

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
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Subject : OTC Policy: Diablo Canyon Plant Draft Determination
Date: September 5, 2017

Dear Ms. Townsend: This is my initial comment as an interested individual. I anticipate that Californians for Green Nuclear Power, Inc. will supply additional comments.

POSITION: In favor of Alternative Compliance

PG&E, the owner of DCPD should continue its policy of mitigating any *claimed* damage to sea life by continuing to pay the very modest annual fees to help construct artificial reefs for California sea life. Multiplying the proposed 2015-16 annual mitigation fee of \$3.852 million by 20 years to get a sense of the approximate mitigation fee for the period from 2025 to 2045 yields about **\$77.042 million**.

An annual mitigation fee of \$3.85 million is a minuscule fraction of the annual operational cost of DCPD., which was estimated to be about \$0.5 billion in 2015. There are no credible research results showing significant harm to California sea life from "Once Through Cooling." (OTC) The cost-effective precedent of alternative compliance was set by California's San Onofre Nuclear Generating Station (SONGS) which began operation in 1968.

DCPD's outfall lagoon is teeming with sea life. The species that are found there are well-adapted to the slightly warmer temperature there, including Garibaldi, the California state fish. DCPD's exclusion zone (as an extension of the adjacent marine preserve to the north) protects adult fish from harvesting, strengthening local fisheries.

There is no value or utility to follow the advocacy of some anti-nuclear power groups that demand that PG&E install incredibly expensive and unnecessary cooling towers at DCPD. I believe that those demands serve the purpose of abusing a California state agency's regulatory power to indirectly shut down DCPD to serve their special interests, instead of the general interests of those Californians dedicated to environmental stewardship.

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CGNP is an independent pro-environment non-profit educational organization advocating for the continued safe operation of Pacific Gas & Electric's Diablo Canyon Power Plant since 2013. We have been recognized by the IRS as a 501(c)(3) . We are also a CPUC Intervenor supporting nuclear power in California in CPUC Proceedings including A.16-08-006, among others. CGNP has obtained eligibility to claim intervenor compensation in Proceeding A.16-08-006. CGNP is also a Party to FERC Docket AD17-11-000 regarding preventing the potential harm of state policies regarding nuclear power..