

California State Lands Commission August 20, 2020 Executive Officer's Report

COVID-19 Rent and Application Expense Deferral Program

When the Commission met in April,, it approved a <u>COVID-19 Rent and Application Expense Deferral Program</u>. Since the last update at the June meeting and as of August 10, the Commission has received 14 applications. Staff approved one application and 13 applications are incomplete. Details of the approved application include:

• Michael Wilson (Lease 9612) – General Lease – Recreational Use, in Tomales Bay, adjacent to 12938 Sir Francis Drake Boulevard, near Inverness; for one mooring buoy; 10-year lease expiring in May 2028. Annual rent: \$388.49 with an annual CPI adjustment.

For the 13 incomplete applications, staff are working with the applicants to complete those applications.

Since the program's inception in April, the Commission has received 32 applications. Staff approved eight, denied four, and 20 are incomplete. Additionally, the Commission approved 2 lease amendments at its June meeting. One previously approved applicant subsequently declined the deferral and opted to pay the full rental amount. The seven approved rent deferral applications total \$14,925 in annual rent. The combined annual rent for the two lease amendments is \$182,602.

Crockett Waterfront Fire

At midnight on August 3, staff learned that structures located along the Town of Crockett waterfront were on fire. Luckily, the Crockett Carquinez Fire Department responded swiftly and the Nantucket restaurant and the neighboring Bass Club pier sustained only minor damage. Staff was part of a coordinated emergency cleanup response team that included the Crockett

Carquinez Fire Department, the California Department of Oil Spill Prevention and Response, Union Pacific Railroad, Contra Costa County HazMat team, Contra Costa County Building Inspector, and the Commission's Lessee, the Dixon's. Staff contracted with experts to conduct the emergency demolition and hazardous material cleanup at the site, including removal of the boathouse fire debris, the pier, rock and concrete pilings along the shoreline. Nine 55-gallon barrels of hazardous waste were transported offsite and disposed. The Commission has spent roughly \$80,000 on debris removal and site cleanup.

Now, staff are working with the San Francisco Bay Conservation and Development Commission, US Army Corps of Engineers, and the Regional Water Quality Control Board to obtain permits to remove other in-water facilities.

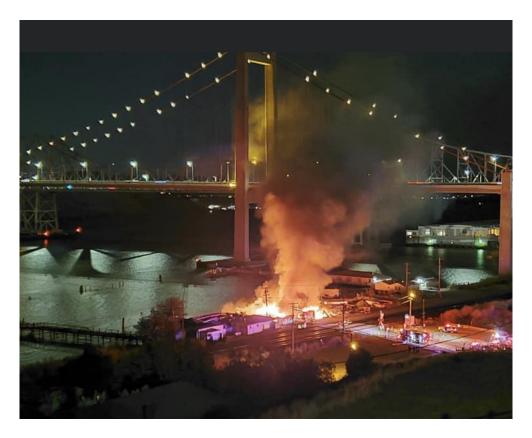


Photo courtesy of Crockett Carquinez Fire Department



Photo courtesy of Vicki Caldwell



Photo courtesy of Vicki Caldwell

Justice, Equity, Diversity, and Inclusion (JEDI) Team

Staff recently created a new JEDI team. The team, a hybrid of our previous GARE and environmental justice teams, will build on our past work and be dedicated to promoting equity, inclusion, and diversity, and addressing environmental justice within the Commission and through the Commission's programs. The team will focus broadly on the Commission's Environmental Justice Policy implementation and its racial equity goals. Subcommittees within the team will work to advance and lead specific initiatives and actions. Subcommittees are likely to focus on the Commission's racial equity action plan, environmental justice, our Equity Matters newsletter, and other areas based on the team's interest and capacity. This new JEDI team aligns with similar efforts among other departments and commissions within the California Natural Resources Agency. And in addition to the broader internal themes, the JEDI team will be a platform by which staff can coordinate with its sister agencies who are focusing on similar themes within their respective JEDI teams.

Legislative Process

This legislative year continues to be unprecedentedly vexing as the California Legislature moves toward its August 31 adjournment. When the Legislature adjourns in two weeks, it will have sent far fewer bills to the Governor than it has in previous years. And while there is no way to know how many bills will be passed by August 31, it will certainly be fewer than in past years owing to the COVID-19 pandemic and the obstacles that made remote voting and conducting hearings difficult.

The key legislative issues the Legislature is addressing in the final weeks of the legislative session include COVID-19 related legislation, bills related to the California budget, police reform, and voting rights. The protests and outrage about racial injustices have led to constitutional amendments, ACA 5 and ACA 6, to restore affirmative action and voting rights to people released from prison. Both of which will be on the November 2020 ballot. Averting evictions for tenants who cannot pay their rent because of the loss of income owing to the pandemic is another key focus of the Legislature.

The climate change bond was sidelined after the pandemic and ensuing budget deficit, and several legislative concepts involving climate change and sea-level rise preparedness were also sidelined for these reasons. Still, the Governor and Legislature recognize that climate change and sea-level rise preparedness are priorities.

The Commission sponsored two bills this year. The first, SB 1472 (Senate Natural Resources and Water Committee), repeals obsolete and redundant school land statutes and recasts or modernizes other school land statutes. (Staff Report 61, February 2020). The second, AB 2687 (O'Donnell), would have removed the \$300 million cap in the Oil Trust Fund, resuming monthly deposits of \$2 million from Long Beach oil operation revenues until the Fund reaches a balance that will cover the State's projected abandonment liabilities (Staff Report 62, February 2020). AB 2687 was one of many bills that did not proceed because of the pandemic and ensuing budget deficit. SB 1472 is on the Assembly floor and expected to be on the Governor's desk by the August 31 deadline.

<u>Item 58</u> on today's agenda includes a list of legislation staff is monitoring. Staff is monitoring a more extensive range of bills this year, given the shifting landscape in California and the nation. Staff will continue to monitor these bills as the Legislature moves into the final days of the legislative session.

New Staff Report Template

Staff is debuting an updated, modernized staff report template at this meeting. Readers will note a change in the way the information is laid out and that we are using the Governor's preferred font for optimal readability and website accessibility to persons with disabilities. The updated template is a major step in website accessibility because staff reports are the most detailed source of information about the Commission's decisions. The new template is part of a broader staff effort, prompted by <u>AB 434</u> and related website accessibility laws, to make Commission information more accessible to persons with disabilities.

Rincon Well Abandonment Project

Driltek, the Commission's contractor, is making steady progress in abandoning the wells at the former Rincon leases. On the island, 42 of the 50 offshore wells have now been plugged. Onshore, 24 of the 25 State wells have been abandoned, the removal of the wellheads and concrete well cellars is complete, and the surface area has been graded.

Total project costs are estimated at \$33.7 million, which is \$4.4 million, or 11.5 percent, below plan. Altogether, 66 of 75, or 88 percent, of the State well abandonments are complete and project completion is expected by June 30, 2021.

Platform Holly Abandonment Project

Due to the COVID-19 pandemic, the Commission and ExxonMobil determined that further plug and abandonment of the wells on platform Holly was untenable given the physical distancing requirements and continued personnel and idle equipment costs.

On July 26, the preservation, cold stack, and demobilization of the Platform Holly rig equipment was completed to prevent degradation from the marine environment, and ExxonMobil personnel have left the platform. The Commission, through its contractor Beacon West, will continue to secure the Platform and monitor and staff the on and offshore operations in compliance with state regulations. The Commission and ExxonMobil will have quarterly meetings to assess the potential for restarting work based on the evolution of the pandemic and state guidance.

The Commission and ExxonMobil are proceeding with decommissioning the shorezone PRC 421 Piers. A soil removal test was postponed to next month because of bird nesting on the access road and at the piers. Once the test is complete, staff will draft a comprehensive project description and, in collaboration with interested agencies, will begin preparing the environmental document to remove the infrastructure in the surf zone and on the beach.

On August 27, the Commission will host a <u>virtual Town Hall</u> from 6-8 p.m. to update the public about the status of the Platform Holly/Piers 421 decommissioning projects, including the upcoming CEQA process associated with removing the Piers 421 piers. The Town Hall will be recorded and aired live on Channel 19 and rebroadcast throughout the week. The public can watch it live online or view a recording after the meeting on the Commission and City websites.

SB 44 Legacy Wells and Coastal Hazards Program

The SB 44 Legacy Wells and Coastal Hazards Program was codified in 2017 and provides up to \$2 million per year to properly remediate legacy wells and coastal hazards. In June, following a competitive selection process, staff selected Interact to plug and abandon up to eight legacy wells, depending on costs and available SB 44 funding, located offshore Summerland Beach in Santa Barbara County. Permitting is underway, including with the Santa Barbara County Planning and Parks departments, the California Coastal Commission, the US Army Corps of Engineers, the Air Pollution Control District, US Coast Guard,

and the Office of Spill Prevention and Response. Plug and abandonment work is anticipated to begin in the fourth quarter of 2020.

AB 691 Sea Level Rise Assessments

AB 691 (Muratsuchi, 2013) required local trustees of State lands that generate more than \$250,000 in annual revenue to assess impacts and financial costs of sea-level rise. Staff and a consultant team are preparing a summary report of the assessments. Staff will have an update to present at the next Commission meeting and a final report will be presented at the end of the year.

On a related note, the Legislative Analyst's Office published a new report, called What Threat Does Sea-Level Rise Pose to California? This report describes available research on the multiple ways in which sea-level rise threatens the State. Its main purpose is to help the Legislature and the public deepen their knowledge on the risks posed by sea-level rise to in turn help inform response actions. This is a follow-up to their December 2019 report, Preparing for Rising Seas: How the State Can Help Support Local Coastal Adaptation Efforts.

West Coast Ocean Alliance Tribal Guidance

In July, the West Coast Ocean Alliance (WCOA), on which the Commission participates as one of two state representative seats (along with the Ocean Protection Council), publicly released the Guidance and Responsibilities for Effective Tribal Consultation, Communication, and Engagement: A Guide for Agencies Working with West Coast Tribes on Ocean & Coastal Issues. This landmark document was developed over the past year by California, Oregon, and Washington State tribal governments engaged in the WCOA and supported by staff from the Udall Foundation. The guide is meant to compliment and build on west coast states' existing tribal consultation policies, and is aimed at enhancing state and federal approaches to engaging with tribal governments on the West Coast, which WCOA members identified as a priority in recent years. The guide is centered around five best practices for implementation: Early and frequent communication, appropriate representation, understanding and respecting Tribal decision-making processes, consensus-seeking approach, and agency transparency and accountability. WCOA members are now beginning to plan for targeted outreach to federal and state partners to assess options for state-specific or region-wide state outreach around the guide and how to tailor future engagement most effectively for partners in each state. Commission staff is excited to be part of that process.

Hollister Ranch Public Access Program

Over the past year, staff have been working in a collaborative partnership with three other state agencies, the California Coastal Commission, State Coastal Conservancy and State Parks, as part of a State Agency Team to implement AB 1680 and update the 1982 Hollister Ranch Access Plan with a Contemporary Access Program. Between December 2019 and March 2020, activities focused on initial community engagement. In December 2019, the consultant team conducted approximately 18 interviews with a wide variety of stakeholders. These interviews provided an overview of the variety of perspectives, interests, and concerns that will inform the planning process.

In January 2020, following the initial interviews, a survey was sent to the stakeholder email list of about 1,700 email addresses. The survey, which was provided in English and Spanish, gathered information on ideas, areas of interest, and priorities for future public access. On February 20, the planning team held its first public workshop to help guide the planning effort. Over 170 people attended the workshop. Assembly Member Monique Limón provided opening remarks, followed by small group discussions that covered potential interests and concerns associated with a comprehensive Hollister Ranch public access program. In March 2020, a summary of comments from the first public survey was compiled and released to help inform and guide the planning process. The second public workshop planned for April 2020 was postponed due to the COVID-19 pandemic.

In April 2020, a request for statements of interest and applications was released to form a stakeholder working group along with the Principles of Participation, a guiding document that outlines the expectations for participation in the working group. Over 50 applications were received and evaluated for breadth and depth of a variety of experience, interests and ability to participate. Seventeen members were selected, including Assembly Member Limón. The working group will meet about 6-8 times over the next year to collaboratively evaluate stakeholder input and participate in the planning process.

From May to July, the State Agency Team and consultants developed the schedule and scope for the working group and revised schedule for the public engagement strategy. On July 29, the working group met for the first time and reviewed the Mission Statement, Principles of Participation, Scope of Work and Timeline, and other items. The group also discussed the planning process and schedule and the draft objectives and their relationship to other plans, policies and laws.

On August 17, the working group held its second meeting, followed by the release of another public survey. Additional working group meetings, public workshops, and surveys are planned for later this year.

Tijuana River Valley Pollution Crisis

The Tijuana River Valley pollution crisis continues to impact the coastal communities and Public Trust lands and resources in southern San Diego County. Advisories to avoid all contact with water due to sewage-contaminated runoff from the Tijuana River have remained in effect for much of the summer at beaches in the City of Imperial Beach. At the same time, work is proceeding to identify and implement solutions. Earlier this year, \$300 million was secured in congressional appropriations to address transboundary pollution in the United States-Mexico-Canada (USMCA) Implementation Act. The US EPA convened the USMCA Inter-Agency Consultation Group to identify short and long-term projects that will help solve the crisis. The State of California, including the Commission, is represented in the group by CalEPA staff. In recognition of these efforts, litigation against the USIBWC was stayed until July 1, 2021. If the US EPA's process does not adequately protect the public from transboundary pollution, the litigation will resume. On July 29, Senator Feinstein introduced the Border Water Quality Restoration and Protection Act to designate the US EPA as the lead agency to coordinate federal, state and local agencies to build and maintain infrastructure projects that will decrease pollution along the border.

Offshore Renewable Energy Applications

Staff is processing two offshore wind applications (Ideol USA Inc. and Cierco Projects Corporation) for use of sovereign lands located in the Pacific Ocean off the coast of Lompoc and Vandenberg Air Force Base. Both applications are for construction, operation, maintenance, and decommissioning of floating offshore wind electrical generation. Figure 1 below depicts the proposed turbine location for both projects as well as the proposed turbine lease area for one of the applicants.

Figures 2 and 3 depict additional project components for each application. Staff is preparing a comprehensive map showing additional project details for the entire area. The map will include the approximate locations of the static cable connecting to land for both projects as well as general reference to proposed onshore infrastructures.

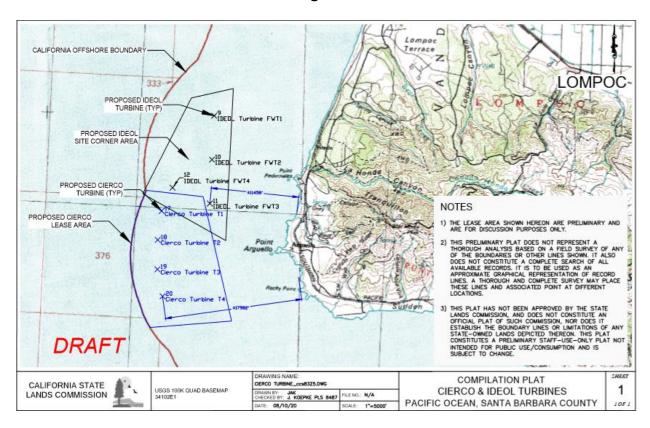
Below are additional details about these two applications:

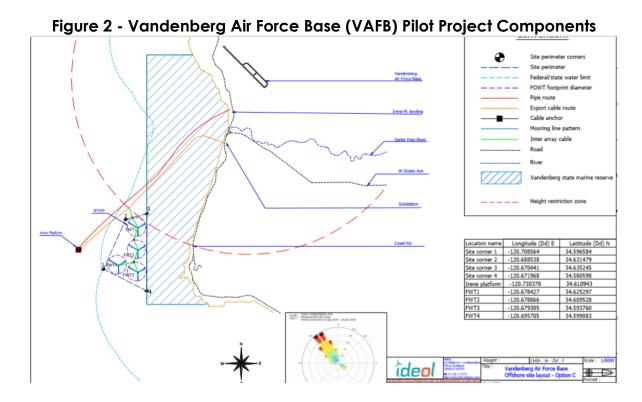
- Lease Application A2181 (Vandenberg Air Force Base Pilot Project or VAFB Pilot Project by Ideol USA Inc.) is "Incomplete." Ideol submitted its application on July 26, 2019 and proposes to install four floating offshore wind turbines with maximum generation capacity of 10 MW each. Over the past year, staff has had discussions with Ideol and requested additional project details. Staff's review of the latest supplemental material, however, indicates that the application is still incomplete. Staff sent a second Incomplete letter to Ideol in July 2020.
- Lease Application A2222 (CADEMO Project) was submitted by Cierco Projects Corporation on August 23, 2019 and includes two floating wind base technologies through the installation of four 12-15 MW floating wind turbines in the area. Over the past year, staff has had multiple discussions with Cierco related to their project details. On June 22, 2020, Cierco submitted a revised turbine site location and their proposed turbine lease area. After reviewing the new submitted material, staff notified Cierco that their application is complete.

As used in this context, a complete application means that the applicant has provided responses to each of the questions in the standard lease application and those responses include the information staff has determined necessary to begin analysis of the proposal. A complete application status means staff will be evaluating options for proceeding on an environmental analysis of the application pursuant to CEQA. Neither application may be presented to the Commission at a properly noticed, public meeting for consideration of a lease agreement until environmental review and analysis is completed pursuant to CEQA.

A third application, A2152, submitted by Ideol for research/data collection in the same area was withdrawn by the Applicant on July 24, 2020.

Figure 1





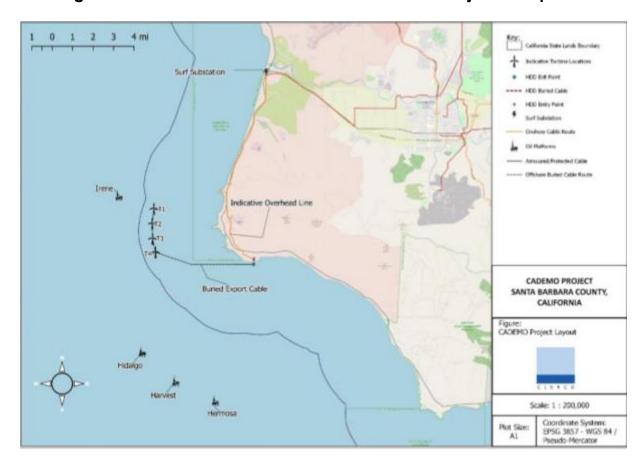


Figure 3 - CADEMO Offshore Wind Demonstration Project Components

Poseidon Huntington Beach Desalination Project

The Santa Ana Regional Water Quality Control Board conducted public hearings on the tentative National Pollutant Discharge Elimination System Permit and associated Addendum to the Commission's 2017 Final Supplemental Environmental Impact Report for the Huntington Beach Desalination Project on July 30-31 and August 7. Public comments closed at the conclusion of the July 31 meeting. The Board deliberated on August 7, 2020 and adjourned the meeting without acting on the permit application and scheduled the next public hearing for September 17, 2020.

During the August 7 meeting, the Board reached a consensus to modify the required mitigation credits for impacts to conform with the Ocean Plan Amendment. The total mitigation credit requirement remains 112.1 credits, however the revised credit ratio is 75 percent restoration credits and 25 percent preservation credits. This lowered the preservation credit for the ocean inlet dredging at Bolsa Chica from 108 credits to 28 credits and increased the requirement for restoration to 84 credits. An additional 51 credits for restoration will be required beyond Poseidon's proposed Marine Life Mitigation Plan.

The proposed preservation dredging, enhancement, and restoration at Bolsa Chica will remain part of the total mitigation requirements. Any additional restoration will be accomplished within the source water body, with Bolsa Chica as the first priority for any additional restoration, if feasible. Board staff will consult with Commission staff on expected feasibility for additional restoration credits within Bolsa Chica. Discharges from the desalination facility will continue to be prohibited until Poseidon obtains permits for all components of the required mitigation.

The results of the Board's determination could result in changes to Poseidon's proposed intake and diffuser design. Once the Board acts, Poseidon may apply to the Commission to amend the existing lease to include the approved design. Depending on the Board's determination, Poseidon may also request the Commission authorize an agreement to implement the approved mitigation actions at Bolsa Chica.

On October 19, 2017, the Commission authorized an amendment of Lease No. PRC 1980 to modify existing intake and discharge pipeline by installing wedgewire screens and a multiport diffuser to the offshore ends of the pipelines, reduce seawater intake volume from 152 million gallons per day volume to 106.7 MGD. A legal challenge regarding the October 2017 amendment approval is spending in the California Court of Appeals, Third Appellate District.

San Onofre Nuclear Generating Station Units 2 & 3 Decommissioning Project

Essential Fuel Transfer Operations Continue

The transfer of spent fuel from the spent fuel pools into dry storage was completed on August 7. A total of 123 canisters are now stored in the Holtec dry storage system and 50 are stored in the TN-NUHOMS system. The dry storage systems at San Onofre have over twice the seismic rating as the spent fuel pools, and dry storage uses no electricity because the fuel is convection-cooled by ambient air. Spent nuclear fuel is safer than passive dry storage because the spent fuel pools require multiple back-up systems to assure safe storage. Moving the fuel to a passive storage system allows Southern California Edison (SCE) to safely shut down other plant functions. Most of the plant is now a deconstruction site.

SCE continues to explore opportunities to relocate the fuel to a federally licensed off-site location. SCE expects to release a strategic plan in early 2021 to identify alternatives for relocating on-site spent fuel to an off-site facility, either for permanent disposal or temporary storage, and to identify actions that SCE can take to advance off-site alternatives.

Asbestos abatement activities inside the Units 2 and 3 containment domes (onshore) began on February 24, 2020 and are expected to continue through September 2020. 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, including the domes. Three hundred tons of asbestos-containing material has been removed and safely shipped offsite to an appropriate waste repository. San Diego Air Pollution District will provide spot-check inspections. SCE will continue to issue quarterly updates to stakeholders and the SONGS community. The updates are also available on the SONGS community website: https://www.songscommunity.com/

At its July 16 meeting, the Coastal Commission approved an Inspection & Maintenance Program for spent nuclear fuel storage. SCE developed the program in response to a special condition of the 2015 Coastal Development Permit issued by the Coastal Commission for the SONGS dry fuel storage facility. Beginning in 2024, two spent fuel storage canisters will be inspected every 5 years, and the San Onofre test canister will be inspected every 2½ years. The test canister is an electrically heated, full-scale, empty canister simulator used to model canister integrity over time and is a first for the industry. The Program applies to the Holtec UMAX dry fuel storage facility located on the upland at SONGS and does not affect the Commission's Lease PRC 6785, nor does the Program pertain to anything within Commission's leasing jurisdiction.

Wheeler North Reef Expansion Project is Complete

SCE's Wheeler North Reef Expansion Project has successfully completed the addition of 200 acres to the reef, for a total of 376 acres. The expansion project was required by the Coastal Commission's permit conditions and constructed as mitigation for SONGS Units 2 and 3 impacts on the San Onofre kelp reef to compensate for loss of marine environment. SCE must meet a series of performance standards each year, for the "full operating life" of Units 2 and 3 as defined in the permit, which includes the decommissioning period to the extent there are continuing discharges.

Real-Time Radiation Monitoring Troubleshooting and Planned Refinements

Per the Mitigation Monitoring Program that the Commission adopted for the SONGS Units 2 & 3 Decommissioning Project, SCE continues to operate real-time gamma radiation monitoring of the dry fuel storage facility located on the upland at SONGS. The only other U.S. nuclear plant to employ such a system is Prairie Island in Minnesota. On June 17, 2020 at 6:00 p.m., the ISFSI Radiation Monitoring System was taken out of service for a brief period of less than 24 hours to repair an issue with the data collection server. The System was restored

on June 18, 2020 at 3:50 p.m. SCE immediately notified the required agencies that receive the live data (Orange County Emergency Management, San Diego County Office of Emergency Services, and the state Department of Public Health Radiologic Health Branch) and corrected the problem. No data was lost because there are two other systems (Holtec and SONGS Decommissioning Solutions (SDS)) that also capture this data. SCE plans to install its own redundant server to avoid a repeat of this situation.

March 25, 2020 Sewage Release – Investigation Order Update

On June 15, 2020, staff received SCE's Responses to San Diego Regional Water Quality Control Board Investigation Order No. R9-2020-0124 (IO), stemming from the previously reported unauthorized discharge of partially treated domestic wastewater into and through the SONGS Unit 2 outfall to the Pacific Ocean. The event was triggered by an unusually high inflow of water into the SONGS Sewage Treatment Plant, combined with a plugged influent pump that caused the unauthorized waste discharge.

The investigation was performed by a team of experts, Gregory J. Duffy of WD Associates, Inc., and Timothy Simpson of GSI Environmental, who worked in collaboration with SCE's (SONGS) technical personnel.

WD Associates identified the following causes of the release:

- Reductions in the staffing levels at the station, and the corresponding
 decrease in wastewater flow, resulted in valve throttling and recirculation
 at the SONGS Sewage Treatment Plant (Treatment Plant) that optimized
 process efficiency but also limited the facility's rate of processing
 incoming water. Limited direction was given to station personnel to
 address abnormal conditions such as a temporary higher rate of incoming
 wastewater, and that direction relied on human intervention.
- At approximately 21:00 on March 24, an equalization basin high-level alarm was received. The equalization basin is the uppermost basin in the Treatment Plant system. SONGS operations personnel assessed the condition and determined it did not require an immediate response. As a result, the appropriate personnel were not contacted as timely as required by procedure. Had communication been timely, the Statecertified Treatment Plant operator could have increased the flow rate from the equalization basin to the aerator to prevent the basin from overfilling.
- When the level rose in the equalization basin and reached overflow pipes from other tanks, radial gaps around those pipes allowed water to fill the

digester, ultimately resulting in digester sludge entering the aerator. Had those gaps not been present, digester sludge would not have gotten into the aerator from the digester and there likely would not have been an unpermitted release.

• At 05:32, when the day-shift station operator took action to unplug the influent pump discharge line, the flow increased through the Treatment Plant above the influx flow rate and resulted in the level in the equalization basin decreasing and digester sludge from the digester flowing into the basin and then being pumped into the process stream. Had this action not occurred, digester sludge would not have reached the effluent basin at the end of the system as quickly as it did, and the Treatment Plant operator might have arrived on site in time to prevent an unpermitted release even with the delay in communication.

GSI Environmental Inc. evaluated ecological, human health, and physical impacts from the discharge of partially treated domestic wastewater on ocean receiving waters. The investigation concluded:

- Ecological impact: no toxicity observed for topsmelt and kelp, differences from control were observed in sea urchins indicating low toxicity, and the NPDES permit maximum daily effluent limitation was not exceeded.
- Human health: no evidence of elevated bacterial levels. Covid-19 beach and park closures minimized any direct exposure with the offshore location of discharge. Human exposures via shellfish harvesting were low due to Covid-19 restrictions and lack of discernable water quality impacts.
- Physical impacts: no evidence of discoloration or change in aesthetics, suspended particulates, or turbidity plume.

The San Diego County Department of Environmental Health determined that because of the dilution factor (200:1) and the offshore location of the release, it was low impact, requiring no action. This was a non-radiological release.

Parking Lot 4 Office Complex Construction Update

The construction of Parking Lot 4 office complex, which consists of 22 office trailers, is almost completed. The construction is estimated to be completed and the complex ready to occupy by late summer, early fall.

Unit 1 Reactor Pressure Vessel Transport Completed

The Unit 1 Reactor Pressure Vessel (RPV1) arrived safely at a licensed disposal facility in Clive, Utah in mid-July. 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 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 included warning signs, barricades, and flaggers.

The RPVs for SONGS Units 2 & 3 will be transported at a later time 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.

Other Business and Updates

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