

[EXT]Comments on Diablo Canyon Draft Environmental Impact Report

Matt Downing <MDowning@PismoBeach.org>

Mon 9/25/2023 4:24 PM

To:PL_Diablo <PL_Diablo@co.slo.ca.us>

Cc:Susan Strachan <sstrachan@co.slo.ca.us>;Cindy A. Chambers <cchambers@co.slo.ca.us>;Jorge Garcia <jgarcia@pismo beach.org>;Fleishman, Dave <dfleishman@rwglaw.com>;Cory Hanh <chanh@pismo beach.org>

📎 1 attachments (214 KB)

2023-09-25 - Diablo Canyon Power Plant Decommissioning Project Signed.pdf;

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Hi Susan:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report for the Diablo Canyon Power Plan Decommissioning project (DRC2021-00092). Please see attached comments from the City of Pismo Beach.



Matthew Downing, AICP

Director

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September 25, 2023

Susan Strachan
Nuclear Power Plant Decommissioning Manager
County of San Luis Obispo Department of Planning and Building
976 Osos Street Room 300
San Luis Obispo, CA 93408
Sent via email: sstrachan@co.slo.ca.us

Subject: Diablo Canyon Power Plant Decommissioning Project Draft Environmental Impact Report – Comments

Dear Ms. Strachan:

Thank you for including the City of Pismo Beach (“City”) in the Environmental Impact Report (EIR) process for the Diablo Canyon Power Plant Decommissioning Project (“Project”).

On December 1, 2021, the City provided comments that were preliminary in nature due to lingering questions on the specific details as it relates to the activities that may occur within and around Pismo Beach city limits and as it relates to the Pismo Beach Materials Handling Facility (PBMHF). At this time, based on the information available, the City offers the following comments:

1. **Anticipated permits and approvals.** As part of the Project, the PBMHF has been identified as a possible facility for transporting non-radiological and non-hazardous waste via rail out of state. The City is a Responsible Agency for the Project as a result of the potential use of the PBMHF. While conversations regarding activities relating to the PBMHF have occurred, no additional specific details have been submitted to the City for review. As such, the City maintains that permits, approvals, and/or consultation from the City may be required. However, the Draft EIR does not adequately identify this concern as it relates to anticipated approvals and authorizations for the Project. Please adequately identify the City and potential permits, approvals, and/or consultation from the City in Table 1-1 of the Introduction and in any other references.
2. **Noise barrier.** Installation of a temporary noise barrier has been identified as a noise mitigation measure at the Pismo Beach railyard. The mitigation also indicates that design plans for the noise barrier shall be submitted to the City at least 90 days prior to the use of the site. It should be noted that the appropriate permits and approvals shall also be secured prior to the noise barrier on the site. In addition, the need for additional mitigation seems to indicate that the potential activities would be an intensification of use on the site, and therefore, would require additional review by the City.
3. **Truck routes and potential impacts.** The identified “Pismo Beach Railyard Route” is in close proximity to sensitive receptors (such as residential neighborhoods, a Judkins Middle School, Veteran’s Hall, and a sports complex) and City emergency services (Police Station and Fire Station located on Bello Street). The intensification of use at the PBMHF in such close proximity to sensitive receptors and emergency services is concerning and may not be appropriate. The potential activities at the PBMHF must be appropriately



reviewed through the City’s permitting and approval process to ensure that community feedback will be sufficiently considered and to determine the appropriateness of such activities.

4. **Non-radiological and non-hazardous waste.** The description of waste that may be transported to the PBMHF is inconsistent throughout the Draft EIR. The following descriptions have been utilized in various sections of the Draft EIR: “non-radiological waste and non-hazardous waste”, “non-radiological hazardous materials”, “no radiological or hazardous waste”, “non-radioactive and nonhazardous decommissioning waste”, and “non-radiological or non-hazardous waste”. One of the primary purposes of an EIR is to disclose information regarding a project and its potential impacts, and as such, the project description and any related terminology should be clear and consistent throughout an EIR. Please ensure that the description of waste is clear and consistent throughout the EIR. It appears that “non-radiological and non-hazardous waste” would be the most appropriate as it specifies that the waste would be both non-radiological and non-hazardous, as opposed to other descriptions that may not apply both aspects simultaneously. In addition, please provide examples of non-radiological and non-hazardous waste to allow the public to better understand the type of waste that may be transported into the city.

5. **Storage of non-radiological and non-hazardous waste.** The Draft EIR indicates the following: “Temporary storage of any non-radiological or non-hazardous waste at the PBR site would be kept at least one foot above any existing Federal Emergency Management Agency 100-year floodplain elevation. This would reduce the need for emergency response during the transport and temporary storage of non-radiological waste. Impacts would be less than significant (Class III).” Please define “temporary” and provide information on how non-radiological and non-hazardous waste would be stored for further consideration.

Thank you again for the opportunity to comment. Should you have any questions, please feel free to contact me by email at mdowning@pismo-beach.org or by phone at (805) 773-4658.

Thank you,



Matthew Downing, AICP

Community Development Director

cc: Cindy Chambers, County of San Luis Obispo (sent via email: cchambers@co.slo.ca.us)
Interim City Manager, City of Pismo Beach
City Attorney, City of Pismo Beach
Planning Manager, City of Pismo Beach