Good afternoon Mr. Chairman and Supervisors. I’m Andrew Christie, I’m the director of the Santa Lucia Chapter of the Sierra Club, and I’m speaking today on behalf of the 57,000 Sierra Club members in the state of California.

At the October 8 meeting of the Avila Valley Advisory Council, John Shoals was asked if PG&E is proposing to split the survey into 2 parts because they don’t know what the impacts on marine wildlife might be and they need to find out. He said “no, that’s not the case,” they just need to “assure the technology is effective. We know what the impacts are going to be. The EIR states them, and we stand by the EIR.”

In fact, the EIR acknowledges the absence of specific studies on long-term effects on fish populations... that the potential for Permanent Threshold Shifts in hearing, injury, or lethal effects from air guns on sea turtles is unknown… there is limited available data on responses of sea otters to seismic air guns, as well as their hearing abilities… there is a dearth of scientific study concerning long-term effects of air guns on fish eggs and larvae …and so on.

The EIR bases its conclusion of no-long-term impacts on optimistic estimates of sound propagation in the marine environment regardless of the fact that researchers have confirmed airgun pulses can cover 300,000 square kilometers, and travel more than 2,000 miles from the sound source. It ignores the International Whaling Commission’s conclusion that “repeated and persistent acoustic insults [over] a large area…should be considered enough to cause population level impacts.”

Marine biologists urge moving away from seismic airgun technology, which is contributing to the near-continuous ensonification of the world’s oceans. Several companies are developing those replacements; PG&E could assist in quickly bringing them to commercial viability.

To take advantage of these more benign technologies for offshore surveys, it is necessary to deny this permit. Let the applicant come back with a project design that will provide more information about the seismic hazards around Diablo canyon, but does not carry the threat of unacceptable impacts inflicted on the marine wildlife and fisheries of the central coast. More than 1600 Sierra Club members have conveyed this message to the Coastal Commission; we urge the board to do likewise. This is the “third way.”