Comment Set PG, cont.
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ALTERNATIVES

I. Specific Comments

PG-73

1. Page C-1, Second Paragraph, Fourth Sentence

The following phrase should be added at the end of this sentence:

". . while meeting the Proposed Project's objectives."

2. Section C.4.2, Page C-6, Fifth Paragraph, New Last Sentence

A new sentence should be added at the end of this paragraph as follows:

> In 1995, four main bank transporters, each weighing approximately the same as an RSG, were brought in by barge to the Intake Structure. The load path would be identical for the RSGs if the Intake Cove delivery option is used. Medium size loads (15-25 tons) have been routinely transported along this road to the intake structure to support replacement of various plant equipment. In addition, three main bank transformers, were transported along the Access Road to DCPP in 1998.

The DEIR addresses the stability of the ground along the transport route and proposes mitigation to ensure that the roads are capable of carrying the Project loads. *See* Geology, Soils and Paleontology Section at D.5-14 to D.5-15 and Comment 2 to the Geology Section, below.

3. Section C.5.2.3 , Page C-18 First Paragraph, First and Second Sentences

This discussion may include a reference for the landslides in 1996-97. Patton Cove, as with all other coves near DCPP, and are unsuitable because of many offshore wash rocks that could block barge transport.

III. Clerical/Typographical Comments

PG-74

4. Section C.6.1 Page C-27, First Paragraph, Second Sentence

Eliminate period after "2013."

Comment Set PG, cont.
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5. Section C.6.3.4, Page C-33, First Paragraph, Last Sentence

PG-74

Change Counties to counties.

Comment Set PG, cont.
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INTRODUCTION TO ENVIRONMENTAL ANALYSIS

I. Specific Comments

PG-75

1. Section D.1.2.2, Page D.1-3, Second Full Sentence

This sentence should read as follows:

> In addition, NRC license renewal is not considered to be a reasonably foreseeable project for the purpose of a cumulative environmental analysis because PG&E has not decided to pursue license renewal or applied to the NRC for formal license renewal.

Comment Set PG, cont.
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AIR QUALITY

I. General Comments

1. Section D.2, Entire Section

The DEIR's air quality analysis is based on overly conservative assumptions of impacts. In addition, the proposed mitigation measures include effectiveness criteria that are not linked to the reduction of emission levels below the significance thresholds set by the County Air Pollution Control District. For these reasons, PG&E suggests modifications to the mitigation measures in this section to take into account actual Project emissions levels, to take advantage of the expertise of the San Luis Obispo Air Pollution Control District (SLOAPCD) and to provide a comprehensive plan to address air quality emissions from the Project that can be integrated with the traffic reduction measures set forth in Section D.13 of the DEIR.

PG-76
PG-77
PG-78

Worst Case Emissions Levels

Section D.2 (Air Quality) assesses the "worst case" scenario for air emissions from the Proposed Project and establishes mitigation measures accordingly. Specifically, the mitigation measures are based on the following overly conservative assumptions:

PG-79

(1) The number and types of construction equipment, including tugboats, prime movers, transporters, forklifts, cranes. For example, the analysis assumes use of two tugboats when it is possible that only one tugboat will be used. Also, prime movers may not be necessary because self-propelled modular transporters may be sufficient to perform all heavy load transport activities.

(2) The number of SGRP project workers. The number included in the DEIR is based on PG&E's assumptions prior to awarding the installation contract. The installation contractor has now provided PG&E new manpower curves indicating that fewer project workers will be required than PG&E assumed.

(3) The location of SGRP project workers. The DEIR is based on the assumption that all of the project workers will be on site. In fact, many employees, such as engineering staff, will not be on site.

These assumptions largely result in an overstatement of air quality impacts from the Project and therefore set overly high emissions levels that must be reduced through mitigation measures.

Comment Set PG, cont.
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Unsupported Effectiveness Criteria

PG-80

In addition to using overly conservative assumptions that result in higher than necessary emissions levels, some mitigation measures suggested in this section use effectiveness criteria that are tailored to reducing air quality impacts below the required significance level. As a result, the suggested mitigation measures may not appropriately address the actual air quality impacts of the SGRP. For example, achieving a project worker vehicle occupancy rate of 2.0, or van pool rider-ship participation of 10 percent, as required by Mitigation Measure A-1a, may be more or less than what is required.

Construction Activity Management Plan

PG-81

In order to ensure that the project's mitigation measures address actual project impacts and set meaningful effectiveness standards, PG&E proposes that air quality impacts currently addressed in Mitigation Measures A-1a, A-1b, A-1c and A-2a, be addressed through the preparation of a Construction Activity Management Plan (CAMP). A CAMP offers the following benefits:

- Meaningful Significance Criteria: In order to be effective, the CAMP would have to ensure that SGRP emission levels remain under SLOAPCD air emissions standards through either project design features or off-site mitigation measures.

- Accurate Project Specifications: The CAMP would have to be based on the installation contractors' final construction plan, so that it will address actual project equipment and personnel levels.

- SLOAPCD Expertise: The CAMP would be subject to approval by the SLOAPCD, which has significant expertise on off-site mitigation programs, diesel combustion emission controls, and the registration of portable equipment.

- Integrated Plan: The CAMP approach will allow PG&E and SLOAPCD to develop an integrated plan for addressing air quality emissions rather than three different plans addressing air quality. This plan could also integrate the traffic control measures required under the Traffic and Transportation section of the EIR.

A CAMP would specifically define the air quality mitigation measures to be employed as the project moves forward and will directly address the concerns addressed by mitigation measures A-1a, A-1b, A-1c. A CAMP for this type of project would include specific requirements in connection with:

(1) Sensitive Receptors

Comment Set PG, cont.
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(2) Mitigation Monitoring
(3) Dust Control
(4) Permitting Requirements
(5) Construction Equipment Emission Reductions
(6) Construction Worker Trips
(7) Complaint Response

PG-81

Encompassed in these sections will be requirements to control diesel emissions (as currently described in Measure A-1b), to restrict and/or offset NOx emissions (as currently described in A-1c), and trip reduction requirements (as currently described in Measures A-1a, and T-3a). As the agency responsible for registration of portable construction equipment, the CAMP would also be a vehicle for addressing the concerns in Measure A-2a.

PG-82

Consistent with these suggestions, we recommend that current Mitigation Measures A-1a, A-1b, A-1c and A-2a be replaced with the following:

> **Mitigation Measure A-1a: Develop and Implement a Construction Activity Management Plan (CAMP).** PG&E shall develop and implement a CAMP in cooperation with the SLOAPCD and the CPUC that will --
> 1) provide emission and congestion benefits through a trip reduction plan; 2) address any necessary offsite mitigation program for NOx emissions; 3) address diesel combustion emissions; 4) ensure that all portable equipment is properly registered or permitted by SLOAPCD; and 5) take other measures required by SLOAPCD to ensure that project emissions are reduced below the relevant significance criteria published by SLOAPCD.
> **Effectiveness Criteria**: Evidence of plan approval by SLOAPCD
> **Responsible Agency**: SLOAPCD, CPUC

PG-83

PG&E is developing a CAMP with SLOAPCD for the ISFSI project. It has served as an effective mechanism for addressing air quality impacts in that context and would be a more effective approach in this project as well.

II. Specific Comments

PG-84

2. Pages D.2-10 through D.2-13

Page D.2-8 states that "The potentially significant emissions shown above are based on use of newer, or lower-emitting, transport equipment as part of a Diesel Combustion Emission Control Plan and use of double occupancy vehicles or a vanpool by all commuters in worker vehicles." The Final EIR should clarify whether these emissions levels take into account the application of diesel control measures and the imposition of traffic control requirements or would those levels be further reduced through the imposition of these types of measures.

Comment Set PG, cont.
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In addition, emissions from the portable concrete batch plant should be included as part of project-related emissions even if they are already included in the inventory used for attainment planning.

PG-85

3. Section D.2.1, Page D.2-2, Table D.-1 (Local Ambient Air Quality Monitoring Data)

PG-86

The 2004 ambient air quality data is available on the Air Resources Board (ARB) Website. The maximum 1-hour and 8-hour ozone levels do not match the data listed on the ARB Website.

Based on PG&E's research these levels should be modified as follows:

- Under maximum 1-hour ozone, the levels I have are 0.073 ppm for 2002 (instead of 0.067 ppm) and 0.070 ppm for 2003 (instead of 0.074 ppm). The level for 2004 is 0.073 ppm.
- Under maximum 8-hour ozone, the levels I have are 0.062 ppm for 2002 (instead of 0.058 ppm) and 0.063 ppm for 2003 (instead of 0.062 ppm). The level for 2004 is 0.070 ppm.
- The level for 2004 under maximum 24-hour PM10 is 30 ug/m3 and under maximum 24-hour PM2.5 is 8.8 ug/m3.

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Comment Set PG, cont.
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BIOLOGICAL RESOURCES

I. General Comments

1. Baseline Environmental Condition: Cooling Water Discharge and Fish Entrainment:

The DEIR includes an extensive description of the DCPP cooling water system and impacts related to fish entrainment and impingement. As described in the specific comments below, some of this analysis is factually inaccurate or misleading. As a foundational matter, however, the discussion of the cooling water system and its impacts on the marine environment near DCPP is completely irrelevant to the SGRP and so represents an unnecessary analysis in the DEIR. This system and any impacts from it are encompassed within the environmental baseline against which the impacts from the SGRP are to be measured. The Final EIR should make absolutely clear that the SGRP will in no way affect the cooling water system at DCPP or alter its impacts on the marine environment.

PG-87

PG-88

2. Section D.3.3.1, pages D.3-2 through D.3-3

The section lacks a description of the botanical resources associated with the Intake Cove alternative off-loading site and the haul route that would be utilized under this alternative. The information in the figure, provided as Attachment 4, should be incorporated into the FEIR to further describe these botanical resources.

PG-89

3. D.3.1.4.2 Threatened or Endangered Wildlife, beginning on Page D.3-9.

- The section opens with the finding that no state or federally listed threatened or endangered species are expected to occur in the project zone of potential effect, but that listed species (terrestrial) are known to occur in the project vicinity. While this statement is true, certain of the information that follows should be clarified in the final EIR.

- Red-legged frogs are discussed at length, although there are no records of red-legged frog occurring within many miles of DCPP. Surveys conducted for this species on DCPP lands, in potentially suitable habitat areas, both in the past and very recently have found none.

- Not mentioned but known to occur in the vicinity of DCPP are the brown pelican and the golden eagle. Another species for which surveys have been conducted within the project area recently, but no individuals have been found, is the federally listed Morro Bay shoulderband snail.

PG-90

Comment Set PG, cont.
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- The peregrine falcon is discussed but no mention is made of the two active nest sites within the project vicinity (Diablo Rock Site and North Ranch Coastal Bluffs Site). **PG-90**

All of these species should be discussed in this section, though no impacts to these species would occur from the SGRP.

The following language adapted from the ISFSI project is suitable for a general discussion of these species: **PG-91**

PEREGRINE FALCON

Falco peregrinus anatum

Regional And Local Distribution. The peregrine falcon occupies breeding territories at select sites along the California coast north of Santa Barbara, in the Sierra Nevada Mountains, and in other mountains of northern California. In winter, this species is found throughout the Central Valley, and occasionally on the Channel Islands. Migrants occur along the coast and in the western Sierra Nevada in Spring and Fall. Breeding occurs mostly in woodland, forest and coastal habitats. Riparian areas and coastal and inland wetlands are important habitats yearlong. Two active peregrine falcon nesting territories occur within the project vicinity, one on an off-shore rock near the power plant, and a second to the north of the power plant on the coastal bluffs of the North Property.

Conservation Status. The peregrine falcon is currently listed as endangered under the California Endangered Species Act, and has been removed from the federal Endangered Species list.

Status On Diablo Canyon Lands. The peregrine falcon is a year-round resident in the vicinity of Diablo Canyon.

Habitat Suitability. Suitable nesting habitat occurs in the form of isolated off-shore rocks and cliffs. Foraging habitat includes the air space above coastal terraces, coastal bluffs and near shore areas were prey (birds up to the size of ducks) are hunted on the wing.

Mapping Criteria. Peregrine falcon habitat has not been mapped on the Diablo Canyon Lands.

Local Endangerment Factors. Continuing exposure to toxic pesticides, primarily from migrant prey species, is the most

Comment Set PG, cont.
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PG-91

important endangerment factor. Peregrine falcon populations have rebounded significantly since restrictions were placed on use of DDT in the United States.

BROWN PELICAN

Pelicanus occidentalis californicus

Regional And Local Distribution. The brown pelican is found in estuarine, marine subtidal, and marine pelagic waters along the entire California coastline. Brown pelicans breed on the Channel Islands (Anacapa, Santa Barbara, and Santa Cruz) from March to early August. In southern California the brown pelican is common along the coast from June to October, especially within 20 miles of shore, but can be found as far as 100 miles out to sea (Granholm et al., In: Reference 21).

Conservation Status. The brown pelican is currently listed as endangered under both the state and federal Endangered Species Acts.

Status On Diablo Canyon Lands. Brown pelicans are frequently observed, outside the breeding season, along the Pecho Coast where they feed in open water areas off-shore and rest on off-shore rocks and along the outer edges of the coastal bluffs.

Habitat Suitability. Off-shore rocks and coastal bluffs overlooking the water are used for roosting. No nesting by this species occurs along the Pecho Coast. Foraging is limited to off-shore open water areas.

Mapping Criteria. Brown pelican habitat has not been mapped on the Diablo Canyon Lands.

Local Endangerment Factors. No local endangerment factors have been identified for this species.

MORRO BAY SHOULDERBAND SNAIL

Helminthoglypta walkeriana

Conservation Status: Federally endangered

Status on Diablo Canyon Lands: Not known from Diablo Canyon Lands. Surveys have been conducted within the project area recently, but no individuals have been found.

Comment Set PG, cont.
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CALIFORNIA RED-LEGGED FROG

Rana aurora draytonii

Conservation Status: Federally threatened,

Status on Diablo Canyon Lands: Not known to occur on Diablo Canyon Lands

GOLDEN EAGLE

Aquila chrysaetos

Conservation Status: Protected by provisions of the Bald Eagle Protection Act and the federal Migratory Bird Treaty Act.

Status on Diablo Canyon Lands: Known to forage over Diablo Canyon Lands, nesting status unknown

PG-91

4. Table D.3-3, Page D.3-14.

PG-92

The table should be re-titled "Sensitive Wildlife Species Potentially Occurring on Diablo Canyon Lands," to reflect that it includes fish. In addition to the fish currently included in the table, it should also include tidewater goby, a listed species known to occur in the vicinity of the project. The table does not include the brown pelican, another listed species known to occur in the vicinity of the project. Please see discussion of brown pelican above.

The following language, adapted from the ISFSI Environmental Assessment, could be used for a discussion of the tidewater goby:

PG-93

TIDEWATER GOBY

Eucyclobius newberryi

Regional And Local Distribution.

Tidewater gobies are discontinuously distributed throughout California, ranging from Tillas Slough (mouth of the Smith River) in Del Norte County south to Agua Hedionda Lagoon in San Diego County. Areas of precipitous coastlines that preclude the formation of lagoons at stream mouths have created natural gaps in the distribution of the goby. Local populations have been documented within San Luis Obispo Creek, and the Santa Maria River. No populations are known to occur within Diablo Canyon Lands

Comment Set PG, cont.
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Conservation Status.

The tidewater goby was officially listed as endangered by the U.S. Fish and Wildlife Service in March of 1994. A proposed rule to de-list the species in all portions of its range north of Orange County was submitted in June of 1999. Critical habitat was designated for 10 coastal stream segments in San Diego and Orange Counties in December, 2000.

Status on Diablo Canyon Lands.

No tidewater gobies have been documented in or around the mouth of either Diablo Creek or Coon Creek.

Habitat Suitability.

No suitable habitat is available in Diablo Creek. The creek has no estuary and ascends steeply over rocky substrate from the mouth upstream, precluding the occurrence of gobies. Coon Creek presents limited and marginal habitat for the tidewater goby at the very mouth of the stream. A small bar forms and creates a pool when the mouth of the stream is closed off, but this is seasonal and limited in extent. When the mouth of the stream is open, the pool drains significantly and the habitat is characterized by swift moving water.

Mapping Criteria.

All life stages are known to utilize the upper end of lagoons, marshes, and slow moving estuaries with salinities of less than 10 parts per thousand and depths generally less than 1 meter. Only Coon Creek presents any potential habitat and this just within the vicinity of the stream mouth. It is marginal at best because of its limited extent and temporal nature.

Local Endangerment Factors.

Extended breaches of the bar at the stream mouth are likely to preclude the occurrence of the species within Coon Creek. No other habitat is available.

PG-93

5. Corrected Off-Loading Description

PG-94

The DEIR describes the method that will be used to dock and stabilize the barge at Port San Luis (PSL) as "to 'pin' the nose of the barge to the harbor bottom, or to the riprap at the edge of the shore (PG&E, 2004d). The barge would be pulled tight against the shore and positioned directly on the harbor bottom." DEIR at B-16. This statement suggests that some contact between the barge and riprap along the shore is anticipated. As indicated in the

Comment Set PG, cont.
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correction to the Project Description at Specific Comment 8, above, the proposed procedure entails pinning the nose of the barge to the harbor bottom in depths of five feet or more and using a barge ramp, estimated to be 60 to 75 feet in length, to span the distance to the shore for completion of the RSG offloading. This off-loading method creates no impacts to intertidal habitat. To avoid confusion, all references to pinning the nose of the barge to the riprap at the edge of the shore or pulling the barge tight against the shore should be deleted from the DEIR. **PG-94**

6. Marine Mammal Impacts, Section D.3.3.1, page D.3-29 **PG-95**

Discussion of Potential Impacts to Marine Mammals- The primary marine biological impact addressed in the DEIR is associated with disturbances to marine mammals from increased vessel traffic and barge maneuvering during RSG offloading. These impacts would be temporary and are not expected to result in the "take" of any marine mammals or significant impedance of normal activities.

Marine mammals at both PSL and Intake Cove are habituated to vessels traffic and human activity. The area surrounding the mobile crane and Port Side Marine recreational boat launch is a hub of boating activity in Port San Luis and results in a considerable volume of vessel traffic in the immediate vicinity of the RSG landing site. Vessel traffic is also common in the Intake Cove as a result of the operation of the DCPP dive boats and kelp harvester. Therefore, introducing a barge and tug boat into either area would not constitute a new impact to marine mammals.

There is a greater potential to encounter and disturb marine mammals at the Intake Cove landing site because of the usage of areas within the Cove as a year-round harbor seal haul out site and the persistent presence of sea otters rafting in the kelp beds inside of the breakwater. The presence of a barge and maneuvering vessels in the Intake Cove has the potential to result in a temporary displacement of otters from the Cove, however the displaced animals would more than likely move only a short distance to bull kelp located along the breakwater at the entrance of the Cove. The proposed marine mammal training and use of marine mammal observers represent adequate measures to reduce the potential for impacts to marine mammals to less than significant levels. **PG-96**

7. Section D.3.3.2, First full paragraph, page D.3-32 **PG-97**

Both the Executive Summary at ES-26 and the Biological Resources chapter at D.3-32, state that RSG offloading activities would temporarily impact intertidal habitat at Port San Luis. Based on the landing scenario in which the barge is grounded some distance away from the riprap along the shore, no impacts to intertidal habitat are anticipated. The term "intertidal"

Comment Set PG, cont.
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should be changed to "subtidal" to better reflect the community in which the anticipated temporary impacts will occur. PG-97

The seafloor in the vicinity of the proposed RSG offloading site at Port San Luis is composed primarily of relatively stable sandy substrate that would be expected to support a variety of invertebrate species including various clams, worms, crabs, sea stars, and sand dollars. Grounding the barge in this area would result in Class III adverse impacts to organisms inhabiting the soft bottom. These impacts are not likely to surpass the CEQA significance criteria for marine biological resources described on page D.3-28 of the DEIR. PG-98

Although these invertebrate species are not protected under federal or state law, an effort should be made to avoid positioning the barge over dense sand dollar beds, which could be present in the area, since grounding the barge on a sand dollar bed may result in a longer-term (more than one year) adverse impact to the community. Seagrass beds, which may be present in the area, should also be avoided since they provide important nursery habitat for fishes and crustaceans and may be slow to recover. As noted in the DEIR at p. B-39, PG&E will conduct an underwater survey prior to arrival of the barge to assess what marine biological resources are present in the area that will be impacted and avoid sand dollar or seagrass beds if possible. PG-99

The live offload procedure is proposed for RSG landing if implemented in Intake Cove. No impacts to intertidal or subtidal habitat are expected because the barge will not contact either the seafloor or the revetment along the shore of the Cove. PG-100

8. Section D.3.3.2, Page D.3-31, D.3-32

PG&E concurs with the DEIR's determination that potential impact B-4, related to nearshore marine habitats, would create no more than a Class III impact. Nonetheless, as part of the underwater survey to ensure no damage to the offloading barge, see DEIR at B-39, PG&E will review of the subtidal habitat within the RSG landing area to ensure that the barge would avoid sensitive marine life. This underwater survey will be conducted sufficiently prior to the time that the barge arrives so that contingencies or alternatives can be implemented to minimize any potential impacts or project delays. PG-101

Impact B-4 refers to impacts to the "beach." It should be noted, however, as discussed above, the offload option at Port San Luis will not require pinning the nose of the barge on the rip-rap and so will not have impacts on the "beach" per se. Moreover, as mentioned earlier, with this offload option there also will be no impacts to the "intertidal" habitat. Instead, only "subtidal" habitats will be impacted and these to the level of a Class III impact. PG-102 PG-103

9. Marine Plants at Offload Options: PG-104

Comment Set PG, cont.
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Discussion of Seagrasses- Seagrasses are grass-like marine plants that provide shelter for many species of juvenile fishes and invertebrates. Surfgrass (*Phyllospadix* spp.) occurs along the wave exposed outer coast, while eelgrass (*Zostera marina*) occurs in protected harbors and bays. Like giant kelp, seagrasses are not listed as endangered or threatened, but have high habitat value.

PG-104

Seagrass beds may be present in the vicinity of the proposed Port San Luis landing site. The sand substrate in the Intake Cove is more stable and supports some small patches of eelgrass. However, it is not known if any seagrasses occur in areas that will be impacted by the RSG landing. The above-mentioned underwater survey will include a review for seagrass beds in order to avoid impacts to the extent practicable.

Discussion of Kelp- Giant kelp (*Macrocystis pyrifera*) is the most conspicuous species at the Port San Luis and DCPP Intake Cove sites, with its floating fronds that form dense canopies on the sea surface. Giant kelp provides important habitat, refuge, and food for fishes and invertebrates and can regulate understory community structure by canopy shading and dampening water currents and surge. Giant kelp is appreciably more abundant and widely distributed in the Intake Cove, compared to Port San Luis harbor. The area of the Intake Cove landing site is populated with widely scattered individual giant kelp plants. Continuous beds of giant kelp are more common fringing the Intake Cove breakwaters located away from the landing site. At Port San Luis, there is only a single small distinctive bed of giant kelp in the vicinity of the Port San Luis offloading site.

PG-105

Giant kelp is among the fastest growing plant species in the world and has high recovery potential (North 1971, Kimura and Foster 1984, Foster and Schiel 1985). Damaged and undamaged kelp fronds would continue growing, and within a year new plants would quickly become established to replace lost plants. PG&E retains a Special Use Permit issued by the California Department of Fish and Game to actively remove whole plants that constantly grow and repopulate the area in front of the DCPP intake structure. PG&E also utilizes a kelp harvester and implements CDF&G harvesting rights to remove kelp surface canopies that constantly regenerate in the Intake Cove. These efforts to control kelp growth in the Intake Cove underscore the species high recovery potential in this area.

Impacts to giant kelp cannot be avoided if the Intake Cove landing site was used. Although most kelp fringes the breakwaters, scattered individual plants occur in the central portions of the Intake Cove and in the planned footprint of the docked barge. Therefore, some plants would be chopped by boat propellers and affected by the barge offloading operation. However, only a limited number of plants would be affected. Mitigation is not warranted because of the few plants that would be affected and the high potential for this species to recover.

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Comment Set PG, cont.
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II. Specific Comments

PG-106

10. Section D.3.1.1, Page D.3-2, First paragraph below Table D.3-1

This paragraph states: "...haul route traverses a variety of native vegetation communities." There is no discussion of the botanical resources associated with the haul route.

11. Section 3.1.1, Page D.3-3, Fourth paragraph

This paragraph states: "Three small areas of hydrophytic vegetation also occur on this fill site." Hydrophytic vegetation indicates the possibility of wetlands, and although "wetlands" as defined by the U.S. Army Corps of Engineers do not occur at this site, it would have been appropriate to discuss why these hydrophytic plants are found here and why a wetlands delineation was not considered necessary. The following additional language is recommended:

> This vegetation is largely associated with a 6 foot wide by 60 foot long concrete-lined drainage ditch that carries surface runoff water into the site drainage system. Over a long period of time several hydrophytic or wetland plant species have become established in this ditch. These include cattail (*Typha latifolia*), rabbit foot grass (*Polypogon monspeliensis*), and brass buttons (*Cotula coronopifolia*).
>
> The described ditch is unlikely to qualify as either a "Wetland" or "Waters of the U.S." regulated habitat because of its small size and because the concrete lining precludes development of hydric soils.

12. Section D.3.1.4, Page D.3-6, Fifth paragraph

PG-107

This paragraph states: "An inventory of sensitive resources can be found in…" The reference cited does not include marine resources and therefore should not be identified as if it represents the entire SGR project. A better reference would have been the Ecology Section of the ISFSI Environmental report, as it comprehensively addresses all biological resources in the vicinity of the project.

13. Section D.3.1.4.2, Page D.3-15, Peregrine Falcon

PG-108

Comment Set PG, cont.
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The discussion of peregrine falcons fails to mention that this species breeds at two locations within the project vicinity, at Diablo Rock and on the North Property coastal bluffs. See additional text provided above.

PG-108

14. Section D.3.1.4.3, Pages D.3-15 and D.3-16, Omission of endangered, threatened fish

This section should include reference to the tidewater goby. There is, however, no known occurrence of or suitable habitat for Tidewater Goby in the Project Area.

15. Section D.3.1.5.1, Page D.3-17, First Paragraph, Third/Fourth Sentences

The Ecological Monitoring Program (EMP) should be referred to as the *Receiving Water Monitoring Program (RWMP)*.

16. Section D.3.1.5.1, Page D.3-17, Second Paragraph from bottom of page (Number 1)

It appears that the stated coastline distances are incorrect.

Numerical errors: change '1.1 miles' to '1.4 miles'; change '0.7 miles' to '0.9' miles; change '1.8 miles' to '2.3 miles'. Add citation at end:

> Tenera Inc. 1997. Chapter 1 – Changes in the marine environment resulting from the Diablo Canyon Power Plant Discharge. Thermal Effects Monitoring Program Analysis Report. Submitted to Pacific Gas and Electric Company. December 1997. Note: This document is the source document for all Regional Board staff reports concerning thermal discharge effects.

17. Section D.3.1.5.1, Page D.3-17, Second Paragraph from bottom of page (Number 1)

Please amend to read as follows:

> "Field's Cove and northward was intended as a control area…"

18. Section D.3.1.5.1, Page D.3-17, Second Paragraph from bottom of page (Number 2)

Comment Set PG, cont.
Latham & Watkins LLP, for Pacific Gas and Electric Company

Please make the following changes. Replace "of the subtidal zone" with "subtidal habitat." Add: "of Diablo Cove at the surface" after "40 acres." Replace "subtidal kelp" with "surface bull kelp." Add: "containing surface bull kelp" after" 105 acres. Replace "major" with "the 1987". Replace "affects" with "was found to affect" in order to make the finding past tense. PG-108

19. Section D.3.1.5.1., Page D.3-17

On page D.3-17, Paragraph 2, Number 2, the DEIR states:

"The discharge affects a greater area of the subtidal zone than predicted. The discharge was predicted to effect an area of approximately 40 acres. Yet the discharge affects approximately 56 acres of subtidal kelp on a frequent basis, and up to 105 acres during major El Niño event years."

We feel it is more accurate to phrase the paragraph as follows:

> "The discharge was found to affect a greater area of the subtidal habitat than predicted. The discharge was predicted to affect an area of approximately 40 acres of Diablo Cove at the surface. Yet the discharge affects approximately 56 acres of surface bull kelp on a frequent basis, and was found to effect up to 105 acres of surface bull kelp during a major El Niño event in 1987."

20. Section D.3.1.5.1, Page D.3-18, Second Paragraph, Number 4, Third Sentence PG-109

Please eliminate the following: "and is indicative of a stressed biological community".

21. Section D.3.1.5.1, Page D.3-18, Third Paragraph PG-110

Please amend the first sentence to read as follows:

> Schiel et al. (2004) conducted an analysis of the Thermal Effects Monitoring Program data to evaluate the biological changes reported in Tenera (1997) relative to predicted changes based biogeographical distributions of the organisms.

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22. Section D.3.1.5.1, Page D.3-18, Third Paragraph, Second and Third Sentences

PG-110

Please replace these sentences with the following:

"The study used an 18-year sampling…."

23. Section D.3.1.5.2, Page D.3-18, First Paragraph, First Sentence

Please amend as follows:

"...traveling screens within the DCPP…"

24. Section D.3.1.5.2, Page D.3-18, First Paragraph, Fourth and Fifth Sentences

This water velocity at the bar racks is about 1 ft/sec. The velocity at the traveling screens located further in the plant is reported in the 1988 DCPP 316b report to be about 1.95 ft/sec.

25. Section D.3.1.5.2, Page D.3-19, First Paragraph, Seventh Sentence

There were 80 skates and rays and 323 bony fishes impinged during 1985-1986 impingement study. The 60-pound value could not be verified in the 1988 DCPP 316b study. The weight (60 pounds) has not been adjusted to total annual impingement. The 1,300 crabs were just the count of impinged Pacific rock crabs collected during the study. There were also 1,143 sharpnose crabs, 698 cryptic kelp crabs and 425 Northern kelp crabs reported to have been impinged during the 1985-1986 impingement study.

26. Section D.3.1.5.2, Page D.3-19, First Paragraph, Eighth Sentence

PG-111

At this time, it is not possible to verify annual impingement at Huntington Beach and El Segundo Generating Stations and therefore, not possible to directly compare to weight presented for DCPP, as 60 pounds was only the weight of impinged fishes, skates, and rays that were found on the sampled days at DCPP and has not been adjusted to an annual total.

27. Section D.3.1.5.2, Page D.3-19, First Paragraph, Eleventh Sentence

PG-112

Huntington Beach Generating Station's intakes are 1,500 feet offshore in 20 foot of water. El Segundo Generating Station's intakes are 2,100 feet offshore in 28 feet of water.

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28. Section D.3.1.5.2, Page D.3-19, First Paragraph, Twelfth Sentence PG-113

It is not possible to directly compare the amount of impingement at DCPP because it is not presented as an annual total that can be compared across plants.

29. Section D.3.1.5.2, Page D.3-19, Second Paragraph, Second Sentence PG-114

Please delete the word "other". This list should also include California halibut along with the others.

30. Section D.3.1.5.2, Page D.3-19, Third Paragraph, Last Sentence PG-115

ETM modeling values for these species ranged from 10-31%. It does not seem proper to refer to 10% as a "large" value. It is recommended that the term 'large' be rephrased and that the end of the sentence be amended to read as follow: "…available in the nearshore source water body."

31. Section D.3.1.5.2, Page D.3-19, Fourth Paragraph, Last Three Sentences PG-116

Subtidal diver-swam fish observations in the vicinity of DCPP have been ongoing since 1976 therefore the population trend data should not be referred as "limited" for many of the species discussed in the recent DCPP 316b.

32. Section D.3.5.2 , Page D.3-37, First Paragraph, Second Sentence PG-117

Please amend this sentence to read as follows:

> ". . . however, it would eliminate effects of normal DCPP operations, such as from the thermal plume and from cooling water intake impingement and entrainment."

33. Section D.3.5.2, Page D.3-37, Second Paragraph, Third and Fourth Sentences PG-118

Please make the following numerical corrections: Replace "1.1" with "1.4" and replace "0.7" with "0.9". Add "and northward" after Fields Cove, and add "containing surface bull kelp" after 105 acres.

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34. Section D.3.5.2, Page D.3-37, Second Paragraph, Seventh Sentence

PG-118

Please amend this sentence to read as follows:

"withering syndrome in black abalone."

35. Section D.3.5.2, Page D.3-37, Third Paragraph, Fourth Sentence

Please amend the following sentence as follows:

"...on the screens within the DCPP cooling..."

36. Section D.3.5.2, Page D.3-37, Third Paragraph, Fifth Sentence

Superheated is defined as "to heat (a vapor not in contact with its own liquid) so as to cause it to remain free from suspended liquid droplets or to heat (a liquid) above the boiling point without converting into vapor." This does not happen to the seawater that passes through the DCPP cooling water system. It is recommended that 'superheated' be changed to 'heated'.

37. Section D.3.5.2, Page D.3-37, Third Paragraph, Seventh Sentence

Please amend the sentence to read as follows:

". . . about 400 fishes, skates, and rays."

38. Section D.3.5.2, Page D.3-37, Third Paragraph, Eighth Sentence

Please amend the sentence to read as follows:

"...larval loss in nearshore fish taxa, which cannot be converted into equivalent adults, but still... ."

See comments above about adult equivalent loss.

III. Clerical/Typographical Comments

PG-119

39. Section D.3.1, Page D.3-2, Fifth Paragraph, First Sentence

Comment Set PG, cont.
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PG-119

Please amend to read:

"…extending from the mean high-tide Line seaward."

40. Section D.3.1.1, Page D.3-2, Table D.3-1 (Community: Closed-Cone Pine Forest, Community Characteristics)

A period is missing.

41. Section D.3.1.1, Page D.3-2, Table D.3-1 (Native Terrestrial Habitat Types on the PG&E Diablo Canyon Lands Community: Freshwater Marsh, Community Characteristics Vegetation Communities and Habitats)

A period is missing.

42. Section D.3.1.4, Page D.3-2 Table D.3-2, (Sensitive Terrestrial Plant Species Potentially Occurring on Diablo Canyon Lands Nuttail's milk vetch, Description and Habitat), Last Sentence

Please change Counties to counties.

43. Section D.3.1.4, Page D.3-2 Table D.3-2, (Sensitive Terrestrial Plant Species Potentially Occurring on Diablo Canyon Lands San Luis mariposa lily, Distribution in Project Area), Third Sentence

Please change Coon creek to Coon Creek.

44. Section D.3.1.4.2, D.3-10, First Paragraph, Last Sentence

A period is missing.

45. Section D.3.1.4.4. Page D.3-16, First Paragraph, Third Sentence

Please amend to read:

"As described above, most of the turtle nests…"

46. Section D.3.1.4.4, Page D.3-16, Second Paragraph, First Sentence

Please amend to read:

"they have occasionally been…"

Comment Set PG, cont.
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CULTURAL RESOURCES

I. Specific Comments

1. Section D.4.3.3, Page D.4-10, Third paragraph, Second sentence

PG-120

Section D.4.3.2 states that there are no known presence of cultural resources along the seven mile access route from Port San Luis. According to Wickstrom and Tremaine (1993),[1] 11 archaeological sites either border or are crossed by the access road. While there are known cultural resources along the haul route, due to proper resource protection protocol, the exact location of these resources are not public. However, these resources will not be adversely affected because no expansion of the footprint of the access road is proposed as part of the SGRP.

2. Section D 4.3.3, Page D.4-11, First paragraph, Last sentence

PG-121

Section D.4.3.3 and D.4.4.2 emphasize the highly developed and disturbed nature of this portion of DCPP. There is a highly remote and improbable chance that any cultural remains would be found due to the extensive past disturbance in this area.

3. Section 4.3.3., Page D.4-11, Paragraph, C-1a

PG-122

This paragraph recommends that the CRTP be submitted to the CPUC 30 days before start of construction. Mitigation measure number C-1a states that the report should be submitted 60 days before start of construction. Due to the high unlikelihood of finding any cultural resources, the CRTP should be submitted 30 days before start of construction.

4. Section D.4.6, Page D.4-14, Table D.4-4

PG-123

Mitigation measure C-1b requires a cultural monitor during ground-disturbing activities. Because of the highly disturbed nature of the Project APE, a fulltime monitor is not necessary. Periodic monitoring and necessary sensitivity and awareness training on what to do if human remains or artifacts are encountered should be adequate.

Please amend the second sentence of the Monitoring/Reporting Action to read as follows:

> CPUC to coordinate with principal archaeologist to verify that PG&E archaeologist, or his designated representative, monitors

[1] Wickstrom, Brian and K. Tremaine, 1993. A Cultural Resources Survey of Portions of Diablo Canyon Nuclear Power Plant South Property, San Luis Obispo County, California. Report prepared for Pacific Gas and Electric Company, San Francisco.

Comment Set PG, cont.
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the designated locations and follows procedures outlined in CRTP in the event of unanticipated discoveries.

PG-123