[EXT]Comments - Diablo Canyon Power Plant Draft EIR

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

Sept. 25, 2023

Ms. Susan Strachan
San Luis Obispo County Department of Planning & Building
976 Osos St., Rm 300
San Luis Obispo, CA 93408

Dear Ms. Strachan,

When the Diablo Canyon Power Plant (DCPP) Decommissioning Engagement Panel met August 9, several alternatives were discussed for decommissioning that would help to minimize environmental impacts. Thought it was represented by an icon on the accompanying PowerPoint presentation, what was not discussed was mandatory consideration of a "No-Project Alternative."

According to state guidelines for interpretation of the California Environmental Quality Act (CEQA), the No-Project Alternative analysis must discuss the existing conditions and what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and/or available infrastructure and community services (CEQA Guidelines, Section 15126.6(e)(2)).

If decommissioning were not approved, it is reasonable to expect the plant would continue to generate electricity profitably, safely, and reliably for owner PG&E, contingent on approval of its pending license extension by the U.S. Nuclear Regulatory Commission.

Moreover, the Guidelines describe several Mandatory Findings of Significance, criteria all clearly met with respect to decommissioning of DCPP:

> *"The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals."* [1]
>
> *"The project has possible environmental effects that are individually limited but cumulatively considerable. 'Cumulatively considerable' means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."* [2]
>
> *"The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly...*
>
> *"An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment."* [3]

Among analyses from several organizations, a 2021 study assembled by eight eminent engineers and environment scientists from Stanford University and Massachusetts Institute of Technology identified multiple environmental benefits DCPP provides, all of which would be lost if the plant was decommissioned:

> *"By burning less gas and importing less power, the state system with Diablo Canyon is able to achieve significantly lower emissions levels—an average of 7 Mt [million tons] CO2 a year, corresponding to an 11% reduction in CO2 from the electricity sector relative to 2017 levels...*
>
> *"If operated to 2045 and beyond, Diablo Canyon could...spare 90,000 acres of land from use for energy production, while meeting coastal protection requirements…"* ***[4]***

Under CEQA guidelines, the climate change impacts of both decommissioning and allowing the plant to remain open thus require mandatory findings of significance, and must be considered within the scope of any CEQA review.

We urge SLO County commissioners to undertake Diablo Canyon's Environmental Impact with all due diligence, giving the No-Project Alternative the attention it deserves in this consequential case. Closing Diablo Canyon prematurely and unnecessarily would have severe implications for not only the environment, but the county's economy and the reliability of California's electrical grid.

Sincerely,

Carl Wurtz

Executive Director

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[1] *CEQA Guidelines, § 15065, subd. (a)(2)*

[2] Ibid., subd. (a)(3)

[3] Ibid., subd. (a)(4)

[4] "*An Assessment of the Diablo Canyon Nuclear Plant for Zero-Carbon Electricity, Desalination and Hydrogen Production*" https://drive.google.com/file/d/1RcWmKwqgzvIgllh0BB2s5cA6ajuVJJzt/view