



January 17, 2014

Mr. Dan Berman
Director of Conservation
Humboldt Bay Harbor, Recreation and Conservation District
601 Startare Drive, Eureka, CA 95502

Re: Humboldt Bay Power Plant Canal Remediation

Dear Mr. Berman,

On behalf of the board, staff and supporting members of Humboldt Baykeeper, these comments are submitted for your consideration on the Initial Study and Mitigated Negative Declaration for PG&E's Humboldt Bay Power Plant Canal Remediation.

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.

Humboldt Baykeeper's primary concern with the discharge canal remediation is regarding potential radionuclide contamination of bay sediments and the methodology used to delineate the area to be remediated. 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. Are there sampling results that support the extent of remediation being proposed?

The attached document is one of several that we have come across in our research that suggests that radioactive contamination has traveled off-site. Note that mussels were collected with elevated levels of radionuclides from a sample site called Humboldt Bay Beach Jetty (p. 321 of the attached document).

Of particular concern are the levels of ^{238}Pu detected at the higher end of detections found in this study of sites across the Pacific and Atlantic Coasts of the U.S. With a half-life on the order of 6500 years, I would like to know how far from

the Humboldt Bay Power Plant the bay sediments have been sampled for ^{238}Pu as well as other radionuclides.

On p. 323, it states:

^{238}Pu concentrations (Tables 2 and 3) are generally low on all three coasts (median of all the values is $\sim 3 \times 10^{-6} \text{ Bq g}^{-1}$) and no statistically significant difference is detected among the means for these coasts. However, six locations (Jamaica Bay, NY, Savannah Estuary, GA; Biscayne Bay, FL; Cedar Key, FL; Humboldt Bay, CA; and Whidbey Island, WA) show relatively high concentrations (from ~ 8.6 up to $\sim 59 \times 10^{-6} \text{ Bq g}^{-1}$).

We look forward to learning more about this potentially significant impact and how PG&E plans to remediate the discharge canal 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. Making public any sediment or mussel tissue sampling that has been done would be quite helpful in making a determination of whether such impacts have been mitigated to less than significant.

Thank you for the opportunity to comment on this matter.

Sincerely,

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

Radionuclide Concentrations in Bivalves Collected Along the Coastal United States.
NATHALIE J. VALETTE-SILVER and GUNNAR G. LAUENSTEIN. Marine Pollution
Bulletin, Vol. 30, No. 5, pp. 320-331, 1995.