

# BOARD OF SUPERVISORS

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November 1, 2012

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Mary K. Shallenberger, Chair  
Honorable Commissioners  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**Re: Application No. E-12-005 and CC-027-12  
PG&E High Energy Geophysical Survey  
(Wednesday, November 14<sup>th</sup>, Item 13.b.)**

Dear Chair Shallenberger and Members of the Commission:

The San Luis Obispo County Board of Supervisors appreciates the opportunity to provide comment on the above-referenced application for a high-energy offshore seismic reflection survey, proposed to be conducted near the Diablo Canyon Power Plant (DCPP). Our Board has been actively involved for some time with efforts to better understand the earthquake seismic hazard at DCPP.

Our Board again considered this matter at our October 30, 2012 meeting. After reviewing our previous recommendations and hearing over four hours of public testimony, we are of the unanimous opinion that that your Commission should not approve the application for the project as currently proposed, for reasons noted below.

Your Commission is already in receipt of our Board's letter to the State Lands Commission (dated August 7, 2012, transmitted to you on September 17, 2012). The relevant paragraph of that letter reads:

*"Our Board believes that the State Lands Commission (CSLC) should only issue a permit for the Diablo Canyon HESS if the following conditions are met: 1) all environmental impacts are fully understood and mitigated to the maximum degree possible, understanding that mitigation to a level of insignificance may not be possible; 2) all unavoidable economic impacts are fully and fairly compensated; and 3) the technical details of the survey design have been subjected to independent third-party review by industry-qualified experts to confirm that the best available technology is applied to this crucial investigation."*

Our opposition to the proposal before you (a subset of the project submitted to CSLC) is based primarily on the fact that none of the three conditions listed have been realized.

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First, the environmental impacts of the proposed survey are not yet completely understood and therefore cannot be mitigated to the greatest extent feasible. There is broad concern about the effect that high levels of underwater noise may have on divers, swimmers, surfers, and other humans who may be in the ocean when the proposed testing takes place. If it proves necessary to close areas of the ocean to these activities then a closure protocol must be developed and mitigation for the lost recreational resource must be addressed. The Board also believes there should be further substantiation of the expected impacts to marine life.

Second, PG&E has not yet arrived at an adequate and comprehensive program to mitigate and compensate for the significant economic impact of the survey on ocean-dependent commercial interests, including commercial fishing, recreational fishing, other recreational activities (e.g., diving) and associated shore-based enterprises.

Third, the current survey design, which proposes using the vessel *R/V Langseth* towing four streamers, does not likely represent the state-of-the-art in 3-D high-energy data collection. For instance, a different vessel towing more streamers would create a wider survey footprint thereby reducing data acquisition time and its associated impacts. The technical details of the survey design should be subjected to an independent third party review by qualified industry experts to confirm that the best available technology is being applied. We expect no less than a demonstration that any high-energy offshore survey would provide the best possible scientific result with the least environmental impacts.

Our Board is driven by the fundamental concern that the earthquake hazard to the Diablo Canyon Power Plant be understood as thoroughly and objectively as possible. We acknowledge that a three-dimensional high-energy survey could provide information essential to a full understanding of the potential hazards off-shore of DCP. Given the significant environmental impacts, any such survey must be designed and executed to meet the highest standards.

As part of a proper design approach to this project, we believe that PG&E should first complete processing and interpretation of low-energy offshore data recently collected, as well as the substantial data sets collected onshore. Information from these related studies would provide important guidance in optimizing high-energy offshore data collection and processing parameters, consistent with modern survey design practice.

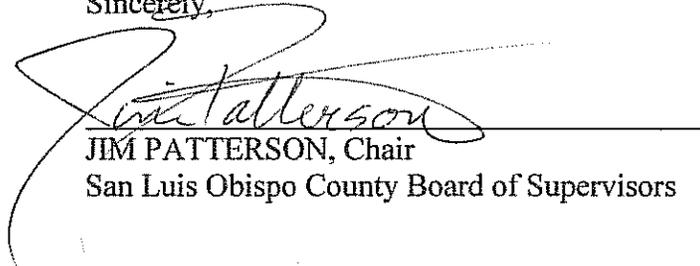
While PG&E has characterized their current proposal as a sort of pilot project, the stated project objectives are those of accomplishing a piece of the overall high-energy offshore survey previously proposed. It is not clear how the technical adequacy of this survey would be assessed, nor how any subsequent survey parameters might be optimized based on these results. Our position remains that independent review is necessary before any high-energy work is conducted offshore.

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In conclusion, our Board urges your Commission to deny the current application. PG&E's current proposal fails to describe and mitigate environmental impacts to the greatest degree possible, it lacks an adequate and comprehensive program to mitigate and compensate for economic impacts, and it lacks an independent third-party review of survey design to guarantee a state-of-the art seismic study.

Thank you for your consideration.

Sincerely,



JIM PATTERSON, Chair  
San Luis Obispo County Board of Supervisors

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