


[EXT]FW: Port San Luis Comments on DCPD DEIR

Suzy Watkins <suzyw@portsanluis.com>

Mon 9/25/2023 5:00 PM

To: PL_Diablo <PL_Diablo@co.slo.ca.us>; Susan Strachan <sstrachan@co.slo.ca.us>

 1 attachments (199 KB)

DCPP DEIR 92523 comments.docx;

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From: Suzy Watkins

Sent: Monday, September 25, 2023 4:58 PM

To: diablo@co.slo.us; sstrachan@co.slo.us

Cc: Dawn Ortiz-Legg <dortizlegg@co.slo.ca.us>; Mary Matakovich <marym@portsanluis.com>; Bob Vessely <bobv@portsanluis.com>; Drew Brandy <drewb@portsanluis.com>; Jim Blecha <jimb@portsanluis.com>; Bill Barrow <billb@portsanluis.com>

Subject: Port San Luis Comments on DCPD DEIR

Good afternoon,

Please see attached comments on the Draft EIR for DCPD Decommissioning.

Thank you,

Suzy Watkins
Harbor Director

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September 25, 2023

Project Number & Name: ED2021-174 / DRC2021-00092
DCPP Decommissioning Project DEIR Comments

To: Ms. Susan Strachan, Nuclear Power Plant Decommissioning Project Manager
San Luis Obispo County, Department of Planning and Building
sstrachan@co.slo.us, diablo@co.slo.us

This letter contains the Port San Luis Harbor District's (District) comments on the Diablo Canyon Power Plant (DCPP) Decommissioning Project Draft Environmental Impact Report (DEIR) and the District's overall concerns with the Project. The District's comments are focused on the DCPP site and adjacent land.

- 1. Harbor District land, facilities, and submerged tidelands:** The environmental impact of all potential utilization planned during the decommissioning project of any land, facilities, and submerged tidelands owned and managed by the District should be reviewed. The District continues to be concerned with the potential for decommissioning activities and potential future uses to impact erosion and sediment properties and transport as well as impact on coastal processes in the Santa Maria littoral cell. The review under the DEIR is limited to the nearshore area adjacent to the project, although reference is made to the regional impact of coastal processes and sediment transport. As an example, the DEIR does not include an analysis of the impact a concrete bulkhead over the Intake Structure opening will have on erosion to the adjacent shoreline as well as regional sediment loads.
- 2. Road Transportation:** The District's area of concern includes use of roadways for heavy construction vehicles, vehicle staging, and all transportation of demolished non-radioactive concrete and materials, particularly transportation that results in road closures of the single access road to Port San Luis facilities. As discussed in the DEIR, Port San Luis facilities are available 24 hours a day, seven days a week to a multitude of commercial and recreational users, including for boating, fishing, and camping. The mitigation measures focus on coordination with and access for commercial fishing operations, without discussion of other impacted user groups. As noted in previous comments on the planned EIR scope, a condition assessment of the Avila Beach Drive revetment should be performed to ensure ability to withstand loads, erosion, and sea level rise during the full duration of decommissioning. The District has additional concerns regarding traffic loads for potential future uses of the site, many of which are noted in the DEIR, but are not analyzed.

3. **Water Quality:** Water runoff during decommissioning and its impacts to the ocean water quality and fish habitats. This water quality impact and environmental review should extend well beyond the DCPD marina.
4. **Desalination / Brine Water Quality:** The DEIR does not address the impact of wastewater discharge and ocean effluent discharges from the desalinization plant in the absence of high-volume water discharge from plant operations.
5. **Lighthouse Road Controlled Access:** Removal of the DCPD entrance guard station impacts traffic management of the single-lane road to the Point San Luis light station. Access to the light station road is currently limited by the security checkpoint at the DCPD entrance.
6. **Future Site Reuse Potential:** The District has previously submitted its ideas for future uses of PG&E owned land in and around the DCPD and requested review of the cumulative environmental impact of these public uses in the EIR. No review of future uses was completed for the DEIR, although a list of future uses are noted in the DEIR and those uses may inform the proposed project. Uses proposed by the District include:
 - Full District control of the access to the road and trails to the Point San Luis Lighthouse.
 - Expansion of District land ownership adjacent to the District's Harbor Terrace campground for expansion of the camping area and public access to a trail system.
 - Boat storage, commercial fishing gear storage, and harbor operations material storage near the current entrance to the DCPD along Avila Beach Drive.
 - Use of the current DCPD marina and adjacent land for harbor operations including commercial fishing, recreational fishing and boating, and other coastal dependent and coastal related public uses. The District supports preserving the current breakwaters at the DCPD.
 - PG&E owned property around the Wild Cherry Canyon area for public access, boat storage, and harbor operations.

In addition to the above-listed concerns regarding the DEIR analysis, please note two errors in the draft document:

- There is a typographical error at 4-15.9 where Harford Pier is referenced as Hanford pier; and
- A factual error at 4-15.10: Fishermen's Memorial is not a trailhead (see also Fig 4-15.3) The trailhead is located roadside near the DCPD entrance station.

Thank you for consideration of our comments for this DEIR.

Suzy Watkins
Harbor Director
Port San Luis Harbor District

cc: PSLHD Harbor Commission
Dawn Ortiz-Legg, 3rd District Supervisor