

San Luis Obispo



December 8, 2025

Chair Jane Gray and Board Members
% Ryan E. Lodge, Executive Officer
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Sent via electronic submission to: centralcoast@waterboards.ca.gov

RE: Diablo Canyon Nuclear Plant Tentative Permits - OPPOSE

Dear Chair Gray and Members of the Board,

San Luis Obispo Mothers for Peace (MFP) is a local, nonprofit organization which has been legal intervenors in cases involving Diablo Canyon Nuclear Plant (DCNP) since 1973. These cases include those before the Regional Water Quality Control Board.

MFP is deeply concerned about the undisputed damage which is being done to the local marine environment by DCNP's once-through cooling system (OTC): entrainment, impingement, thermal pollution - as well as toxic materials regularly discharged into the ocean.

MFP urges the Central Coast Regional Water Board (Water Board) to deny the National Pollutant Discharge Elimination System (NPDES) Permit as well as the Clean Water Act Section 401 Certification.

SENATE BILL 846 CANNOT MANDATE COMPLIANCE

Senate Bill 846 allows the continued operation of DCNP through October 31, 2030 - but only if certain conditions are met. One of the many conditions is the acquisition of these two permits.

SB 846 states that the "final" compliance date of the OTC policy for DCNP is October 31, 2030. But we've been hearing that "final" argument since the Clean Water Act section 316(b) was first enacted in 2010. Repeated waivers have been granted to Pacific Gas and Electric Company (PG&E) for various reasons - water towers are unfeasible (i.e. expensive), the plant will soon be decommissioned, and now SB 846 claiming grid reliability. It must be noted and recognized by the Water Board that PG&E has applied for license renewal until the year 2045.

Mitigation fees do not compensate for the extreme detrimental impacts to the marine environment. PG&E is using ineffective mitigation measures to evade the Clean Water Act and OTC policy. The Water Board must abide by the law and force PG&E to take action NOW and either implement the Best Technology Available (BTA) or cease operation.

SB 846 unilaterally directed state agencies to extend the operation of DCNP's OTC facility as well as the compliance schedule to 2030. But SB 846 overstepped its authority because it defies federal law (the Clean Water Act). SB 846 cannot usurp the Water Board's authority and mandate it to grant these permits.

DCNP is the most destructive and largest discharger in the state. Repeated issuance of permits without implementing BTA runs counter to state and federal law. Again, MFP urges you to deny these permits and enforce the law.

Sincerely,

Jill ZamEk
Board Member, San Luis Obispo Mothers for Peace

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