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IN REPLY REFER TO:

5700
CPLO
30 MAY 05

Mr. Andrew Barnsdale, SONGS/CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear Mr. Barnsdale:

Marine Corps Base (MCB), Camp Pendleton appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the Proposed San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement Project. While we essentially have no objection to the Steam Generator Replacement Project in and of itself, nor any significant concerns with the SONGS plan for how this project is to be carried out, we do have a concern and comments regarding the specific matter of "Transportation Route Alternatives", as presently addressed in the Draft EIR.

The specific focus of our comments regarding the issue of "Transportation Route Alternatives" is oriented toward the fact that the "ground transportation" portion of the project must also satisfy certain federal National Environmental Policy Act (NEPA) requirements, if it is to be executed as described in the Draft EIR. Although the analysis of this SONGS project appears to be quite thorough from a CEQA perspective, it fails to address the fact that some additional NEPA analysis will be necessary before execution of the ground transportation portion of the project (movement of the steam generators through MCB Camp Pendleton) can be performed. While the Draft EIR may meet the State's CEQA demands as they pertain to this future SONGS project, the document is lacking by its failure to acknowledge and discuss in Section E that certain NEPA requirements are also applicable to the Transportation Route Alternatives portion of the project. For example, the analysis and discussion of three potential route alternatives for transporting the steam generators across MCB Camp Pendleton property concludes that the MCBCP Inland Route Alternative is the preferred alternative. Yet the Draft EIR fails to acknowledge that the decision on any transportation route to be used for moving the steam generators across Camp Pendleton land or road areas shall rest solely with the Base Commanding General, pending results of a NEPA analysis, rather than the analysis and conclusions of this CEQA document.

As the CPUC may be aware, SONGS operates as a tenant activity on MCB Camp Pendleton and occupies property under ownership of the Department of the Navy (DoN). SONGS occupancy of this DoN-owned property has been granted through a combination of leases and easements from the DoN. As the Draft EIR describes for this SONGS project, the four new steam generators for Units 2 and 3 would be delivered to Camp Pendleton's Del Mar Boat Basin by barge. From the Boat Basin the generators would then be moved by surface transportation to the SONGS plant using a designated route through the Base. Three different ground routes have been identified and analyzed within the Draft EIR as potential routes for moving the steam generators between the Boat Basin and the SONGS facility. Each of these three proposed routes would traverse some portion of MCB Camp Pendleton, a federal military installation.

Before any of these proposed transportation routes can be utilized to move the steam generators to the SONGS facility, MCB Camp Pendleton must first grant to SONGS or its agent a DoN License for Non-Federal Use of Real Property (License), authorizing the use of that particular on-base route. A NEPA analysis is required to evaluate potential environmental impacts associated with any of the proposed route alternatives before such a License can be granted. The Commanding General of Camp Pendleton will be the final decision authority, based on results of the NEPA analysis, to determine which of any

proposed transportation route alternatives is considered to be the environmentally superior route and/or the least impacting upon the Base mission when conducting this movement of the steam generators.

Because this Steam Generator Replacement Project won't likely occur until at least the 2009 time frame or later, completion of a NEPA analysis to evaluate the ground transportation portion of the project should be delayed until such time as SONGS gets closer to the actual execution date for the project. Many things can change between now and 2009 with respect to the availability (and usability) of the three transportation route alternatives presented and analyzed by the Draft EIR. Potential impacts associated with each route alternative, whether they be impacts to natural resources, recreation activities or military training operations, could easily be different in 2009 as compared to the current situation. For that reason, we request the following actions be taken and the following clarifications be incorporated in the Final EIS for the SONGS Steam Generator Replacement Project:

a. The Final EIR should clarify that, while this CEQA analysis may suggest a preferred transportation alternative, the final decision as to which transportation route will be authorized for movement of the steam generators across Camp Pendleton property will ultimately rest with the Base Commanding General.

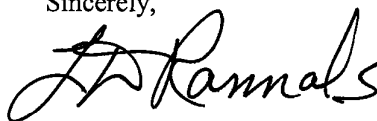
b. The Final EIR should acknowledge that an additional NEPA analysis will be required in support of the Commanding General's decision as to which transportation route alternative may ultimately be authorized.

c. The Final EIR should acknowledge that the ultimate approval for use of any on-base transportation route (to move the steam generators from the Del Mar Boat Basin to the SONGS plant site) will be granted to SONGS in the form of a DoN License for Non-Federal Use of Real Property. The granting of this License is a federal action requiring that a NEPA evaluation of all potential on-base route alternatives be performed before an approved movement route is determined.

d. The Final EIR should acknowledge that any mandated mitigation requirements to support movement of the steam generators across Camp Pendleton property, regardless of which on-base route may ultimately be approved for this action, will require consultation with and concurrence from the Base Commanding General if any such mitigation requirements have the potential to directly or indirectly affect MCB Camp Pendleton.

Thank you for the opportunity to review and comment on the Draft EIR for this proposed SONGS project. Should you have any questions or require additional information regarding our comments on this matter, the appropriate point of contact is the undersigned at (760) 725-6513.

Sincerely,



L. D. RANNALS

Community Plans & Liaison Officer

By direction of the Commanding General

Copy to:
Chief of Staff
AC/S Ops & Trng
AC/S Facilities
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WACO
SONGS (Mgr, Site Support Services)