



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL OCEAN SERVICE  
Monterey Bay National Marine Sanctuary  
99 Pacific Street, Bldg 455a  
Monterey, CA 93940

November 1, 2012

Charles Lester  
Executive Director  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

Dear Charles,

The Monterey Bay National Marine Sanctuary Advisory Council recently requested that I send you a letter conveying the council's concerns with PG&E's proposed seismic surveys for the Diablo Canyon nuclear power plant. This issue was discussed at the October 18 SAC meeting in Cambria. The purpose of this letter is to convey Advisory Council concerns, and their desire for the Coastal Commission to consider these at its November 14 meeting.

As you may know, NOAA-National Marine Fisheries Service (NMFS) is currently reviewing PG&E's request for an IHA (Incidental Harassment Authorization) for impacts to protected species. In September of this year, Monterey Bay National Marine Sanctuary (MBNMS) articulated its concerns about potential impacts to sanctuary resources during the comment period for an EA prepared by the National Science Foundation. The project was subsequently moved out of sanctuary waters and further confined to a smaller area. MBNMS has since worked to help make sure that if an IHA is provided, certain monitoring and permit requirements would ensure that sound levels and impacts are carefully observed and reported and mitigated.

The Advisory Council voiced two major concerns with the proposed seismic survey project. First, the council was concerned overall with the potential harmful effects of high-decibel sound on marine organisms in sanctuary waters and those that would enter sanctuary waters from the active survey area. The council felt that there was insufficient information and analysis on the effects and threshold levels. The other concern was with regard to inadequate time to understand baseline conditions prior to the survey for appropriate monitoring.

Because the proposed survey is outside sanctuary waters, MBNMS has chosen to rely on NMFS, to help ensure that sanctuary resource protection is adequately addressed. Nevertheless, the Advisory Council remains concerned for sanctuary resources and feels that the surveys should be delayed until more is known about impacts and baseline conditions in and around the target survey area.

Thank you for the opportunity to pass along the concerns of the Advisory Council.

Sincerely,  
  
Paul Michel,  
Superintendent

