Dayna Bochco

Chairperson

California Coastal Commission

45 Freemont Street #2000

San Francisco, Ca 94105

Re: San Onofre Decommissioning

Greetings: We are writing to ask you to change your approach in issuing a Coastal Permit to Southern California Edison (SCE) for the decommissioning of the San Onofre nuclear power plant, including the October 2015 permit for the new Independent Spent Fuel Storage Installation (ISFSI).

You were raised in San Diego. You are an attorney. However, your analysis of the ISFSI permit showed no regard for your city and was void of any lawyer like analysis. Contrary to Commission group think the Commissions’ hands were not tied. Further planting 3,600,000 lbs of spent nuclear fuel on the edge of the beach in a new ISFSI was a gross violation of the Coastal Act on its face.

The Commission evaluation of the ISFSI project was flawed and deficient. You did not employ an independent expert to advise the Commission on whether there were other spent fuel storage sites. You did not use an expert to determine the feasibility of a relocation transportation plan. You did not retain an expert to determine how long the spent fuel could be safely stored in the pools.

You did not do adequate legal research. If you had, you would have learned the Commission had broad jurisdiction to deny the permit e.g. on “cost grounds.” See *Pac. Gas & Elec. Co. v. State Energy Res. Conservation & Dev. Comm'n*, (U.S. 1983) 461 U.S. 190. Did you even read this case?

You did not ask the staff if it used an expert to see if there were other storage sites. You did not ask if the staff used an expert to development a relocation transportation plan. You did not ask the staff for a clear legal analysis of the scope of the Commission’s jurisdiction. You went on SCE guided tour and finished up as follows: what it did to determine if there were other sites

MS. BOCHCO: Okay. Um, all right. Well, I think that's all my questions. Well, thank you very much. [R.T. 81-86]

When you came to San Diego on 10 May 2017, interested parties attempted to engage you in a constructive conversation about these issues. After you arbitrarily limited public discussion of San Onofre decommissioning to 8 minutes you then ignored the speakers you allowed to speak.

We demand the Coastal Commission open up to public scrutiny and public involvement the process the Commission is now using to consider the permits needed to decommission the San Onofre nuclear power plant.

Thank You,