

## **DCPP 3D Seismic Permitting Background**

Pacific Gas and Electric Company (PG&E) has for more than 25 years conducted a Long-term Seismic Program (LTSP) in the area surrounding the Diablo Canyon power plant (DCPP). The LTSP provides a robust body of seismic research that informs the seismic setting at DCPP.

Pursuant to AB 1632 (Chapter 722, Statutes of 2006), the California Energy Commission (CEC) was required to assess the vulnerability of the state's operating nuclear power plants to a major disruption due to plant aging or a major seismic event, the potential impacts of such a disruption, and the potential impacts from the accumulation of nuclear waste at the state's existing nuclear plants.

The CEC's November 2008 final report recommended, among other steps, that PG&E use three-dimensional geophysical seismic reflection mapping and other advanced techniques to explore fault zones near DCPP. Members of PG&E's geosciences team met with the California State Lands Commission (CSLC) staff in Summer 2010 to discuss the permitting requirements for 3D surveys in the offshore waters. Upon learning from CSLC staff that a full EIR, taking 12-18 months, would be required for high-energy surveys (above 2 kilojoules), PG&E's team commenced work on low-energy 3D surveys using contractors with existing permits in order to determine the appropriate scope for high-energy work.

With that refined scope, PG&E now proposes offshore seismic studies within both federal and state waters. This work will require both federal and state authorizations. The federal aspects relate to the use of air guns in marine protected areas of coastal waters, which necessitates involvement with the National Marine Fisheries Service, and the placement of ocean-bottom seismometers (OBS) onto the seafloor which triggers the need for an Army Corps of Engineers (Corps) permit. For the state, geophysical surveys within the three-mile limit and placement of seismometers require permit and a lease from CSLC. CSLC also is the lead agency to assure that the proposed activities comply with CEQA; the federal lead agency (assumed to be NMFS) has a similar obligation in federal waters for compliance with NEPA as well as completing consultation and possible authorization under the Endangered Species Act.

The Coastal Commission has been delegated the authority to assure compliance with federal Coastal Zone Management Act, as well as their own compliance with the California Coastal Act. Consistency, usually issued through a Coastal Development Permit (CDP), is required for the Corps authorization and requires completion of the CEQA process before the CDP is issued.

After again meeting with CSLC in April 2011, PG&E believes that CEQA compliance for the OBS project can occur through a mitigated negative declaration, but that the offshore seismic survey will require a full EIR for compliance. A final decision, however, will not be made until a more detailed description of the proposed offshore survey is provided and the federal and state lead agencies decide on the level of environmental compliance.

Finally, additional two-dimensional survey work will be performed on shore using vibration devices. This work will require additional permits from the County of San Luis Obispo, the Corps, and possibly the Coastal Commission, CSLC and Caltrans.

