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P.O. BOX 249 · AVILA BEACH  
CALIFORNIA 93424  
(805) 595-5400 · Fax 595-5404  
www.portsanluis.com

JOHN D'ORNELLAS *Interim Harbor Manager*  
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December 6, 2021

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

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

This letter contains the Port San Luis Harbor District's (District) comments on the scope of the Diablo Canyon Power Plant (DCPP) Decommissioning Project Environmental Impact Report (EIR) 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. These could include, but are not limited to, the old barge landing adjacent to entrance of the DCPP access road, parking lots, piers, and moorage areas.
2. **Road Transportation:** Transportation and pedestrian safety/access on Avila Beach Drive to support the decommissioning project and future traffic loads for potential uses at the DCPP site should be reviewed in the EIR. The District's areas of concern include use of roadways for heavy construction vehicles during any high traffic times, vehicle staging, and all transportation of demolished non-radioactive concrete and materials. 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.
3. **Water Quality:** Water runoff during decommissioning and its impacts to the ocean water quality and fish habitats should be fully reviewed during the project. This water quality impact and environmental review should extend well beyond the DCPP marina.
4. **Desalination / Brine Water Quality:** Review what will occur to the existing desalination plant and resulting waste products during the decommissioning project and after the project for the future potential uses of the land and their potable water requirements. Assess wastewater treatment and ocean effluent discharges in absence of the current high volume water discharge.

5. **Future Site Reuse Potential:** The District has previously submitted its ideas for future uses of PG&E owned land in and around the DCPD. The District requests review of the environmental impact of these public uses in the EIR. These uses 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.

Thank you for consideration of our comments for this project.



John D'Ornellas  
Interim Harbor Manager  
Port San Luis Harbor District

C: PSLHD Harbor Commission  
Dawn Ortiz-Legg, 3<sup>rd</sup> District Supervisor