths of George Floyd, Breonna Taylor, Ahmaud Arbery, and countless others. Against this backdrop, the Legislature continues its business. There are new bills focused on addressing the effects of the pandemic, and on addressing the police brutality that was brought into sharp focus last month. Homelessness, the housing crisis, and wildfire prevention continue to be among the top priorities for the Legislature and the Administration. But other compelling and important issues have become equally critical. More information, including about specific bills, is available in the [Legislative Update](#).

The Legislature passed a 2020-21 state budget on June 15th that builds on the Governor's framework announced in the May Revise but delays what are known as "trigger cuts," which are \$14 billion in cuts that would occur if the federal government does not provide financial aid. Later amendments to the budget bill are expected in the coming weeks and months in response to ongoing

negotiations between the Governor and Legislature. The 2020-21 state budget approved all of the Commission's Fiscal Year 2020-21 proposals as re-submitted for the May Revise, including funding for increased lease costs, administrative staffing, operations and maintenance at the Bolsa Chica wetlands, and environmental review for the Rincon Island and Platform Holly decommissioning projects, though the appropriation for Platform Holly is deferred to Fiscal Year 2021-22. The 2020-21 budget also borrows \$49 million from the Commission's School Land Bank Fund—bifurcated into two loans. One is a \$17 million loan to the California Earthquake Safety Fund. The other is a \$32 million loan to the General Fund. The repayment date has not been set, but accrued interest will be paid out of the Pooled Money Investment Account when the funds transfer back to the School Land Bank Fund.

### ***Rincon Well Abandonment Project***

The Commission continues to make progress in abandoning the offshore and onshore wells at the former Rincon leases. On the island, 37 of the 50 offshore wells have been plugged. Onshore, 24 of the 25 wells have been abandoned, the removal of the wellheads and concrete well cellars is complete, and the surface area has been graded. Project costs are estimated at \$35.6 million, which is \$4.1 million, or 11.5 percent, below plan. In total we have completed 61 of 75, or 81 percent, of the State well abandonments, and project completion is expected before June 30, 2021. Driltek, the abandonment contractor, has established a COVID-19 response plan that includes maintaining a safe number of staffing on site, practicing personal distancing, conducting daily cleaning, encouraging frequent handwashing, and conducting wellness screening of all Driltek personnel and third-party contractors prior to entering the job site.

### ***Platform Holly Abandonment Project***

ExxonMobil and the Commission have suspended plugging and abandonment operations on Platform Holly pursuant to the pandemic response plan. Although a small crew has been conducting preventive maintenance and minor construction, due to the significant space constraints on Platform Holly and the inability to continue to work with sufficient physical distancing and risk mitigation, Commission staff and ExxonMobil are preparing to terminate further work until it is safe to resume the plugging and abandonment operations. Meanwhile, equipment from our service providers will be removed or warehoused to avoid deterioration from the offshore elements.

Commission staff and Beacon West Energy continue to secure the platform and monitor and staff the onshore and offshore operations. Commission staff and

ExxonMobil will meet regularly to assess the potential for restarting work based on the evolution of the pandemic.

Commission staff and ExxonMobil are proceeding with decommissioning the PRC 421 piers consistent with physical distancing and face covering requirements.

### ***El Capitán State Beach Well Abandonment Project***

In April, the California Geologic Energy Management Division (CalGEM) notified Commission staff that State Parks had discovered an uncapped orphan well at El Capitán State Beach near group campgrounds. The orphan well had been drilled in 1930 and abandoned in 1931. In May, State Parks requested that the Commission help develop a well abandonment plan and execute that plan to abate the hazard caused by the 20-inch diameter well hole, which was exposed to a depth of approximately 100 feet, by plugging the well.

Commission staff and its contractor Driltek, which has been performing plug and abandonment work at nearby Rincon Island, plugged and abandoned the El Capitán orphan well in early June. We cleaned out the orphan well and set a cement plug from 95 feet below ground level to 5 feet below ground level. We also removed the well cellar, cut the casing to 5.5 feet below ground level, capped the well with a steel plate, and restored the location to its original condition. This work successfully abated a public hazard and was completed before the campgrounds were reopened.

### ***Hollister Ranch Public Access Program***

For the better part of a year, staff have been working in a collaborative partnership with the California Coastal Commission, the State Coastal Conservancy and State Parks, as part of a State Agency Team to implement AB 1680 (Limón) and a contemporary Hollister Ranch access plan.

Recent activities focused on community engagement, including conducting approximately 18 interviews with a wide variety of stakeholders. These interviews provided an overview of many of the positions, interests, and concerns that the planning process will need to address.

Following the initial interviews, the team sent a survey link to the stakeholder email list of approximately 1,700 email addresses (now approximately 2,000). The survey, which was provided in English and Spanish, solicited ideas for future

public access to the ranch coastline and priorities for the team to consider as the planning process progresses.

In February 2020, the team held its first public workshop to help guide the planning effort. Over 170 people attended the workshop. Assembly Member Limón provided opening remarks, followed by small group discussions. In March 2020, the team summarized, compiled, and released comments from the first public survey to further help inform and guide the planning process. A second public workshop was postponed due to COVID-19 pandemic.

In April 2020, the team released a request for statements of interest to form a stakeholder working group. A total of 59 individuals with an array of qualifications and perspectives submitted statements of interest. The team is proceeding with a 22-member working group that includes Hollister Ranch owners, representatives of the Chumash Nation, local and state government, and coastal access, environmental, and coastal equity advocates. The Working Group will meet approximately 6-8 times over the next year. They will work together collaboratively to evaluate stakeholder input and participate in the planning process to develop a contemporary public access program at Hollister Ranch. Additional public workshops and surveys are also planned for later this year.

### ***AB 691 Sea Level Rise Assessments***

Commission staff continues to progress on the [AB 691](#) (Muratsuchi, 2013) project in partnership with Revell Coastal. AB 691 required local trustees of State lands receiving more than \$250,000 in annual revenue, including many of our ports and harbors, to assess impacts and financial costs of sea-level rise. Staff are analyzing the results of a recent survey and continue to create one-page summaries of each assessment. Staff is also preparing a summary report that will be made available to the public later this year.

### ***Tijuana River Valley Pollution Crisis***

In connection with the United States-Mexico-Canada Agreement, Congress recently allocated \$300 million to the US EPA to spend on border projects. In May 2020, the US EPA announced that the entire amount would go toward addressing pollution in the Tijuana River watershed. The US EPA's first step is to complete a feasibility study that analyzes potential projects. While they did not list the specific projects, they are expected to include the projects endorsed in the Commission's December 2019 resolution. The feasibility study process will start at the end of June and take about a year. Afterward, the US EPA will select



projects to fund, with final design and construction expected to take another 2 to 4 years.

Throughout the process, the US EPA will consult with a stakeholder steering committee and hold public meetings. Commission staff is looking forward to working with the US EPA and other stakeholders to ensure that the selected projects meet California's needs. The US EPA's next public meeting is on June 25<sup>th</sup>. It is important to remember that while the US EPA is pursuing this process, the pollution crisis continues. The residents of Imperial Beach and other southern California communities will continue to be severely impacted by the pollution crisis while the US EPA analyzes long-term projects. Staff will continue to update the Commission about short-term emergency measures to protect public lands and people of California.

The Mexico Section of the International Boundary and Water Commission recently announced that the Tijuana pump station would be rehabilitated, having received approximately \$3.6 million from Mexico's National Water Commission. The money will be used to construct a new pump intake and a sedimentation tank to remove silt, which will reduce the amount of trash that clogs the pumps and lessen the time the pump station is out of operation for cleaning, which could reduce dry-weather flows of wastewater by 70 percent.

Finally, the Legislature extended the deadline to encumber the \$15 million allocated to the Coastal Conservancy for Tijuana River pollution control and restoration projects from June 30, 2020 to June 30, 2021.

### ***Offshore Renewable Energy Applications***

Over the past year, the Commission has received three applications for projects and activities to facilitate offshore renewable energy production in state waters. Below is a summary of the status of these applications:

- 1) In July 2019, IP Renewable Energy Holdings and IDEOL S.A. applied for a lease to collect data in state waters off the Vandenberg Air Force Base. The purpose of this lease application is to determine whether the site is suitable for a potential future floating offshore wind electrical generation project. The applicant proposes to:
  - Conduct environmental data collection surveys by installing a metocean buoy to assess site-specific weather, wave, and soil conditions.

- Conduct biological surveys, including a marine habitat assessment and avian point counts using small ocean vessels.
- Perform geophysical and geotechnical surveys using an ocean vessel.

In March 2020, the applicant requested that we put this lease application on hold.

- 2) In July 2019, IDEOL applied for a lease to construct, operate, maintain, and decommission a floating offshore wind electrical generation pilot project at the Vandenberg Air Force Base. IDEOL proposes to install four floating offshore wind turbines with maximum generation capacity of 10MW each. In August 2019, staff deemed the application incomplete. The applicant submitted additional information earlier this month. Staff is reviewing this material and will provide their evaluation by July 12, 2020, consistent with Permit Streamlining Act requirements.
- 3) In August 2019, Cierco Projects applied for a lease to build a floating offshore wind demonstration project in state waters off the Vandenberg Air Force Base. Cierco Projects proposes to install four 12-15 MW floating wind turbines in the area. In October 2019, staff notified Cierco Projects that their application was incomplete. Cierco Projects subsequently amended their application and in April 2020, Commission staff deemed their application complete.

On April 16, 2020, Cierco Projects submitted two alternative sites to staff, though Cierco Projects did not amend their application. Staff is engaged in ongoing discussions with the applicant to determine the final site for the proposed floating offshore wind demonstration project so that staff can reevaluate the amended application with the selected site consistent with the Permit Streamlining Act requirements.

It is important to note that both active lease applications will need to go through a comprehensive environmental impact review pursuant to the California Environmental Quality Act before the Commission considers the lease applications.

### ***NorthPoint Litigation and Title Settlement Agreement***

At its April 2020 meeting, the Commission approved a [Litigation and Title Settlement Agreement](#) between the Commission and NP Oakley, LLC (NorthPoint) regarding certain real property located adjacent to the San

Joaquin River, City of Oakley, Contra Costa County. Since then, NorthPoint created two new affiliate entities, NP Oakley Building I, LLC and NPIF IV Oakley Building II, LLC, with interests in the development parcel described in the Agreement. As the Commissioners will recall, the Agreement provides that the Commission quitclaims any right, title, and interest in the development parcel to NorthPoint. Before finalizing and signing the agreement, staff made a non-substantive addition to the Agreement, consistent with the Commission's authorization, to include these affiliate entities as signatories to ensure the broadest possible protection for the state.

***San Onofre Nuclear Generating Station Units 2 & 3 Decommissioning Project***  
***Unit 1 Reactor Pressure Vessel Transport Completed***

On May 29, 2020, staff received notification that the offsite transport of the Unit 1 Reactor Pressure Vessel (RPV1) to a licensed disposal facility in Utah has been completed. The RPV1 is the large component that housed SONGS Unit 1's nuclear fuel when the reactor was operating. This activity was approved as part of the SONGS Units 2 & 3 Decommissioning Project. The shipment is classified as low-level (or Class A) waste, the least hazardous of the radioactive waste classifications as defined by the federal Nuclear Regulatory Commission. This shipment is 500 times below the Department of Transportation limit for dose rate, an extremely low risk to the public.

To maintain public safety during the loading activities, and because the shipment was an oversized and heavy load, temporary lane closures on the eastern portion of Beach Club Road and Old Pacific Highway were instituted during the RPV loading activities, including the use of the access road. Traffic safety control measures including warning signs, barricades, and flaggers. The RPVs for SONGS Units 2 & 3 will be transported later in the decommissioning process.

Remaining activities associated with the removal and transport include the removal of materials and equipment from the staging areas in Parking Lot 4 and demobilization from the site.

Asbestos abatement activities inside Units 2 and 3 containment (onshore) began on February 24, 2020 and are expected to occur through September 2020. The work is being performed in two phases by Bay View Environmental. The first phase includes the abatement of friable asbestos and the removal of related materials and equipment. The second phase will include the abatement of non-friable asbestos and the cleaning of affected areas within Units 2 and 3 prior to

deconstruction. The San Diego Air Pollution District has been notified of start date and will provide spot-check inspections.

Offshore construction activities are anticipated to start in 2023. No compliance issues with any of the above have been reported during the monitoring period.

#### COVID-19 Response at SONGS

Southern California Edison's (SCE) electric utility operations, including nuclear power plant decommissioning activities, are excluded from Governor Newsom's "Safer at Home" Executive Order restrictions. However, in the interest of worker safety, SCE implemented the SONGS Pandemic Protocol on March 19, 2020. On March 23, 2020, SCE paused work at SONGS to ensure compliance with the Governor's order. The dismantlement work led by SONGS Decommissioning Solutions, the decommissioning general contractor at SONGS, remains curtailed except for the work on the containment domes, which must be left in a safe condition until decommissioning can restart. Crews are currently finishing that process.

SCE has determined that safe transfer of spent nuclear fuel from wet to dry storage is essential work that will continue. Additional measures to protect workers, particularly those in Operations and Security, have been put into place. Strict travel restrictions were also established. The fuel transfer to dry storage is expected to be completed this summer.<sup>1</sup> Moving the fuel to a passive storage system is important because it allows SCE to safely shut down other plant functions. In addition, spent nuclear fuel is safer in passive dry storage than in spent fuel pools, as the pools require multiple back-up systems in order to assure safe storage.

#### March 25, 2020 Sewage Release

On March 25, 2020, SCE reported that the SONGS Sewage Treatment Plant released between 6,000 to 7,000 gallons of non-radiological, partially treated domestic wastewater into and through the SONGS Unit 2 outfall to the Pacific Ocean. SCE's initial report to the San Diego Regional Water Quality Control Board indicated that before the release, the partially treated domestic wastewater was diluted with seawater at the minimum 10:1 ratio required by the Commission's lease and the facility's National Pollutant Discharge Elimination System permit. SCE later stated the discharge was even more diluted, at a ratio of approximately 200:1. In addition to reporting to the Regional Water Board,

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<sup>1</sup> May 14, 2020 Fuel Transfer Operations Update: <https://www.songscommunity.com/need-to-know/overview/fuel-transfer-operations-update-may-14-2020>

SCE reported the spill to the federal Nuclear Regulatory Commission, the State Office of Emergency Services, and local environmental health agencies. The San Diego Department of Environmental Health determined the release did not require a beach closure. The sewage was discharged from a point more than a mile from the beach. The spill flowed through the Unit 2 conduit (the Unit 3 conduit is not in service). Since the flow was into the conduit and not a surface spill, the spill did not result in sewage flowing into the near-shore area. This is because the conduit diffusers begin at approximately 1.1 miles offshore and extend to 1.3 miles offshore, at water depths of 30-50 feet. Commission staff coordinated with enforcement staff at the Regional Water Board, which issued a Notice of Violation and Investigative Order regarding the discharge on April 16, 2020. The Order requires a complete explanation of the source and cause of the incident by June 15, 2020, among other requirements, and potential penalties. SCE is reviewing procedure and equipment modifications to prevent recurrence.<sup>2</sup>

#### Spent Fuel Storage Monitoring Data Now Online

In compliance with the required mitigation requirements (Applicant Proposed Measure-23), a gamma radiation monitoring system has been installed around the perimeter of the SONGS dry spent fuel storage area (Independent Spent Fuel Storage Installation or ISFSI). This system supplies a real-time data stream to state and local authorities, and monthly reports of the daily data readings are posted online by the California Department of Health Radiologic Health Branch. The only other U.S. nuclear plant to employ such a system is Prairie Island in Minnesota.

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<sup>2</sup> <https://www.songscommunity.com/need-to-know/overview/update-on-wastewater-release-from-san-onofre-sewage-treatment-plant>