

Comment Set SCE, cont.
Southern California Edison

Detailed SCE Comments on CPUC Draft Environmental Impact Report
SONGS Steam Generator Replacement Project

Dated: May 31, 2005

Change to Sentence under Original Steam Generator Disposal, Page D.2-10

The rail loading location is within the OCA, not adjacent to it. The first sentence in the last paragraph on page D.2-10 should be changed from "...SONGS 2 & 3 and the rail loading location adjacent to the OCA, ..." to "...SONGS 2 & 3 and the rail loading location within the OCA, ..."

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Impact discussion beginning on Page D.2-9

As described in the Draft EIR, the Proposed Project will not result in significant impacts on air quality and with the mitigation measures as modified below, will not exceed significance criteria listed in the Draft EIR. Specifically, the proposed project:

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- Will not conflict with or obstruct implementation of the applicable air quality plan.
- Will not violate air quality standards or contribute substantially to existing or projected violations.
- Will not result in a cumulatively considerable net increase of a non-attainment pollutant.
- Will not expose sensitive receptors to substantial pollutant concentrations.
- Will not create objectionable odors affecting substantial numbers of people.

Project emissions during staging and preparation activities are included in the San Diego Air Pollution Control District's (APCD's) regionwide inventory, and are thus consistent with San Diego County's attainment plan. Mitigation measures will suppress dust generation and decrease exhaust emissions during the Proposed Project to levels that are not significant. Therefore, the Proposed Project, including all three transport options should be approved by the CPUC.

3.5.2 CHANGES TO MITIGATION MEASURES

Air Quality Mitigation Measures, Table D.2-17, Page D.2-16

Mitigation Measure A-1a

Mitigation Measure A-1a refers to portions of the transportation route that are on MCBCP. References to impacts and mitigation measures on MCBCP will be addressed and authorized by MCBCP, and such references should be removed from the EIR as required measures. The CPUC may indicate them as recommendations to MCBCP for consideration during its NEPA analysis. While SCE agrees with the mitigation measures in general, it will only be able to implement mitigation measures on MCBCP that are required by MCBCP.

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3.6 DRAFT EIR SECTION D.3 – BIOLOGICAL RESOURCES

3.6.1 ISSUES

Segment E discussion of San Diego Fairy Shrimp on MCBCP, Page D.3-7

The Draft EIR states that “Because of the known populations of fairy shrimp on MCBCP, this species is assumed to be the federally endangered San Diego fairy shrimp...”. The species of fairy shrimp present in the referenced pools are unknown. San Diego fairy shrimp may or may not be present in these pools. Therefore, this sentence should be changed to indicate that San Diego fairy shrimp “may be present”, rather than assuming their presence. These “pools” described in the Draft EIR are actually mud puddles in ruts in the existing heavily used military training dirt roads on MCBCP. The potential of the project to affect San Diego fairy shrimp on MCBCP will be addressed through Section 7 consultation between MCBCP and the U.S. Fish and Wildlife Service during future NEPA compliance for this project. Reference to impacts on MCBCP and mitigation measures that will be required on MCBCP will be solely determined by MCBCP in consultation with appropriate Federal agencies at that time, and such references should be removed from the EIR. The CPUC may, however, make recommendations to MCBCP, and the document should be changed accordingly.

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Existing Marine Resource Issues, Page D.3-43

SCE requests a language change replacing the second and third sentences in the first paragraph with the following text:

This cooling water system (intake and discharge) is regulated under provisions of the Federal Clean Water Act and compliance conditions implemented under the SONGS Units 2 and 3 National Pollutant Discharge Elimination System Permits (NPDES). SONGS operates in compliance with related regulatory requirements applicable to its cooling water system. Studies have been conducted under provisions of the above regulatory programs that focus on identification of marine resource impacts. These studies indicate that the SONGS cooling water system impacts the existing marine resources primarily through the impingement and entrainment of marine organisms and transferring naturally occurring turbidity through its discharge system. The existing impingement, entrainment, and turbidity conditions would not change under this Proposed Project, and therefore, would be considered part of the baseline conditions of the project.

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Section D.3.1.5.1, Page D.3-43

Section D.3.1.5.1 title should be changed from "Cooling Water Thermal Discharge Plume" to "Cooling Water System Discharge". This suggested title will be more accurate because the studies indicate that turbidity is the more likely cause of impacts.

The first paragraph states that, "Organisms are affected by the cooling water discharge, mainly through increased water temperatures or turbidity in the plume, increased deposition of organic material, discharge of radionucleotides and metals, or offshore transport in the plume (translocation)."

With regard to the above statement, review of the MRC document from 1989 indicates that although radiological emission exist, they "seem unlikely to produce measurable ecological effects on the local marine biota", (Technical Report to the California Coastal Commission, E. Metals and Radiation, 1989). The statement should be corrected to reflect this finding by removing radionucleotides from the sentence.

In addition to the above items, the EIR should note that marine resource impacts are accounted for and are in the process of being mitigated under the NPDES permitting program and Section 316(b) of the Clean Water Act. Baseline operations of SONGS are in compliance, and will continue to be in compliance under the SONGS NPDES permits.

Impact discussion beginning on Page D.3-56

The Proposed Project will not result in significant impacts on biological resources and will not exceed significance criteria listed in the Draft EIR:

- There will not be substantial adverse effects on habitats or species subject to general or special management, including no adverse effects on listed species.
- There will be no substantial adverse effects on riparian habitats or other habitats subject to special management plans.
- There will be no substantial adverse effects on jurisdictional wetlands or waters.
- The Proposed Project will not substantially interfere with the movement of fish or wildlife species, including wildlife corridors or nursery sites.
- There will be no conflict with local policies or ordinances protecting biological resources.
- There will be no conflict with provisions of an adopted habitat conservation plan, natural communities conservation plan, or other special management plans.
- There will be no adverse effects on marine biological resources, including consideration of significance criteria listed in the Draft EIR (the Proposed Project will not adversely affect the marine environment or create changes in the marine environmental baseline).

Therefore, the Proposed Project, including all three transport options should be approved by the CPUC.

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3.6.2 CHANGES TO MITIGATION MEASURES

Section D.3.3.2 Biological Avoidance and Minimization Measures, beginning on Page D.3-54, and also on Page D.3-69

As discussed in the cover letter, MCBCP has sole authority on MCBCP to conduct environmental review and assessment related to the portions of the project on MCBCP. MCBCP is the only agency with authority to implement its regulations. MCBCP will conduct review of the project in the future with regard to the portions of the transport routes on MCBCP during NEPA review and in issuance of a Real Estate permit for transport. MCBCP will determine what is necessary for compliance with its regulations on MCBCP and what requirements are needed for mitigation on MCBCP. Reference to requirements for environmental review, analysis of impacts, and required mitigation measures on MCBCP should be removed from the EIR. The CPUC should, instead, make recommendations to MCBCP, if it has comments on the portions of the project on MCBCP, which MCBCP could then consider during its NEPA review. Specifically, items 1 through 7 on pages D.3-55 and 56 should be removed from the EIR because they refer to activities on MCBCP that will be only determined by MCBCP.

If the CPUC decides to make recommendations to MCBCP, then modification of Items 3 and 6 are requested. Item 3 describes pre-transport nesting surveys, but fails to acknowledge seasonal avoidance. It should be noted that the Proposed Project will avoid nesting periods, thus precluding the need for pre-project nesting surveys. Details of requirements for transport on MCBCP will be determined by MCBCP during its environmental review, and the need for and conditions of pre-project nesting surveys will be determined during consultation between MCBCP and the U.S. Fish and Wildlife Service (USFWS).

Reference is made in item 6 to hard packed sand. Hard packed sand is not defined. In general, sand has a low capacity for compression and does not pose a problem for transport, especially on the proposed transport route options. Transport is expected to be allowed along routes as described in the PEA, which will avoid adverse affects on vegetation and special status species along the route. As with item 3, details of requirements for transport on MCBCP will be determined by MCBCP during its environmental review, and the need for and conditions of requirements for buffers will be determined during consultation between MCBCP and the USFWS. Such requirements should be removed from the EIR.

Mitigation Measures B-1a and B-2a, Page D.3-70

Mitigation measure B-1a refers to portions of the project on MCBCP and states requirements of MCBCP. As discussed in the cover letter, MCBCP has sole authority on MCBCP to conduct environmental review and assessment related to the portions of the project on MCBCP. MCBCP is the only agency with authority to implement its regulations. MCBCP will conduct review of the project in the future with regard to the

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portions of the transport routes on MCBCP during NEPA review and in issuance of a Real Estate permit for transport. MCBCP will determine what is necessary for compliance with its regulations on MCBCP and what requirements are needed for mitigation on MCBCP. Reference to requirements for environmental review, analysis of impacts, and required mitigation measures should be removed from the Draft EIR. The CPUC should, instead, make recommendations to MCBCP, if it has comments on the portions of the project on MCBCP, which MCBCP could then consider during its NEPA review.

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Mitigation measure B-2a requires clearly marking the limits of the transport route with construction flagging and/or fencing along dirt and paved roads in areas with adjacent sensitive habitats. This mitigation measure should be removed. Reference to areas on MCBCP should, in particular, be eliminated in the EIR because only MCBCP can require mitigation or other measures on MCBCP. Most of these areas are on MCBCP and such measures are unlikely to be required by MCBCP because the suggested mitigation measures are likely to result in impacts, are not necessary to avoid such habitats, and will almost certainly be contrary to the training mission on MCBCP. The dirt and paved roads on MCBCP, including the beach route, are clearly defined. MCBCP routinely travels these identical routes with caravans of vehicles, including armored amphibious tracked vehicles, tanks, and other military transport with the caravans consisting of 20 to 50 or more vehicles at a time, and these caravans traverse these areas up to several times a day and night. There is no substantive difference between the RSG transport and these military uses, and hence, no change in the environmental baseline. Placement of flagging and/or fencing may, however, interfere with MCBCP's activities along these routes (which will occur when the transport is not active, and may occur in conjunction with the transport at MCBCP's discretion). Furthermore, the biological monitor will be present to ensure that designated routes are followed. Therefore, this mitigation should be removed from the EIR.

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Mitigation Measure B-6a, Page D.3-71

Mitigation Measure B-6a should be removed because it is unnecessary and is not based on impacts that are likely to occur. This measure requires marine mammal observer training and observers, including on MCBCP.

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The MCBCP Camp Del Mar Boat Basin is wholly on MCBCP and MCBCP will be solely responsible for environmental review and mitigation measures regarding activities in the boat basin. All reference to mitigation on MCBCP should be removed from the Draft EIR. It is also important to understand that the boat basin on MCBCP is actively used on a regular basis by MCBCP for transport and docking of Marine Corps and Naval vessels, supply ships, and other vessels. The boat basin is an active shipyard. The transport of the RSGs by barge in the boat basin is a minor action compared to the high rate of use by the military in the boat basin. This activity by SCE will not result in a change in the environmental baseline with regard to activity in the boat basin or the marine environment. Although a variety of marine life may use the boat basin, there are no known permanent resident marine mammals in the boat basin. The likelihood of

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incidentally affecting marine mammals or other sea life in the boat basin is very low and there is little likelihood of a significant adverse impact on marine mammals or other marine life. The SONGS Unit 1 RPV Project involved similar activities in the boat basin and that project was reviewed by appropriate Federal agencies including the USFWS and the NMFS. No adverse effects on marine mammals were identified and no mitigation measures were required for the SONGS Unit 1 RPV Project.

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Transport from Long Beach to the Camp Del Mar Boat Basin in the Pacific Ocean will be along traditional shipping lanes with vessels bound by existing laws. This route is regularly traversed by ships of various sizes, including large commercial vessels and recreation vessels. This transport is consistent with the existing level of sea vessel transport in this area and does not substantially add to shipping traffic or exceed the environmental baseline. There is little potential for significant adverse effect on marine mammals or other marine life along this portion of the transport, which will occur in open ocean where such species are dispersed and will avoid such vessels as a result of their natural behavior. The SONGS Unit 1 RPV Project involved similar activities and no significant impacts or mitigation measures were identified or required for such issues. This mitigation measure is not justified by potential adverse effects of the project and it is not necessary. This mitigation measure should be removed from the EIR.

Mitigation Measures B-8a and B-9a, Page D.3-72

Mitigation measure B-8a requires revegetation of temporarily disturbed areas and should be modified. Revegetation requirements on such areas on MCBCP will be solely determined by MCBCP for the portions of the route on MCBCP, and references to areas on MCBCP should be removed from this mitigation measure. The CPUC may make recommendations to MCBCP for activities on MCBCP.

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This mitigation measure requires use of mixtures of native species in the revegetation. This aspect of the mitigation measure should be modified to require restoration of the predisturbance plant community to the extent feasible. Many of the areas off MCBCP will be in areas that are dominated by ruderal or non-native vegetation. The area of disturbance in these areas will be very small, on the order of 25 feet x 25 feet. It is not feasible to establish native species in such areas that are completely dominated by non-native, ruderal species, and that did not support native species prior to disturbance. To attempt such activity is unlikely to provide environmental benefit and may result in adverse effects. Restoration of predisturbance plant communities will avoid this issue (note that areas with native species are, therefore, proposed for revegetation with native species). This mitigation measure should also be modified to state that the proposed revegetation plan in areas managed by specific land managers in the portions of the route subject to CEQA, such as State Parks, Caltrans, and the railroad, will be approved by these respective agencies rather than the CPUC. It should also be noted that some species that may be encountered, although such encounter is highly unlikely, may not be amenable to transplantation, and that transport over them is unlikely to eliminate a population of such plants from the area.

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Mitigation Measure B-9a, Complete Jurisdictional Delineation for Waters and Wetlands, Page D.3-72

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Mitigation Measure B-9a requires the results of the wetland delineation be submitted to the CPUC for approval prior to transport. The CPUC lacks authority to approve jurisdictional delineations pursuant to the Federal Clean Water Act. Only the U.S. Army Corps of Engineers may approve a wetland delineation pursuant to Section 404 of the Clean Water Act. This mitigation measure should be changed to require submittal of a wetland delineation approved by the U.S. Army Corps of Engineers, providing jurisdictional wetlands are present, to the CPUC, and that SCE comply with requirements of a Section 404 permit from the Corps, if a Section 404 permit is required. If no wetlands or waters are affected requiring a Section 404 permit, then no such delineation need be provided. This mitigation measure should only apply to areas that are not on MCBCP, as such areas will be addressed by MCBCP in its environmental review and permitting process.

D.3.6 Mitigation Monitoring, Compliance, and Reporting Table, beginning on Page D.3-69

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Discussion and requirements pertaining to MCBCP and areas on MCBCP should be removed as requirements for mitigation monitoring, compliance, and reporting to the CPUC because MCBCP has sole authority in these areas and will determine requirements during its NEPA review for this project. The CPUC may include recommendations for such matters to MCBCP for consideration during its NEPA review. References to mitigation measures should be modified to incorporate the changes requested above (this applies to Biological Resources, as well as all other resource areas).

Items 1 through 7 on pages D.3-69 and 70 should be removed as discussed above. Please refer to the comments on specific mitigation measures provided above. Reference to MCBCP and activities involving MCBCP should be removed, such as for Impact B-8 under Monitoring and Reporting Action, which requires submittal of a revegetation plan to the CPUC and MCBCP. MCBCP will determine such needs on MCBCP, which will not be subject to approval by the CPUC. Reporting to the CPUC should be limited to areas that are not on MCBCP.

3.7 DRAFT EIR SECTION D.4 – CULTURAL RESOURCES

No comment other than the fact that MCBCP has sole jurisdiction on MCBCP. Therefore, reference to MCBCP in this section should either be removed or changed to recommendations to MCBCP when it performs NEPA analysis.

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3.8 DRAFT EIR SECTION D.5 – GEOLOGY, SOILS, AND PALEONTOLOGY

3.8.1 ISSUES

D.5.3.5 Steam Generator Installation and Return to Service, Page D.5-15

As stated in the cover letter, the NRC has complete jurisdiction over items related to seismic events and their effects for the portion of the project at SONGS. Discussion of such effects and associated mitigation measures should be removed from the EIR.

It is also important to note that the Proposed Project, including the transport options, will not exceed significance criteria for this resource.

Impact discussion beginning on Page D.5-12

The Proposed Project will not result in significant impacts on geology, soils, and paleontology, and will not exceed significance criteria listed in the Draft EIR:

- There will be no effect on unique geologic features or geologic features of scientific value.
- There will be no effect on mineral and/or energy resources.
- No agricultural soils will be converted to non-agricultural uses.
- The Proposed Project, including the portions of the transport routes, is not in areas of existing landslides, and is not expected to trigger adverse geologic processes, such as landslides or erosion, as a result of construction or disturbance of landforms.
- There will be no substantial alteration of topography.
- The threat within the environmental baseline from earth-quake induced ground shaking is the same for the entire Proposed Project, including the three transport route options. There is no change in the potential for threat or likelihood of effects from such a threat for the Proposed Project or its three transport route options.
- There will be no change in the threat from tsunami or seiche relative to the environmental baseline, which includes active use of the beach area along the Proposed Project's transport route options by the public at San Onofre State Beach. In fact, the entire coastline in this region is intensively used by public, private, and governmental interests as part of the regional environmental baseline. There is nothing unique to this project relative to this sense and no increase in exposure people or risk to the natural environment as a result of the Proposed Project in the extremely low likelihood of a tsunami of sufficient size to affect coastal areas. The overall potential for a catastrophic tsunami in this region is also very low, and there is an active tsunami alert network available to provide warning, if needed. There is no substantial or likely risk of damage to temporary facilities or equipment from tsunamis.

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Therefore, the Proposed Project, including all three transport options should be approved by the CPUC.

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3.8.2 CHANGES TO MITIGATION MEASURES

Mitigation Measure G-2a, Page D.5-18

Mitigation Measure G-2a refers to issues of seismic safety. These issues are solely under the purview of the NRC on SONGS, and portions of this measure associated with SONGS and related discussion in the Draft EIR should be removed from the EIR. Similarly, the EIR should only make recommendations to MCBCP regarding this issue for portions of the transport routes on MCBCP. This measure should be changed to reflect its application only to portions of the transport routes that are not on MCBCP.

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Mitigation Measure G-4a, Page D.5-19

Mitigation measure G-4a should be modified to change the text in the first sentence from "...that include placement of sandbags around basins..." to "...that may include placement of sandbags around basins..." Best Management Practices should be goal-driven rather than prescriptive, and multiple measures may be available to achieve a specific objective. The current language appears to require sandbags, and it is more appropriate to request use of measures that avoid or minimize appropriate potential effects, while providing flexibility in determining measures that are well-suited to a given application.

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Erosion control and storm water pollution prevention plans should be approved by the San Diego Regional Water Quality Control Board, and the approved plan provided to the CPUC rather than having the CPUC approve the plan. This measure should be modified to reflect this.

Mitigation Measures G-5a and 6a, Page D.5-19 and D.5-20

Mitigation measures G-5a and G-6a must be deleted from the EIR because these are not within the purview of the CPUC. The NRC has complete jurisdiction in this area as correctly stated by the CPUC in the Draft EIR.

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3.9 DRAFT EIR SECTION D.6 – HAZARDOUS MATERIALS

3.9.1 ISSUES

No comment.

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3.9.2 CHANGES TO MITIGATION MEASURES

Mitigation Measures H-1a, H-1b, and H-2a, Page D.6-21

Mitigation measure H-1a discusses MCBCP and requirements on MCBCP. These references to MCBCP should be removed. The CPUC may make recommendations for mitigation measures on MCBCP, but should not make requirements on MCBCP.

Mitigation measure H-1b indicates that stops of duration longer than 15 minutes should require an inspection. Although SCE intends to prevent and respond to leaks, we believe the 15 minute criteria does not result in a demonstrable benefit because it would prolong the transport process and not necessarily provide a corresponding benefit. SCE recommends the following modification to this condition (H-1b):

All transport vehicles shall be inspected at the beginning of each work day and at the end of each work shift. While in transport, continual visual inspections shall be conducted by the crew. If leaks are observed during transport, appropriate action will be taken to stop the leak prior to continuance of transport. Necessary spill responses shall be conducted according to Condition H-1a.

Mitigation measure H-2a discusses MCBCP and requirements on MCBCP. These references to MCBCP should be removed. The CPUC may make recommendations for mitigation measures on MCBCP, but should not make requirements on MCBCP.

3.10 DRAFT EIR SECTION 3.11 – HYDROLOGY AND WATER QUALITY

3.10.1 ISSUES

Impact discussion beginning on Page D.7-3

The Proposed Project will not result in significant impacts on hydrology and water quality, and will not exceed significance criteria listed in the Draft EIR:

- The Proposed Project will not violate water quality standards or waste discharge requirements.
- The Proposed Project will not provide additional sources of polluted runoff or otherwise degrade water quality that violates applicable standards.
- There will be no adverse effect on groundwater.
- There will be no alteration of existing drainage patterns.
- There will be no adverse effects on surface runoff.
- There will be no adverse alteration within a 100-year floodplain that would affect adjacent property.
- There will be no exposure of people or structures to risks involving flooding.

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Therefore, the Proposed Project, including all three transport options should be approved by the CPUC.

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Impact W-2, Page D.7-4

This section states that refueling of vehicles will take place off the beach. Because the beach is on MCBCP, this discussion should be entirely removed from the EIR. The PEA states that refueling will not be permitted on the beach portion of the route unless an emergency occurs. If the CPUC wishes to make a recommendation to MCBCP, this statement regarding impacts for W-2 should be modified to reflect the potential need for refueling on the beach in the case of an emergency. Although refueling is not planned on the beach, emergency refueling should be possible without risk to the beach environment or adjacent marine habitat.

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3.10.2 CHANGES TO MITIGATION MEASURES

Not applicable.

3.11 DRAFT EIR SECTION D8 – LAND USE, RECREATION, AND MILITARY OPERATIONS

Environmental Setting and other Subsections, beginning on Page D.8-1

This section discusses the environmental setting on MCBCP. Reference to MCBCP, military operations, and conditions on MCBCP should be removed from this section because MCBCP has sole authority on MCBCP.

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Camp Del Mar Recreational Facilities, Page D.8-2

The discussion regarding facilities on MCBCP related to Camp Del Mar and the recreational facilities should be removed from the EIR. It should also be noted that all facilities on MCBCP, including recreational facilities, are not public facilities and are present on MCBCP to support the military mission. As such, all facilities are operated at the discretion of the U.S. Marine Corps and are subject to change at the discretion of MCBCP.

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Figure D.8-1, Notable Land Uses in the Vicinity of the Proposed Project, page D.8-3

This figure refers to activities and conditions on MCBCP. The portions on MCBCP should be removed. The Coastal Zone appears to extend too far inland in most situations. We believe that it is bounded by I-5 along most of the route. The map should be modified accordingly to reflect the properly designated Coastal Zone in this area.

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Impact discussion beginning on Page D.8-9

The Proposed Project will not result in significant impacts on land use, recreation, and military operations, and will not exceed significance criteria listed in the Draft EIR:

- The Proposed Project will not conflict with applicable land use plans, policies, or regulations.
- The Proposed Project will not physically divide an established community.
- The Proposed Project will not create long-term disturbances that would disrupt an established land use.
- There will be no increase in the use of existing neighborhood or regional parks and recreational facilities with no adverse effects on such parks and facilities.
- There will be no adverse disruption of recreational activities, including at San Onofre State Beach (or even on the non-public Marine Corps facilities on MCBCP).
- The will be no affect on Prime or Unique Farmland or Farmland of Statewide Importance.
- The will be no conflict with zoning for agriculture or Williamson Act contracts.

Therefore, the Proposed Project, including all three transport options should be approved by the CPUC.

3.11.2 CHANGES TO MITIGATION MEASURES

Mitigation Measure L-2a, Avoid Peak Recreational Usage, Page D.8-18

Mitigation measure L-2a includes requirements on MCBCP. Reference to and requirements on MCBCP should be removed from this mitigation measure. The CPUC may make recommendations to MCBCP for mitigation measures, but they should not be requirements. It should also be noted that the Proposed Project will not adversely affect recreational facilities on MCBCP or their use. The recreational facilities at Camp Del Mar are located along a restricted portion of the beach that is bounded by existing military uses, which include active use of the boat basin, offices, maintenance yards, and operation of heavy amphibious tracked vehicles and other heavy military vehicles from the area of the boat basin along the back side of the RV parking area and then along military roads to the beach and on the beach road to the north. The RSG transport along the Beach and Road Route will not be substantially different from these existing uses or adversely affect existing uses. There will be no change in the environmental baseline with regard to these matters. Environmental review of potential effects in this area of MCBCP, however, will be addressed by MCBCP during its NEPA review and permitting.

Table D.8-2 includes MCBCP as a Responsible Agency and discusses MCBCP. MCBCP should be removed as a Responsible Agency and reference to MCBCP should be removed.

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