

I. Public Participation

This section outlines the scoping and public participation program completed by the CPUC before issuance of the Draft EIR. In the Final EIR, this section will include copies of comments on the Draft EIR and responses to comments.

I.1 EIR Scoping Process

The scoping process for the SONGS Steam Generator Replacement Project EIR consists of three elements listed below. Each element is described in more detail in the following sections:

- Publication of a Notice of Preparation (NOP) of an EIR and Notice of Public Scoping Meetings soliciting comments from affected public agencies and members of the public;
- Public Scoping Meetings and meetings with agencies;
- Summarization of scoping comments in a Scoping Report.

In order to maximize agency and public input on the SONGS Steam Generator Replacement Project, the CPUC established a SONGS Steam Generator Replacement Project website, e-mail address, and fax number. Project information was posted to the CPUC's website for review by the public and all interested parties.

I.1.1 Notice of Preparation

The CPUC issued the NOP of an EIR on October 1, 2004, and distributed it to the State Clearinghouse (SCH No. 2004101008) and federal, State, and local agencies that may be affected by the Proposed Project, as required by CEQA. The NOP was mailed to 160 interested or affected individuals, including residents and persons at public agencies, private organizations, and interest groups. The mailing list included 16 non-government agencies and special interests groups, 95 public agencies (including federal, State, county, and city), 32 private organizations, and 17 individuals. There was a 30-day period for interested parties to submit comments regarding the contents of the EIR. A copy of the NOP is presented in Appendix 1 and can be viewed on the SONGS Steam Generator Replacement Project website (see Section I.2.3, EIR Information).

I.1.2 Public Scoping Meetings

As part of the EIR scoping process, three public scoping meetings were conducted to solicit comments regarding the scope and content of the EIR, as well as the alternatives and mitigation measures that should be considered as part of the analysis. Approximately 34 members of the public and representatives from organizations and government agencies attended the three scoping meetings. Seven individuals made verbal comments at the public scoping meetings. The scoping meetings were held at the following locations, dates, and times:

- October 13, 2004, 10:30 a.m. to 1:30 p.m., California Public Utilities Commission, 505 Van Ness Avenue, San Francisco
- October 21, 2004, 2:00 p.m. to 4:00 p.m., City Council Chambers, San Clemente City Hall, San Clemente
- October 21, 2004, 7:00 p.m. to 9:00 p.m., City Council Chambers, San Clemente City Hall, San Clemente

I.1.3 Scoping Comments Received

A total of 17 written and 7 verbal comments were received during the NOP scoping period from federal, State, local, and county government agencies, non-profit organizations, and concerned members of the public. The comments received during the scoping process were summarized in the scoping report, which is described in more detail in the following section.

I.1.4 Scoping Report

In December 2004, a comprehensive Scoping Report was prepared summarizing concerns received from the public and various agencies, and presenting copies of comment letters received. The Scoping Report may be obtained upon request to the CPUC using any of the contact methods outlined in Section I.2.3.

The majority of public comments focused on the purpose and need of the Proposed Project. While many of these comments expressed opposition to the existence of SONGS and the use of nuclear power in general, some comments were in support of the Proposed Project. Other common concerns dealt with the security of the power plant, including public health and safety, while other comments focused on environmental issues such as biological and marine resources, seismic activity, recreation, and traffic and transportation.

The specific issues raised during the public scoping process are summarized below according to the following major themes:

- Purpose and Need
- Human Environment Issues and Concerns
- Physical Environment Issues and Concerns
- Alternatives
- Environmental Review and Decision-Making Process

I.1.4.1 Purpose and Need

A clear majority of comments received by members of the public and community organizations addressed the purpose and need of the Proposed Project. Many of these comments expressed opposition to the existence of SONGS and to the use of nuclear power in general. Some people stated that they preferred the shutdown of SONGS and discontinuing the use of nuclear power as a generation source in favor of the utilization of natural gas power plants, or alternative and renewable energy technologies such as wind, solar, and wave power. Some comments also expressed support of the Proposed Project. It was generally understood by persons and organizations commenting that without the CPUC's approval of the Proposed Project, SONGS would continue to operate only until the existing steam generators reached the end of their operating lives.

I.1.4.2 Human Environment Issues and Concerns

Nearly all of the public and agency comments raised strong concerns regarding the potential impacts of the Proposed Project on the human environment, most often expressing concerns regarding the security of the power plant, and the overall public health and safety risks associated with the operation of SONGS. These issues were mostly concerning the potential impacts of terrorists attacks and hazardous substance exposure (either as a result of a terrorist attack or seismic activity). Other concerns dealt with transportation and traffic issues.

- **SONGS Security.** Based on the comments received, the security of SONGS is extremely important to private citizens and organization in the area of the Proposed Project. Several comments identified SONGS as a potential terrorist target and questioned the adequacy of current emergency evacuation and response plans. In addition, several private citizens and organizations expressed a concern regarding the potential risk of wildland fires at SONGS. Comments also focused on the lack of safeguard measures in the event of a fire.
- **Public Health and Safety.** Several of the comments received from private citizens and community organizations expressed concerns regarding public health and safety in the event of a hazardous substance release following a terrorist attack or other incidents that might result in the release of radioactive waste (i.e., seismic activity). Additional comments expressed concerns about the lack of an adequate emergency response plan, including proper evacuation plans in the vicinity of the area of the Proposed Project (along I-5). Some concerns also focused on the increased exposure to the possibility of an emergency evacuation of the population of San Clemente in the event of a release of radiation waste from damage to the plant (either caused by an earthquake or terrorist attacks).
- **Traffic and Transportation.** Concerns regarding traffic and transportation focused on the impacts of overweight load on the railroad tracks and the traffic overload on the affected segments of I-5. It was suggested that impacts be thoroughly re-evaluated on the increase of severity and repetitiveness of the transport route (traveling the same route eight times instead of one). Caltrans provided information on the permits that would be required for the Proposed Project in order to move extralegal loads and to access I-5 at other points besides the normal entrance or exit ramps, as well as the possibility of transporting the replacement steam generators and/or original steam generators by rail.

I.1.4.3 Physical Environment Issues and Concerns

The comments from public agencies, community organizations, and private citizens expressed concerns about the potential impacts of the project on the physical environment, particularly impacts to biological resources, marine resources, and recreation. In addition, concerns were raised about the geologic stability of the area and whether the Proposed Project or its associated facilities would be negatively affected in the event of an earthquake.

- **Biological Resources.** Public agency comments expressed significant concern regarding the impacts to biological resources during transport and construction phases of the steam generator replacement project. Specifically, comments focused on the potential affects to flora and fauna of the subtidal, intertidal, and terrestrial communities adjacent to the project area and steam generator transport route, including endangered, threatened and locally unique species to the area. Comments also focused on wetland and riparian habitats that may be affected by the Proposed Project. It was suggested that a thorough biological assessment be completed in order to adequately evaluate the potential short- and long-term impacts of the Proposed Project. In addition, comments identified the permits that must be obtained in the event the Proposed Project results in the “take” of plant or animal species listed under the California Endangered Species Act (CESA).
- **Geology and Seismic Activity.** Community members expressed concerns regarding the increased exposure of the Proposed Project to seismic activity in the area. Comments focused on the need to include an analysis of the impacts of earthquakes faults discovered offshore since the construction of SONGS. Members of the public are concerned about the potential hazard that would occur in the event of an earthquake in the area of SONGS. The public recommended that a more thorough analysis be done regarding the new discoveries of the thrust faults on the San Onofre site.

The project applicant commented that the CPUC is not required to consider the radiological health and safety effects of either a seismic event or a terrorist attack and should, therefore, not analyze these effects during the CEQA process.

- **Marine Resources.** Members of the public expressed concern regarding the impact of the Proposed Project on the marine environment. Specifically, their concerns focused on the loss of gametes and larvae from entrainment into the once-through cooling system, as well as the loss of fish, turtles, and other marine life that may be impinged on the intake screens. Additional concerns were raised regarding the potential loss of kelp bed by the discharge of seston, which could potentially cut off light necessary to sustain the bed.
- **Recreation.** Members of the public expressed concern regarding the bluff top staging area. According to the comments, this area was originally permitted for the construction of the Units 2 and 3, with the condition that it would be returned to San Onofre State Beach after construction. Today, the area is still a fenced, restricted parking lot. It was suggested that the EIR evaluate the return of this area to the public and the State park system as a recreational park. In addition, a comment was raised regarding the need for the EIR to address the potential impacts of the Proposed Project on the Camp Del Mar RV campground and other recreational facilities located at Camp Del Mar beach areas (which is near the Del Mar Boat Basin).

I.1.4.4 Alternatives

Comments from individuals, community organizations, and government agencies suggested a variety of alternatives, including the No Project Alternative.

- **No Project Alternative.** Several comments from individual citizens and non-profit organizations supported the No Project Alternative, as it deals directly with marine, recreation and air resources. It was suggested that the No Project Alternative would reverse the impacts on marine species, as it would allow for the recovery of nearshore species. It was also suggested that with the No Project Alternative, California residents would recover the access to and recreational use of shoreline that is now restricted by the SONGS exclusion area. This would include recovery and access to the barrancas in the nearshore areas. Comments also suggested that the No Project Alternative would help improve the air quality of the area.
- **Other project alternatives.** The public and private agencies, as well as private citizens suggested an array of alternatives for the Proposed Project, including the following:
 - Supplement natural-gas powered electricity generation with renewable energy sources such as wind, solar, and wave power.
 - Use conservation technology as a means of reducing energy demand.
 - Upgrade and expand existing gas-fired generation plants to offset the power generated by SONGS.

I.1.4.5 Environmental Review and Decision-Making Process

Scope of Environmental Review

Concerns regarding the scope of the project description were frequently addressed in the written comments submitted. The comments identified the extension of the operating life of SONGS and the associated cumulative impacts of long-term operations as a critical issue that should be included in the environmental review. This issue is discussed further in the following section. In addition, those that submitted comments identified other issues that should be included in the environmental review, such as the replacement of the primary loops, reactor vessel flanges, instrumentation and control cables and trays, containment structures, and all other replacements and rebuild requirements needed by the removal of the OSGs and installation of the new steam generators.

Extension of Power Plant Life and Cumulative Impacts. An issue addressed in the comments was the extension of the life issue and associated cumulative impacts from the long-term operation of SONGS. Some expressed concern that the Proposed Project represents a means to extend the operating life of SONGS. Some comments requested that the environmental review include the long-term impacts associated with potentially enabling the plant to operate until the expiration of the NRC license in 2022 instead of 2009 or 2010, which is the period the steam generators are estimated to cease operations should the project not be approved. Cumulative impacts associated with the extension of power plant life include the disposal of additional increments of spent fuel and other waste, and the additional costs required to operate the plant beyond the life of the original steam generators.

I.2 Public Notification

This section summarizes the CPUC's program of public notice and participation to obtain agency and public input on the SONGS Steam Generator Replacement Project. In addition to public comment submission, the CPUC contact information can be used to request a copy of the Scoping Report. Contact information for CPUC is provided in Section I.2.3. The CPUC's program of public notice and participation consists of three elements as described below.

- Public Notification
- Public Review Period
- EIR Information

I.2.1 Public Notification

As described in Section I.1, the NOP was issued on October 1, 2004, to federal, State, and local trustees and agencies that may be affected by the Proposed Project. The NOP was mailed to 160 interested or affected individuals, including residents and persons at public agencies, private organizations, and interest groups received copies of the NOP via mail. Addressees included 16 non-government agencies and special interests groups, 95 agencies (including federal, State, county, and city), 32 private organizations, and 17 individuals. The NOP and scoping meeting information was also posted on the CPUC's project website (see Section I.2.3 for website address). Notices for the two local public scoping meetings were also published in the North County Times and the Orange County Register on October 11 and October 17, 2004. For the October 13 meeting, a notice was sent via e-mail to all addresses listed in the CPUC Service List.

I.2.2 Public Review Period

In compliance with CEQA Guidelines, the CPUC provides a public review period of 45 days for the Draft EIR. This public review period will commence upon release of the Draft EIR on April 15, 2005, and will end on May 31, 2005. Written comments on the Draft EIR may be submitted at the informational workshops, via facsimile transmission on the EIR telephone hotline at (949) 203-6410, via email at sanonofre@aspenerg.com, or by mail to:

Andrew Barnsdale, Project Manager
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Written comments must be received or postmarked by May 31, 2005. Please remember to include your name and return address in whatever form you make your written comments.

Following the release of the Draft EIR, two informational workshops will be held in San Clemente (times and dates are listed below). The purpose of these informational workshops is to help interested parties understand the Proposed Project, the Draft EIR, and how to participate in the CPUC's decision-making process, including providing comments on the Draft EIR. At these informational workshops, the EIR team and CPUC staff will be available to respond to questions and provide clarification regarding the impact analysis and conclusions presented in the Draft EIR.

Following are the locations and dates for informational workshops:

Informational Workshops on Draft EIR
May 12, 2005 2:00 – 4:00 p.m. AND 7:00 – 9:00 p.m.
Multi-Purpose Room San Clemente Community Center 100 North Calle Seville San Clemente, CA 92672

I.2.3 EIR Information

Copies of the EIR documents have been made available at the CPUC office in San Francisco. In addition, copies of the Draft EIR will be available to the public on the project website.

Website. The following website will be used to post all public documents during the environmental review process and to announce upcoming public meetings:

<http://www.cpuc.ca.gov/environment/info/aspen/sanonofre/sanonofre.htm>

Project Information Hotline. You may request project information by leaving a voice message or sending a fax to (949) 203-6410.