

Comment Set A
State of California, Department of Transportation (Caltrans District 12)

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

Arnold Schwarzenegger, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
3337 Michelson Drive Suite 380
Irvine, CA. 92612-8894



May 5, 2005

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

File: IGR/CEQA
SCH#: 2004101008
Log #: 1468A
SR: I-5

Subject: San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement Project DEIR

Dear Mr. Barnsdale,

Thank you for the opportunity to review and comment on the **DEIR** dated April 2005, for the **SONGS Steam Generator Replacement** project. The project site is located on the Pacific coastline in North San Diego County adjacent to San Clemente and the Orange County line, Interstate 5, Camp Pendleton and San Onofre State Beach. The project consists of removal, deconstruction, transportation and disposal of the existing steam generators 2 & 3, and shipment, transportation and construction of the new replacement steam generators from five proposed alternatives.

Caltrans District 12 status is a reviewing agency on this project and has the following comments:

1. Our comments from the NOP review still stand. (Please see attached).
2. In addition, we acknowledge that Caltrans District 11 in San Diego would be the lead in permitting and guiding this project except where transport should cross into Orange County within State Routes at any time during staging, demolition, reconstruction, and transport of radioactive waste for storage. At that time Caltrans District 12 needs to be involved in order to study proposed routes and submit its own feedback. In addition, HQ Truck and Weight State, State Division of Extra Legal Trucks, and State Division of Variance Coordinator would also need to be consulted. The CHP may also need to be consulted regarding the nature of the cargo.
3. As soon as a final transportation route for disposal is set, a Traffic Control Plan should be filed and a Transportation Permit may be required. Please call (909) 383-4637 for information regarding a Transportation Permit.

A-1 - A-5
(attached)

A-6

A-7

Comment Set A, cont.
State of California, Department of Transportation (Caltrans District 12)

May 5, 2005
Page 2

Please continue to keep us informed of this project and other future developments, which could potentially impact our transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Maureen El Harake at (949) 724-2086.

Sincerely,


Robert F. Joseph, Chief
IGR/Community Planning Branch

c: Bob Joseph, Branch Chief - IGR/Community Planning
Terry Pencovic, HQ IGR/Community Planning
Raouf Moussa, Traffic Operations South
Mory Mohtashami, Permits Branch

Comment Set A, cont.
State of California, Department of Transportation (Caltrans District 12)

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVIS, Govern

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
3337 Michelson Drive Suite 380
Irvine, CA. 92612-8894



November 1, 2004

Mr. Nicolas Procos
California Public Utilities Commission
C/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

File: IGR/CEQA
SCH#: N/A
Log #: 1468
SR: I-5

Subject: San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement Project NOP

Dear Mr. Procos,

Thank you for the opportunity to review and comment on the **Notice of Preparation** dated 10/01/04, for the **SONGS Steam Generator Replacement** project. The project site is located on the Pacific coastline in North San Diego County adjacent to San Clemente and the Orange County line, Interstate 5, Camp Pendleton and San Onofre State Beach. The project consists of removal, deconstruction, transportation and disposal of the existing steam generators 2 & 3, and shipment, transportation and construction of the new replacement steam generators from five proposed alternatives.

Caltrans District 12 status is a reviewing agency on this project and has the following comments:

1. Caltrans District 12 will become a responsible permitting agency should the ultimate transportation of the decommissioned generators and/or the replacement generators pass over or onto State Right of Way in Orange County.
2. Transporting and/or maneuvering equipment to transport either replacement generators or disposal generators (and parts) over, under or onto State Right of Way or facilities would need an Encroachment Permit(s). Please see our Permit website for more details at: <http://www.dot.ca.gov/hq/traffops/developserv/permits>. Also, please see the standard Environmental and cultural requirements for an Encroachment Permit (attached). Care should be taken during construction to cover all loads for this project to prevent tracking onto State Right of Way and facilities. Construction Traffic should file a management plan to avoid peak travel periods on Ortega Highway and Interstate 5. In District 12, you may contact Mory Mohtashami, Encroachment Permits Branch Chief at (949) 724-2525.
3. Consider the option of transporting the replacement generators and/or the disposal parts by rail. The NOP states that the dimensions of the steam generators are approximately 65 feet in eight, 22 feet in diameter (at the steam dome), and approximately weighs 620 tons. It seems highly infeasible to transport these devices on State Highways. Vertical and horizontal clearances as well as weight would be a significant impact to the State facilities. For intact generators, gaining vertical clearance of the bridges would be impossible.

A-1

A-2

A-3

Comment Set A, cont.
State of California, Department of Transportation (Caltrans District 12)

April 22, 2005
Page 2

4. The report states that the removal of the old generators would involve their destruction, and part of the dome would be cut up into pieces in order to reduce the volume of waste. The waste would be placed in shipping containers for shipment to a licensed low-level radioactive waste disposal facility. (Currently an unidentified facility in Utah is the tentative terminal for this waste). If this shipment needs to be transported on State Highways, CHP Hazardous Materials Unit would need to be consulted.
5. Notification must also be made to the Truck Services Managers in District 11 (San Diego) and District 12 (Orange County) and any other District through which this material may pass; for approval of the final truck routing should that alternative be selected.

A-4

A-5

Please continue to keep us informed of this project and other future developments, which could potentially impact our transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Maureen El Harake at (949) 724-2086.

Sincerely,

Robert F. Joseph, Chief
IGR/Community Planning Branch

c: Bob Joseph, Branch Chief - IGR/Community Planning
Terry Pencovic, HQ IGR/Community Planning
Raouf Moussa, Traffic Operations South
Praveen Gupta, Environmental Planning A
Mory Mohtashami, Permits Branch

Responses to Comment Set A

State of California, Department of Transportation (Caltrans District 12)

- A-1 Table A-1 of the Draft EIR shows that Southern California Edison (SCE) may be required to obtain several permits, such as an Encroachment Permit, Highway Crossing Permit, and Dual Lane Bonus Purple Permit, from the California Department of Transportation (Caltrans), as a Responsible Agency, to implement the Proposed Project. It is further noted that Caltrans, District 12 (Orange County) will be a Responsible Agency in the event that the Proposed Project transport phase or disposal of the OSGs crosses into State Right of Way in Orange County. Caltrans would be a responsible agency irrespective of which transport option were implemented. Please also see Response A-6.
- A-2 Section D.13.2 of the Draft EIR acknowledges that Caltrans would be responsible for issuing permits to allow for encroachment on traveled lanes of a State highway. The Draft EIR contains procedures, including Mitigation Measure A-1a (Suppress dust at all work areas or transport routes and on public roads), to reduce the spread of dirt onto State Right of Way and facilities. In addition to Mitigation Measure A-1a, Mitigation Measure G-4a (Prevent accelerated erosion during OSG Storage Facility construction), and Applicant Proposed Measures (APMs) AQ-1 (Standard Dust Control Measures), Hydro-1 (BMPs for erosion control), and Geo-1 (Erosion control measures), would be implemented to ensure that no tracking occurs. No major excavation would be associated with the Proposed Project, obviating the need to cover truck loads on State highways. It is noted that Caltrans suggested that their Permit website and standard environmental and cultural requirements for an Encroachment Permit be reviewed.
- A-3 Transport by rail was analyzed in Section C.5.2.1 of the Draft EIR and was eliminated from full EIR evaluation due to technical feasibility concerns and increased environmental impacts. Two Transport by Rail Alternatives to the SONGS facility were discussed: (1) MCBCP Del Mar Boat Basin via a new rail spur, and (2) from Long Beach Harbor and transferred to railcar at the Burlington Northern Santa Fe rail spur. Transporting the RSGs by rail from MCBCP Del Mar Boat Basin would cause temporary noise, air quality, erosion, and transportation impacts, as well as potential long-term impacts such as habitat displacement due to construction of a new rail spur and necessary modifications to bridge crossings and overpasses. Rail transport from Long Beach Harbor would also encounter many clearance interferences and potential obstructions along the rail route and weight limitations on the San Mateo Rail Bridge.

The Draft EIR shows that there would be no impacts to State facilities due to vertical and horizontal clearances for the proposed Beach and Road Route. Segment N of the I-5/Old Highway 101 Route Alternative would circumvent the low Cockleburr and Cook Road overpasses by rerouting to Coaster Way (see Draft EIR Section C.4.2.1), via a fabricated transition. As stated in Impact T-1 (Transport of the RSGs would result in public road closures and cause traffic delays), it is not anticipated that the transporter would damage I-5 road surfaces during the RSG Transport phase because it is assumed that a Caltrans-approved transporter, whose size and load capability would be within industry standard design specifications, would be used to safely transport the load over the selected route. As stated in Section B.3.2.1, the transporter would distribute the load safely and uniformly over a large surface area, reducing excessive loads and impacts on existing surfaces, and mats would be utilized were necessary to assist in weight distribution. However as stated in Section

D.13.3.2, if any damage occurs or modifications are needed on I-5, repairs would be scheduled and completed as per the Encroachment Permit.

In addition, please note that Section B.3.2.1 of the Draft EIR shows that the original steam generators were transported along a route similar to the Beach and Road Route in the late 1970s and, as stated in Section A.1.2, the Beach and Road Route received environmental approvals from the California Coastal Commission and MCBCP for transport of the decommissioned SONGS Unit 1 reactor vessel in the reverse direction.

- A-4 It is noted that if the OSGs are transported to the licensed disposal facility using State Highways that the CHP Hazardous Materials Unit would need to be contacted and consulted prior to transport. Also as stated in Section B.3.4.5 of the Draft EIR, the appropriate State permits would be obtained for the portions of the OSGs transported by road. Table A-1 of the Final EIR includes a revision to note that CHP may need to be consulted.
- A-5 It is noted that the Caltrans Truck Services Managers in District 11 (San Diego), District 12 (Orange County), and any other District through which the OSGs would travel should be notified of, and should approve the final truck route if this option is utilized. Table A-1 of the Final EIR includes a revision to note that the Truck Services Managers of any applicable Caltrans District may need to be notified.
- A-6 Draft EIR Tables A-1 and D.13-6, Sections B.3.2.1, C.4.2.1, and D.13.3.2, and APM Traffic-1 show that the project activities would be coordinated with Caltrans during different phases. In addition to the Caltrans permits that may be required (see Draft EIR Table A-1), SCE would implement APM Traffic-1, which includes the submission and approval of a detailed traffic control plan to Caltrans. It is noted that Caltrans District 11 (San Diego) would be the permitting Responsible Agency for any applicable project activities that occur within San Diego County and District 12 (Orange County) would be the permitting Responsible Agency for Orange County. In addition to contacting the appropriate Caltrans District, the commenter suggests that HQ Truck and Weight State, State Division of Extra Legal Trucks, the State Division of Variance Coordinator, and CHP also be consulted. Please also refer to Responses A-1 and A-4.
- A-7 APM Traffic-1 states that as part of the Proposed Project SCE would submit and obtain approval of a detailed traffic control plan from Caltrans, detailing required lane closures, hours of operation, appropriate signage and warning devices, and required work areas. (See Table B-3 and Section D.13.3.1 of the Draft EIR.) In addition, Table A-1 lists the Caltrans permits that may be required for the SONGS Steam Generator Replacement Project.

Comment Set B U.S. Marine Corps Base Camp Pendleton



UNITED STATES MARINE CORPS
MARINE CORPS BASE
BOX 555010
CAMP PENDLETON, CALIFORNIA 92055-5010

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

B-1

Comment Set B, cont.

U.S. Marine Corps Base Camp Pendleton

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.

B-1

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.

B-2

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.

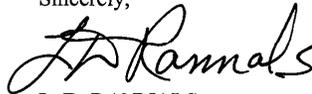
B-3

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.

B-4

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

Comment Set B, cont.
U.S. Marine Corps Base Camp Pendleton

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

Responses to Comment Set B

U.S. Marine Corps Base Camp Pendleton

B-1 The Draft EIR recognizes that supplemental environmental review under NEPA would be required to transport the replacement steam generators (RSGs) across lands occupied by Camp Pendleton. Table A-1 (Permits Required for the SONGS Steam Generator Replacement Project) of the Draft EIR Introduction section indicates under “Federal Agencies” that a Department of the Navy License for Non-Federal Use of Real Property (License) must be obtained from Camp Pendleton for transport of the RSGs across lands owned by the U.S. Department of the Navy (DoN). It is also acknowledged that the license would be subject to NEPA review. Table A-1 has been revised to indicate that Camp Pendleton is occupied by the Marine Corps and is owned by the Department of the Navy.

It should be noted that the CPUC is being asked to approve the financing of the Proposed Project. As a result, it must examine the environmental impacts of the Proposed Project as well as feasible alternatives. The Base is responsible for issuing a license to allow transport of the RSGs across Base property. The Base will also conduct its own environmental review pursuant to NEPA and will be ultimately responsible for approving the transport alternative route selected. The ultimate route selected is likely to be one of the three proposed by SCE and analyzed in the EIR.

Table D.8-1 of the Draft EIR (Consistency with Applicable Land Use Plans and Policies) indicates that it is the mission of the Camp Pendleton to operate an amphibious training Base. The table also indicates that all SONGS-related activities on the Base are conducted at the sole discretion of Camp Pendleton through its Commanding Officer and chain of command; and that before the RSGs can be transported across Camp Pendleton, SCE must be granted a license that is issued by the Base.

As requested by this comment, additional clarification has been added to the Final EIR to reiterate that approval of a temporary RSG transport route across Camp Pendleton property would require approval by the Base Commanding General, and such an approval would be based on NEPA compliance and the selection of a route that is least impacting upon the Base mission. This information has been clarified in changes to the EIR Introduction (Section A), Project Description (Section B), Alternatives (Section C), Comparison of Alternatives (Section E), and Mitigation Monitoring and Reporting (Section H). Specifically, the following sections have been modified:

- A.6 Agency Use of this Document
- B.3.1 Fabrication and Delivery of Replacement Steam Generators
 - B.3.2.1 Beach and Road Route
- C.4.2.1 I-5/Old Highway 101 Route Alternative
- C.4.2.2 MCBCP Inland Route Alternative
- E.2.3 Definition of Environmentally Superior Alternatives
- H.6 Mitigation Monitoring Program Tables

In addition to the minor clarifications described above, the implementation and monitoring provisions of recommended mitigation measures that are applicable to the project-related use of Camp Pendleton facilities have also been revised. The revisions indicate that the Marine Corps Base at Camp Pendleton would be responsible for the implementation of mitigation measures and jointly responsible (with the CPUC) for monitoring of mitigation measures that have been proposed to reduce project-related impacts that occur on Camp Pendleton. The text changes have been made in the Final EIR to clarify the implementation/monitoring responsibilities of the Marine Corps. The changes have been made to the Mitigation Monitoring, Compliance, and Reporting Tables that were provided for each environmental issue area evaluated by the EIR. The Final EIR clarifies that implementation of mitigation measures recommended by CPUC for activities within MCBCP would require approval by the Base Commanding General and is subject to NEPA review. Mitigation measures adopted by MCBCP on the Base would also be implemented by MCBCP, with assistance from the CPUC, if requested by the Base. See each issue area subsection in Section D, including the Mitigation Monitoring, Compliance, and Reporting Tables, and Section H.6 for those mitigation measures that require approval from the MCBCP and the reasoning for such approval.

The commenter correctly notes that because of the long lead time before it would be necessary to transport the RSGs across Camp Pendleton property (scheduled to begin in late 2008), the NEPA evaluation of the RSG transport phase of the Proposed Project would not likely occur until a time that is closer to project implementation. For this reason, and also due to the somewhat limited scope of potential environmental impacts associated with temporary transport activities across Camp Pendleton property, a joint NEPA/CEQA document has not been prepared for the Proposed Project.

The CEQA evaluation of the preferred transportation route (Beach and Road Route), along with a full evaluation of two proposed alternative routes (I-5/Old Highway 101 Route and MCBCP Inland Route Alternatives), has been prepared at this time in order to comply with several CEQA requirements:

- CEQA requires that an EIR evaluate the potential for environmental impacts to result from the implementation of the entire project. CEQA Guidelines Section 15126 states “*All phases of a project must be considered when evaluating its impact on the environment . . .*” This requirement is elaborated further in CEQA Guidelines Section 15003(h), which states “*the lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect.*” CEQA Guidelines Section 15378(c) indicates that “*the term ‘project’ refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term ‘project’ does not mean each separate governmental approval.*” Therefore, to comply with CEQA requirements, project-related activities that would occur on Camp Pendleton and that would also be subject to subsequent NEPA review (specifically the selection and use of a route to transport RSGs) have been evaluated in this EIR. Project description information provided by this EIR may also be helpful to the NEPA review process.
- CEQA Guidelines Section 15126.6 requires that the CPUC examine a reasonable range of alternatives to the Proposed Project. In particular, “*An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substan-*

tially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

- CEQA Guidelines Section 15004 indicates that “*EIRs . . . should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessments.*” Preparation of this EIR and the evaluation of potential RSG transportation routes at this time is consistent with this CEQA requirement and will promote informed decision-making by the public and the CPUC. NEPA review would be performed closer to the project implementation date.
- CEQA Guidelines Section 15226 (Joint Activities) indicates that “*state and local agencies should cooperate with federal agencies to the fullest extent possible to reduce duplication between the California Environmental Quality Act and the National Environmental Policy Act.*” It anticipated that information and environmental impact analysis provided by this EIR would be used, at least in part, by Camp Pendleton when conducting the required NEPA evaluation of the project-related use of Base facilities. Although not required by CEQA, the EIR has provided a full and project-specific review of impacts associated with the use of alternative RSG transportation routes, which will help to facilitate the NEPA review of potential environmental impacts that may result from the RSG transport component of the Proposed Project.

- B-2 Please see Response B-1. The Final EIR includes clarifications to better identify the future need for NEPA analysis.
- B-3 Table A-1 of the Draft EIR indicates that a license would be required from MCBCP for use of on-base transportation routes. The EIR has also been clarified to show that the approval would be in the form of a License for Non-Federal Use of Real Property from the Department of the Navy. Please also refer to Response B-1.
- B-4 Section B.3.1 of the Final EIR has been clarified to show that impacts to MCBCP activities would be minimized through consultation and concurrence with the Base Commanding General. The CPUC recognizes that any mitigation measures required to support the transport of the RSGs across MCBCP property would need to also be coordinated with and approved by the Base Commanding General. This Final EIR includes revisions to the Mitigation Monitoring, Compliance, and Reporting Tables (throughout Section D and in Section H.6) to identify the measures recommended by CPUC for implementation on MCBCP property, and those that require approval from the Base Commanding General and the reasoning for such approval.

Comment Set C
County of Orange, Resources & Development Management Department



COUNTY OF ORANGE
RESOURCES & DEVELOPMENT MANAGEMENT DEPARTMENT

Bryan Speegle, Director
300 N. Flower Street
Santa Ana, CA
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NCL 05-014

May 31, 2005

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

SUBJECT; Draft Environmental Impact Report for the Proposed San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement Project

Dear Mr. Barnsdale,

Thank you for the opportunity to respond to the above referenced project. The County of Orange has reviewed the Draft Environmental Impact Report (DEIR) and has no comments at this time. However, we would appreciate being informed of any further developments.

C-1

If you have any questions, please contact Charlotte Harryman at (714) 834-2522.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ronald L. Tippett".

Ronald L. Tippett, Chief
Environmental Planning Division

Responses to Comment Set C

County of Orange, Resources & Development Management Department

- C-1 It is noted that the commenter (County of Orange, Resources & Development Management Department, Environmental Planning Division) does not have comments on the Draft EIR at this time. The commenter is on the SONGS project mailing list for the CEQA process and therefore should receive project information if any additional notifications or communications are mailed.

Comment Set D
State of California, Department of Transportation (Caltrans District 11)

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

District 11 · 2829 Juan Street
P. O. BOX 85406, M.S. 50
San Diego, CA 92110-2799
PHONE (619) 688-6954
FAX (619) 688-4299



*Flex your power!
Be energy efficient!*

May 31, 2005

11-SD-005
PM 71.38

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

RE: San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement Project – Draft Environmental Impact Report (EIR) (SCH 2004101088)

Dear Mr. Barnsdale:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement Project, located immediately west of and adjacent to Interstate 5 (I-5). The project proposes several options for transport of the Replacement Steam Generators (RSGs) to the SONGS facility and consideration of on site Original Steam Generator (OSG) storage. According to the Draft EIR document page C-1, the preferred transport option is the Beach and Road Route, which constitutes the proposed project.

On page B-17, Figure B-6b – Proposed RSG Transport Route (preferred option) – segments 'E' and 'F' appear to be within Caltrans Right of Way (R/W). Any work performed within Caltrans R/W will require an encroachment permit. For example, an encroachment permit would be required for entry or exit to or from I-5 at any point other than normal entrance or exit ramps or if any work is required in the median to facilitate crossing over the freeway. Plans for work within State R/W must include: typical cross sections, adequate structural sections, traffic handling plans, and signing and striping plans stamped by a professional engineer. Also, for those portions of the project within the Caltrans R/W, the permit application must be stated in both English and Metric units (Metric first, with English in parentheses). Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

Furthermore, for any work or improvements within Caltrans R/W, the project's environmental studies must include such work. The applicant is responsible for quantifying the environmental impacts of the improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The indirect effects of any mitigation within Caltrans R/W must also be addressed. The applicant will be responsible for procuring

D-1

D-2

"Caltrans improves mobility across California"

Comment Set D, cont.
State of California, Department of Transportation (Caltrans District 11)

Mr. Andrew Barnsdale
May 31, 2005
Page 2

any necessary permits or approvals from the regulatory and resource agencies for the improvements.

Movement of an oversized load on I-5 will require a Wide Load Permit from the Caltrans Southern Region Transportation Permits Office. For more information, please contact Steve Dickey at (909) 388-7077 or Camille Abou-Fadel at (858) 467-4328. Also, Traffic Control Plans are required for a complete review prior to project initiation. The plans should be prepared in accordance with the Caltrans *Manual on Uniform Traffic Control Devices (MUTCD)* [2003 edition] and the MUTCD 2003 California supplement Part 6. All work proposed within the State R/W will require lane and shoulder closure charts. All roadway features (e.g., signs, pavement delineation, roadway surface, etc.) within the State R/W must be protected, maintained in a temporary condition, and/or restored.

Caltrans appreciates the opportunity to review this project proposal. Please also refer to the Department's comment letter regarding the project's Notice of Preparation (NOP) dated November 1, 2004 (attached). For questions regarding the Department's comments, please contact Brent McDonald at (619) 688-6819.

Sincerely,


MARIO H. ORSO, Chief
Development Review Branch

c: BMcDonald Planning MS-50
EGojuangco Traffic Ops MS-55
CAbou-Fadel TMC MS-58
SMorgan State Clearing House (SCH)

"Caltrans improves mobility across California"

Comment Set D, cont.
State of California, Department of Transportation (Caltrans District 11)

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

District 11
2829 Juan Street
P. O. BOX 85406, M.S. 50
San Diego, CA 92110
PHONE (619) 688-6954
FAX (619) 688-4299



Flex your power!
Be energy efficient!

November 1, 2004

11-SD-5
PM 71.38 (KP 114.9)
SCH 2004101008
SONGS

Mr. Nicolas Procos
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Mr. Procos:

The California Department of Transportation (Department) appreciates the opportunity to have reviewed the Notice of Preparation (NOP) for the San Onofre Nuclear Generating Station (SONGS) Steam Generator Replacement – SCH 2004101008. The Department has the following comments:

- Movement of any extralegal loads (overlength, overwidth, overheight, overweight) on Interstate 5 (I-5) or any State Highway will require Transportation Permits from the Department's Southern Region Transportation Permits Branch in San Bernardino.
- If entry or exit onto or from I-5 at any point other than normal entrance or exit ramps is required or if any work is required in the median to facilitate crossing over, then an encroachment permit will be required from the Department's District 11 Encroachment Permit Office. If an encroachment permit is required, the applicant must provide environmental clearance for all encroachment permit work within the State right-of-way.
- Transportation of the replacement steam generators will require a Traffic Control / Lane(s) Closure Plan and a California Highway Patrol (CHP) escort.

If you have any further questions, please contact Jacob Armstrong, Development Review Branch, at (619) 688-6960.

Sincerely,

MARIO H. ORSO, Chief
Development Review Branch

"Caltrans improves mobility across California"

See D-1 to D-3

Responses to Comment Set D

State of California, Department of Transportation (Caltrans District 11)

- D-1 The comment notes that work within the Caltrans right-of-way would require an encroachment permit. Section B.3.2.1 of the Draft EIR (p. B-24) states that Segment E follows the MCBCP dirt road that runs parallel to I-5 from the Las Pulgas gate for approximately 0.2 miles. Segment F bypasses Skull Canyon by transitioning to the southbound lanes of I-5 for approximately 0.2 miles before transitioning back to the MCBCP dirt road. Work in these segments would require an encroachment permits, as noted in Table A-1. SCE has not yet applied for these permits; however, it is noted that plans for work within the State right-of-way should include: typical cross sections, adequate structural sections, traffic handling plans, and signing and striping plans stamped by a professional engineer. APM Traffic-1 indicates that SCE would submit and request approval from Caltrans of a detailed traffic control plan that includes required lane closures, hours of operation, appropriate signage and warning devices, and required work areas. It is also noted that for portions of the project within Caltrans right-of-way, the permit application must include metric and U.S. standard units.
- D-2 It is not anticipated that the transporter would damage I-5 road surfaces. Any damage or changes to I-5 surfaces, fencing, road separators, shoulders, or other roadway infrastructure would be repaired according to the provisions of the Encroachment Permit (see Section D.13.3.2 of the Draft EIR). The expected improvements or work within the right-of-way, and the associated environmental impacts, have been described in the Draft EIR (e.g., see Impact B-8 and Mitigation Measure B-8a for revegetation of temporarily disturbed areas for temporary paved transitions). With the implementation of the recommended measures, the impacts to resources within the right-of-way would be less than significant. The level of analysis is detailed enough that it could be relied upon by Caltrans in the issuance of the necessary permits. Table A-1 lists the permits required for the Proposed Project.
- D-3 Table A-1 of the Draft EIR indicates the permits required for the Proposed Project, including Caltrans permits such as an Encroachment Permit, Highway Crossing Permit, and Dual Lane Bonus Purple Permit. The “Wide Load Permit” noted by the comment has been added to Table A-1 in the Final EIR. SCE has proposed to implement APM Traffic-1 as part of the Proposed Project (see Draft EIR Table B-3 and Section D.13.3.1). APM Traffic-1 includes the submission and approval of a detailed traffic control plan from Caltrans, detailing required lane closures, hours of operation, appropriate signage and warning devices, and required work areas. In addition, Mitigation Measures T-1a, T-3a, and T-5a would require that the traffic control plan includes provisions to ensure uninterrupted emergency vehicle access, to schedule SONGS shift changes outside of peak hours, and to avoid peak hour traffic deliveries, respectively. As stated in Section D.13.3.2 of the Draft EIR, any damage or changes to the I-5 road surfaces, fencing, road separators, shoulders, and other roadway features would be repaired as required by Encroachment Permits.

Comment Set E California Coastal Commission

STATE OF CALIFORNIA—THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, GOVERNOR

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
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May 31, 2005

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

RE: Comments on Proposed Steam Generator Replacement at San Onofre Nuclear Generating Station (SONGS) – Draft Environmental Impact Report (DEIR) – State Clearinghouse No. 2004101008)

VIA FACSIMILE (949) 203-6410

Dear Mr. Barnsdale:

Thank you for the opportunity to comment on the above-referenced DEIR. The proposed project, which involves Southern California Edison (SCE) replacing the existing steam generators at SONGS, is located within the coastal zone and will be subject to the review and permitting requirements of the California Coastal Commission.

Our overall comment on the DEIR is that several key aspects of the proposed project are not adequately described or evaluated for purposes of CEQA review. The document does not yet provide the level of information necessary to achieve one of the main purposes of CEQA – to inform decision-makers of the likely adverse environmental effects of the proposed project and the measures that would mitigate those effects. In each of our comments below, we have recommended specific revisions that would allow the DEIR to better conform to CEQA requirements and provide the level of information needed to make informed decisions about the proposed project. Many of these comments are similar to those we provided for the similar proposed steam generator replacement project the PUC is reviewing at the Diablo Canyon Nuclear Power Plant, since the two DEIRs share many of the same shortcomings.

Jurisdiction and Standard of Review

- 1) As noted above, the project will require review and permitting by the Coastal Commission, and the DEIR correctly notes in several places that the standard of review for the coastal development permit will be the California Coastal Act. In at least one section, however (at page D.5-11), the document refers to several policies in Chapter 11 of the Coastal Act. Please note that neither these policies nor that chapter exists. That same section also refers to the local land use plan, which for this proposed project does not provide the standard of review for Coastal Act conformity. We recommend these references be deleted.

E-1

Comment Set E, cont.
California Coastal Commission

*Comments on Draft EIR for Proposed San Onofre Steam Generator Replacement
May 31, 2005
Page 2 of 6*

Overall Adequacy of Information

- 2) Many descriptions and analyses in the DEIR lack adequate information upon which to make informed decisions about the proposed project. The document admits to the many challenges presented by the proposed project and the project site, but it does not adequately describe how these challenges will be addressed. The document's most significant shortcomings arise from several key problems – it describes a project in which little information is provided about potential locations for storing the original steam generators, no certainty about the feasibility of methods proposed to transport the generators, and inadequate analyses of potential hazards along likely transport routes. For example, regarding the storage locations, the DEIR states that the preferred location is a single facility in Utah, but it provides no information about whether the site is feasible or available. It then states that alternative storage locations include several on the SONGS site, but provides no details about where they are or whether concerns about their space constraints or seismic suitability make them infeasible.

E-2

This lack of adequate information throughout the document creates another problem in that many of the mitigation measures described in the DEIR are actually elements of the proposed project that must be evaluated during CEQA review, not after. These measures represent the type of information necessary to conduct CEQA review so that decision-makers can make informed decisions about the proposed project. For example, the DEIR states that there could be landslides in portions of the transport route caused by moving the heavy generators along certain areas. The proposed mitigation measure to address this issue is to review existing geotechnical reports at least a year before the scheduled transport to determine whether they provide sufficient information to ensure the routes are stable, and to provide new geotechnical reports if more information is needed. This is the type of review expected during CEQA, not after, particularly since the proposed measure refers initially to existing and available reports. It is also appropriate and necessary to evaluate this type of study during CEQA since that evaluation could result in substantial changes to either the proposed transport route or the need for significant structural improvements along the route. Putting these measures off until after CEQA is complete would not conform to the basic purposes of CEQA and does not provide decision-makers with adequate information on which to base their decisions.

E-3

In sum, the level of information presented in the DEIR is far short of what is necessary for CEQA review. It is particularly troubling to see this lack of information for this proposed project since the consequences of ignorance are so high and the problems with the steam generators that led to the proposed project have been known for several years. The DEIR contains far too many information gaps for a proposed project involving a nuclear power plant in the midst of millions of Californians next to California's coast and its main north-south transportation route. We therefore recommend the document be revised throughout so that the analyses necessary to determine whether preferred and alternative project sites and transport routes are feasible are incorporated into CEQA review.

E-4

Comment Set E, cont.
California Coastal Commission

Comments on Draft EIR for Proposed San Onofre Steam Generator Replacement
May 31, 2005
Page 3 of 6

Environmental Baseline

- 3) The DEIR uses the remaining term of the power plant's NRC operating license as the basis for the proposed project's environmental baseline. This creates a baseline scenario in which the generators currently operating at SONGS would operate until the end of the license term in 2022. The DEIR therefore evaluates only those incremental changes that would be caused by replacing the generators before that date – e.g., moving equipment in and out of the power plant, performing relatively short-term construction projects, etc. This baseline assumption is flawed however, because it does not reflect actual conditions at SONGS and does not conform to CEQA's requirement that the environmental setting used in the DEIR be based on existing physical conditions¹. This single flaw requires substantial revisions be made throughout the rest of the document.

The remaining license term is not an existing physical condition, and using it as the foundation for the baseline in this DEIR ignores another very real physical condition – the degraded state of the existing generators – that provides the primary reason for the proposed project. The physical condition of the existing generators and associated infrastructure is far more relevant to the CEQA review than the remaining term of the operating license.

Using the steam generators' existing physical conditions as a key part of the power plant's environmental baseline is further supported by the DEIR's use of those same conditions as the basis for its "No Project Alternative". It only makes sense that if the "No Project Alternative" is based on what will happen at the power plant in 2009, the "Project Alternative" should be based on the same thing.

We therefore recommend that the DEIR be revised so that the environmental baseline is based on the actual existing physical condition of the generators rather than on the remaining term of the NRC license. This revised baseline should then be applied to the relevant evaluations in the DEIR, particularly those related to water quality and marine biology. This approach would allow conformity to the CEQA requirement and would provide a more accurate and suitable basis for comprehensively evaluating the proposed project and comparing its effects with those of other alternatives.

¹ Section 15125(a): "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives."

E-5

Comment Set E, cont.
California Coastal Commission

Comments on Draft EIR for Proposed San Onofre Steam Generator Replacement
May 31, 2005
Page 4 of 6

Reasonably Foreseeable Alternatives

- 4) Although the remaining NRC license term does not provide an appropriate foundation for the project's physical baseline, it does serve as an appropriate basis to differentiate between three reasonably foreseeable SONGS operating scenarios – first, the power plant operating under the “No Project Alternative”, which would occur if the generators are not replaced (i.e., operating only until 2009); second, the power plant operating with new generators until the end of the existing license term (i.e., operating until 2022); and finally, the power plant operating with new generators and with an extension of the NRC license (i.e., operating until approximately 2030, assuming a forty-year operating life for the new generators). This approach represents the three reasonably foreseeable scenarios that could result from this CEQA review and using it would allow the DEIR to provide the comprehensive evaluation needed for CEQA conformity.

Although the DEIR describes the likelihood of a license extension as “remote and speculative” due to various regulatory and technical hurdles, this does not appear to be accurate. While the DEIR notes that SCE has not yet requested an extension of its operating licenses and that such a request would involve a number of considerations, it also notes that approval of this proposed generator replacement project could provide SCE an incentive that would increase the likelihood of such a request. Given that these new and costly generators would have an expected operating life well beyond the approximately twelve years that would remain in the license term after they are installed, it would be clearly prudent for SCE to request a license extension and it is clearly and reasonably foreseeable to assume SCE will request such an extension. This is further supported by the number of nuclear power plants around the country that have performed similar steam generator replacements and have obtained license extensions.

We therefore recommend that the DEIR be revised to include the three reasonably foreseeable scenarios described above as part of the document's environmental evaluations and alternatives analyses. These scenarios should also be applied to the DEIR's assessments of cumulative and indirect impacts.

Adverse Effects on Marine Biological Resources and Water Quality

- 5) The DEIR notes that the existing power plant uses a once-through cooling system, which uses up to hundreds of millions of gallons of ocean water per day. The document briefly describes some of the adverse effects related to use of this water; however, it does not provide the level of detail necessary to adequately describe the adverse effects of this cooling water use and does not consider the opportunities made possible by this proposed project to avoid or reduce these adverse effects.

E-6

E-7

Comment Set E, cont.
California Coastal Commission

*Comments on Draft EIR for Proposed San Onofre Steam Generator Replacement
May 31, 2005
Page 5 of 6*

We recommend at least two main revisions to the DEIR's sections on marine biology and water quality. First, the DEIR's description and evaluation of marine biology and water quality effects should be revised based on the necessary changes noted above regarding environmental baseline and reasonable alternatives. These revisions should specifically describe and evaluate the different impacts to the marine environment that would result from the three scenarios described in the previous comment. We also recommend the DEIR be revised to consider a far wider and more detailed range of feasible alternative cooling mitigation options than the few briefly mentioned in the DEIR.

E-7

Geologic and Seismic Hazards

6) The DEIR contains little of the geologic data and analyses necessary for this level of CEQA review. The document addresses only in a very general way the seismic hazards at the proposed project site, the geologic hazards along the proposed transport routes, the implications of landslides, poorly consolidated fill, coastal hazards, and other concerns that could substantially affect both the feasibility and the success of the proposed project and its alternatives. We request that the DEIR revise these analyses to provide a more thorough and comprehensive evaluation of the potential hazards and the necessary responses to those hazards. The revisions should include the following:

- The ground motion expected at the site by a design-basis earthquake (the 1-in-2000 year event) should be adequately characterized and used as the basis for the original steam generator storage facilities.
- The stability of areas of known poorly consolidated fill along Old Highway 101, some of which are causing structural distress on the road, should be fully evaluated to determine whether this alternative route is feasible.
- The landslide hazards along the alternative routes have not yet been adequately analyzed. We also note that the "landslide areas" shown on Figure D.5-2 are incorrect. The areas highlighted may be the headscarps of some of the landslides, but the landslides themselves are much larger semi-circular features easily visible on the photograph, heading in some cases near Old Highway 101 and extending into the surf zone. Quantitative slope stability analyses should be provided to demonstrate that these landslides will not be reactivated and that new landslides will not form landward of the existing headscarps when loaded during transport of the new steam generators.
- The DEIR states that the anticipated maximum wave height from a locally-generated tsunami is about six feet and the maximum tsunami runup is about 15.5 feet. The revised DEIR should provide the basis of these statements. We note, too, that the DEIR describes these tsunami figures as being based on those generated by local offshore faults. We recommend the DEIR also evaluate the maximum heights from non-local seismic events.

E-8

E-9

E-10

E-11

Comment Set E, cont.
California Coastal Commission

*Comments on Draft EIR for Proposed San Onofre Steam Generator Replacement
May 31, 2005
Page 6 of 6*

Public Access

- 7) The proposed project would limit public access to the shoreline for substantial periods of time over the course of the proposed work; however, the DEIR does not adequately describe the various impacts to public access or evaluate feasible measures that might mitigate for those impacts. The revised DEIR should describe the numbers of likely shoreline users during periods when use of and access to the shoreline would be affected, the types of activities that would likely be affected, and feasible mitigation measures to address those impacts.

E-12

Closing

Again, thank you for the opportunity to comment. Please contact me at 415-904-5248 or at tluster@coastal.ca.gov if you have questions or would like additional information.

Sincerely,



Tom Luster
Energy and Ocean Resources Unit

cc: CEQA State Clearinghouse
Southern California Edison – David Kay
Mothers For Peace – Rochelle Becker, David Weisman

Responses to Comment Set E California Coastal Commission

- E-1 As the commenter notes, the Proposed Project will likely require a coastal development permit from the California Coastal Commission (CCC). The Draft EIR mentions the coastal development permitting requirement in Table A-1. Section D.5.2 of the Final EIR includes revisions to delete the erroneous references to the California Coastal Act and local ordinances identified by the comment.
- E-2 The Project Description information provided in the Draft EIR (Section B) provides the information required by CEQA Guidelines Section 15124 (Project Description). This section indicates that the project description is not required to “. . . *supply extensive detail beyond that needed for evaluation and review of the environmental impact.*” The level of detail provided in the Project Description is adequate to conduct an evaluation of the Proposed Project’s potentially significant direct and indirect impacts.

In regard to the proposed disposal of the original steam generators, the Project Description indicates that it is the intent of SCE to dispose of the equipment at a licensed management facility. A disposal facility (Envirocare of Utah) was identified as a potentially feasible disposal site. Draft EIR Section D.12.1 (Low-Level Radioactive Waste Baseline) recognized that the availability of storage at the offsite facility is subject to numerous factors, however, based on currently available information, the Utah facility would have the ability to accept low-level radioactive waste (the OSGs) from the SONGS facility. Other facilities identified in South Carolina and Washington may become unavailable before 2009. The Draft EIR has fulfilled its CEQA mandated full disclosure requirement by informing the public of existing issues associated with the disposal of low-level radioactive waste in Section D.12.1.

In regard to the transportation of the OSGs, those activities would be regulated by the NRC and federal Department of Transportation. The role of those agencies in regard to the Proposed Project and the management of the OSGs is described in Section D.12.2 (Applicable Regulations, Plans, and Standards) of the Draft EIR. The CPUC does not have jurisdiction over low-level radioactive waste management regulations and responsibilities, and an evaluation of those issues is beyond the scope of this CEQA document. The Draft EIR has, however, provided an evaluation of potential radiation exposure impacts that could occur as a result of offsite transport of the OSGs (Draft EIR Impact S-3). The evaluation determined that compliance with existing applicable regulations would be adequate to reduce potential safety impacts to a less than significant level, and no mitigation measures would be required.

The evaluation of potential impacts that could result from the development of an on-site OSG Storage Facility is presented as an alternative to offsite disposal, as illustrated in Section C of the Draft EIR. Based on a review of the space requirements for an adequate on-site storage facility, along with other implementation considerations, Section C.4.3.1 of the Draft EIR determined that an on-site storage facility would be a potentially feasible alternative. As such, the evaluation of the on-site storage alternative was prepared to comply with the requirements of CEQA Guidelines Section 15126(d), which requires the level of alternative analysis to be sufficient to “. . . *allow meaningful evaluation, analysis and comparison with the proposed project.*” This section also indicates that the “. . . *significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as*

proposed.” The evaluation of potential impacts resulting from an alternative that would result in the on-site storage of the OSGs, including potential seismic impacts, was provided in the Draft EIR consistent with CEQA requirements.

E-3 The comment asserts that recommended mitigation measures are actually elements of the Proposed Project. Certain measures are Applicant Proposed Measures (APMs) described in Draft EIR Section B.5, and where necessary to reduce impacts to a less than significant level, the EIR recommends adoption of additional measures as mitigation. CEQA indicates that mitigation measures to minimize potentially significant environmental effects of a proposed project may be provided by the project applicant. CEQA Guidelines Section 15126.4(a)(1)(A) (Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects) indicates that an EIR is to identify the mitigation measures that are proposed by the project proponent. The Draft EIR complies with this requirement and identifies the measures proposed by SCE as APMs in Table B-3 (Applicant-Proposed Measures). These measures would be imposed as conditions of CPUC project approval, and their implementation would be monitored by the CPUC.

CEQA Guidelines Section 15126.4(a)(1)(B) indicates that mitigation measures “. . . *may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.*” Proposed Mitigation Measure G-1a, which addresses potentially significant landslide-related impacts along the preferred RSG access route (approximately 0.6 miles through San Onofre State Beach), provides actions that must occur to reduce potential landslide impacts caused by transportation activities to a less than significant level. The proposed mitigation measure identifies what actions must be taken (review and preparation of geotechnical reports), when the actions must be completed, and actions to be taken in the event that a potentially significant landslide impact is identified as a result of the implementation of the mitigation measure (develop and complete plans for necessary road improvements within the footprint of the proposed route).

The transport phase of the Proposed Project is not scheduled to start until late 2008 or 2009. Due to the projected long lead-time before start of the project, the condition of the slopes and landslides along the San Onofre Bluffs could be significantly different when the RSGs are transported. In the intervening three to four years additional slope erosion and landslides could occur, and Mitigation Measure G-1a includes timing to establish repairs in advance of the transport. As recommended by Mitigation Measure G-1a, slope stability analyses and identification of measures to avoid potential impacts to the slopes/bluffs should be conducted closer to the actual start of the project to ensure that the analyses are based on geologic conditions at that time. Such pre-construction studies have been adjudged adequate to reduce potentially significant geology impacts to a less than significant level. (*Ocean View Estates Homeowners Assn. v. Montecito Water District*, 116 Cal.App.4th 396 (2004)).

Mitigation Measure G-1a has been revised in the Final EIR to clarify that geotechnical reports may exist for this area, but their availability is unknown. The beginning of Mitigation Measure G-1a has been clarified to require a determination of whether the existing reports provide sufficient information to establish that the geologic formations under and adjacent to the portions of the transport route near the San Onofre Bluffs are sufficiently stable.

E-4 Please refer to Responses E-2 and E-3 regarding specific examples provided by commenter regarding the adequacy of impact evaluations provided by the Draft EIR. The evaluation of potential project-related impacts and potentially feasible alternatives is considered adequate to promote informed decision-making and to comply with CEQA requirements regarding adequacy, completeness and a good-faith effort at full disclosure. A full EIR was prepared to analyze the project's potentially significant environmental impacts based on a detailed project description. Mitigation measures are proposed to reduce all potential impacts to a less than significant level, and alternatives to the project were developed and considered.

E-5 The comment recommends that substantial revisions be made to the EIR because of the definition of baseline. Please refer to Master Response MR-1 (Baseline). The Draft EIR includes assessment of the No Project Alternative, which when compared to the baseline conditions, would cause a shutdown of plant operations and corresponding locally beneficial effects on water quality and marine biology, as described in Section D.3.5.2. Please also refer to Responses CC2-1 and CC2-2 below for more information on the adequacy of the No Project Alternative.

E-6 Please refer to Master Responses MR-1 (Baseline) and MR-2 (License Renewal). The comment recommends that the Draft EIR be revised to include a scenario of foreseeable SONGS operation with an extension of the NRC licenses. Relicensing of SONGS is only in the preliminary feasibility and planning stages and would not in any case increase the scope or nature of the impacts of the Proposed Project. As such, relicensing is not a reasonably foreseeable consequence of the project and need not be analyzed in the Draft EIR. Even if relicensing were a reasonably foreseeable project, Section G of the EIR contains a general analysis of the likely impacts associated with relicensing, which satisfies CEQA requirements.

As stated in Section D.1.2.2 of the Draft EIR, SCE is still evaluating the feasibility of applying for a license renewal. Attempting to complete an environmental review of a potential licensing project for which no application has been filed and that would not be implemented for at least 17 years would be based on conjecture and not on firm evidence or knowledge, requiring an extensive amount of "forecasting," which is not required by CEQA. CEQA Guidelines Section 15144 states that "*An agency cannot be expected to predict the future course of governmental regulation or exactly what information scientific advances may ultimately reveal*" (*Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376*). See also Response E-5 with regard to the No Project Alternative.

E-7 The comment recommends revising the Draft EIR to describe the impacts to marine biology and water quality caused by SONGS operation until the end of the NRC licenses and also with an extension of the NRC licenses. The existing effects of the cooling system are described in the Draft EIR (Section D.3.1.5), and as part of the environmental baseline, these existing effects would continue until the expiration of the NRC licenses (Draft EIR Section D.1.2.1). Please also refer to Master Response MR-1 (Baseline). The Final EIR includes revisions to Section G to provide further information on these effects, if SCE chooses to apply for a license renewal. Please also refer to Master Response MR-2 (License Renewal) and Response E-6 above for more information on the treatment of license renewal.

- The Draft EIR includes sufficient information for decision-makers to consider the consequences of the Proposed Project, including the opportunities to create beneficial impacts with the No Project Alternative (as described in Draft EIR Section D.3.5.2). To fully inform the decision-makers of environmental baseline conditions, environmental issues associated with SONGS operations at the time of the NOP were disclosed in the Environmental Setting section of the EIR. Section D.3.1.5 of the Draft EIR clearly states that “. . . *existing thermal plume, impingement and entrainment issues would not change under this Proposed Project, and therefore, would be considered part of the baseline conditions of the project.*” Given the need for full disclosure under CEQA, the EIR correctly identified baseline conditions associated with the cooling water system, but the EIR does not identify these issues as project impacts. The Proposed Project would cause no change in the existing baseline conditions of marine biology and water quality. The degraded marine resource conditions offshore of SONGS are characteristic of the marine environment at the time the NOP was published, which under CEQA, defined the baseline against which all potential impacts are to be evaluated.
- E-8 The exposure of existing SONGS facilities to known seismic hazards is one facet of the environmental setting (as described in Draft EIR Section D.5.1.4), and as noted in Section D.1.2.5, the seismic safety of SONGS in its current design is within the jurisdiction of the NRC.
- The comment suggests a design basis earthquake for the OSG Storage Facility that could occur under the OSG Onsite Storage Alternative. The CPUC has limited jurisdiction over the design of the facility, as described in Master Response MR-3 (Jurisdiction). Mitigation Measures G-5a and G-6a require geotechnical and seismic investigations and analyses to be conducted for the onsite OSG Storage Facility under the alternative. These investigations and analyses would provide detailed seismic design criteria, including the design-basis earthquake and expected peak ground accelerations (PGA). Detailed analysis could not be conducted unless and until the storage site is chosen. However, an estimated PGA was calculated using the California Geological Survey’s (CGS) Probabilistic Seismic Hazards Mapping (PSHM) Ground Motion web site, and this information has been added to the text of the Final EIR. The estimated PGA value from the website is approximately 30%g at the SONGS site. These PGA values are based on a probabilistic analysis considering a 10% probability of exceedance in 50 years and were calculated based on ‘soft rock’ or Sc soil type for the SONGS site. The CGS ground motion values were interpolated from a 0.05-degree spaced grid of calculated values for California. The engineering phase of the project would lead to more specific design measures that must satisfy the requirements of both the mitigation and NRC regulations.
- E-9 Evaluation of areas of potentially unstable poorly consolidated fill beneath Old Highway 101 has been added to Mitigation Measure G-1a in the Final EIR.
- E-10 The Final EIR includes revisions to Figure D.5-2 to improve the accuracy of this figure. Please also see Response E-3 regarding detailed slope stability analysis of the landslides along the bluff.
- E-11 The Final EIR has been modified to include a more detailed description of the tsunami wave analysis included in the 1998 San Onofre 2 & 3 FSAR Update (SCE, 1998 in Section D.5), including calculation assumptions and a brief discussion of distant seismic sources.

E-12 As analyzed in Draft EIR Section D.8.3.2, Replacement Steam Generator Transport, Impact L-2, disruption of recreational activities would be temporary. The types of recreational uses that may be temporarily precluded are described in Draft EIR Section D.8.1, Recreational Resources, and have been added to the discussion in the Final EIR Section D.8.3.2, Impact L-2. Beach access would not be restricted within San Onofre State Beach, and as discussed in Section B.3.2.1, Beach and Road Route, Segments H through J, flagmen would be used to direct park traffic around the transporter. While the impact to recreational facilities would be of short duration, this impact is considered significant overall. As such, Mitigation Measures L-2a (Avoid peak recreational usage), N-1a (Provide advance notice of transport), V-1a (Request decision on closure of San Onofre State Beach) and V-1b (Provide advance notice of campground closure to prospective park visitors and campers) would be implemented to reduce this impact to a less than significant level.

Comment Set F
City of San Clemente Planning Division



City of San Clemente
Planning Division

James E. Pechous, Senior Planner
Phone: (949) 361-6195 Fax: (949) 366-4750
PechousJ@San-Clemente.org

May 24, 2005

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

Re: Comments on DEIR for the Proposed SONGS Steam Generating Station Replacement

Dear Mr. Barnsdale:

The City of San Clemente appreciates the opportunity to comment on the Draft EIR. Our comments provided on the Project NOP requested that the DEIR adequately address potential public health hazards. As I am sure you can understand, this is particularly a concern to the City of San Clemente's 65,000 residents who live four miles north of SONGS.

Our overall comment on the EIR is that several key aspects of the proposed project are not adequately described or evaluated for purposes of CEQA review.

- The DEIR fails to provide the level of information necessary to inform the CPUC and other decision makers of the likely environmental consequences of their decision and fully identify measures that will mitigate adverse potential significant impacts.
- The DEIR states that one of the key considerations used to establish the document's environmental baseline is the remaining term of the power plant's NRC license for Unit 2 and 3 which are licensed until the year 2022. The EIR, therefore, evaluates only those incremental changes that would be caused by replacing the four steam generators, e.g. moving equipment in and out of the power plant, performing the related construction, etc. and fails to analyze any impacts related to the extended operation of the plant.
- The remaining term of the license is not an appropriate foundation for this proposed project's environmental baseline, especially since the baseline selected in this EIR leaves out a much more significant physical baseline condition- the degraded state of the existing generators. The cracked condition of the existing generators and associated infrastructure is a far more relevant baseline physical condition that the

F-1

F-2

F-3

Planning Division 910 Calle Negocio, Suite 100-San Clemente CA 92673

Comment Set F, cont.
City of San Clemente Planning Division

City of San Clemente

Page 2

remaining term of the SONGS license and in fact the degraded condition of the steam generators is the primary reason the project is being proposed.¹

F-3

- Section 3.1.1 **Environmental Baseline** of the DEIR, suggests that the Federal environmental review was completed during the licensing of SONGS Units 2 and 3 which included analysis on the operation of the power plant through 2022 and is thus considered a part of the project baseline. This reasoning is faulty because the analysis was based on conditions that were conducted over twenty four years ago, not the conditions at the time of the Notice of Preparation. It is probably that these conditions and the state of the art in the analysis of these conditions have significantly changed to the point that they no longer accurately reflect or predict the actual environmental impacts of the project through the year 2022.
- The DEIR (pg B-33) confirms that the conditions have changed, in that it states, that the NRC recognizes that the steam generator replacement is a modification that can affect the plant safety analysis, the containment structure and plant operational characteristics. Also, since 9/11, conditions have changed regarding the threat of terrorist attacks which has prompted the NRC to impose greater safety standards for Nuclear Power Plants throughout the country. The original project had not considered that the long term storage of radioactive material be stored on site which is now taking place. To date, the NRC has not approved a location to accommodate high grade radioactive material. These are changes of conditions that could not have been envisioned in any of the previous environmental analysis and should be recognized as part of the project baseline.
- Under Section D.1.2.2 **Beyond the NRC License**, the DEIR concludes that it is not necessary to evaluate the impacts that could occur if the SONGS facility is operated beyond the license expiration date of 2022 because the applicant, SCE, has not formally proposed to renew the license, nor is license renewal a reasonable foreseeable outcome of the Proposed Project. This conclusion seems counter intuitive given that the new steam generators, if they had a similar life expectancy of the OSG of 26 years, would extend the life of the plant to 2035. The EIR should identify the potential extended life expectancy of SONGS based on the installation of the new generators. It also seems likely that the live of the plant will extend beyond 2022 given that 800 million dollar public investment in this project.
- Section D.6 **Hazardous Materials** considers the environmental and safety hazards associated with non-radioactive hazardous material used, stored, and generated during the transport and installation of the replacement steam generators at SONGS, as well as the dismantling, staging, and offsite transport and disposal of the original steam

F-4

F-5

F-6

F-7

¹ §15126.2. **Consideration and Discussion of Significant Environmental Impacts.** (a) The Significant Environmental Effects of the Proposed Project. An EIR shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services. The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected.

Comment Set F, cont.
City of San Clemente Planning Division

City of San Clemente

Page 3

generators. The DEIR fails to consider the potential impacts related to long term storage of radioactive material on site or any potential risk related to the sites storage areas as a possible terrorist target.

F-7

- In the City's comments on the NOD the City requested that the EIR examine the structural integrity of the containment vessel relating to its opening and resealing to maintain acceptable integrity standards for both containment of the reactor and potential terrorist attacks. The EIR states that SCE expects the containment to maintain acceptable integrity with the construction opening in place based primarily on industry experience. The DEIR lacks sufficient analysis to draw this conclusion.

F-8

For all the reasons stated above, we recommend that the EIR use the actual existing physical condition of the generators as the foundation of the environmental baseline rather than use the remaining term of the NRC license. In addition the analysis should also be based on the likely life of the plant, not the term of the current NRC license. The revised baseline should be applied to the relevant sections in the EIR, particularly those related to public health and safety. This would conform to the CEQA requirement and would provide a more accurate and suitable basis for comprehensively evaluating the proposed project and comparing its effect with the alternatives.

F-9

Sincerely,



James E. Pechous
Senior Planner

cc: George Scarborough, City Manager
James S. Holloway, Community Development Director
David N. Lund, Public Works & Economic Development Director
George Buell, City Planner
Jim Russell, Emergency Planning Officer

Responses to Comment Set F City of San Clemente Planning Division

- F-1 This comment asserts that the Draft EIR did not provide the level of information needed to inform the CPUC and other decision-makers of the environmental consequences of the Proposed Project. No specific examples of perceived deficiencies in the Draft EIR were identified by the comment.
- Due to the lack of specificity provided by the comment, a detailed response cannot be provided. The evaluation of potential project-related impacts and potentially feasible alternatives is considered adequate to promote informed decision-making and to comply with CEQA requirements regarding adequacy, completeness and a good-faith effort at full disclosure. Please also refer to Responses E-2 and E-3 regarding specific examples of the adequacy of impact evaluations provided by the Draft EIR.
- F-2 Please refer to Master Response MR-1 (Baseline). The comment asserts that the Draft EIR fails to analyze impacts related to extended operation of SONGS. Section D of the Draft EIR (including Section D.1.2.1) identifies baseline conditions associated with operating SONGS through the end of the NRC licenses. The effects of the ongoing operation of SONGS are characteristic of the environment at the time the NOP was published, which under CEQA, defined the baseline against which all potential impacts are to be evaluated. The Proposed Project would not change the effects of ongoing plant operations.
- F-3 Please refer to Master Responses MR-1 (Baseline) and MR-2 (License Renewal). The Draft EIR acknowledges that plant operations would cease if the steam generators are not replaced, and the document appropriately describes the effects of early SONGS shutdown, including beneficial effects, in the analysis of the No Project Alternative.
- F-4 The comment asserts that the earlier environmental reviews, conducted prior to the NRC licenses being issued, were based on conditions existing decades ago and that the earlier reviews do not reflect the current state of the art in environmental analysis. Section D.1.2.1 of the Draft EIR notes that the U.S. Atomic Energy Commission and the NRC conducted environmental review of the potential operational impacts of SONGS Units 2 and 3. The Proposed Project activities (RSG transport, staging and preparation, etc.) would not alter the ongoing operation of SONGS, which was the subject of the earlier reviews. Please also see Master Response MR-1 (Baseline).
- F-5 The comment notes that over the years since the time of original NRC environmental review and license issuance, environmental and safety concerns have changed, and at the time of original licensing, the effects of radioactive waste storage had not been considered. The threat of terrorist attack and the need for security is an aspect of the environmental setting that would not be altered by the Proposed Project. Draft EIR Section D.12.1 includes a description of the baseline risks of sabotage, and Section D.12.5 describes how the No Project Alternative would result in a beneficial impact by alleviating some of the security concern. Section D.1.2.1 of the Draft EIR notes that SCE received CEQA clearance for storage of radioactive waste at SONGS most recently in 2002, and storage of waste, which presently occurs on the site, would similarly not be altered by the Proposed Project. Please also see Master Response MR-1 (Baseline).

F-6 Please refer to Master Responses MR-1 (Baseline) and MR-2 (License Renewal). The comment asserts that the life of SONGS would be likely to extend beyond the existing NRC licenses as a result of the proposed steam generator replacement project. Section D.1.2.2 of the Draft EIR acknowledges that the Proposed Project could provide an incentive for SCE to apply to extend the licenses, but SCE has stated that it currently has no plans to apply to the NRC for renewal of the operating licenses (please see also Draft EIR Section G with revisions included in the Final EIR). As explained more fully in Master Response MR-2 (License Renewal), relicensing is not a reasonably foreseeable consequence of the Proposed Project and thus, pursuant to CEQA, need not be analyzed in the project EIR.

As discussed in Master Response MR-2 (License Renewal), the Draft EIR is not required to analyze license renewal. However, the Draft EIR does generally identify and discuss the type of impacts that may occur should SCE seek a license renewal. In addition, Section G has been revised to include additional detailed information on the NRC license renewal process and the potential impacts that may result from the continuation of power plant operations after 2022. The impacts of power plant operations beyond the current license expiration dates will be evaluated if and when SCE submits a license renewal application to the NRC.

F-7 Please see Response F-5 above. Storage of radioactive waste at SONGS, which presently occurs as part of the environmental setting, would not be affected by the Proposed Project. The baseline risks of spent fuel storage and low-level radioactive waste handling are described in Section D.12.1 of the Draft EIR. Long term storage of low-level radioactive waste would only be caused by the OSG Onsite Storage Alternative, if adopted. Although this is not the Environmentally Superior Alternative (Section E.2.3), the safety impacts of onsite storage of this LLRW could be mitigated, as described for Impacts S-4, S-5, and S-6, related to the risk of accident, terrorism, or seismic hazards, respectively. The OSG Onsite Storage Alternative would involve additional hazards that are identified in Section D.12.4.2 because of the possibility of additional storage of radioactive material onsite. Please also see Master Response MR-1 (Baseline).

F-8 The relative impact on overall containment structure integrity is a function of the procedures to remove and replace each component. As noted in the Project Description (Section B.3.4.2 and in Section D.12.3.4), there are several steps and precautions required to create an opening in the containment structure.

The containment opening would not occur without first removing all fuel from the reactor to create a de-fueled condition. As noted in the Draft EIR, the SONGS 2 & 3 containment buildings are composed of reinforced concrete walls over four feet thick with an interior steel liner and tensioned with horizontal and vertical tendons. To perform steam generator replacement, an opening approximately 28 feet by 28 feet would be created in each containment building above the existing equipment hatch.

The process of creating the opening would begin with the de-tensioning and removal of the structural tendons. There would be no loss of structural integrity when these tendons are replaced since they will be reinstalled in the same manner as they were originally when the structures were constructed.

Removal of the 28-foot-by-28-foot concrete section would require cutting the concrete and rebar. This is the area where the containment would have the most potential to lose struc-

tural integrity. Replacement of this section of concrete and rebar would require that the rebar associated with the replacement section be tied in to the existing rebar in the containment structure. This is a common procedure that involves removal of enough of the concrete from the edges of the opening to securely attach the new rebar to the existing containment structure rebar array. Typically, this results in a considerable amount of rebar overlap and a section of concrete and rebar that is as strong or stronger than the original design.

Removal of a section of the steel liner would also be required. Little or no loss of structural integrity would occur as a result of removing a section of the steel liner since the reinstallation of the liner would result in sections of the liner that are stronger than the original liner.

The NRC recognizes that cutting the temporary opening and closing it would involve modifying the most important safety-related structure in the nuclear power plant. Comprehensive NRC inspection and oversight would occur as described by NRC Inspection Procedure 50001. With this oversight, the potential safety impacts described in Section D.12.3.4 would be less than significant. Please also note the limits of CPUC jurisdiction regarding NRC safety-related oversight described in Master Response MR-3 (Jurisdiction).

- F-9 The comment summarizes the above issues and recommends that the EIR be revised with a baseline that does not include ongoing SONGS operation until the end of its NRC licenses. Please refer to Responses F-2 and F-3 above, including Master Response MR-1 (Baseline).

Comment Set G
State of California, Department of Fish and Game

State of California – The Resources Agency

ARNOLD SCHWARZENEGGER, *Governor*



DEPARTMENT OF FISH AND GAME

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May 31, 2005

Mr. Andrew Barnsdale, SONGS/CPUC
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San Francisco, California 94104

**Draft Environmental Impact Report (DEIR) for the San Onofre Nuclear Generating
Station (SONGS) Steam Generator Replacement Project
(SCH #2004101008)**

Dear Mr. Barnsdale,

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act, Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Fish and Game Code. The Department also administers the Natural Community Conservation Planning program (NCCP). We offer the following comments to assist the California Public Utilities Commission (CPUC) and the Project Applicant in avoiding and minimizing project impacts to biological resources.

The Project Applicant, the Southern California Edison Company (SCE), proposes to replace the original steam generators at SONGS Units 2 and 3. The Proposed Project consists of four phases: Replacement Steam Generator (RSG) Staging and Preparation; RSG Transport; Original Steam Generator (OSG) Removal, Staging, and Disposal (to be accomplished by rail); and RSG Installation and Return to Service. The only one of these phases likely to have significant direct and/or indirect effects on biological resources is the RSG Transport Phase. RSGs will initially be conveyed to the Port of Long Beach via heavy-load ship, offloading from a barge for travel to the Camp Pendleton Del Mar Boat Basin. The RSGs will then be transported from the Camp Pendleton Del Mar Boat Basin to the SONGS facility along the beach and portions of existing roads. The Proposed Project transport route would be located adjacent to known occurrences of sensitive animal and plant species as well as sensitive vegetation communities. The SONGS facility itself consists of 84 acres of almost entirely paved and developed areas; therefore, no sensitive species are known to occur on site.

The DEIR divided the Proposed Project transport route into segments for the purpose of analyzing potential environmental impacts. Sensitive species or vegetation communities occur within or adjacent to several of these segments. Within Segment B of the transport route, the RSGs will be transported across the unvegetated mouth of the Santa Margarita River, adjacent to

G-1

Comment Set G, cont.
State of California, Department of Fish and Game

Mr. Andrew Barnsdale
CEQA 2005 0342 R5
Page 2

estuarine and beach habitats that are protected as nesting areas for the California least tern (*Sterna antillarum brownii*) and western snowy plover (*Charadrius alexandrinus nivosus*), two State and Federal listed species. Within Segment C, the route passes the unvegetated mouths of Cocklebur Canyon Creek, Aliso Canyon Creek, and Las Flores Creek. Several pairs of least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii eximius*), and coastal California gnatcatcher (*Poliophtila californica californica*) are known to occur in the vicinity of these creek mouths. Within Segments E and G, unvegetated ponding features containing fairy shrimp of the genus *Branchinecta* are located along the road. Transport through segments H through J continues on paved roads, but coastal sage scrub habitat is located adjacent to segments of the road. In addition, vegetated vernal pools that may support sensitive plant species are located approximately 100 feet from the "Y" turn onto Old Highway 101.

G-1

The DEIR states that RSG transport will occur between October and February (Table D.3-3 and Impact B-5, page D.3-58), outside of the nesting seasons for the sensitive bird species known to occur in the vicinity. The Department strongly concurs with this time frame, as well as the other proposed precautionary measures for avoiding impacts to birds, such as pre-transport focused surveys, avoidance of known nesting areas, and direction of night-lighting away from sensitive habitats. The Department also concurs with the proposed flagging and avoidance of vernal pools and ponding features. Areas within the transport route that are directly adjacent to pools should be protected with the specialized matting proposed in Section B.3.3.3

Pre-transport surveys for sensitive plant species are proposed within the transport route. If avoidance of individuals of any sensitive species occurring within the transport route cannot be achieved through reasonable efforts, the DEIR proposes transplantation to suitable habitat in the vicinity. Coastal sage scrub, riparian forest, and estuary plant communities will be avoided. However, there will be temporary impacts to annual grassland and ruderal habitats resulting from the placement of temporary paving. These impacts are proposed to be mitigated through revegetation with native species. The Department requests that revegetation and translocation plans be submitted to us for review and comment.

G-2

Thank you for this opportunity to comment on this project. Questions regarding this letter and further coordination on these issues should be directed to Meredith Osborne at (858) 636-3163.

Sincerely,



David A. Mayer
Habitat Conservation Planning Supervisor
California Department of Fish and Game

cc: State Clearinghouse, Sacramento
Jill Terp, U.S. Fish and Wildlife Service

Responses to Comment Set G

State of California, Department of Fish and Game

- G-1 The comment notes that the Department of Fish and Game concurs with the proposed RSG transport schedule, between October and February, and with the other proposed precautionary measures, such as pre-transport focused surveys, avoidance of known nesting areas, and flagging and avoidance of vernal pools and ponding features. The support and concurrence with the timing of the Proposed Project, as well as the Biological Avoidance and Minimization Measures, is noted. By adhering to the proposed schedule, SCE would be able to implement the Proposed Project and associated measures to ensure the highest possible degree of avoidance of sensitive flora and fauna. The matting identified in the Project Description (Section B.3.3.3) would be used near pools as necessary and as described under Impact B-3.
- G-2 Mitigation Measure B-1a of the Draft EIR would require sensitive plant surveys for all vegetated areas that may occur within the final transport route. Mitigation Measure B-1a also would require the transplantation of sensitive plants and the preparation of a Mitigation Plan for sensitive plants that could not be avoided by the Proposed Project. This Final EIR includes revisions to the wording of Mitigation Measure B-1a to additionally require the preparation of a Revegetation and Translocation Plan. As requested, Mitigation Measure B-1a now indicates that the plan shall be submitted for review and approval by governing regulatory agencies, including the California Department of Fish and Game, prior to project implementation.

Comment Set H
Native American Heritage Commission

STATE OF CALIFORNIA

Arnold Schwarzenegger Governor

NATIVE AMERICAN HERITAGE COMMISSION

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May 31, 2005

Mr. Andrew Barnsdale
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Re: San Onofre Nuclear Generating Stem Generation Replacement Project
SCH# 2004101008

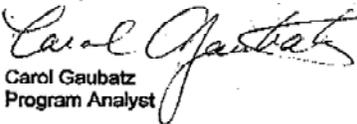
Dear Mr. Barnsdale:

Thank you for the opportunity to comment on the above-mentioned document. The Commission was able to perform a record search of its Sacred Lands File for the project area, which failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the Sacred Lands File does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Early consultation with tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed is a list of Native Americans individuals/organizations that may have knowledge of cultural resources in the project area. The Commission makes no recommendation of a single individual or group over another. Please contact all those listed; if they cannot supply you with specific information, they may be able to recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If you have not received a response within two weeks' time, we recommend that you follow-up with a telephone call to make sure that the information was received.

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should consider avoidance, as defined in Section 15370 of the CEQA Guidelines, when significant cultural resources could be affected by a project. Provisions should also be included for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA), Public Resources Code §15064.5 (f), Health and Safety Code §7060.5; and Public Resources Code §5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-6251.

Sincerely,


Carol Gaubatz
Program Analyst

Cc: State Clearinghouse

H-1

Comment Set H, cont.
Native American Heritage Commission

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San Diego County
May 31, 2005

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Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed San Onofre Nuclear Generating Station Steam Generator Replacement Project, SCH# 2004101008, San Diego County.

Comment Set H, cont.
Native American Heritage Commission

Native American Contacts
San Diego County
May 31, 2005

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Comment Set H, cont.
Native American Heritage Commission

Native American Contacts
San Diego County
May 31, 2005

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This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed San Onofre Nuclear Generating Station Steam Generator Replacement Project, SCH# 2004101008, San Diego County.

Responses to Comment Set H Native American Heritage Commission

H-1 It is noted that the commenter (Native American Heritage Commission) performed a record search of its Sacred Lands File for the presence of Native American cultural resources in the project area, but failed to find any resources in the immediate project area. However, it is also noted that the commenter states that the absence of specific site information does not preclude the existence of cultural resources in the area, and provided a list of individuals and organizations that may have knowledge of cultural resources in the project area. Consultation with these individuals and organizations has been initiated by their notification of the availability of the Final EIR.

Section D.4.1.4 of the Draft EIR states that 118 archaeological sites have been previously recorded within a half-mile radius of the project area; however, none of these sites appear to be situated within the project's Area of Potential Effect (APE). No impacts are anticipated for any project activities, except for the MCBCP Inland Transport Route Alternative (see Section D.4.4.1 of the Draft EIR) where Impact C-1 (RSG transport on the MCBCP Inland Route may damage or destroy previously detected cultural resources) could potentially occur. The commenter notes that CPUC should consider avoidance when significant cultural resources could be affected by a project, and the Draft EIR illustrates that Impact C-1 would be less than significant with the implementation of Mitigation Measure C-1a (Avoid cultural sites along the MCBCP Inland Route). The commenter further notes that provisions should be included for accidental discovery of archaeological resources during construction. The project would comply with CEQA Guidelines Section 15064.5 and Public Resources Code Section 5097.98, which detail the procedures to follow if archaeological resources are accidentally discovered during the project activities. Limited ground disturbance would occur with the Proposed Project, except under the OSG Onsite Storage Alternative. Under that alternative, Section D.4.4.2 of the Draft EIR illustrates that the discovery of new resources is not likely because SONGS is essentially a fully disturbed or developed site.

Comment Set I
State of California, Department of Parks and Recreation, Orange Coast District



State of California • The Resources Agency

Arnold Schwarzenegger, Governor

DEPARTMENT OF PARKS AND RECREATION
Orange Coast District
3030 Avenida Del Presidente
San Clemente CA 92672
(949) 492-0802

Ruth G. Coleman, Director

May 31, 2005

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

Subject: Draft Environmental Impact Report for the Proposed San Onofre Nuclear
Generating Station (SONGS) Steam Generator Replacement Project
SCH #2004101008

Dear Mr. Barnsdale:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the proposed SONGS Steam Generator Replacement Project. California State Parks operates San Onofre State Beach for the Base Camp Pendleton so that the exceptional natural and recreational resources are protected and available for the citizens of California. San Onofre State Beach serves more than one and a half million visitors annually. A large percentage of these visitors use the beach and ocean for recreation.

Southern California Edison has applied to replace the steam generators at San Onofre Nuclear Generation Station Units 2 and 3. This replacement procedure would necessitate transport of replacement and original generators across the Bluffs section of San Onofre State Beach. This three mile section of San Onofre State Beach has approximately 221 campsites and hundreds of day use parking spaces along the old Highway 101 alignment. The park is open to the public every day of the year, and is a popular running and cycling area.

We are most concerned with the public safety of our campers and day use visitors, and their access to desired portions of the park. During steam generator transports across this section of the park, protective measures will have to be placed in order to assure the safety of all public users. State Parks needs assurances that public facilities and utilities that are located along the park will not be impacted, and if so, will be repaired or replaced. SONGS will need to enter into a Right of Entry Agreement with State Parks in order to conduct activities across the park.

I-1

I-2

Comment Set I, cont.
State of California, Department of Parks and Recreation, Orange Coast District

Mr. Barnsdale
May 31, 2005
Page 2

We appreciate this opportunity to comment on this proposed project. If you have a need to clarify any of our concerns, please feel free to call me at (949) 492-0802.

Sincerely,



Richard Rozzelle
State Park Superintendent III

Responses to Comment Set I

State of California, Department of Parks and Recreation, Orange Coast District

I-1 The comment notes concerns about the public safety of visitors to the San Onofre State Beach. Activities proposed by SCE as part of the Project Description (Draft EIR Section B) include scheduling transport to occur during the winter season and other precautions to avoid damage to the park. As discussed in Draft EIR Section B.3.2.1, Beach and Road Route, Segments H through J, culverts under Old Highway 101 would be protected with placement of steel plates, mats, or ramps during transport of the RSGs. Section B.3.2.1 also describes how park visitors would be directed around the transporter with the use of flagmen, which would ensure the safety of these public users. Additionally, Mitigation Measure V-1a would require SCE to request a decision from the Department of Parks and Recreation on whether closure of the park would be necessary to meet the commenter's needs.

Potential impacts to landscape and the roadway within San Onofre State Beach are discussed in Draft EIR Section D.14.3.2, Replacement Steam Generator Transport. To facilitate RSG transport along Old Highway 101, planting beds and landscaping within the San Onofre State Beach may be removed, thereby creating a potentially significant impact. To reduce this impact to a less than significant level, Mitigation Measure V-2a (Minimize disturbance to roadway and landscape within San Onofre State Beach) would require SCE and transport contractors to restore original planting beds, landscape, curbs, and roadways wherever disturbed as soon after the project transport phase as feasible. If San Onofre State Beach administrators determine temporary landscaping is required during the summer between delivery seasons, landscaped areas or temporary planters would be seeded with native wildflowers and irrigated by SCE to minimize the short-term visual impacts of landscaping removal.

I-2 As shown by Draft EIR Table A-1, Section A.6, a permit from the California Department of Parks and Recreation would be required for the use of Old Highway 101 during RSG transport. The text has been changed to refer to the permit as a Right of Entry Agreement. Text has also been added to Table D.8-1, Consistency with Applicable Land Use Plans and Policies, Section D.8.3.2, to reflect the need for a Right of Entry Agreement.