Responses to Comment Set SCE
Southern California Edison Company

SCE-1 The comment notes that SCE identified three transport options and requested approval of all three, not solely the preferred option. Regarding the CPUC's identification of alternative replacement steam generator transportation routes, and the evaluation of potential environmental impacts associated with those routes, Executive Summary Section 2.1 of the Draft EIR (Alternatives Fully Evaluated in the EIR) clearly indicates that "*SCE asked the CPUC to evaluate all of the route options to provide SCE with flexibility in selecting an appropriate option. In order to fulfill the intent of the CEQA process and present a clear environmental analysis in the EIR, the CPUC evaluated the transport option preferred by SCE as the Proposed Project, described in Section B (Project Description), and retained the Inland Route Transport Options as alternatives, described in Section C.4.2 (Transportation Route Alternatives).*" The EIR includes sufficient information for the decision-makers to adopt any of the transport options or none at all. Therefore, the Draft EIR has appropriately evaluated potential impacts of the Proposed Project and feasible alternatives to the project. The level of analysis detail that is provided for the preferred replacement steam generator transportation route and the proposed alternative routes is equal, and the analysis is sufficient to allow the CPUC to approve the Proposed Project with any of the transportation route alternatives that have been considered in the EIR.

According to CEQA Guidelines Section 15002, an EIR is an informational document to provide governmental decision-makers and the general public with information about the potential environmental effects of a project, identify ways to minimize potential environmental effects by requiring changes to a project through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible, and to disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved. Upon certification, this EIR will be used by the CPUC in considering whether or not to approve the project as proposed or an alternative.

Please also refer to Response B-1 regarding approvals of proposed transportation routes that must be obtained from the U.S. Marine Corps Base at Camp Pendleton.

SCE-2 Potential environmental impacts resulting from temporary activities required to transport the replacement steam generators across Camp Pendleton, as well as the project-related use of other Base facilities has been evaluated in the project EIR consistent with the requirements of CEQA. 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.*" Therefore, all project-related activities that would occur on Camp Pendleton have been evaluated in this EIR.

CEQA also requires an EIR to be an informational document that will:

- "*Identify the ways that environmental damage can be avoided or significantly reduced*" [CEQA Guidelines Section 15002(a)(2)].

- "*Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible*" [CEQA Guidelines Section 15002(a)(3)].

The EIR has fulfilled these CEQA requirements by identifying feasible mitigation measures that would avoid or substantially lessen environmental impacts resulting from the project-related use of Base facilities to the extent feasible.

The CPUC recognizes that implementation of the Proposed Project within Marine Corps Base Camp Pendleton, including any mitigation measures recommended by the CPUC, would be subject to the approval of the Base Commanding General. In addition, if any mitigation measures were to change as a result of the subsequent MCBCP approval process, further CPUC review and approval, including that of the effectiveness of the revised mitigation measures to address potential environmental impacts, would be needed.

The CPUC also recognizes that supplemental environmental review under the requirements of NEPA will be required for proposed offloading and transport of 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 Real Estate License must be obtained from Camp Pendleton for transport of the RSGs across lands occupied by the Marine Corps, and that approving the Real Estate License would be a federal action subject to NEPA review.

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.*" The CPUC anticipates that information and environmental impact analysis provided by this EIR would, at least in part, be used 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 transportation component of the Proposed Project.

Mitigation measures recommended in the EIR, if they are adopted as part of the Proposed Project, enable the CPUC to find that the impacts have been reduced to a less than significant level. The information in the EIR allows the CPUC to make this finding for the Proposed Project, even where mitigation measures require further approvals from MCBCP. The CPUC must make findings under the requirements of CEQA Guidelines Section 15091 (Findings).

The remainder of this comment indicates that the Camp Pendleton has previously approved similar temporary transportation projects through the Base after conducting their own NEPA review. This information, however, does not relieve the EIR of its obligation to identify potentially significant impacts of the Proposed Project, or to identify mitigation measures capable of reducing project-related impacts to the extent feasible.

Please also see related information about the relationship of the NEPA process and MCBCP in Response B-1.

SCE-3 The CPUC fully understands that the NRC has sole jurisdiction over the management of radioactive material, as well as design and operation of nuclear power plants, including their radiological safety and security. However, for the CEQA purposes of public disclosure, these topics and the Proposed Project's related impacts are discussed in the Draft EIR. The CPUC believes that each of the recommended measures, as shown with revisions in the Final EIR, are legally feasible and enforceable. The CPUC has recommended only limited mitigation measures that relate to the manner in which SCE carries out certain project activities that are properly regulated under CPUC authority.

The Proposed Project includes disposing the OSGs at a permitted facility offsite. To comport with the requirements of CEQA, the CPUC also analyzed an onsite storage alternative involving construction of an OSG Storage Facility. Mitigation measures identified for OSG Storage Facility design were carefully crafted in recognition of the federal preemption of nuclear safety issues, and these measures would only be implemented if the onsite storage alternative were adopted.

The mitigation does not impinge on NRC's authority over plant operations or radiological safety. The CPUC does not intend to adopt any mitigation measures that are beyond its authority to impose. The cases referenced in the comment clearly established that states cannot regulate nuclear power plant operations that affect radiological safety. Please see Master Response MR-3 (Jurisdiction) for more information on the jurisdiction of the CPUC versus the NRC. While the CPUC does not have jurisdiction over nuclear power plant operation or radiological safety issues, it does have jurisdiction over utility activities that do not directly effect the operation and safety of the nuclear generating plant itself. It is under this latter authority that the CPUC can require evaluation and mitigation of impacts related to geological resources including seismic hazards related to transport of the RSGs, worker safety, and compilation of seismological data for the OSG Storage Facility. Responses SCE-51 and SCE-53 also address NRC jurisdiction related to the OSG Storage Facility under the onsite storage alternative

SCE-4 Please refer to Master Response MR-1 (Baseline). The comment asserts that the Draft EIR inappropriately analyses the impacts that the operating plant may have on the environment. Much of the discussion regarding the existing baseline is in response to comments received on the Notice of Preparation for the Proposed Project. Section D.1.2.1 of the Draft EIR illustrates that the existing operations of SONGS are clearly included in the environmental setting, and the environmental effects of ongoing operations are not characterized as "impacts" attributable to the Proposed Project. Existing military activity at MCBCP is considered where appropriate (e.g., Sections D.3.1, D.8.1, and D.14.1, for biological resources, land use, and visual resources, respectively) as part of the baseline.

The baseline information is provided because decision-makers must fully consider the consequences of the Proposed Project and alternatives, including the No Project Alternative, as compared to the baseline environmental conditions. Although the Proposed Project would not affect the cooling water system at SONGS, the No Project Alternative would likely cause SONGS operations to cease before the end of the current license periods, which would beneficially alter the existing marine resources in the area (as described in Sections D.3.1.5 and D.3.5.2 of the Draft EIR). The evaluation of the No Project Alternative necessitates establishing baseline conditions for the marine environment as they would relate to the possible early shutdown of the SONGS cooling water system. Response SCE-5 also addresses the approach to baseline conditions.

SCE-5 The commenter is correct that the environmental setting at the time of the lead agency's review represents the baseline conditions against which all environmental impacts must be measured. The information presented in the Draft EIR provides relevant baseline information for decision makers to fully consider the environmental impacts of the Proposed Project and alternatives, including the No Project Alternative. The Draft EIR does not evaluate baseline conditions that would not be affected by the Proposed Project or alternatives. The Draft EIR avoids use of the word "impact" in its description of the environmental setting to avoid confusion with project-related impacts, which are discussed separately from the setting. Please also see Response SCE-4.

SCE-6 The EIR identifies potentially significant impacts of the Proposed Project, including the transport route alternatives, that would be reduced to less than significant levels with implementation of the recommended mitigation measures. Please see Response SCE-1 for information on the methodology of analyzing the transport route alternatives.

SCE-7 The comment raises general issues regarding air emissions, unstable geologic features, recreational facilities, and the visual resources assessment that are addressed in greater detail in responses below (e.g., please see Responses SCE-31, SCE-50, SCE-60, and SCE-77, respectively). It also contends that the differences between the three transport options are minor and not significant. The Draft EIR provides a thorough comparison of the transportation route alternatives in Section E.2.1 and Tables ES-2 and E-1, which illustrates that no significant and unavoidable impacts (Class I) would occur as a result of any transport alternative, but various potentially significant but avoidable impacts (Class II) could result depending on the route selected. The comment erroneously suggests that the Beach and Road Route should be favored because of its lesser effect to traffic on I-5 by ignoring other environmental issue areas. As the Draft EIR notes, the comparison of alternatives focuses on reducing the potentially significant impacts (Class II), and the MCBCP Inland Route is found to be the Environmentally Superior Alternative because of its ability to eliminate the need for certain mitigation of geologic hazards, recreational disruption, and visual effects. As noted in Response SCE-1, this is sufficient information for the decision-makers to adopt any of the transport options or none at all.

SCE-8 It should be clarified that the Draft EIR did determine that the Proposed Project and the alternatives to the project would have the potential to result in potentially significant (Class II) environmental impacts. The identified impacts, however, can be feasibly reduced to a less than significant level with the implementation of recommended mitigation measures. The mitigation measures identified for the Proposed Project and alternative transportation routes are summarized in the Executive Summary on Tables ES-4 and ES-5. With adherence to the mitigation measures, implementation of the Proposed Project, including any of the proposed transportation alternatives, would not result in any significant and unavoidable environmental impacts.

SCE-9 The recommended clarification reflecting the scope of transmission system upgrades needed under the No Project Alternative has been included in the Executive Summary of the Final EIR.

SCE-10 The recommended clarification of replacement transmission construction effects under the No Project Alternative has been included in the Executive Summary (e.g., in Section 3.4.2) of the Final EIR. Similar minor clarifications have also been included throughout Section D of the Final EIR (e.g., Sections D.4.5 and D.9.5).

SCE-11 The basis for determining that the MCBCP Inland Route Alternative would be environmentally superior to the proposed Beach and Road Route is described in Draft EIR Section E.2.3 and depicted on Tables ES-2 and E-1. The analysis concluded that the MCBCP Inland Route is "slightly preferred" when compared to the proposed Beach and Road Route, and also indicates that potential environmental impacts associated with the Proposed Project (Beach and Road) route, including geologic hazards, recreation disruption, and visual effects, can be avoided by avoiding travel on the San Onofre Bluffs and through San Onofre State Beach. Also potentially significant impacts to biological and cultural resources can be feasibly reduced to a less than significant level by restoring possible wetlands at the transition areas and clearly demarcating the cultural resources adjacent to MCBCP roads. Please also see Responses SCE-1 and SCE-7.

SCE-12 The comparison methodology for the alternatives is provided in Draft EIR Executive Summary Section 4.1. If an alternative had less overall environmental impacts, it was identified as the environmentally superior alternative. Although each alternative has potentially significant impacts, no significant impacts would occur with implementation of mitigation measures identified in the EIR. The comment asserts that the Proposed Project (Beach and Road Route) would not result in potentially significant impacts to biological resources, but this is contrary to the Draft EIR, which identifies six potential impact areas in Section D.3.3.3. These project impacts would occur in addition to the military activities, which are part of the baseline. Because additional potentially significant impacts would occur with the other route alternatives, the Beach and Road Route is slightly preferred for biological resources (see Tables ES-2 and E-1).

SCE-13 The suggested change regarding the proper voltage of the SONGS connection to the transmission grid as 230 kV instead of 500 kV has been made throughout the Final EIR.

SCE-14 Closure of I-5 could be up to one hour on southbound lanes, and therefore, CEQA requires that this scenario be evaluated in the EIR. With this short period of closure, the impact is classified as less than significant, Class III. If the transport would only require partial closure of southbound lane and emergency vehicles access is not affected, then Mitigation Measure T-1a (Provide emergency vehicle access) would not be applicable, and by default, there would be sufficient access for emergency vehicles. Therefore, no changes have been made to the text.

SCE-15 According to the PEA, 200 vehicles would be accessing the plant per shift change. This means that 200 vehicles would also be leaving the plant at the same time. Therefore, the total number of vehicles one way trips would be approximately 400.

The future traffic conditions during the peak hour could be congested over several segments of I-5 near the project vicinity. The Draft EIR describes the effect that project-related traffic would have in contributing traffic to the highway. Mitigation Measure T-3a (Schedule SONGS shift changes outside of peak hours) does not restrict the necessary travel to and from the facility, emergency travel, or other support or delivery vehicle travel. The proposed mitigation measure can be easily accomplished and easily monitored. However, the measure has been changed to be less restrictive, and allow for multiple shift changes of small numbers of project vehicles.

SCE-16 The comment requests a change to the description of route alternatives and the text of the Executive Summary to clarify the duration of closures on I-5 under the I-5/Old Highway 101 Transport Route Alternative. To provide the clarification this change has been made in the Final EIR in the Executive Summary, Section C (Alternatives), and Section D.13 (Traffic and Circulation). It would not alter the analysis of traffic impacts or substantially increase the previously-identified impacts.

SCE-17 Mitigation Measures V-1a and V-1b do not require closure of San Onofre State Beach. Rather, they call for advance noticing, and closure *if* deemed appropriate by the State Department of Parks and Recreation to avoid impacts to park visitors. Particular concern in this instance is connected to visual impacts of nighttime RSG transport on nearby campers during peak park vehicle camping season. Please refer also to Response SCE-78, below, which deals with this issue in more detail.

Such potentially adverse effects on high sensitivity recreational viewers, though temporary, would exceed the study criteria, as well as various CEQA significance criteria. Though temporary, such impacts could, if occurring during peak visitor season, strongly affect hundreds of park visitors on up to seven occasions, once per trip. Only when a specific schedule for RSG transport becomes available would it be possible for the State Department of Parks and Recreation to specifically determine whether park closure should occur or not.

SCE-18 SONGS is indeed an industrial facility, with relatively low visual quality within the facility itself. However most of the industrial activities of the facility are well-screened to viewers on Highway I-5 by terrain, tall perimeter masonry walls, and landscaping that present a simple and uncluttered, visually unified, and moderately attractive appearance. Current activities associated with decommissioning of SONGS Unit 1 appear also to be well-screened or well-sited because they were not evident anywhere within the visible foreground of I-5 outside of the site perimeter walls at the time that site visits for this study were conducted. No demonstrable evidence of construction activities, equipment or materials was visible in the highway foreground vicinity of SONGS during field visits to the site. Outside of the facility's perimeter walls, industrial and/or construction activities to the west of I-5 would be highly visible to southbound motorists and would occupy the visual foreground of an eligible State scenic highway. This State scenic status and the fact that the area is seen by many millions of viewers annually make this visual foreground area one of relatively high visual sensitivity. Staging–related impacts, furthermore, could potentially have impacts over a period of three years or more. Mitigation Measure V-4a (Minimize or eliminate staging with the visual foreground of I-5 and San Onofre State Beach) offers several feasible strategies for reducing the effects of staging in the foreground of I-5 and San Onofre State Beach to less than significant levels. Please also see Response SCE-77 for additional information on the visual analysis.

SCE-19 Responses below (including Responses SCE-31 and SCE-32) address the new emission estimates provided by SCE. The Final EIR has been revised to illustrate that no specific transport route is preferred for air quality because no alternative simultaneously provides lower daily *and* total emissions. Minimizing air pollutant emissions on both a total and daily basis, if it were possible, would be preferred. For instance, although the Proposed Project (Beach and Road Route) would cause the highest total emissions, it would simultaneously cause the lowest emissions per day when compared to the two inland transport alternatives.

SCE-20 Although the Old Highway 101 transport route segment near the San Onofre Bluffs is currently not underlain by any known landslides, it is possible that in the intervening years prior to project implementation, additional landslides may occur. Future landslides could undermine Old Highway 101. Additionally, it is possible that the weight of the RSGs could trigger an incipient landslide that is waiting for the right conditions to let loose. Therefore, the conclusion that the routes that use this segment are less preferred geologically is accurate, and no revision to the analysis in the Draft EIR is necessary.

SCE-21 It is acknowledged that the Environmentally Superior Alternative cannot be determined from the analysis of any one issue area. However, Draft EIR Section E, Comparison of Alternatives, presented a comparison of the impacts from each issue area that would result from the three transportation route alternatives. The MCBCP Inland Route Alternative was defined as superior in Section E.2.3, Definition of Environmentally Superior Alternative, and Tables ES-2 and E-1 by a plurality of issue areas such as air quality, geology, land use and recreation, noise and vibration, and visual resources.

SCE-22 CEQA Guidelines Section 15126.2(a) states: "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 . . . [and] the human use of the land (including commercial and residential development)." CEQA provides no exception to the requirements in Section 15126.2(a) for projects that would be subject to NEPA review.

Consequently, Draft EIR Section D.8, Land Use, Recreation, and Military Operations, examines impacts to existing land uses that would be traversed by the Proposed Project, which includes recreational land uses at MCBCP Camp Del Mar and San Onofre State Beach. Please also refer to Response SCE-2. The Final EIR includes revisions to note that implementation of Mitigation Measure L-2a on MCBCP would require approval by the Base Commanding General, which would involve NEPA review.

SCE-23 The preference for the MCBCP Inland Route is based on its ability to avoid the potentially significant visual effects of the Proposed Project (Beach and Road Route) as illustrated in Draft EIR Section E.2.1 and explained in more detail in Response SCE-90. The suggested revisions to the conclusions of the visual resources analysis, therefore, have not been included in the Final EIR. Please also see Responses SCE-77 through SCE-84 for more information on the treatment of visual resources impacts.

SCE-24 Please see Responses SCE-1 and SCE-11 regarding the CPUC process of analyzing options proposed by SCE. The options proposed by SCE are treated as CEQA alternatives, and they have each been fully analyzed in the Draft EIR. This provides sufficient information for the decision-makers to adopt any of the transport options or none at all. The MCBCP Inland Route is found to be the Environmentally Superior Alternative because of its ability to eliminate the need for certain mitigation of geologic hazards, recreational disruption, and visual effects. The suggested revisions, that all three transport options are acceptable, have not been included in this Final EIR.

SCE-25 The text revisions suggested in the first two comments regarding the NRC tube identification and repair process have been made in Section A.2.2 of the Final EIR. The third revision changes the commencement dates of the refueling outages during which the Unit 2 and

3 steam generators would be replaced from March 2009 and September 2010, respectively, to October 2009 and October 2010. The text in the Final EIR has been revised to reflect these new outage commencement dates.

SCE-26 These specific comments suggest various text modifications to clarify certain issues within Table A-1. The following list addresses the suggested text changes and identifies if each was corrected or left unchanged in the Final EIR.

- The title of Table A-1 has been changed to "Permits that May Be Required for the SONGS Steam Generator Replacement Project" in the Final EIR to reflect the preliminary nature of the project's permit application processes.
- Table A-1 now states only that these permits *may* be required for the SONGS Steam Generator Replacement Project, therefore the references to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act permits will remain unchanged in the Final EIR. In addition, as stated in this Comment, the Section 10 of the Rivers and Harbors Act permit may be required for activities that are within the tidal waters of the Pacific Ocean.
- As stated above, Table A-1 now states only that the included permits may be required for the Proposed Project, so the reference to a Coastal Development Permit will remain unchanged in the Final EIR. Although SCE asserts in this comment that it is uncertain that a Coastal Development Permit would be required, it is noted that SCE would coordinate with the California Coastal Commission to determine the permitting requirements. Please also see Response E-1, which notes that the Proposed Project is subject to the review and permitting by the California Coastal Commission.
- As described in Section B.3.5 of the Draft EIR, an Integrated Leak Rate Test (IRLT) is not specifically part of the Proposed Project because it is scheduled to occur anyway and would be conducted regardless of the Proposed Project. The next routine IRLT at SONGS would be due during a refueling outage closest to 2005. SCE would propose to postpone this test date, with approval from the NRC, to Cycle 16 RFO. However if the NRC denies SCE's request for an IRLT extension it may force SCE to conduct an IRLT in 2005, which would mean the IRLT would then become part of the Proposed Project. In order to clarify this issue, the phrase "and integrated leak rate test equipment engines" has been deleted from the Final EIR.

SCE-27 Please see Responses SCE-1 and SCE-11 regarding the CPUC process of analyzing transport options proposed by SCE. Please also see Response SCE-2 regarding the role of MCBCP in implementing project mitigation.

SCE-28 Figure C-1a has been modified to show Segment T.

SCE-29 The recommended revision reflecting the scope of transmission system upgrades needed under the No Project Alternative has been included in Section C.6.2 of the Final EIR.

SCE-30 The comment notes that the federal air quality attainment designation for PM2.5 in San Diego County has recently been changed, and the Final EIR includes the necessary revisions. This does not cause any change in the assessment methodology or conclusions.

SCE-31 The comment asserts that the emissions data in Section D.2 of the Draft EIR is incorrect and that the total annual emissions for the Proposed Project (Beach and Road Route) should be adjusted downward. The emissions in the Draft EIR were estimated based on the information provided in the PEA and subsequent responses from the Applicant, which indicated that 8 to 12 days of activity would be necessary for each trip along the Beach and Road Route (PEA p. 3-3). This comment and Comment SCE-32 below suggest that the EIR be revised to favor the Beach and Road Route, based on the assumption that only 4 days of activity would be needed within MCBCP. The information in the comment appears to conflict with the 8 to 12 days originally described by the Applicant. The comment also notes that the route would be shorter than the alternatives but does not acknowledge that it would cross considerably more complex terrain off of paved roads. The EIR must portray emissions based on the possible worst-case scenario, and the estimates provided in the Draft EIR are suitable for that purpose because they are based on a typical trip duration of about 8 days, as was shown in the original filings. As such, the analysis in the Draft EIR is reasonable, and no revision is necessary. Please also note that the Environmentally Superior Alternative is based on analysis of *all* potential impacts, not just those related to air quality. This issue is discussed further in Response SCE-32 below.

SCE-32 The comment provides a new estimate of RSG transport emissions including activity within MCBCP. This is new information from the Applicant. The comment incorrectly asserts that detailed calculations supporting the new estimates were originally provided in SCE's Deficiency Response Question 57 Attachment (May 17, 2004); no such calculations were provided at that time. The Draft EIR shows emission estimates of activity within MCBCP based on a total trip duration through MCBCP to SONGS of about 8 days, which is a reasonable worst-case scenario based on activity levels provided by SCE. The new information is based upon an unreasonably optimistic duration of only 4 days of activity within MCBCP. Although the comment provides new emission estimates for the transport phase activities, no revision to the Draft EIR is necessary because the assumptions used in the Draft EIR reflect activity levels provided by SCE throughout the proceeding (PEA p. 3-3, as described in Response SCE-31 above). The EIR preparers believe that by following SCE's original forecasts of activity levels, the worst-case emissions are reasonably portrayed in the Draft EIR. If the Applicant's revisions would be included in the air quality assessment, there would be no change the impact conclusion or mitigation because for each alternative, mitigation would require feasible measures be implemented, as per SDAPCD recommendations.

As suggested by this comment, revisions are included in the Executive Summary (Table ES-2) and Section E.2.1 (Table E-1) of the Final EIR to show that none of the transport options are preferred regarding air quality. This is because emissions from the Proposed Project (Beach and Road Route) on a per-day basis would tend to be less than the emissions caused by the other alternatives, even though total emissions may be higher. Please also note that the Environmentally Superior Alternative is based on analysis of *all* potential impacts, not just those related to air quality.

SCE-33 The comment includes a text revision to clarify the location of the rail loading location within OCA. The clarification has been included in the Final EIR in Section D.2.3.4.

SCE-34 The Draft EIR characterizes air quality impacts as potentially significant, meaning that mitigation measures would be necessary to reduce the impacts to less than significant levels. As noted by the comment, Mitigation Measures A-1a and A-1b would apply to each trans-

port alternative and would require reduction of dust emissions and equipment exhaust emissions, respectively. Table ES-5 shows that these mitigation measures would apply to the transport alternatives equally.

SCE-35 Mitigation Measure A-1a would require dust suppression in a manner consistent with SDAPCD recommendations. Implementation of this measure would ensure that potential air quality impacts from dust are reduced to a less than significant level. Please also see Response SCE-2. The Final EIR includes revisions to note that implementation of Mitigation Measures A-1a and A-1b on MCBCP would require approval by the Base Commanding General. Such approval is subject to environmental review pursuant to the National Environmental Policy Act (NEPA).

SCE-36 The comment requests a change in the discussion of fairy shrimp on MCBCP. This statement has been changed in the Final EIR to note that the populations of fairy shrimp on MCBCP *may* be the federally endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*). The analysis in the EIR recognizes that the San Diego fairy shrimp is the most widely distributed species in San Diego County. It can withstand disturbance, and the species are known to occur on MCBCP in close proximity to Las Pulgas Road and surrounding coastal bluffs. Some of the ponds observed during the reconnaissance survey were not "mud puddles" and were in fact located on the edge of dirt roads and were vegetated with wetland indicator species including common spikerush (*Eleocharis macrostachya, OBL*), mule-fat (*Baccharis salicifolia*, FACW), coyote brush (FACU), and curly doc (*Rumex crispus*, FACW). In addition, road ruts or "mud puddles" are often formed where natural topographic low spots occur and vegetation is removed by grubbing, grading, or trampling for the purposes of creating a road. The ponding features observed on the MCBCP are likely a combination of historic and man-made features. Biological Avoidance and Minimization Measures 1 and the oversight of a qualified biological monitor would ensure that potential impacts to fairy shrimp species would be less than significant. Please also see Response SCE-2. The Final EIR includes revisions to note that Biological Avoidance and Minimization Measures would be imposed as conditions of CPUC project approval and that implementation of avoidance measures or other mitigation measures on MCBCP would require approval by the Base Commanding General.

SCE-37 The requested text changes have been made.

SCE-38 The title of Section D.3.1.5.1 has been changed in the Final EIR as requested. The text in this section has not been changed to delete any reference of radionuclides in the cooling water system discharge. However, the finding from the 1989 MRC report has been added that concludes that potential impacts associated with trace discharges of radionuclides would not likely produce measurable ecological effects on local marine biota. Baseline operation of the cooling system and its existing ability to affect marine resources are accounted for and accurately portrayed in the environmental setting of Section D.3.1.5. The existing compliance status of SONGS with Section 316(b) of the Clean Water Act would not be altered by the Proposed Project.

SCE-39 The Draft EIR characterizes impacts to biological resources as potentially significant, and mitigation measures would need to be adopted to reduce impacts to less than significant levels. Mitigation Measures B-8a (Revegetation of temporarily disturbed areas) and B-9a (Complete jurisdictional delineation for waters and wetlands in Segments AA and AC) would apply to each of the alternative transport routes, but they would not apply to the pro-

posed Beach and Road Route because paved transition areas would be unnecessary for this route, as shown in Tables ES-4 and ES-5. As a result, for biological resources, the proposed Beach and Road Route is slightly preferred (Tables ES-2 and E-1).

SCE-40 This Final EIR includes revisions to note that approval of all activities on MCBCP would be subject to approval by the Base Commanding General, which would involve NEPA review. This is addressed in more detail in Response SCE-2. The Biological Avoidance and Minimization Measures shown in Section D.3.3.2 and Table D.3-6 of the Draft EIR are components of the MCBCP Integrated Natural Resources Management Plan (INRMP) that must be implemented by SCE in consultation with MCBCP. These measures are recommendations for adoption within MCBCP to implement the INRMP and reduce impacts within MCBCP to less than significant levels.

The comment recommends modifying the measures to note that the Proposed Project may avoid nesting periods. The fact that the Proposed Project avoids the breeding and nesting season by occurring between October and February is taken into account throughout the biological analysis, most notably in Draft EIR Table D.3-2, and the measures have been developed based on this scheduling and based on the fact that *foraging* birds may be present. If the timing of the project were to be within the breeding and nesting season, additional mitigation measures would be needed to avoid impacts to sensitive and migratory birds.

California least tern nests from mid-April to mid-September and the western snowy plover nests from early-March to late-September. Although the least terns are migratory, many of the snowy plovers are year-round residents of MCBCP and forage on the sandy beaches within and adjacent to the transport route. In addition, wildlife does not always behave as humans expect and nesting could be extended on rare occasions. CEQA requires that every effort to protect sensitive species be made including ensuring that no unauthorized or avoidable impacts occur. The list of Biological Avoidance and Minimization Measures in Section D.3.3.2 are modified versions of programmatic instructions contained in the MCBCP INRMP and the EBCP. These documents contain the standard operating procedures for activities in the estuarine and beach habitat areas of MCBCP, as such implementation of the EIR measures would be consistent with MCBCP instructions. As stated, the MCBCP Commanding General must approve all activities that occur on the MCBCP.

SCE-41 The term "hard packed sand" was taken directly from the MCBCP's INRMP EBMP (p. D-15, item 1). "Motorized vehicles will remain on hard packed sand unless parked, outside posted (signed) areas during the breeding season and as much as possible at other times, and will avoid the dune system at the base of the bluffs, as well as coastal wetlands." This is an *instruction* for military training activities under the subheading of *vehicles*. The SCE had described the proposed RSG transport activities in past documents, including the PEA, as emulating military activities. In order to ensure that unauthorized impacts to sensitive species or habitats do not occur as a result of the RSG transport adjacent to highly sensitive estuarine habitats, SCE would need to comply with the measures, which reflect the guidelines (as in Response SCE-36). Therefore, item 6 has not been modified at this time. As noted above, the MCBCP Commanding General would need to provide approval of the measure. Please also see Response SCE-2.

SCE-42 Please see Responses B-1 and SCE-2 for information and explanation of the CPUC's responsibility to review and report on all aspects of the Proposed Project, including those activities which take place on MCBCP. The Final EIR includes revisions to note that implementation of Mitigation Measures B-1a, B-2a, B-8a, and B-9a on MCBCP would require approval by the Base Commanding General, which would involve NEPA review.

SCE-43 Mitigation Measure B-2a (Delineate transport route) would require flagging or fencing for activities likely to encounter sensitive habitat in order to avoid impacts to sensitive species. The measure does not refer to the beach transport areas since it is sufficiently wide enough and adjacent sensitive habitat along the beach are permanently marked with fencing and sign posts constructed by MCBCP. Mitigation Measure B-2a is required because the transport operators may not be military personnel, and they may be conducting a different set of activities with wider heavier loads, operating lights and other equipment at night, with less knowledge of the surrounding areas when compared to the military personnel who travel the much narrower dirt and paved roads on a daily basis. It is important for SCE to take every precaution to ensure that sensitive habitats adjacent to the transport route are protected to the greatest extent practicable. It would be unreasonable for the CPUC to assume that project-related transport workers would have the same knowledge as military personnel who are required to know the guidelines and restrictions within the INRMP and the EBCP.

The CPUC does not intend for implementation of Mitigation Measure B-2a to interfere with military activities; therefore, minor modifications to the measure have been made to allow for alternative materials approved by MCBCP. As noted above, measures on MCBCP are recommendations that ultimately would need to be approved by the Base Commanding General. Please also see Response SCE-2 and Responses SCE-36 and SCE-42 above.

SCE-44 While it would seem that a small number of barge trips might not pose a threat to marine mammals, whale strikes have occurred in open ocean and near shore during projects with minimal marine traffic. A gray whale calf was severely injured offshore Morro Bay, California, during installation of a trans-Pacific cable. The injury consisted of a severely cut tail stock and flukes completely severed off the animal. The extent of the injury (severing of the caudal peduncle) was consistent with a propeller strike (Harvey 2001). Although the carcass of the calf was never recovered, it is unlikely that the injured calf traveled far from the location where it was observed (Harvey 2001).[1]

It should be noted that proposed Mitigation Measure B-6 (Provide marine mammal observer training and trained observers) would not solely be applicable to the water of Camp Pendleton Del Mar Boat Basin, but to all California Waters between the Port of Long Beach and the Del Mar Boar Basin. However, in order to avoid confusion and to focus on the main issue of the spring whale migration when whale calves are most vulnerable, the mitigation measure has been modified in the Final EIR to only require a marine mammal observer during the spring whale migration. If SCE does not transport any materials via barge during this period, the mitigation measure would not be applicable.

[1] Harvey, J.T. 2001. Injured gray whale off Morro Bay. Report to County of San Luis Obispo, California Coastal Commission, and California State Lands Commission. 3 p.

SCE-45 Mitigation Measure B-8a (Revegetation of temporarily disturbed areas) does not require transplant of sensitive species. Instead, Mitigation Measure B-1a addresses the details regarding transplant of sensitive plants found during pre-transport surveys. Mitigation Measure B-8a requires that best management practices and native species be used to reestablish disturbed areas and ensure that erosion of bare areas does not occur post-transport. Without explanation by SCE, it is difficult to understand how establishing native grasses and forbs in an area that is vegetated by non-native annuals could "result in adverse effects." The measure is feasible, as it requires one year of monitoring, and the monitoring is to be focused on soil stability not plant establishment. Mitigation Measure B-8a is not unnecessarily restrictive, although it has been modified in the Final EIR to include that the plant palate also be approved by the appropriate owners and operators such as Caltrans or MCBCP. Please also see Response SCE-2 and Response SCE-42 above.

SCE-46 Mitigation Measure B-9a requires that a delineation of waters and wetlands be completed prior to bridging, filling, or otherwise impacting habitats. During field reconnaissance on November 5, 2004, the EIR team wetland ecologist, Michelle Mattson (Aspen Environmental Group), observed several locations along the transport route that may be jurisdictional waters or wetlands. Therefore, Mitigation Measure B-9a would be necessary to ensure that impacts to waters and wetlands do not occur without proper notification, permits, and mitigation. Mitigation Measure B-9a has been modified in the Final EIR to require submission and approval of the delineation to the Army Corps of Engineers prior to submission to the CPUC. Please also see Response SCE-2 and Response SCE-42 above.

SCE-47 The comment recommends revising mitigation measures to indicate that the need for mitigation on MCBCP land would ultimately be determined by MCBCP. The CPUC believes that the suggested revisions would not be warranted because no mitigation measures in the Draft EIR would preclude or obstruct implementation by MCBCP, nor would they be binding on MCBCP. Please also see Responses B-1 and SCE-2 for an explanation of the CPUC's responsibility to review and report on all aspects of the Proposed Project, including those activities which take place on MCBCP. The Final EIR includes revisions to note that implementation all aspects of the adopted project, including mitigation, on MCBCP would require approval by the Base Commanding General, which would involve NEPA review.

SCE-48 Please see Response SCE-2.

SCE-49 Detailed responses below (SCE-50 through SCE-53) illustrate that CPUC believes that the measures recommended in the Final EIR, with revisions, are feasible and would not inhibit project implementation. Response SCE-3 above also addresses this issue. Please see Master Response MR-3 (Jurisdiction) for more information on the jurisdiction of the CPUC versus the NRC.

SCE-50 Please see Response SCE-1 regarding the requested approval of all three routes. Response SCE-20 addresses landslide hazards. The Draft EIR characterizes impacts related to geology and soils as potentially significant, warranting mitigation measures for each of the possible transport alternatives. As noted in Tables ES-2 and E-1, the MCBCP Inland Route would be preferred because it would avoid the need for Mitigation Measure G-1a (Prevent overloading of unstable ground along transport route).

Although there is no change in likelihood of earthquake ground shaking or tsunami as a result of the Proposed Project, these issues still pose a hazard to project activities. The significance criteria for geologic hazards in Section D.5.2.1 of the Draft EIR state that impacts would be significant if there is:

- High potential for earthquake-induced ground shaking to cause liquefaction, settlement, lateral spreading and/or surface cracking in the vicinity of proposed work areas or along the transportation routes; or
- Potential for tsunamis or seiche to cause damage to temporary facilities or to equipment during transportation or construction of facilities from the project.

As noted in the Draft EIR, project activities would be impacted by groundshaking and tsunamis if the transport roads are damaged or equipment was toppled potentially causing damage to the equipment or injury to workers. This impact (see Impact G-2) would be less than significant with the implementation of Mitigation Measure G-2a (Protect workers from temporary effects of earthquake shaking).

SCE-51 This comments asserts that the subject of seismic safety, which is addressed in the form of worker protection in Mitigation Measure G-2a, is an issue solely under the purview of the NRC. Section D.5.3.2 of the Draft EIR indicates that the danger to worker safety is especially a concern during offloading and transport activities. Because RSG transport involves no handling of radioactive or nuclear material, it is unclear how this activity could be solely regulated by the NRC. Clearly, NRC oversight would occur during installation phases, but the CPUC believes that Mitigation Measure G-2a, which would establish protocols and training for workers in the event of an earthquake, should be implemented along the RSG transport route. Mitigation Measure G-2a would also require the worker protocols for earthquake shaking during the installation phase, but this would be feasible for SCE to implement because the measure would not contradict with or obstruct NRC oversight of installation or areas of NRC jurisdiction. The Final EIR includes revisions to note that implementation of this measure on MCBCP would require approval by the Base Commanding General.

SCE-52 The text in Mitigation Measure G-4a has been appropriately modified in the Final EIR to reflect the concern of the commenter.

SCE-53 The comment recommends deleting Mitigation Measures G-5a and G-6a, which deal with geotechnical and seismological investigations and design requirements for the OSG Storage Facility under the OSG Onsite Storage Alternative. The comment asserts that the NRC requirements preempt these measures. These measures would require compilation and consideration of recent geotechnical and seismological information by SCE during its design of the OSG Storage Facility. The EIR recognizes the areas of NRC jurisdiction, including seismic safety, however, and deciding the suitability of OSG Storage Facility design remains fully within the jurisdiction of the NRC and would not be regulated by CPUC. Mitigation Measures G-5a and G-6a include revisions to clarify the CPUC role. It is within CPUC jurisdiction to require SCE to submit relevant updated information because all seismic factors should be considered by the NRC while siting new facilities at SONGS, and consideration of such information would not contradict with NRC design requirements.

Please also see Section E.2.3 of the Draft EIR, which notes that onsite storage is not preferred compared to the Proposed Project, and it is not the Environmentally Superior Alternative. Please see also Master Response MR-3 (Jurisdiction) and Response SCE-3.

SCE-54 The comment recommends revisions to Mitigation Measure H-1b that have been included in the Final EIR. The Final EIR includes revisions to note that implementation of Mitigation Measures H-1a, H-1b, and H-2a on MCBCP would require approval by the Base Commanding General. Please also see Response SCE-2.

SCE-55 Please see Response SCE-1 for information describing treatment of the transport options as alternatives. The analysis in Draft EIR Section D.7 confirms the assertion of the comment that the Proposed Project would cause no potentially significant impacts related to hydrology and water quality.

SCE-56 Please see Response SCE-2. The role of MCBCP in implementing project measures is also addressed in more detail in Responses B-1 and B-2. If refueling on the beach must occur in the case of an emergency, as noted by the comment, this would not represent a change in the Proposed Project (Draft EIR p. B-25). If SCE eventually decides to propose routine refueling of transport vehicles on the beach, the change may cause additional impacts that may require additional environmental review by CPUC or MCBCP. The possibility for project changes to require additional environmental review, and the process the CPUC would follow to address the changes, is described in Draft EIR Section H. The Final EIR remains unchanged.

SCE-57 Please see Response SCE-2 and Response SCE-22, which explain the proper consideration of existing land uses at MCBCP under CEQA. Please also see Responses B-1 and B-2.

SCE-58 Please see Response SCE-2 and Response SCE-22, which explain the proper consideration of existing land uses at MCBCP under CEQA. Please also see Responses B-1 and B-2.

SCE-59 Figure D.8-1 has been modified in the Final EIR to reflect the approximate coastal zone boundary. (The boundary data was provided by the California Coastal Commission as an ESRI shapefile of the San Diego County Coastal Zone Boundary, UTM Zone 11, NAD 83, meters.)

SCE-60 Please see Response SCE-1 regarding the requested approval of all three routes. The Draft EIR characterizes land use impacts as potentially significant, meaning that mitigation measures must be adopted for the impacts to be less than significant. As discussed in Draft EIR Section D.8.3, transport of the RSGs along the Proposed Project (Beach and Road) route and along the I-5/Old Highway 101 Route Alternative would temporarily restrict or preclude recreational facilities at Camp Del Mar and San Onofre State Beach, resulting in potentially significant impacts on recreational users. To reduce potential impacts to a less than significant level, implementation of the following mitigation measures have been recommended: 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). Because the measures needed for avoiding conflicts with recreational uses would not be needed for the MCBCP Inland Route Alternative, as shown in Tables ES-4 and ES-5, for land use, the MCBCP Inland Route Alternative is clearly preferred (Tables ES-2 and E-1).

SCE-61 The existing military activity within MCBCP and the ongoing use of recreational facilities at Camp Del Mar are noted throughout the environmental setting of the Draft EIR. The Proposed Project would add transport activities to MCBCP and cause a change to these existing conditions; therefore the effects of project-related transport must be and have been addressed in the EIR. Please see Response SCE-2 and Response B-1, which characterizes the role of MCBCP and its NEPA process relative to the EIR.

SCE-62 Baseline noise conditions within MCBCP are characterized in Draft EIR Section D.9.1, where MCBCP operations and other sources of noise (e.g., Highway I-5) are clearly included in the setting. The Proposed Project would add transport activities to MCBCP and cause a short-term, potentially significant change to these existing conditions that could be mitigated to less than significant with Mitigation Measures N-1a (Provide advance notice of offloading and transport) and N-1b (Provide liaison for nuisance complaints). Therefore, the effects of project-related transport must be and have been addressed in the EIR. Please also see Response SCE-2.

SCE-63 The Final EIR has been revised to note that nighttime transport could be needed in some areas, but not at San Onofre State Beach, based on future Caltrans or MCBCP consultation.

SCE-64 The Draft EIR characterizes noise impacts due to use of transport equipment and construction of the temporary containment opening as potentially significant, and mitigation measures, including provision of advance notice of offloading and transport activities, designation of a liaison for nuisance complaints, and establishment of a resolution process for noise complaints, would need to be adopted to reduce impacts to less than significant levels. The need for these measures would be minimized by avoiding noise-sensitive receptors in the San Onofre State Beach. Because the MCBCP Inland Route Alternative would avoid the San Onofre State Beach, the MCBCP Inland Route Alternative is slightly preferred for noise (Tables ES-2 and E-1).

SCE-65 Please see Response SCE-2 and Response B-1, which characterizes the role of MCBCP and its NEPA process relative to the EIR. The Final EIR includes revisions to note that implementation of Mitigation Measures N-1a and N-1b on MCBCP would require approval by the Base Commanding General, which would include NEPA review.

SCE-66 The text of Mitigation Measure U-1a (Identify and protect subsurface utilities) has been modified to reflect the change recommended in the comment. Please also see Response SCE-2 regarding the implementation of mitigation measures at MCBCP. The Final EIR includes revisions to note that implementation of Mitigation Measures U-1a and U-2a on MCBCP would require approval by the Base Commanding General.

SCE-67 Please see Response SCE-66 above, and refer to Response SCE-2 regarding the implementation of mitigation measures at MCBCP.

SCE-68 Please see Response SCE-2 and Response B-1, which characterizes the role of MCBCP and its NEPA process relative to the EIR.

SCE-69 The EIR preparers apologize for the confusion of multiple designated emergency response zones that are shown in Figure D.12-1. As in Draft EIR Section D.12.1 (p. D.12-1), only the 10-mile Emergency Planning Zone (EPZ) and a 50-mile monitoring zone are identified. The revised figure has been included in the Final EIR.

SCE-70 The suggested change has been made in Section D.12.3.4 of the Final EIR to clarify the requirements of 10 CFR 50.59.

SCE-71 Please see Response SCE-53.

SCE-72 The referenced roads in the MCBCP are shown on Figure D.13-1 for informational purposes in order to clarify the overall transportation system in the area. Text has been added to Section D.13.1.2 of the Final EIR to clarify that the EIR does not analyze impacts to these roads since these roads are not used by the traveling public.

SCE-73 Draft EIR Section D.13.3.3 (under Impact T-2) considers that only 200 vehicles would access the project site per shift change, although the daily number of the additional workers would be 1,000 additional workers as it is described in the Project Description. The analysis sufficiently describes the traffic situation during the staging and preparation phase by addressing the higher numbers of workers associated with other phases. The Final EIR has been changed to reflect the clarification made by the comment.

SCE-74 Each phase of the project is evaluated against the mentioned significance criteria, and conclusions are made separately for each individual project phase. Mitigation measures identified for traffic and transportation would reduce all potentially significant traffic impacts to less than significant levels. Because the proposed Beach and Road Route would avoid most obstructions of I-5, the Proposed Project is slightly preferred from a transportation perspective over the other transport alternatives (Tables ES-2 and E-1). Because designation of the Environmentally Superior Alternative depends on *all* resources areas, the proposed Beach and Road Route is not the Environmentally Superior Alternative. Please also refer to Response SCE-1.

SCE-75 Mitigation Measure T-1a (Provide emergency vehicle access), which would require SCE to provide a traffic control that includes provisions for uninterrupted emergency vehicle passage on I-5 during transport activities, or alternative arrangements for emergency response to assure uninterrupted emergency service, remains in the Final EIR. This mitigation measure would reduce Impact T-1 (Transport of RSGs would result in public road closures and cause traffic delays, which could restrict emergency vehicle passage) to less than significant level. The Final EIR includes revisions to note that implementation of Mitigation Measure T-1a on MCBCP would require approval by the Base Commanding General. Please also see Response SCE-2.

SCE-76 The proposed Mitigation Measure T-3a (Schedule SONGS shift changes outside of peak hours) would be necessary to ensure that impacts to I-5 are reduced to less than significant levels. The analysis considers the 200-vehicle impact identified by the comment and concludes that this would cause a potentially significant impact. Mitigation Measure T-3a requires that project shift changes occur outside of the evening peak hours in order to ensure that the project's contribution to cumulative traffic conditions is reduced to a less than significant level. No changes to the text have been made.

SCE-77 This comment provides a series of suggestions and identifies issues with the figures used in the visual resources analysis. The following figures are addressed:

- Regarding Figure D.14-1: Landscape Units have been numbered in the Final EIR on Figure D.14-1.

- Regarding Figure D.14-2: Photo A is taken from I-5, not Old Highway 101, in the vicinity of the southernmost portions of San Onofre State Beach, looking southwest, but it is also very typical of views of the coastal terrace west of I-5 as seen from the south-bound highway over extensive portions of the study area between SONGS and Oceanside.
- Regarding Figure D.14-2: Photo B is taken from a portion of San Onofre State Beach somewhat north of similar affected portions of the proposed Beach and Road Transport Route and was included due to ease of access to the photo point and because it is virtually identical in physiography and visual character to those affected portions of the beach route within MCBCP (i.e., extensive stretches of wide, level sandy beach, enclosed to the east by the high, vertical bluff). The photo accurately reflects the visual character of the affected beach portions of the Beach and Road route, which are essentially similar throughout the segment of the coastline that is the project study area. As the comment notes, the affected beach portions of the route would not be visually accessible to the general public, but would be seen by base personnel with recreational access to those beach portions of the route. Based on field observation, these appeared to receive regular use.
- Regarding Figure D.14-2: Photo C is within MCBCP. However, the location of the affected viewers is not within MCBCP but on the highway. These open space portions of MCBCP are identified in the San Diego County General Plan Open Space Element for their importance as the only undeveloped area on the coast between Los Angeles and Mexico. Regarding jurisdictional issues of the analysis, please refer to Responses B-1 and SCE-2.
- Regarding Figure D.14-3: Photo D is taken from a public viewing point (public beach access trail) a short distance from the San Onofre State Beach parking lot on the way toward the beach. As noted on in the Draft EIR (p. D.14-2), "*beaches are not visible from the paved portions of San Onofre State Beach due both to bluff topography and dense vegetation*." However, the photo is included as part of the visual setting characterization. It is true that viewers in the beach portion of the park would not be affected by the Proposed Project, and this photograph helps the reader understand why that is true (i.e., the distance, the intervening high bluff, and vegetation).
- Regarding Figure D.14-4: Impacts related to the I-5 Vista Point depicted in Figure D.14-4 Photos A and B would not affect viewers on MCBCP, but rather the general public present at the State of California-operated scenic vista point. Transport of the RSGs in the vicinity of this site would cause strong but temporary scenic view obstruction to viewers with high visual sensitivity (Draft EIR, p. D.14-28). The Draft EIR explains that this impact "*would represent an adverse effect on a scenic vista, adversely affect a scenic view within a State Scenic Highway corridor, and temporarily degrade the existing visual character or quality of the site [vista point]. However, because the effect would be temporary only, and of relatively short duration per incident, the impact is considered to be somewhat adverse, but weak overall and thus less than significant (Class III)*." No significant impact was found for this Key Observation Point (KOP). Regarding jurisdictional issues, please refer to Responses B-1 and SCE-2.
- Regarding Figure D.14-6: As noted in the description of KOP 3 (Camp Del Mar) visual quality in the vicinity is mixed, but moderate to high overall due to the predominantly high scenic quality of the viewshed as a result of extensive, relatively undisturbed views of the ocean and undeveloped river floodplain. As also noted, viewer sensitivity in the

vicinity is also mixed. Of principal concern in this area would be scenery-oriented recreational base activities related both to recreational boating activities, and the RV campground. Regarding jurisdictional issues, please refer to Responses B-1 and SCE-2.

SCE-78 This comment provides a series of suggestions and identifies issues with the visual resources analysis for Impact V-1, regarding short-term view intrusion, view obstruction, and night lighting (beginning Draft EIR, p. D.14-27). Several different issues are raised by the comment. Responses are organized below in the order of presentation.

The comment states that the discussion of Impact V-1 is inconsistent with the significance criteria and the baseline, but the reasoning for this statement is unclear. The analysis characterizes the significance criteria used in the methodology to gauge the anticipated degree of project-caused visual change/contrast, overall visual sensitivity, and their constituents (e.g., viewer exposure, degrees of scenic view obstruction, etc.). These criteria are described in the context of the baseline. This means that the impacts are identified from each affected KOP in terms of the baseline evaluation of existing visual quality and character of the landscape, and sensitivity of potentially affected viewer groups from these KOPs.

The comment notes that much of the activity at Camp Del Mar would not be viewable by the general public on I-5. The Draft EIR discussion does not contest the observation that much of the Beach and Road route, including those portions within Camp del Mar, are not visually accessible to the general public. Viewer groups identified under Impact V-1 as potentially impacted (Class II) by transport activities with under the Proposed Project (Beach and Road Route) include only visitors at San Onofre State Beach (KOP 1, p. D.14-27); and MCBCP personnel engaged in recreational activities both in the vicinity of Camp del Mar (KOP 3, D.14-29), not travelers on I-5. This impact could be reduced to less than significant with the implementation of Mitigation Measures V-1a (Request decision on closure of San Onofre State Beach), V-1b (Provide advance notice of campground closure to prospective park visitors and campers), L-2a (Avoid peak recreational usage), and N-1a (Provide advance notice of transport). Regarding jurisdictional issues of the analysis, please refer to Response B-1 and SCE-2.

The comment states that it is not unusual for large equipment to be transported on I-5 near San Onofre State Beach and that the proposed transport equipment is similar to that which would occur on I-5. It is quite true that there is considerable traffic on I-5 at nearly all times and that this occurs relatively close to visitors of San Onofre State Beach. However, the proximity and scale of normal heavy traffic on I-5 and that of the much larger transporter and associated convoy of support vehicles and equipment would be quite different. The latter would occur within the same paved parking and access areas occupied by recreational viewers, potentially within a few feet of viewers, over virtually the entire length of the park. The scale of the transporter and RSGs would be considerably larger than those normally seen on I-5, and experienced at much closer distance. Although these activities would have the potential to interfere with or detract from the quality of picnicking and other day-time activities in the paved areas of the park, a nighttime transit of the RSGs during peak visitor season would have the potential to be highly disruptive to campers, as noted in the Draft EIR.

The comment also identifies that the RSG transport would only be visible for a short period of time. The estimates of individual exposure to immediate foreground views of the RSGs are reasonable, assuming that the convoy is able to move unfettered through the length of

the park. It is worth noting however that although each individual exposure could ideally be brief, several hundred viewers over a three-mile length of the park would be affected, potentially on up to seven separate occasions. It is not known at this time when or for how long disruption of activity within San Onofre State Beach could occur as a result of park transit. If however SCE eventually stipulates that park transit would occur only during daytime hours, and consist of a single uninterrupted transit through the park at a given minimum speed, then it is possible that the State Department of Parks and Recreation could determine under Mitigation Measure V-1a (Request decision on closure of San Onofre State Beach) that park closure is not necessary. However, in that case advance notice would still be recommended so that visitors could avoid the transit event if they wish.

If transport were stipulated to only affect daytime use, it is true that the principal destination areas of park visitors would remain useable. The beach would be largely unaffected, and picnic areas, though more strongly affected, would likely remain useable if somewhat less scenic. However, as discussed above, a larger concern is if RSG transport or staging activities were to occur within the park at night during peak use periods. It is highly likely under such circumstances that the associated night light and glare, as well as noise and traffic, could render the campground partially or entirely unusable by campers at those times. Because many campers reserve their stays well in advance, and because the transport schedule has not be firmly established, it is appropriate to recommend notifying potential visitors in advance so they may avoid those times if such night disturbance is a possibility.

The comment additionally asserts that the impacts should not be characterized as potentially significant. Criteria for evaluating visual impacts in CEQA Guidelines Environmental Checklist, Appendix G, are as follows:

(a) Have a substantial adverse effect on a scenic vista?

(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

(c) Substantially degrade the existing visual character or quality of the site and its surroundings?

(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The Draft EIR shows that the Proposed Project could potentially exceed criteria (b), (c), and (d), if additional measures are not incorporated. Removing park landscape beds to accommodate the proposed RSG transporters could potentially cause a substantial adverse change to the existing scenic quality of San Onofre State Beach, and because the specific alterations that will be needed have not been specified, they clearly have the potential to be substantially adverse [Criterion (b): under Impact V-2 (long-term impacts to landscape), p. D.14-30]. Also, the project could substantially degrade the existing visual character and quality of San Onofre State Beach because of the presence of the transporter and the need to remove landscaping, although these effects would be temporary [Criterion (c)]. Finally, if RSG transport were to occur in the campground at night during peak use periods, night lighting and glare impacts could potentially be significant [Criterion (d): p. D.14-28]. Thus, the mitigation measures identified in the Draft EIR would be necessary to avoid potentially significant impacts.

SCE-79 Regarding Mitigation Measure V-1a (Request decision on closure of San Onofre State Beach), please refer to discussion under Response SCE-78, above. The decision for park closure is to be made by the State Department of Parks and Recreation based on receipt of a precise transport schedule from SCE. The information from the Department of Parks and Recreation provided with the PEA did not address any precise schedule because one is not yet available. Please see Response SCE-17, which shows that the agency would consider the information as it becomes available. As discussed under Response SCE-78 and as SCE notes, it may be possible to avoid closing the park if SCE is able to define specific times, dates, and durations for the park transit. However, even in this case advance notice is still recommended in Mitigation Measure V-1a so that visitors may avoid the transit event if they wish.

SCE-80 Please refer to Responses SCE-78 and SCE-79, above.

SCE-81 Regarding Mitigation Measure V-1c (Minimize night-lighting), please see Response SCE-2 and Response B-1, which characterizes the role of MCBCP and its NEPA process relative to the EIR. The Final EIR includes revisions to note that implementation of Mitigation Measure V-1c on MCBCP would require approval by the Base Commanding General.

SCE-82 As indicated in the Draft EIR, potential changes to the San Onofre State Beach parking area landscape beds would not only be potentially highly prominent, but could extend across two winter seasons for a total duration of up to two years, potentially affecting a substantial number of park visitors. As in the Draft EIR analysis, it is thus important not only to minimize the effects of modifications to park landscaping, and to restore them to their original condition at the end of the project, but to ensure temporary mitigation measures as appropriate during the years potentially spanned by transport. Mitigation Measure V-2a calls for such temporary plantings to be done with native species in order not only to be compatible with the existing landscape, which is predominantly of native species and strongly characterized by the local native plant communities, but also to minimize potential for secondary after-project impacts due to introduction of invasive non-native species that could become park management problems at a later time. This Final EIR includes a revision to Table D.14-2 to clarify that reporting for Mitigation Measure V-2a should be made to *both* the CPUC and to the State Department of Parks and Recreation.

SCE-83 Mitigation Measure V-5a (Restore ground disturbance in visual foreground of I-5) has been modified in the Final EIR to clarify that restoration of pre-disturbance grades and vegetation would occur with native species, rather than specifically native coastal scrub species. Please also see Response SCE-2 and Response B-1, which characterizes the role of MCBCP and its NEPA process relative to the EIR.

SCE-84 Regarding jurisdictional issues of the analysis, please refer to Responses B-1 and SCE-2.

SCE-85 Please see Responses SCE-1 and SCE-11 regarding the CPUC process of analyzing options proposed by SCE.

SCE-86 Please refer to response SCE-7.

SCE-87 Responses above (including Responses SCE-31 and SCE-32) address the new emission estimates provided by SCE. The Final EIR has been revised to illustrate that no specific transport route is preferred for air quality because no alternative would simultaneously provide the lowest emissions on a per-day basis while providing the lowest total emissions.

SCE-88 Please see Responses SCE-1 and SCE-20. Please also note that Responses E-3 and E-10 deal with the concerns of the California Coastal Commission regarding a lack of information on transport across San Onofre Bluffs. Response SCE-1 explains the CPUC process of analyzing options proposed by SCE.

SCE-89 Please see Responses SCE-60 and SCE-61 for information on existing military activities and potentially significant impacts on recreational facilities and Response SCE-79 regarding providing scheduling information to the Department of Parks and Recreation. Please also refer to Response SCE-2 and Response SCE-22, which explains the proper consideration of existing land uses at MCBCP under CEQA. Please also see Response B-1.

SCE-90 Although potentially significant visual effects related to view intrusion, view obstruction, and night lighting (Impact V-1) and disturbances to landscaping in San Onofre State Beach (Impact V-2) caused by the Proposed Project (Beach and Road Route) and the alternative routes could be reduced to less than significant levels by the recommended measures (Mitigation Measures V-1a, V-1b, V-1c, and V-2a), the potential for such impacts to visual resources would clearly be higher under Proposed Project than under the MCBCP Inland Route Alternative, which would completely avoid San Onofre State Beach. Because this is shown in Section E.2.1 and Tables ES-2 and E-1 of the Draft EIR, no revision in the Final EIR is necessary. Designation of the Environmentally Superior Alternative depends on *all* resources areas, not only visual resources.

SCE-91 Please see Response SCE-1 regarding the CPUC process of analyzing options proposed by SCE. Response SCE-7 provides information demonstrating that, contrary to this comment, the Beach and Road Route is not the Environmentally Superior Alternative based on consideration of mitigation that would be needed to address geologic hazards, recreational disruption, and visual effects.

SCE-92 The comment notes that not exactly 1,000 workers would be added but rather up to 1,000 worker would be required through the different phases. Section F.1.1 of the Final EIR includes the requested revisions.

SCE-93 The comment provides additional detail on projects that are expected to occur in the cumulative scenario within the City of San Clemente. To accommodate this comment, Section F.3.1, Table F-1, of the Final EIR has been revised to indicate the correct number of residential units for the Marblehead Coastal Project. This information would not change the approach or conclusions of the analysis in the EIR.

SCE-94 It is noted that SCE intends to implement the Applicant Proposed Measures (APMs) shown in Section H of the EIR. The CPUC considers each APM to be a component of the Proposed Project, and they have been included in the analysis of impacts in the EIR. The analysis assumes that they would be implemented for each project activity, regardless of jurisdiction. The CPUC recognizes that in subsequent permits or approvals, a land manager or permitting agency such as MCBCP may dictate a change in implementation of the APM, but CPUC expects that subsequent changes will not be likely to conflict with the adopted measures. The Final EIR includes revisions to note that, as with all aspects of the Proposed Project on MCBCP, implementation of the APMs on MCBCP would require approval by the Base Commanding General. Please also see Responses B-1 and SCE-2 for information on the role of MCBCP in implementing project measures.

Mitigation measures and APMs are identified throughout the EIR for ensuring that impacts to MCBCP lands would be less than significant. If approval by the Base Commanding General results in changes to these measures, or other aspects of the CPUC-adopted project, then further environmental analysis and approval of the changes may be required by the CPUC. The possibility for project changes to require additional environmental review, and the process the CPUC would follow to address the changes, is described in Draft EIR Section H.

SCE-95 The comment notes that Historic El Camino Real should be removed from the Applicant Proposed Measures CR-1 and CR-2, but this change has not been included in the Final EIR because CPUC expects that SCE would strive implement the APMs, unless a change to the APM is dictated by MCBCP, as explained in Response SCE-94. Because SCE also notes in the comment that Old Highway 101 and the State Department of Parks and Recreation should be included in these measures, these changes have been included in Table H-1 of the Final EIR.

SCE-96 The comment notes that the erosion control measures would be implemented as determined by the San Diego Regional Water Quality Control Board. This is noted in Draft EIR Section D.7.2. Additionally, the Final EIR includes revisions to Table H-1 noting the role of the San Diego Regional Water Quality Control Board.

SCE-97 As noted in Response SCE-94, the CPUC considers this and all other APMs to be components of the Proposed Project. As the comment notes, because implementation of APM Haz-1 would be subject to NRC oversight, the Table H-1 in the Final EIR includes revisions to indicate that the plan would be submitted to CPUC, but compliance would be assured by NRC. As described in Response SCE-99 below, implementation of this measure would be monitored by CPUC.

SCE-98 The comment notes that the erosion control and spill prevention and control measures would be implemented as determined by the San Diego Regional Water Quality Control Board. As such, the Final EIR includes revisions to Table H-1 noting the role of the San Diego Regional Water Quality Control Board.

SCE-99 The comment asserts that CPUC would not have approval authority over traffic control measures that are within Caltrans jurisdiction. The CPUC is still responsible for general oversight and monitoring even though Caltrans is the responsible agency. Because Caltrans is identified in Table H-1 and it would not be appropriate to remove CPUC from the role of mitigation monitoring, Table H-1 of the Final EIR includes revisions to note the role of Caltrans in monitoring.

SCE-100 This comment requests a clarifying change in APM Traffic-6. Although the CPUC considers the APMs to be components of the Proposed Project, the requested change is minor, and it is included in Final EIR Table H-1 and in Section B.5, Table B-3, of the Project Description. This change would not alter the analysis of project impacts or mitigation.

SCE-101 It is noted that SCE has no comments on Section J of the Draft EIR.

SCE-102 Appendix 2 (Biological Resources) provides a detailed background on the marine biological resources in the area that further supplements the environmental setting (see Section D.3.1 of the Draft EIR) for the Proposed Project. Appendix 2 remains in the Final EIR. It is also noted that SCE has no comments on Appendices 3 (Cultural Resources) and 4 (Summary of Pertinent Federal Regulations).