

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

3.12 DRAFT EIR SECTION D.9 – NOISE AND VIBRATION

3.12.1 ISSUES

D.9 Noise and Vibration, Page D.9-1

This section discusses noise effects on MCBCP, and this discussion should be removed from the EIR. It should be noted that the discussion of noise on MCBCP generally ignores and discounts the noise from military baseline condition operations along the transport route, which includes large caravans of military vehicles with equipment equal to or louder than that proposed for the SCE transport, such as tanks, tracked amphibious vehicles, troop carriers, helicopters, trucks, and the like.

SCE-62

Transport at Night, Page D.9-5

SCE requests deletion of the following sentences: "Transport would occur during daytime hours. However, during the night, some noise would also be created by minor amounts of miscellaneous work for servicing vehicles, moving mats, and security operations (SCE, 2004d – Response 44)." Although transport is planned during daylight hours for the most part along the beach, some transport may occur at early morning and early evening. Also, transport at the I-5 bypass of Skull Canyon, other crossings/transport on I-5 plus nearby areas, and on some paved roads on the MCBCP (not at San Onofre State Beach) is likely to occur at night to minimize traffic impacts as directed by Caltrans or the MCBCP.

SCE-63

Impact discussion beginning on Page D.9-5

The Proposed Project will not result in significant impacts relative to noise and vibration, and will not exceed significance criteria listed in the Draft EIR:

- The Proposed Project will not expose people to or generate excessive noise levels in excess of local rules, regulations, or standards.
- The Proposed Project will not expose people to or generate excessive ground-borne vibration or noise levels.
- There will be no permanent increase in ambient noise levels.
- There will be no substantial temporary or periodic increase in ambient noise levels that would affect key receptors in the project vicinity.

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

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3.12.2 CHANGES TO MITIGATION MEASURES

Mitigation Measures N-1a and N-1b, Pages D.9-11

Reference to portions of the base on MCBCP and requirements on MCBCP should be removed from these mitigation measures. The CPUC may make recommendations to MCBCP for consideration during NEPA review.

SCE-65

3.13 DRAFT EIR SECTION D10 – PUBLIC SERVICES AND UTILITIES

3.13.1 ISSUES

No comment.

3.13.2 CHANGES TO MITIGATION MEASURES

Mitigation Measure U-1a, Page D.10-13

Change the following sentence: “The Applicant shall contact Underground Service Alert...” to “The Applicant shall contact an appropriate underground digging alert service, such as Underground Service Alert,”

There are several suitable digging alert services, and a single service may not be available at the time the project is implemented. This change provides flexibility in achieving the desired objective of this mitigation measure.

It should be noted in the EIR that this mitigation measure is only a recommendation for portions of the project on MCBCP.

Mitigation Measure U-2a, Page D.10-13

It should be noted in the EIR that this mitigation measure is only a recommendation for portions of the project on MCBCP.

SCE-66

Table D.10.6, Page D.10-13

This table includes reference to MCBCP. Requirements on MCBCP and citation of MCBCP as a responsible agency should be removed from this table. The CPUC may make recommendations to MCBCP for mitigation.

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3.14 DRAFT EIR SECTION D.11 – SOCIOECONOMICS

No comment.

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3.15 DRAFT EIR SECTION D.12 – SYSTEM AND TRANSPORTATION SAFETY

3.15.1 ISSUES

This section of the Draft EIR discusses issues related to safety that are entirely within the purview of the NRC.

Figure D.12-1 SONGS Emergency Planning Zone Map, Page D.12-3

There are only two designated circles that should be shown on Figure D.12-1:

1. 10-mile Emergency Planning Zone for the San Onofre Nuclear Generating Station (SONGS): This would be a 10 mile circle with SONGS in its center. The SONGS Emergency Plan calls for evacuation of this entire region if a worst case accident were to occur.
2. 50-mile Ingestion Pathway Zone for the San Onofre Nuclear Generating Station (SONGS): This would be a 50 mile circle with SONGS in its center. The SONGS Emergency Plan calls for the monitoring of all food products and milk grown or produced within this 50-mile region in the event of a worst case accident at SONGS with a release of radiation.

The incorrect circles shown on Figure D.12-1 in the Draft EIR should be removed from the EIR. There should be no other circles shown than those listed above.

Citation of 10 CFR 50.59 Correction, Page D.12-21

Because of the 10 CFR 50.59 rule change implemented by the NRC several years ago, the second sentence in the second paragraph on Page D.12-21 should be changed as noted below:

Modifications such as reinforcement of existing structures or floors, construction of new platforms or structures, and modifications to cranes and the impact of these modifications on equipment important to safety may be assessed against 10 CFR 50.59 criteria to determine if prior NRC approval is required.

3.15.2 CHANGES TO MITIGATION MEASURES

Impact S-6 and Mitigation Measure G-6a address NRC preempted Issues, Page D.12-29

The discussion of Impact S-6 and mitigation measure G-6a deal with issues that are preempted by the NRC from CPUC jurisdiction and should be removed from the EIR.

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3.16 DRAFT EIR SECTION D.13 – TRAFFIC AND CIRCULATION

3.16.1 ISSUES

Comment on Figure D.13-1 on Page D.13-1

Figure D.13-1 indicates the roadway system in the project area. This figure shows several roads on MCBCP, including Vandegrift Boulevard, Stuart Mesa Road, Las Pulgas Road, El Camino Real, Basilone Road, San Mateo Road, and portions of Old Highway 101. These roads on MCBCP are not open to the public, and should not be considered part of the public transportation system in the region. Reference to roads on MCBCP and treatment of this topic for portions of the Proposed Project should be removed from the EIR.

SCE-72

Number of Workers in D.13.3.3 Staging and Preparation, Page D.13-11

Change the first sentence of the first paragraph of Section D.13.3.3 from “Staging and preparation activities would involve an additional 1,000 workers...” to “Staging and preparation activities would involve a portion of the additional 1,000 workers (approximately 200 workers)....”

SCE-73

Impact discussion beginning on Page D.13-9

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

SCE-74

- The Proposed Project will not cause a substantial increase in traffic.
- The Proposed Project will not cause LOS standards to be exceeded.
- There will be no increase in hazards from design features or incompatible uses.
- There will be no adverse effect on emergency access.
- There will be no conflict with adopted policies, plans, or programs supporting alternative transportation.
- There will be no increase in roadway wear from the Proposed Project.

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

3.16.2 CHANGES TO MITIGATION MEASURES

Mitigation Measure T-1a, Page D.13-17

MCBCP is listed as a responsible agency for this mitigation measure. As stated in the cover letter, MCBCP has sole authority for environmental review on MCBCP and

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analysis of effects and mitigation measures on MCBCP should be removed from the EIR. MCBCP should also be removed as a responsible agency in Table D.13-6.

SCE-75

Mitigation Measure T-3a, Page D.13 -17

Information provided in several deficiency letter responses demonstrate that the potential impact with the proposed mitigation of staggering the shift changes over three periods is adequate mitigation to reduce traffic impacts. It should not be necessary to schedule the normal shift change outside worker expectation. As indicated in previous data submittals on this topic, a maximum of 2,000 extra employees (1,000 of which are affiliated with routine refueling and maintenance outage) traveling in two shifts staggered over 3 periods will result in 6 vehicular shifts for only a short duration. This results in approximately 200 vehicles per shift change (assuming 1 to 2 persons per vehicle). The worst case effect on I-5 is approximately 200 additional vehicles at a given period's shift change. Furthermore, 50% would be expected to be southbound, 50% northbound. It is estimated that this would represent 1% of the peak hour volume on I-5. We believe there is no need to require an off-peak shift change condition for this project. This minor effect does not exceed significance criteria stated in the Draft EIR, D.13, Traffic and Circulation, and mitigation measures for this issue should be removed from the EIR.

SCE-76

3.17 DRAFT EIR SECTION D.14 – VISUAL RESOURCES

3.17.1 ISSUES

Figures D.14-1 and D.14-2 through D.14-8, Page D.14-3 and beginning on Page D.14-5

SCE-77

Figure D.14-1 refers to Landscape Units, but it does not appear to identify Landscape Units by Number. Landscape Units should be identified on the figure.

Figure D.14-2 appears to show views that are inappropriate to the visual assessment. It is uncertain where photo A is located and whether it is a view from I-5 or old Highway 101. This location should be identified, or removed if it is not within the area of potential effect for the project. Photo B shows views of the Coastal Bluff and Beach at San Onofre State Beach that are outside the area of potential effect for the project (these views are not possible from public viewing points along the proposed transport route), and should be removed from the EIR. Photo C appears to have been taken from within the boundaries of MCBCP, and if so, it should be removed from the EIR because it is on MCBCP and should be excluded from CEQA analysis.

Photo D on Figure D.14-3 shows views of the Coastal Bluff and Beach at San Onofre State Beach that are outside the area of potential effect for the project (these views are not possible from public viewing points along the proposed transport route), and should be removed from the EIR.

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Photos A and B on Figure D.14-4 show views from the I-5 viewing area on the southbound lane of I-5 on MCBCP. The foreground shows the MCBCP Uniform training area, which is part of the proposed Beach and Road Transport Route. It should be noted that military vehicles operate on this area in view of receptors at the view point on a regular basis and the results of these activities are evident in this photo. However, reference to MCBCP and impacts and mitigation measures on MCBCP should be removed from the EIR (the CPUC may make recommendations to MCBCP for consideration during NEPA environmental review). Photos C and D are of facilities on MCBCP and should be removed from the EIR.

SCE-77

It should be noted that Photos B and D of Figure D.14-6 clearly show levels of heavy equipment operation and military uses on MCBCP that are very similar to the activities that will result from the Proposed Project and that demonstrate the compatibility of the Proposed Project with the visual character and environmental baseline on MCBCP. However, reference to MCBCP and impacts and mitigation measures on MCBCP should be removed from the EIR (the CPUC may make recommendations to MCBCP for consideration during NEPA environmental review). Photos B and D are of facilities on MCBCP and should be removed from the EIR.

Impact V-1, beginning on Page D.14-27

The discussion for Impact V-1 states that the Proposed Project along the Beach and Road Route would represent a highly prominent, strongly contrastive visual element of industrial character as seen by viewers groups during overland transport from the Del Mar Boat Basin to SONGS. This discussion in the Draft EIR appears to influence the analysis in the Draft EIR and is inconsistent with significance criteria for environmental impacts assessment on visual resources as well as the environmental baseline and should be modified to accurately reflect conditions in the area of potential effect.

SCE-78

Reference to, discussion of, and requirements on MCBCP that will be reviewed by MCBCP during NEPA evaluation should be removed from the EIR. This issue especially applies to the discussion in this section of the EIR regarding the recreation area at Camp Del Mar. It should be noted that offloading and transport along the Beach and Road Route on MCBCP will generally not be visible to the public. This comment applies specifically to the area at Camp Del Mar (including the Boat Basin and recreation area), and along most of the beach portion of the route (views from I-5 are generally blocked by bluffs and vegetation). Only two portions on the beach of the Beach and Road Route are likely to be viewable by people traveling on I-5: along the Santa Margarita River valley, and along the Las Pulgas exit at Red Beach on MCBCP. Depending on the location of the transporter at the time of transport, which will affect the distance and total viewable time from I-5, and the reasonable period of time available to the vehicle on I-5 for such views, total viewable times are expected to be in the order of just a few seconds. Such views of military vehicles and operations, including tanks, amphibious tracked vehicles, helicopters, Harrier jets, night lighting, and flares at night are common place along this portion of the route and in these areas. Therefore, the transport vehicles are completely consistent with this environmental baseline in these areas. Similar considerations apply

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along the entire Beach and Road Route for portions of the transport on MCBCP, including the dirt and paved roads along I-5, which are also heavily used by MCBCP for its training mission.

The Draft EIR states that KOP 1 on San Onofre State Beach represents a location where visitors to the beach may experience potential significant adverse impacts on visual resources. This conclusion is inconsistent with the environmental baseline and significance criteria for the project and should not be presented as a potentially significant impact on visual resources in the EIR. The justification for this request is provided below.

Transport for the Beach and Road Route and the I-5/Old Highway 101 Route will include traveling on Old Highway 101 from the State Park boundary at MCBCP to the SONGS site along the parking area and some campgrounds on the State Park. Transport for the MCBCP Inland Route will include traveling on Old Highway 101 near the northerly access point to the northern portion of the State Park. The primary concern stated in the Draft EIR appears to be associated with views from the State Park for the Beach and Road, and I-5/Old Highway 101 routes on Old Highway 101. The environmental baseline for this portion of Old Highway 101 includes the following features from east to west: I-5 running parallel, the railroad running parallel, Old Highway 101 and State Park parking, picnic tables and camping areas, upland bluffs habitat, the beach at the base of the bluffs, and the Pacific Ocean in the distance. Old Highway 101 on the State Park is not visible from the beach because views in that direction are blocked by the bluffs.

Transport on Old Highway 101 would be east of the picnic tables/camping areas, and in between the picnic tables/camping areas and I-5/railroad. Viewers in KOP 1 have views to the east of I-5, the railroad, and State Park traffic on Old Highway 101. I-5 is within a few hundred feet of these viewers and the railroad is much closer. As stated in the Draft EIR traffic section, tens of thousands of vehicles pass this area per hour during peak travel periods on I-5, and travel on I-5 occurs all day and all night long. Vehicles on I-5 include cars, trucks, buses, and other vehicles. It is not unusual for large equipment to be transported on I-5. The Proposed Project transport equipment is of similar nature to traffic on I-5. At least four trains pass this area each day. These trains pass immediately to the east of and next to Old Highway 101 through the State Park. Traffic from the use of Old Highway 101 within the State Park occurs on a regular basis.

The transport of the RSGs will be visible for only a short period of time to users of the State Park who happen to be looking towards I-5 and the railroad, or perhaps to the north or south along the transport route. It is reasonable to assume that the transporter will only be substantially viewable to a stationary viewer looking in these directions for a maximum distance of 100 yards to the north or south. Assuming a very low traveling speed range of 1 mile per hour (0.5 yards per second) to 3 miles per hour (1.5 yards per second) on Old Highway 101 within the State Park and a maximum view of 200 yards (100 yards in each direction), the maximum viewable exposure to an observer in the picnic and camping area would range from approximately 2.2 minutes to 6.7 minutes. The traveling speed on Old Highway 101 within the State Park is actually expected to be

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in the range of at least 5 to 10 miles per hour; therefore, the actual viewable time of the transporter will be even less. A viewing duration of even 2 to 7 minutes does not represent a significant impact on visual resources or receptors, especially relative to the significance criteria in the Draft EIR.

It should be noted that viewers within KOP 1 who wish to view the top of the bluffs and the beach will have unobstructed views of these features because the transporter will be behind them, and it will pass behind them in a very short period of time. The transporter will not create an obstacle to these views from the picnic and camping area. We have to assume that anyone who exposes themselves to the views of the transporters from within the State Park will choose to do so because it provides something of interest to them. It should also be noted that the transporter will not be visible to viewers who are on the beach because viewing of Old Highway 101 from that vantage point is not possible. Therefore, the only views of the transporter for State Park users will be from the picnic and camping area and the top of the bluffs from trails at distance in limited areas (because the existing vegetation will block some views from trails), and these views will be limited to generally less than 7 minutes to viewers who specifically choose to look that way. Furthermore, the views will not substantially deviate from the existing visual baseline for views to the east.

Evaluation of the specific significance criteria listed in the Draft EIR documents that this transport will not result in potential significant impacts on visual resources because:

- The project will not have a significant adverse effect on a scenic vista because it does not obstruct views to the west (Pacific Ocean) for users of the picnic areas, camping areas, or bluff tops. Views of I-5, the railroad, and 101 are not scenic vistas, and the transport is consistent with the environmental baseline for these easterly views. Views of the transporter from I-5 will be limited to just a few seconds and will not be different from baseline conditions.
- The project will not substantially damage scenic resources. No damage to scenic resources will occur.
- The project will not substantially degrade the existing visual character or quality of the site and its surroundings (no changes to such character or quality will result from the project).
- The project will not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

None of the significance criteria were exceeded; therefore, the project will not result in potentially significant adverse effects on visual resources. This section, including mitigation measures, should be modified or removed accordingly from the EIR. Discussion in this greater section and the EIR stating that the MCBCP Inland route is clearly preferred with respect to reduced levels of adverse effects on visual resources should be modified to state that there are no significant impacts associated with any of the transport options, and no difference between them with regard to visual resources.

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3.17.2 CHANGES TO MITIGATION MEASURES

Mitigation Measure V-1a, Page D.14-45

Mitigation measure V-1a refers to requesting a decision on closure of San Onofre State Beach from State Parks. This mitigation measure should be removed. The SCE PEA included a letter from State Parks dated January 28, 2004, which states that State Parks does not anticipate significant effects on the Park and mitigation measures similar to those for the SONGS Unit 1 RPV Project are expected to address potential concerns that they may have. SCE has stated that it does not anticipate the need to close the State Park to allow transport on Old Highway 101. There are no significant visual impacts that will result from this transport and closure of the park is unlikely to mitigate for transport-related effects of any nature on visual resources. This mitigation measure should be removed.

SCE-79

Mitigation Measure V-1b, Noticing at San Onofre State Beach, Page D.14-45

SCE agrees with this requirement for noticing at San Onofre State Beach with regard to transport through the Park. As stated above, reference to Park Closure is not warranted and should be removed from this mitigation measure.

SCE-80

Mitigation Measure V-1c, Page D.14-45

This mitigation measure makes a requirement on MCBCP, and should be removed from the EIR. The CPUC may make recommendations to MCBCP for consideration during NEPA environmental assessment; however, such recommendations would not constitute required mitigation measures in the EIR.

SCE-81

Mitigation Measure V-2a, Page D.14-46

Mitigation measure V-2a discusses potential disturbance to roadway and landscape within San Onofre State Beach Park. Such potential disturbances would only occur along Highway 101. SCE has already stated that it will work with State Parks to restore such areas, if disturbance actually occurs, to predisturbance conditions acceptable to State Parks. This mitigation measure does not clearly state the need to restore disturbed areas to predisturbance conditions and includes some potential for changes, such as requirement for use of native species in landscaping, that may be contrary to State Parks management of these facilities. It is important to note that restoration to predisturbance conditions, which is part of the Proposed Project and not a mitigation measure per se, avoids significant adverse effects on visual resources. Use of native species in landscaping where none previously existed has nothing to do with potential impacts on visual resources (i.e., there is no relationship to the environmental baseline). It is also important to note that State Parks should take the lead for approving such potential restoration on the State Park so that measures are not required that are contrary to their management of the Park and their mission. This mitigation measure should be revised to

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require restoration of predisturbance conditions, and approval by State Parks rather than the CPUC of plans on the State Park.

SCE-82

Mitigation Measure V-5a, Page D.14-46

This mitigation measure is not consistent with the impact assessment or our comments on Biology mitigation measures. In particular, it calls out revegetation with scrub species, which would be inappropriate in areas that do not support scrub. Revegetation as part of a mitigation measure that changes the visual character of a site from the predisturbance character would be, in itself, a potential adverse impact on visual resources. This mitigation measure should be modified to require restoration of predisturbance grades and vegetation. This mitigation measure should not apply to lands on MCBCP, although the CPUC may make recommendations to MCBCP for consideration during NEPA environmental review of portions of the project on MCBCP.

SCE-83

Table D.14-2, Pages D.14-46 and D.14-47

This table should be modified to remove reference to MCBCP and requirements on MCBCP. Reference to MCBCP as a Responsible Agency, such as in V-1c and V-5a, should be removed.

SCE-84

3.18 DRAFT EIR SECTION E – COMPARISON OF ALTERNATIVES

Table E-1 Proposed Project vs. Transportation Route Alternatives, Pages E-3 and E-4

This table compares impacts along the three transportation route options. As stated earlier in this series of comments, the three transportation routes are all part of the Proposed Project and represent options, not alternatives under CEQA. SCE requests the CPUC approve all three options from this table. Therefore, it is not appropriate to determine an environmentally superior alternative transport route, and reference to such a route in the EIR should be removed.

SCE-85

The analysis of the transport options above clearly demonstrates the need to change the classifications shown in this table if a comparison of transport options (which are not transport alternatives) is still included in the EIR. The primary changes that need to be made are in the areas classified as clearly preferred or otherwise misclassified for the MCBCP Inland route in the Draft EIR. These areas include Air Quality, Geology, Soils, and Paleontology, Land Use, Recreation, and Military Operations, and Visual Resources.

SCE-86

As described above for Section D.2 (Air Quality), there appears to be miscalculations in the Draft EIR's assessment of relative impacts on air quality for the transport options. The Draft EIR correctly states that no significant impacts are expected to result from any of the transport options; however, it incorrectly calculates total emissions from transport along each route option such that the Beach and Road Route has the highest total emissions even though it is the shortest route in terms of distance and duration. The

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ranking of total emissions per route actually correlates well with the total distance of each route such that the lowest emissions occur along the Beach and Road Route and the highest emissions occur along the MCBCP Inland Route. Therefore, classifications should be changed under Air Quality in this table to reflect Slightly Preferred for the Beach and Road Route, and Less Preferred for the MCBCP Inland Route. The I-5/Old Highway 101 route could remain unchanged.

SCE-87

As described above for Section D.5 (Geology, Soils, and Paleontology), the likelihood of significant adverse impacts resulting from the effects of transport on the San Onofre Bluffs is very low and it is unreasonable to expect adverse effects will result from this transport. There is no technically defensible justification for the conclusion that such effects are likely to occur and that the MCBCP Inland Route is, therefore, clearly preferred. This issue was addressed during the SONGS Unit 1 RPV Project and no adverse effect was identified. This classification should be lowered, and rankings of all routes should be changed to reflect No Preference. SCE is willing; however, to perform the requested geology study to further ensure that such risks are avoided, no matter how minor a risk they are.

SCE-88

As described above for Section D.8 (Land Use, Recreation, and Military Operations), no significant effects on the use of San Onofre State Beach are expected to result from transport of the RSGs. This is further confirmed in the letter from State Parks that was included in the PEA and described in the above text. No changes in the use of the State Park are expected to result from the transport of the RSGs, and there is no discriminator among the transport options. Reference to potential effects of transport on recreation at the Camp Del Mar Recreation Area on MCBCP, a military base wholly dedicated to its military mission and not a public recreation facility, must be removed from consideration in the EIR. Furthermore, the analysis of such effects in the Draft EIR are not appropriately justified on MCBCP because there will clearly be no change in the environmental baseline which includes regular, ongoing operation of large sea vessels in the boat basin, unloading of large equipment, and operation of many large amphibious and land military vehicles on the identical path the transporter will follow. Therefore, areas on MCBCP must not be used as discriminators for options in the EIR. The rankings of these options should be changed to No Preference for this resource area.

SCE-89

As described above for Section D.14 (Visual Resources), no significant effects on visual receptors or visual resources are expected to result from any of the transport options, including on San Onofre State Beach. Therefore, there are no discriminators among the transport options, and the rankings should be changed to No Preference.

SCE-90

The changes discussed in this comment clearly tip the scales of an environmentally preferred option towards the Beach and Road Route and this change should be reflected in the EIR. However, it should also be noted that aside from potential adverse effects on traffic on I-5 that can be readily mitigated, all transport options are environmentally neutral in an overall sense and that all transport options should be approved by the CPUC as there are no significant adverse constraints to these transport options in part or in whole.

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3.19 DRAFT EIR SECTION F – OTHER CEQA CONSIDERATIONS

F.1.1 Growth Caused by Direct and Indirect Employment, Page F-1

Section F.1.1 discusses 1,000 additional workers in reference to staging through disposal. This discussion is misleading because it suggests that 1,000 workers will be added and that these 1,000 extra workers will be present for the duration of the project. This section should be modified to reflect the actual case, which is that up to 1,000 additional workers will be required for staging through disposal.

SCE-92

Table F-1 Cumulative Scenario – Projects, Pages F-3 and F-4

According to Officials within the City of San Clemente the following statistics should be used regarding housing development planned or under construction in San Clemente and the EIR should be modified to reflect these numbers:

SCE-93

- Talega (at final build-out): 3,900 homes
- Coastal Marblehead Property: 313 homes

3.20 DRAFT EIR SECTION G – NRC LICENSE RENEWAL

No comment.

3.21 DRAFT EIR SECTION H – MITIGATION, MONITORING, AND REPORTING

Table H-1 Mitigation Monitoring Program – APMs, Pages H-6 through H-9

It should be noted that SCE intends to implement the APMs for the Proposed Project; however, the portions of the project on MCBCP will be subject to MCBCP approval and the APMs may be modified based on MCBCP's NEPA review and administration of the Real Estate License. Therefore, the EIR should note that references to APMs on MCBCP by the CPUC are only recommendations to MCBCP.

SCE-94

APM CR-1 and CR-2 for Cultural Resources in Table H-1, Page H-7

Reference to Historic El Camino Real, which is on MCBCP, should be removed from this APM and replaced with reference to Old Highway 101 within the State Park to reflect appropriate coordination with Caltrans. State Parks should also be added for this area. Therefore, reference to responsible agencies should include reporting to Caltrans and State Parks, and copying the CPUC.

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APM Geo-1 for Geology and Soils in Table H-1, Page H-7

The San Diego Regional Water Quality Control Board will be responsible for approving erosion control measures through construction storm water pollution prevention plans (SWPPP). Such erosion control measures will only be required when appropriate ground disturbance activities occur. Therefore, reference to responsible agencies should include reporting to the San Diego Regional Water Quality Control Board and copying the CPUC.

SCE-96

APM Haz-1 for Hazards and Hazardous Materials in Table H-1, Page H-7

APM Haz-1 is within the purview of the NRC, and should be removed from the EIR.

SCE-97

APM Hydro-1 and Hydro-2 for Hydrology and Water Quality in Table H-1, Page H-8

Refer to the comment above for APM Geo-1, and make appropriate changes to these APMs.

SCE-98

APM Traffic-1 through Traffic-5 for Traffic and Transportation, Pages H-8 and H-9

Caltrans will be the lead responsible agency for these APMs, and the CPUC should only be copied.

SCE-99

APM Traffic-6 for Traffic and Transportation, Page H-9

Change the text in the row labeled APM Traffic-6 from "Shifts will be staggered to spread the traffic over large periods of time to avoid adverse effects." to "Shifts will be staggered over three periods."

SCE-100

3.22 DRAFT EIR SECTION I – PUBLIC PARTICIPATION

No Comment.

3.23 DRAFT EIR SECTION J – REPORT PREPARATION

No comment.

3.24 APPENDIX 1, NOTICE OF PREPARATION

No comment.

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

Dated: May 31, 2005

3.25 APPENDIX 2, BIOLOGICAL RESOURCES

This appendix deals with marine resources that are not within the area of potential effect for the Proposed Project; therefore, this appendix should be removed from the EIR.

3.26 APPENDIX 3, CULTURAL RESOURCES

No comment.

3.27 APPENDIX 4, SUMMARY OF PERTINENT FEDERAL REGULATIONS

No comment.

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