

Staff Report 53

APPLICANT:

Southern California Edison Company

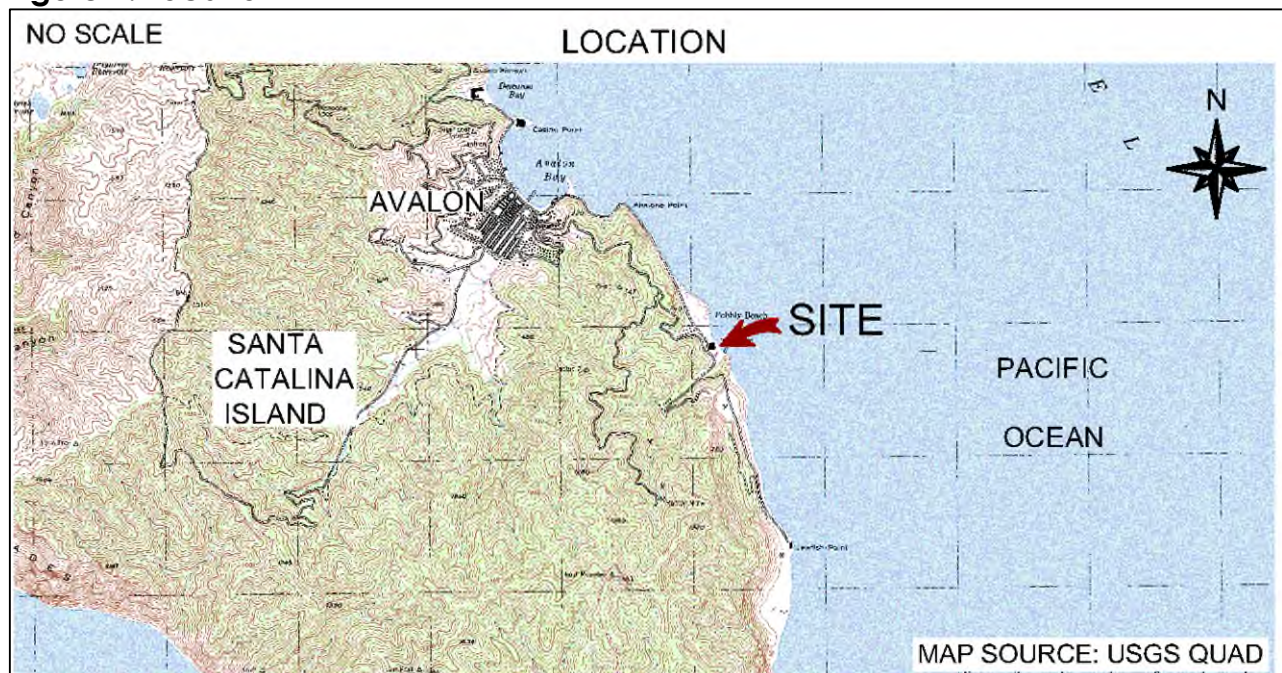
PROPOSED ACTION:

Issuance of a General Lease – Protective Structure Use.

AREA, LAND TYPE, AND LOCATION:

Sovereign land in the Pacific Ocean, located at Pebbly Beach, Santa Catalina Island, Los Angeles County (as shown in Figure 1).

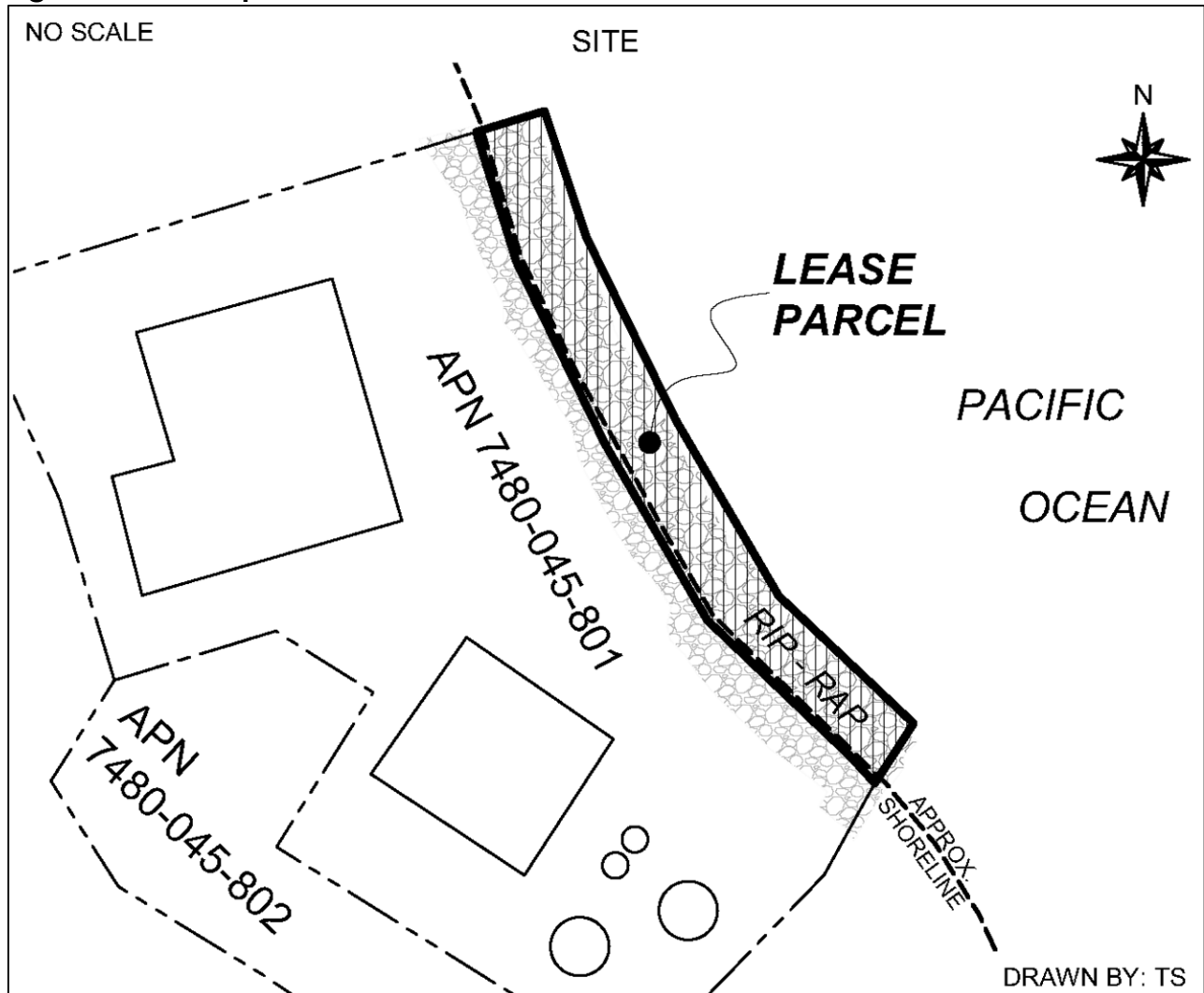
Figure 1. Location



AUTHORIZED USE:

Use of a rock riprap revetment (as shown in Figure 2).

Figure 2. Site Map



NOTE: This depiction of the lease premises is based on unverified information provided by the Applicant or other parties and is not a waiver or limitation of any State interest in the subject or any other property.

TERM:

10 years, beginning June 20, 2025.

CONSIDERATION:

\$1,413 per year, with an annual Consumer Price Index adjustment.

SPECIFIC LEASE PROVISIONS:

- Liability insurance in an amount no less than \$1,000,000 per occurrence, or equivalent staff-approved self-insurance program.
- Section 3, Paragraph 9.1 is deleted and replaced with:

9.1 Lessee Required to Perform Repairs. Lessee is solely responsible for maintaining the Lease Premises, including all Improvements, in good order and repair and in a clean, safe, sanitary, and orderly condition. Lessee is required to notify Lessor's staff at least 30 days in advance for routine repairs.
- Lessee agrees to assess the feasibility of any replacement or repair using alternative adaptation strategies such as nature-based or hybrid solutions utilizing materials that mimic rocky, intertidal habitats prior to any replacement or repair of the rock riprap. Any such adaption strategies will be consistent with Lessor's report [Shoreline Adaptation and the Public Trust](#).

STAFF ANALYSIS AND RECOMMENDATION:

AUTHORITY:

Public Resources Code sections 6005, 6216, 6301, 6321, 6321.2, 6501.1, 6503, 6503.5, and 6505.5; California Code of Regulations, title 2, sections 2000 and 2003.

PUBLIC TRUST AND STATE'S BEST INTERESTS:

On February 20, 2015, the Commission authorized a General Lease – Protective Structure Use to Southern California Edison Company, for the use and maintenance of an existing rock riprap shoreline protection, in the Pacific Ocean, at Pebbly Beach, Santa Catalina Island, Los Angeles County ([Item 80, February 20, 2015](#)). On April 23, 2015, the Commission authorized the rescission of approval of a General Lease – Protective Structure Use and Issuance of a General Lease – Protective Structure Use to allow a new lease that included a provision allowing a staff-approved self-insurance program ([Item 99, April 23, 2015](#)). This lease expired on June 19, 2025.

The Applicant is now applying for a General Lease – Protective Structure Use for the use of an existing rock riprap revetment, in the Pacific Ocean, at Pebbly Beach, Santa Catalina Island, Los Angeles County.

The Applicant owns the upland adjoining the lease premises, and the subject facilities are located directly waterward of the upland property. The uplands is Southern California Edison's Pebbly Beach Generating Station, which is critical infrastructure for power in the area. Catalina Island is not connected to the mainline power grid, and the island's electrical power has mainly been generated by aging diesel-fueled generators, working alongside a fleet of propane-fueled micro-turbines and a long-serving battery energy storage system. Without the Pebbly Beach Generating Station large parts of the island would not have power. The existing rock riprap serves to stabilize the adjacent bluffs atop which the upland facilities are located. Loss or degradation of the rock riprap could result in failure of these bluffs, which could in turn lead to significant property damage.

At this time, since there is no beach below the property, the improvements do not inhibit public access. However, there are potential long-term impacts that may result from the hard armoring at this location which could lead to erosion.

The proposed lease does not alienate the State's fee simple interest or permanently impair public rights. The Lease is limited to a 10-year term, does not grant the lessee exclusive rights to the Lease premises, and reserves an easement to the public for Public Trust-consistent uses. Upon termination, the lessee may be required to remove all improvements from State land and restore the Lease premises to their original condition.

The proposed lease requires the lessee to insure the lease premises and indemnify the State for any liability incurred as a result of the lessee's activities thereon. The lease also required the payment of annual rent to compensate the people of the State for the occupation of the public land involved.

CLIMATE CHANGE:

INTRODUCTION:

The climate crisis and rising sea levels are impacting coastal California now. As underscored in the [State of California Sea Level Rise Guidance](#) (Ocean Protection Council, 2024), the combination of extreme weather events and the persistent and accelerating rise in sea levels will lead to increased coastal hazards, such as wave runup, storm surges, flooding, and erosion. Shorelines will move inland due to rising seas, exposing more of the natural and human-built environment to coastal hazards. The resulting damage will occur repeatedly and incrementally over years and, in extreme cases, over the span of a few large winter storms. These impacts

may affect the existing rock riprap revetment subject to the proposed lease, located in the Pacific Ocean along the coastline of Santa Catalina Island, Los Angeles County.

DATA & PROJECTIONS:

Sea levels along most of the California coast rose four to eight inches during the last century, and this trend will accelerate throughout this century. The current rate of sea level rise is triple the rate during the last century. There is growing confidence that by 2050 sea levels will be approximately ten inches higher than they were in 2000. The severity of sea level rise beyond 2050 is contingent on future levels of greenhouse gas emissions. The California Ocean Protection Council updated the State of California Sea Level Rise Guidance in 2024 to provide a synthesis of the best available science on sea level rise projections and rates for multiple emissions scenarios. To apply a precautionary approach, Commission staff evaluated the “intermediate-high” and “high” scenarios due to the vulnerability and exposure of the lease location and the continued global reliance on fossil fuels. The Los Angeles tide gauge was used for the projected sea level rise scenario for the lease area, as listed in Table 1.

Table 1. Projected Sea Level Rise for Los Angeles

Year	Intermediate-High (feet)	High (feet)
2040	0.6	0.7
2060	1.4	1.8
2080	2.8	3.8
2100	4.5	6.3

Source: Table 12, State of California Sea-Level Rise Guidance: 2024 Update

Note: Projections are with respect to a 2000 baseline.

ANALYSIS:

Commission staff used the online sea level rise mapping tool, [Our Coast Our Future](#), to evaluate risks to the lease premises and structures from sea level rise. At present sea levels, the lease premises are already regularly flooded and subjected to wave impacts and erosion, which could potentially damage any structures or improvements on the lease premises. Episodic or short-term events, such as extreme storms, very high or King tides, and El Niño events, alone or in combination, will increase the vulnerability of the lease premises and expose it to higher water levels and stronger wave runoff, overtopping, and erosion.

This increase in sea level combined with more frequent and stronger storm events will likely expose the lease area to higher flood risks, comprised of greater total water levels for longer periods of time. As described in the submitted 2024 monitoring report, prepared by a licensed engineer, the riprap revetment is currently in fair condition. Five areas of concern were identified for future monitoring, but no immediate corrective measures were warranted. The lessee should continue to monitor the condition of the revetment into the future, as sea level rise and stronger storms could decrease the riprap's integrity and effectiveness, potentially requiring future repairs or upgrades. Any future construction or activities on State land would require a separate authorization from the Commission.

While hard armoring structures, such as the riprap revetment, can exacerbate the adverse effects of sea level rise on Public Trust lands and uses by contributing to the erosion and the loss of public tidelands, hard armoring can be necessary in some situations for protecting critical infrastructure, such as the Pebbly Beach Generating Station, that is highly vulnerable to coastal hazards and located where alternative strategies are infeasible or insufficient. For more information, see Section 4.1 of the Commission's report [Shoreline Adaptation and the Public Trust](#).

RECOMMENDATIONS:

Alternative strategies should be explored to protect the upland property and preserve the beach, including accommodation strategies and the relocation of vulnerable structures further inland. These approaches can be more effective long-term because they interfere less with dynamic coastal processes, which will help to maintain the width of the beach, preserve public access and natural resources, and protect the upland property by buffering coastal hazards. Coordinating with adjacent properties and local governments to develop a regional approach could further enhance the effectiveness of these strategies.

The Commission's report [Shoreline Adaptation and the Public Trust](#) includes more information about various shoreline adaptation strategies and their advantages and disadvantages for mitigating coastal hazards and protecting Public Trust resources. Any future construction or activities on State land would require a separate authorization from the Commission.

Regular maintenance, as referenced in the terms of the lease, may reduce the likelihood of severe structural degradation or dislodgement. Pursuant to the proposed lease, the Lessee acknowledges that the lease premises and adjacent

upland (not within the lease area) are located in an area that may be subject to the effects of climate change, including sea level rise and rising groundwater levels.

CONCLUSION:

For all the reasons above, staff believes approval of this lease will not substantially interfere with Public Trust needs at this location, at this time, nor for the term of the lease; and is in the best interests of the State.

OTHER PERTINENT INFORMATION:

1. Approval or denial of an application is a discretionary action by the Commission. Each time the Commission approves or rejects a use of sovereign land, it exercises legislatively delegated authority and responsibility as trustee of the State's Public Trust lands as authorized by law. If the Commission denies the application, the Applicant may be required to remove the rock riprap revetment and restore the lease premises to their original condition. The lessee has no right to a new lease or renewal of any previous lease.
2. This action is consistent with the "Leading Climate Activism" and "Meeting Evolving Public Trust Needs" Strategic Focus Areas of the Commission's 2021-2025 Strategic Plan.
3. Staff recommends that the Commission find that this activity is exempt from the requirements of the California Environmental Quality Act (CEQA) as a categorically exempt project. The project is exempt under Class 1, Existing Facilities; California Code of Regulations, title 2, section 2905, subdivision (a)(2).

Authority: Public Resources Code section 21084 and California Code of Regulations, title 14, section 15061 and California Code of Regulations, title 2, section 2905.

RECOMMENDED ACTION:

It is recommended that the Commission:

CEQA FINDING:

Find that the activity is exempt from the requirements of CEQA pursuant to California Code of Regulations, title 14, section 15061 as a categorically exempt project, Class 1, Existing Facilities; California Code of Regulations, title 2, section 2905, subdivision (a)(2).

PUBLIC TRUST AND STATE'S BEST INTERESTS:

1. Find that the existing and, for a limited period, continuing use of the rock riprap will not substantially interfere with the Public Trust needs and values at this location.
2. Find that issuing the proposed lease is in the best interest of the State.

AUTHORIZATION:

Authorize issuance of a General Lease – Protective Structure Use to the Applicant beginning June 20, 2025, for a term of 10 years, for the use of an existing rock riprap revetment; annual rent in the amount of \$1,413, with an annual Consumer Price Index adjustment; and liability insurance in an amount no less than \$1,000,000 per occurrence which may be satisfied through a self-insurance program.