



# SIERRA CLUB

## SANTA LUCIA

July 26, 2016

RE: Joint Proposal for the closure of the Diablo Canyon Nuclear Power Plant

The Santa Lucia Chapter of the Sierra Club has the following comments on the Joint Proposal facilitating the closure of the Diablo Canyon Nuclear Power Plant by 2025.

The proposal does not clarify why a time frame of nine years should be necessary to shut down the plant. We are mindful of the comments of the former NRC inspector who testified at your July 20 meeting in San Luis Obispo that nine years for a nuclear power plant closure is excessively long and that all previous transitions have taken five years at most. Every extra day the plant operates equates to more risk, more production of radioactive waste and more destruction of marine life by the cooling system.

In terms of the proposals renewable energy targets, California has set an aggressive target of reducing GHG emissions to 40% below 1990 levels by 2030. This steep reduction is what is needed to avoid some of the worst impact of climate change. The 2030 target will require reductions to occur at a much faster pace than under AB 32 goals, and it is important that we not lose momentum because of the closing of Diablo.

We are concerned that the clean energy commitments in the Joint Proposal are preexisting or reasonably anticipated requirements rather than the timely deployment of the additional clean energy resources needed to ensure greenhouse gases do not increase as a consequence of the shutdown of Diablo. For example, while the Joint Proposal contemplates procurement of 2,000 GWh of energy efficiency by 2024, the Proposal is silent as to whether PG&E could use this energy efficiency procurement toward efficiency obligations identified to meet SB 350 requirements. To remove this ambiguity, the Proposal should clarify that the 2,000 GWh is in addition to any requirement for efficiency procurement under SB 350. Similarly, while the 2031 55 percent RPS commitment is additional to what is currently required under state law, it is highly likely that by 2031, state law will have advanced to require this level of renewable procurement anyway, much like SB 350 recently increased the RPS from 33 to 50 percent. Moving additional RPS procurement to be timed with Diablo's retirement is needed to ensure additionality and limit the GHG impacts from shutdown.

In addition to the direct GHG impacts on the energy sector from the retirement of Diablo, significant indirect GHG impacts will result should PG&E turn its back on previous commitments to ensure the 12,000 acres of property around Diablo is conserved rather than sold for development. In 2000, San Luis Obispo County voters overwhelmingly passed Measure A, an advisory measure recognizing the importance of conserving the lands surrounding Diablo Canyon when no longer needed as an emergency buffer for the facility. At the time of its passage, PG&E repeatedly expressed support for the goals of Measure A. In order to ensure the conservation objectives of Measure A become a reality, PG&E must not, between now and 2025, sell the underlying fee title to any of these undeveloped coastal lands. The Joint Proposal should be amended to include a commitment that these lands will be placed under a conservation easement at the time of closure and land interests will be transferred to a land trust or state conservancy.

As you have been apprised of this desire by the community, the lack of such a statement in this process would raise concern – a concern that has been heightened by the statement of Chief Nuclear Officer Ed Halpin at your July 20 meeting in San Luis Obispo that PG&E “has not made a decision on the future of Wild Cherry Canyon,” which was an apparent contradiction of your agreement with the letter and intent of Measure A sixteen years ago and would be inconsistent with the expressed need of the community. It’s time to ensure that the “DREAM initiative” becomes reality.

Thank you for your attention to these issues.

Andrew Christie,  
Chapter Director