

Sarah Christie reads the prepared remarks of Tom Luster to the State Water Resources Control Board in the matter of once-through-cooling at nuclear power plants. 11/18/2014

Tom participated on the committee for several years and he had some prepared comments that he left with me but I think in the interests of time I'd like to start by addressing the suggestion that was made earlier today that somehow because the Coastal Commission didn't sign the subcommittee letter that that implies that we have an opinion that perhaps the cooling towers are not permissible under the Coastal Act. That is not in fact the case—that had nothing to do with the reason why Tom didn't sign the letter. There was some procedural issues regarding the timing of the final meeting that prevented him from signing onto it, but there's no way that we could make such a determination at this point anyway. Any future application would be looked at with the specifics of what's in the application and that would be what we would consider. So there is no way we could even have an opinion on that question at this point. So with the remainder of my time I'm gonna get as far as I can get in Tom's comments. So...

Your board and the Coastal Commission have similar responsibilities for protecting marine life including shared requirement to minimize entrainment to the extent feasible. You've heard comments today regarding the 1.5 billion larvae that are entrained every year at Diablo Canyon and how significant or not this impact is. So, to put those numbers in context, we'd like to remind you that the Board's independent science review team had identified this entrainment as affecting more than 500 miles of California coastal shoreline waters. They've also calculated that depending on how you measure it, this level of entrainment represents a loss of ocean productivity equal to several hundred or several thousand acres of rocky reef and near-shore habitat. It would be fair to categorize Diablo Canyon as California's largest marine predator. Importantly, this productivity loss is based upon a small proportion of the total entrained organisms. The 1.5 billion larvae are meant to be surrogates for the many more unaccounted species and organisms that are entrained each year. So if anything, the estimated loss of productivity is an under-representation. Additionally, should Diablo be permitted to continue using its once-through cooling system, the scale of mitigation needed to address this impact would likely be far beyond any level of mitigation or restoration ever attempted in California, involving hundreds or thousands of acres or in-kind, out of kind, near field and far field mitigation and restoration. This could be as significant an effort and nearly as costly over the long term as some of the once through cooling alternatives outlined in the Bechtel report.

Speaking of costs and alternatives, the Commission largely concurs with the subcommittees comments on the cost considerations, particularly as they relate to the dispute over the wide range of potential costs from less than \$2 billion to more than \$10 billion. We believe it would be appropriate for the board at this point not to make any conclusions about whether these costs are wholly disproportionate or unreasonable. This is particularly important when viewed in context of PG&E's other likely relicensing

costs such as the not yet quantified costs of seismic retrofits that may be needed and the replacement costs for aged facility components.

I had a few more sentences, but out of respect for the Board's time I'll go ahead and let the other people behind me speak.