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September 21, 2012

Cassidy Teufel  
Coastal Analyst, California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**Re: Central Coastal Seismic Imaging Project—Request for permit denial**

Dear Mr. Teufel:

We are writing to supplement our previous comments as more information has come to light about Pacific Gas and Electric Company's (PG&E) Central Coastal California Seismic Imaging Project. In light of the doubts voiced by geologists and seismologists about the degree of usefulness of the proposed project, we would ask PG&E and the Commission to examine the potential for a suite of less harmful alternative methods to determine the seismic risk surrounding Diablo Canyon Nuclear Power Plant (DCPP).

We believe that Central Coast residents deserve to know the magnitude of the seismic risks around DCPP, however we want to ensure that these tests are done right the first time. We share the concerns of many of our colleagues about whether the proposed test would answer key questions about earthquake risk at the plant. The current project may provide an incomplete picture of the seismic risk. It may give us more information on fault geometry, but potentially exclude other important considerations for determining risk, such as the movement of faults, the direction and speed of such movement, and the "sidetrack" potential of the Hogsri and Shoreline faults.

A combination of more sophisticated modeling, low-frequency testing, or use of new technology currently in development were not fully examined in the Environmental Impact Report as alternatives. As established at the August 9 meeting of the State Lands Commission, PG&E's alleged March 2015 deadline for submission of seismic data to the NRC is a deadline of convenience, not necessity, hence technology expected to become commercially available in the next few years should be considered a viable alternative.

That is why we urge the Commission to deny the permit and consistency certification at this time and work with the applicant to fully examine alternatives that have the potential to produce more valuable data and greatly reduce impacts on the marine environment. Alternatively, we suggest the Commission issue a permit only for such portion of the project over which the Commission

may have jurisdiction that involves the study of onshore seismic areas, with no impacts to marine resources or mitigations for same required, while working with the applicant on the development of procedures that would yield useful data on offshore faults while minimizing harm to marine wildlife and environmentally sensitive areas.

Because we believe there are as yet too many unanswered questions regarding the geophysical data that the project would acquire, the long-term environmental impacts to marine resources and the effectiveness of any conceivable mitigation, which cannot be answered in a short timeframe, we urge the Commission to deny a permit and consistency certification for this project at this time.

Thank you for your attention to these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Christie". The signature is written in a cursive, flowing style.

Andrew Christie, Director  
Santa Lucia Chapter of the Sierra Club