

State of California - The Resources Agency

ARNOLD SCHWARZENEGGER, Governor

**DEPARTMENT OF FISH AND GAME**

<http://www.dfg.ca.gov>  
4949 Viewridge Avenue  
San Diego, CA 92123  
(858) 467-4201



May 31, 2005

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

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 browni*) 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 extimus*), and coastal California gnatcatcher (*Polioptila 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.

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.

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