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Humboldt Bay power plant canal remediation

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W10a



February 10, 2014

Mr. Thomas Luster
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105-2219

Re: Humboldt Bay Power Plant Canal Remediation, Application No. 9-13-0621

Dear Mr. Luster,

On behalf of the board, staff and supporting members of Humboldt Baykeeper, these comments are submitted for the Coastal Commission's consideration on the Coastal Development Permit for PG&E's Humboldt Bay Power Plant Canal Remediation, agenda item W10a for the Feb. 12, 2014 Commission hearing.

Humboldt Baykeeper was launched in October 2004 to safeguard our coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community through education, scientific research, and enforcement of laws to fight pollution.

We are pleased that the remediation of the intake and discharge canals is moving forward. The Humboldt Bay Power Plant (HBPP) included the first commercially-licensed nuclear power plant in the U.S. which has not operated since going offline over 30 years ago. Its proximity to Humboldt Bay and the communities of King Salmon and the greater Eureka areas has been of great concern as the reactor, spent fuel pool, etc. sat awaiting decommissioning for decades. It is a great relief to be nearing the end of the long decommissioning process.

Humboldt Baykeeper's primary concern with the proposed project is regarding the wetland mitigation proposed at and adjacent to the intake to the power plant, which was revealed to have the second-highest level of Cesium-137 in the sampling results presented in the response to our comments on the Initial Study and Mitigated Negative Declaration (attached). We understand that federal pre-emption precludes the Commission from analyzing remediation plans for the site, but we urge the Commission to take a close look at the sampling results in the attached response to our comments (pdf page 5 of 9). The Radiological Characterization Report developed for HBPP by Enercon states that "The results of the samples indicate an increase in sediment contamination in the first half of the canal over the last

decade.” (p. 22, Radiological Characterization Report, HBPP-RPT-001, November 21, 2008).

We are concerned that review of the proposed wetland mitigation identified as the **Alpha Road Parking Mitigation Area** (Exhibit 5) has been done without considering the Cesium-137 detection of 22.39 pCi/g. We bring this to the Commission’s attention so as to avoid segmentation of review by the various agencies with different authority over the project, which includes the Nuclear Regulatory Commission, Department of Toxic Substances Control, Regional Water Quality Control Board, etc. as well as the Coastal Commission. The Alpha Road Parking Mitigation Area may be well-suited to restoration of bay habitat such as salt marsh, mudflats, and eelgrass beds, but our hope is that this determination will not be made in absence of information on the extent of contamination and proposed remediation prior to restoration efforts.

We are also concerned with potential radionuclide contamination of bay sediments and the methodology used to delineate the area to be remediated, particularly off-site at the point of discharge from the discharge canal. We are concerned that radionuclides may be present within bay sediments from effluent discharges over the years, and would like to know how PG&E and its consultants determined the extent of contamination. Sediment sampling results have not been presented that support the extent of remediation being proposed at the discharge.

We look forward to the next phase of decommissioning, which will entail restoration of the entire site. We appreciate the diligence of the numerous agencies that endeavor to ensure the long-term health and safety of Humboldt Bay residents, particularly those who gather and eat mussels and other bivalves, as well as the wildlife that relies on mollusks and other invertebrates.

Thank you for the opportunity to comment on this matter.

Sincerely,

_____/s/_____
Jennifer Kalt, Policy Director
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Attached:

Excerpt the Humboldt Bay Harbor, Recreation, and Conservation District’s Jan. 23, 2014 Mitigated Negative Declaration hearing:
PG&E_canal_MND_response_to_comments_Baykeeper_Section1-22-14. pdf