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FROM: Department of Agriculture Washington, D. C. 20250 T. C. Byerly	DATE OF DOC: 2-2-73	DATE REC'D 2-5-73	LTR x	MEMO	RPT	OTHER
TO: D. R. Muller	ORIG 1 signed	CC	OTHER	SENT AEC PDR X SENT LOCAL PDR X		
CLASS: U/PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-275 (50-323)			

DESCRIPTION:
Ltr furnishing comments on Draft Enviro Statement.....trans the following:

ENCLOSURES:

Comments from Dept of Agriculture including
Comments from Economic Research Service
Comments from Forest Service.

PLANT NAMES: Diablo Canyon, Units 1 & 2

ACKNOWLEDGED DO NOT REMOVE
(1 cy rec'd)

FOR ACTION/INFORMATION 2-6-73 fod

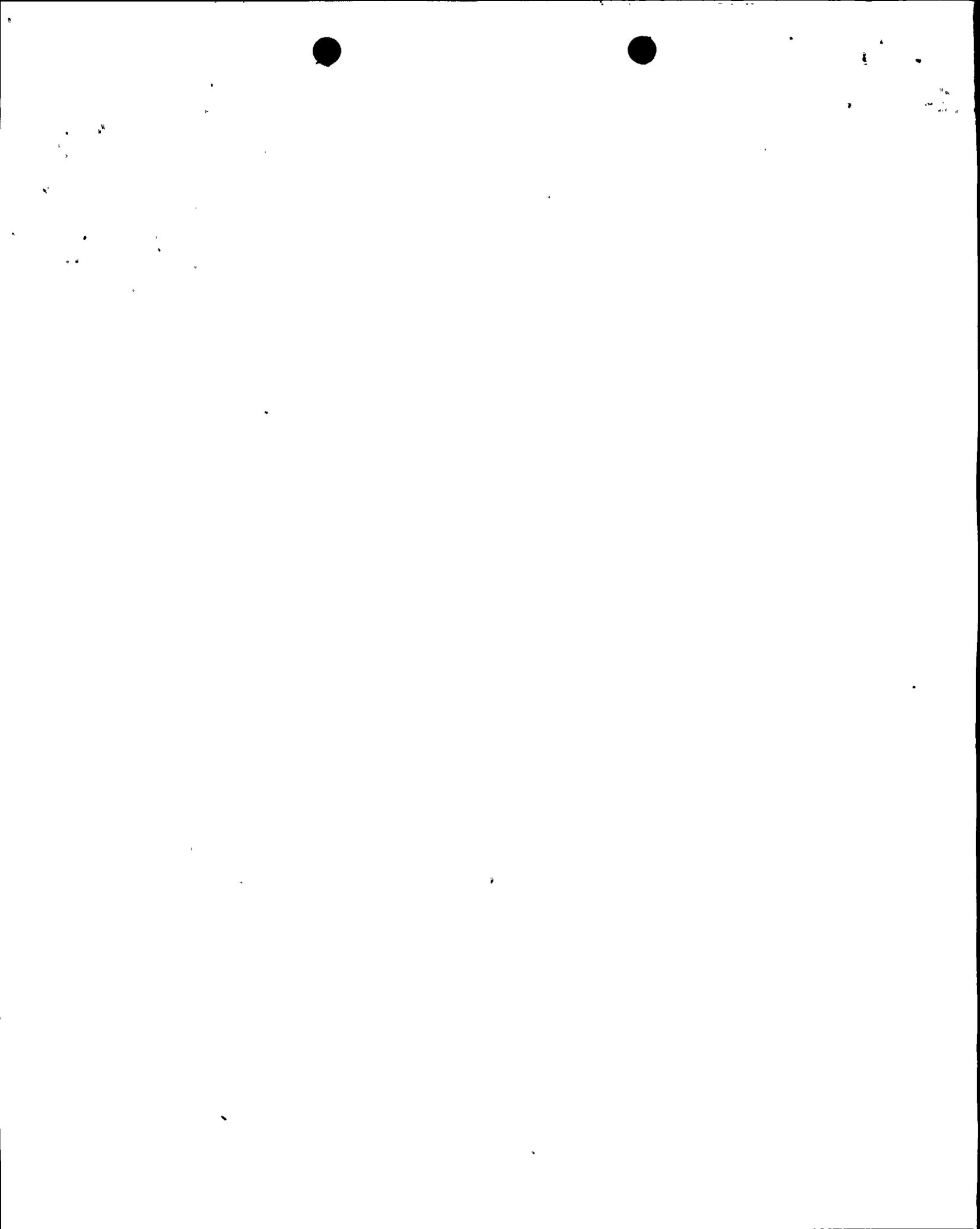
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EXTERNAL DISTRIBUTION

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DEPARTMENT OF AGRICULTURE
OFFICE OF THE SECRETARY
WASHINGTON, D. C. 20250



FEB 2 1973

Mr. Daniel R. Muller
Director of Licensing
Atomic Energy Commission
Washington, D. C. 20545

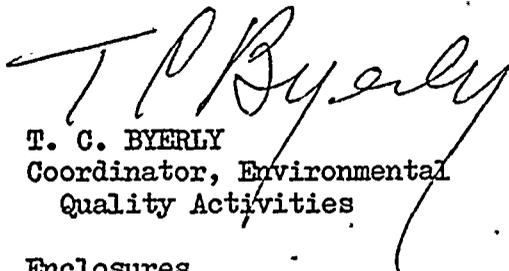
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Regulatory File Cy.

Dear Mr. Muller:

We have had the draft environmental statement for the Diablo Canyon Reactor Units 1 and 2, Pacific Gas and Electric Company, reviewed in the relevant agencies of the Department of Agriculture, and comments from Economic Research Service and Forest Service, both agencies of the Department, are enclosed.

Sincerely,


T. C. BYERLY
Coordinator, Environmental
Quality Activities

Enclosures



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ECONOMIC RESEARCH SERVICE
UNITED STATES DEPARTMENT OF AGRICULTURE

Draft Environmental Statement, Diablo Canyon Reactor Units 1 and 2, Pacific Gas and Electric Company

1. A significant adverse environmental impact is erosion resulting from some methods of constructing maintenance roads for the transmission line systems (p. 4-9). The Statement says that most of the impact will be temporary since revegetation will be rapid (p. 8-1). However, the AEC staff concluded that rapid revegetation is difficult in Diablo Canyon (p. 4-17). In light of the rather severe impact that could result (pp. 4-10 and 11), we feel that the Applicant should include in the final environmental statement their plan for redress of the transmission line impact with its associated costs and benefits (see p. 12-10, para. 3).

Consonant with the apparent public concern in this area, we strongly feel that the support information on which Section 12.3.7 must be based (although little, if any, is presented in the draft statement) should be included in Section 4.2.2 to complement that discussed on pp. 4-9 and 10.

2. The visibility of transmission towers and roads will create an adverse aesthetic impact for many (p. 8-1). We feel that the environmental statement should discuss the alternative transmission line locations which were proposed by the complainants referenced on p. 12-22. The costs and benefits of each major alternative should be briefly displayed. Finally, a map, such as fig. 2.4, noting alternative routes would be a desirable addition to the report.
3. The discussion of the Diablo-Midway transmission line's impact on the California condor (p. 4-11) is exceedingly brief and merits further attention. Although not mentioned, this bird is on the endangered species list and hence has a high social value. Although the nesting area is some 40 miles to the south, the bird's range overlaps the project area. According to the National Audubon Society, most of the reduction in its numbers comes from private game hunters. Hence, the building of access roads into the Los Padres National Forest could have a significant adverse effect. The final environmental statement should include any plans the Applicant may have to minimize this effect. For example, the Applicant might consider measures to restrict the use of these access roads.



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4. In this regard, the effect of the transmission lines and access roads should be considered in Chapter 5, Environmental Impacts of Station Operation.
5. Section 2.2.2 discusses the present and future recreational use of the Diablo Canyon Area. We feel that the statement should also consider recreational uses of land traversed by the three transmission lines and the environmental impact of the latter upon them.
6. The Applicant basically justifies the Diablo Canyon Units on existing and projected growth rates of electricity consumption. Inasmuch as the production of electricity consumes natural resources and results in environmental change, we feel that the Statement should include a discussion of measures that the Applicant, and, possibly, the system service area within which it has intertie agreements, have under consideration to encourage more efficient utilization of electricity. Some measures which could have a significant impact on demand projections might include the reduction of demands for costly peak power through special metering, implementation of rate structures designed to promote more efficient consumption, and the revision of present utility promotional efforts. Such a discussion would be compatible with NEPA Guidelines for environmental impact statements which require evaluation of alternatives to the proposed action. It would be properly included in Chapter 12.

The Applicant only discusses the implementation of such measures in terms of reacting to the crisis situation which would occur if the alternative of "no additional capacity" were chosen over construction of the two Units. (Section 12.1.4). However, recent interpretation of section 102 (2) (c) of NEPA held, in essence, that the range of alternatives required to be considered were those "reasonably available." None were to be ruled out, "merely because they do not offer a complete solution to the problem." NRDC v. Morton (D.C. Cir. 1972).

7. The inclusion of indirect benefits relating to "Air Quality" in Table 13.2 is not acceptable. The proper comparison, and the one consistent with other items in the table, would be between the conditions existing with and without the project.



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UNITED STATES DEPARTMENT OF AGRICULTURE
Forest Service

Re: AEC Draft Environmental Statement - Diablo
Canyon Reactor Units 1 and 2

Forest Service comments on the subject draft Environmental Statement are primarily concerned with the environmental effects of the transmission lines and necessary access and construction roads which cross the Los Padres National Forest at two locations. The Diablo-Gates Route crosses a narrow section of the Forest near State Highway 41 northeast of Morro Bay; the Diablo-Midway Route crosses the Forest further to the south and east. (The locations are indicated on the attached Forest map.)

The right-of-way for the Diablo-Midway Route within the Los Padres National Forest is 400 feet, not 350 feet, as indicated on page 3-44. The access roads constructed in the Los Padres National Forest, under Forest Service supervision, total approximately 16.0 miles, not 11.5 as indicated at the top of page 3-46. (This correction should be made in the middle of page 2-46 also.) We suggest rewriting the last two sentences of the first paragraph on page 3-46 to read:

"Some turns are as much as twice the width of straight portions on the National Forest roads. Further, in most cases the roads on National Forest lands were required to be much less steep than those which Pacific Gas and Electric built on lands outside the Los Padres National Forest."

Section 4.2.2, starting on page 4-8, covers impacts on the terrestrial environment from the construction of transmission lines and associated access roads. The following information could make this section more complete in regard to effects on Los Padres National Forest resources. The first paragraph in Section 4.2.2 states that the forest resources of the region will not be significantly altered as a result of the necessary clearing. We suggest adding:

"Primary uses of these National Forest lands are for grazing, watershed protection, and wildlife production."

The right-of-way for the Diablo-Gates transmission line covers about 22.4 acres, and for the Diablo-Midway transmission lines, 311.0 acres. Impact to the terrestrial environment from the transmission lines themselves is minimal. Of more importance are the longer-term effects of access road construction. Access roads within the Los Padres National Forest for the Diablo-



Gates transmission line covers about 12.6 acres, and for the Diablo-Midway lines, 63.6 acres. Thus, about 76.2 acres of National Forest land will be converted into service roads by the project.

We note that on page 4-17 hydroseeding of cut and fill slopes is mentioned as one of the methods to be used to promote revegetation. On steep slopes hydroseeding does not provide adequate soil cover and does not do an adequate job of holding and stabilizing the soil compared to the punched-in straw mulch method.

Benefits expected to occur from transmission line construction (third paragraph, page 13-9) mention that the "roadways are expected to provide access to heretofore inaccessible areas of the Los Padres National Forest," and that they will serve as fire lanes. These roadways will be used for access for administrative purposes only, including fire suppression, not for public access. Also, similar high-tension powerlines have been known to interfere with aerial tanker operation on wildland fires.

It is recognized that transmission line construction is nearly complete and that most of the environmental damage from transmission line and access road construction has already occurred. On page 5-1 it is noted that Pacific Gas and Electric intends ultimately to install six units at the site. Should this future expansion require additional transmission lines to be built, much of the road construction and environmental damage discussed in this environmental statement can be avoided by utilization of helicopters in construction of transmission towers. This would also be true for construction of transmission lines in similar terrain on other projects. However, the Los Padres National Forest feels that National Forest resources in the project area are adequately protected by the existing special-use permits issued to Pacific Gas and Electric Company.

We have also reviewed the section on the life history of the condor, pages A2-6-17 and A2-6-18. The first sentence of the second paragraph would more correctly summarize current understanding of condor life history if changed to read:

"They do not make a nest but choose a place in some inaccessible area - normally a cave in the face of a rocky ledge."

Two recent publications to which the AEC staff may want to refer are:

USDI, Bureau of Sport Fisheries and Wildlife, 1969. Effects of the Sespe Creek Project on the California Condor. August 1969, Laurel, Maryland.

USDA, Forest Service, 1971. Habitat Management Plan for the California Condor. (Available at Forest Service offices in San Francisco, Santa Barbara, and Ojai, California).

