



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Gavin Newsom
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SENT VIA ELECTRONIC MAIL

May 19, 2026

Robin M Tuohy
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California State Lands Commission
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RE: MITIGATED NEGATIVE DECLARATION FOR THE AT&T JAPAN-U.S. CABLE NETWORK DECOMMISSIONING (JUS S8 AND JUS S9 CABLES) PROJECT DATED APRIL 23, 2026, STATE CLEARINGHOUSE NUMBER [2026041109](#)

Dear Robin M Tuohy,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the AT&T Japan-U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) Project (Project). AT&T Enterprises, LLC proposes to remove two fiber optic cable segments (JUS S8 and JUS S9) from the seafloor that are no longer in-service and are offshore of San Luis Obispo and Mendocino Counties. The cables would be removed using a dive team to expose and cut the cables at the conduit exit points on the seafloor, and the cable would then be recovered by a cable recovery vessel (CRV) that would store and transport the cable for recycling. The conduit cable connected to the utility access point in Montaña de Oro State Park would also be cut by an onshore work crew and pulled from the conduit using a tugboat and later removed by the CRV. The conduit cables connected to the cable landing station in Manchester would remain inside the conduits.

Background

The Project site is within the boundary of hazardous materials site which DTSC has regulatory oversight over in particular, the [Baywood Park Training Area \(BPTA\)](#). BPTA is part of the former Camp San Luis Obispo training complex and was historically used for infantry maneuver exercises and ordnance-related training during World War II.

Previous investigations have confirmed the presence of munitions and explosives of concern (MEC), including artillery projectiles, grenades, mortars, and rockets. BPTA still requires further remediation. In the past six months, the local bomb squad has responded to two MEC incidents, one rifle grenade and one modern phosphorous marine marker.

DTSC Comments

1. Because BPTA contains risk of encountering MEC in both onshore soil and shallow offshore sediment, DTSC recommends that the County require the AT&T Enterprises, LLC to prepare a Construction Support Plan (CSP), to be reviewed and approved by the County prior to initiating any soil or sediment disturbance, diver operations, or other cable-related activities. The CSP should address all MEC-related safety, oversight, and emergency-response measures needed to protect workers and the environment during the proposed project.
2. DTSC recommends that the CSP include the following:
 - MEC Awareness Training – The CSP should require MEC awareness training for all workers prior to mobilization. This training must be conducted by a U.S. Department of Defense Explosives Safety Board (DDESB) Technical Paper (TP) 18 qualified Unexploded Ordnance (UXO) technician and should address the MEC conditions known at the BPTA, including how MEC may appear in buried, degraded, or partially exposed states. The training should reinforce the Recognize, Retreat, Report (3R) safety protocol to ensure workers understand proper response procedures if MEC is encountered.
 - On-Site UXO Support – The CSP should require that all intrusive or sediment-disturbing activities be supported by a minimum of two

DDESB TP 18 qualified UXO technicians. These personnel should provide real-time evaluation and guidance during diver excavation, cable exposure, conduit-exit work, and any onshore handling activities where MEC may be present. Continuous oversight by UXO-qualified personnel is essential for prompt identification and safe management of MEC hazards.

- Stop-Work and Emergency-Response Procedures – The CSP should establish clear MEC stop-work and hazard-response protocols to be followed immediately upon encountering any object or condition that resembles MEC. Work should halt, the area should be secured, and personnel should follow procedures provided during MEC awareness training. Initial notification should be made by calling 911 to reach the San Luis Obispo County Bomb Squad, which may coordinate directly with Vandenberg Space Force Base Explosive Ordnance Disposal for technical MEC support.
- MEC Safety Integration and Work-Resumption Controls – The CSP should explain how MEC safety requirements will be implemented throughout project execution, including management of hazard zones, communication pathways, and reinforcement of 3R procedures. The CSP should also specify that work may not resume in a suspected MEC area until a TP 18 qualified UXO technician has evaluated the condition and confirmed the area is safe. The Plan should also describe coordination procedures with the U.S. Army Corps of Engineers Los Angeles District, which retains technical oversight responsibilities for Formerly Used Defense Sites with unresolved MEC concerns, including the BPTA.
- Soil Management Requirements – The CSP should include detailed soil management procedures to control soil placement and prevent any offsite removal or disposal of excavated material. The CSP should clearly describe how soil will be handled, stockpiled, tracked, and

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reused onsite to ensure that potentially MEC-impacted soil is not transported offsite. The plan should also outline monitoring measures, documentation requirements, and procedures for addressing soil placement.

Ensuring that these MEC safety requirements are incorporated into the CSP and actively implemented throughout the Project is critical to reducing MEC-related risks during all phases of work.

DTSC appreciates the opportunity to comment on the MND for the AT&T Japan-U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [the CEQA Review email](#) for additional guidance.

Sincerely,



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cc: (via email)

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