



April 6, 2005

Mr. Eric Gillies
California State Lands Commission
100 Howe Ave Suite 100 South
Sacramento, CA 95825-8202

Subject: SONGS 1 Offshore Conduits Disposition DEIR Comments

Dear Eric,

The Southern California Edison Company (Edison) tenders the attached comments for consideration as revisions to the Draft Environmental Impact Report (DEIR) for the "Disposition of the Offshore Cooling Water Conduits, SONGS Unit 1".

3.9.1

Edison concurs with the selection of the Artificial Reef as the Environmentally Superior Alternative. In addition, we propose the Artificial Reef Alternative be modified to allow removal and appropriate disposal of the dismantled terminal structures. We propose the terminal structure removal modification to eliminate our potential long-term liability or our successor's, under the Termination/Abandonment Agreement.

The environmental impacts that would arise under our proposed modification have already been evaluated under the Proposed Project and Artificial Reef alternatives in this DEIR. We would appreciate your assistance in accommodating our request for modification of the Artificial Reef Alternative for the final disposition of the SONGS-1 Off-Shore Conduits.

If you have any question concerning our comments, do not hesitate to contact me at 1-626-302-8531.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig L. Eaker', written in a cursive style.

Craig L. Eaker

**SONGS Unit 1: Disposition of the Offshore Cooling Water Conduit
Draft Environmental Impact Report Comments**

| | <u>Page</u> | <u>Comment</u> |
|-------|---------------------------------------|---|
| 3.9.2 | Impact BIO-1, 2, 3 throughout DEIR | Change Recommended Mitigation Measure WAT-1a to read, "Exercise due care during dredging operations to minimize turbidity." |
| | Impact WAT-1 throughout DEIR | Change Recommended Mitigation Measure WAT-1a to read, "Exercise due care during dredging operations to minimize turbidity." |
| | Impact GEO-1 throughout DEIR | Change Recommended Mitigation Measure WAT-1a to read, "Exercise due care during dredging operations to minimize turbidity." |
| | ES-5 WAT-1 | Change to read, "WAT-1a. Exercise due care during dredging operations to minimize turbidity." |
| | ES-6 GEO-1 | Change to read, "WAT-1a. Exercise due care during dredging operations to minimize turbidity." |
| 3.9.3 | p. 2-1 lines 8-9 | Change to read, "The onshore Unit 1 power plant includes an 11-acre parcel developed by the Applicant under an easement granted by the Department of the Navy." |
| 3.9.4 | p. 2-14 lines 5-8 | Change to read, "All recycling or disposal activities would be conducted at an approved site within existing permit conditions; recycling and disposal activities are therefore not considered to be a part of the Proposed Project and are not addressed in this EIR." |
| 3.9.5 | p. 2-15 lines 27-29 | The objective of the Proposed Project is to place the conduits in an environmentally benign condition. The applicant also requested, from the CSLC, a revision to its current Easement Agreement to reflect the change from |

complete conduit removal to the proposed project. The revised Easement Agreement may require the Applicant to remain responsible for the abandoned conduit structures. However, the current Easement Agreement provides for the transfer to a third party for potential future reuse of the conduits. Any third party transferee would release the Applicant from any future responsibility for the abandoned conduit structures and indemnify the Applicant against any future claims related to the abandoned conduit structures.

3.9.6 { p. 3-7
Section 3.3

Add a new alternative that would be identical to the existing "Artificial Reef" alternative, except that it would allow Edison to remove, and recycle or dispose of, the dismantled terminal structures in lieu of placing them on the ocean floor to remain permanently as part of a larger artificial reef. Edison proposes this new alternative because removing the terminal structures from the marine environment would eliminate a potential long-term liability for Edison or its successor under the Termination/Abandonment Agreement. Moreover, the current Artificial Reef alternative does not propose to monitor the performance of the dismantled terminal structures as an artificial reef.

3.9.7 { p. 3-13
lines 19-24

Change to read, "**SONGS** currently uses the existing Unit 1 discharge conduit for small discharges of wastewater under an existing NPDES Permit. SONGS intends to divert these small wastewater flows to the Units 2 and 3 conduits as allowed in the NPDES permits."

3.9.8 { p. 4.1-13;
Tbl. 4.1-1

Reference: American Fisheries Society, Special Edition 20, "Common and Scientific Names of Fishes"
Make the following corrections

| | | |
|--------------------|------|-------------------------|
| "shiner surfperch" | -to- | "shiner perch" |
| "black surfperch" | -to- | "black perch" |
| "corbina" | -to- | "California corbina" |
| "black croaker" | -to- | "spotfin croaker" |
| "sardine" | -to- | "pacific sardine" |
| "lizardfish" | -to- | "California lizardfish" |

- 3.9.8 {
- p. 4.1-15;
Tbl. 4.1-2: Misspelled species names:

Strongylocentrotus francisanus -to- *Strongylocentrotus franciscanus*
Hypsopops rubicundus -to- *Hypsypops rubicundus*
 - p. 4.1-18;
line 34. Misspelled species name:
S. francisanus -to- *S. franciscanus*
 - p. 4.1-22;
line 16. Misspelled species name:
Zalophus californacus -to- *Zalophus californianus*
 - p. 4.1-22;
line 29: Typographical error:
"Threatened of endangered" -to- "threatened **or** endangered"
 - 4.1-24
lines 25-26 Change to read, "The California gray whale migrates through the SCB twice each year, traveling between its feeding grounds in Alaska and its breeding **grounds** in Baja California."
 - p. 4.1-33;
line 13: Typographical error:
"do" change to "**does**"
 - p. 4.1-36;
line 12: Typo Typographical error:
"und" change to "**under**"
- 3.9.9 {
- 4.3-17
lines 30-33 The environmental closed-cap bucket is designed to minimize turbidity by forming a complete seal around excavations of soft sediment loads, but not loads of large rocks. Operational experience has demonstrated that these buckets are less effective in grasping large rocks, and that they do not consistently seal around large rocks. Because the materials to be excavated around the bases of the SONGS 1 Vertical Terminal Structures are predominantly large rocks and not soft sediment, the

environmental closed-cap bucket is likely to be less effective at removing the materials, and its use is unlikely to create any less turbidity than the use of a clamshell bucket or rock tongs.

Therefore, change to read, "The applicant shall exercise due care to minimize turbidity while performing mechanical dredging around the terminal structures. A clamshell bucket, rock tongs, closed-cap bucket, or similar device shall be employed to minimize turbidity at all excavation areas."

- 3.9.10 { 4.6-10
 lines 21-23 Change to read, "The effects on waterborne navigation safety would be the same as with the Proposed Project, except that the duration of the disposition effects would be extended for an additional 8 months." (This is consistent with the project durations given on page 4.6-9 lines 11-13.)
- 3.9.11 { 4.7-6
 lines 1-5 Change to read, "Based on Table 6.8 of the BGI report, and assuming that the final project specifications would include the release of dredged materials as close to the seafloor as possible, it is estimated that the horizontal extent of the sediment plume created by the dredging will range from 10 to 50 feet (3 to 15 m) from the point of placement."
- 3.9.12 { 4.7-9
 lines 17-20 Change to read, "This alternative would be similar to the Proposed Project. The Applicant would remove the cut up sections of concrete from the terminal structures and take them to the recycling or disposal facility."
- 3.9.13 { 4.7-10
 lines 1-4 Change to read, "The Applicant would remove the cut up sections of concrete from the terminal structures and take them to the recycling or disposal facility. No impacts to the beaches would occur (Class III). No mitigation is required.
- 3.9.14 { 4.8-2
 lines 16-18 Replace second sentence in paragraph with, "The NRC sets requirements for offshore radiological monitoring."

- 3.9.15 { 4.8-2
lines 19-21 Change to read, "Offshore monitoring is conducted by sample collection and analysis semiannually for nonmigratory marine animals, kelp, and ocean-bottom sediments, and once a month for ocean water. Monitoring reports are submitted annually to the **NRC**."
- 3.9.16 { 4.8-5
lines 21-25 Change to read, "During the operation of Unit 1, all effluent releases from the facility were conducted in accordance with NRC requirements and were well below regulatory limits. Long-term monitoring indicates that there have been no impacts to environment attributable to the facility. Additionally, the **NRC** has issued no notices of violations associated with effluent releases from Unit 1 or with the use of the cooling water conduits."

1 **3.9 Southern California Edison, April 6, 2005**

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3 3.9.1 Request noted. The implementation of this request would effectively render
4 the Artificial Reef Alternative moot.

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6 3.9.2 Mitigation Measure MMWAT-1a as stated in the EIR provides the measures
7 to minimize turbidity during dredging operations.

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9 3.9.3 The text of the EIR at the cited location has been revised appropriately.

10

11 3.9.4 The text of the EIR at the cited location has been revised appropriately.

12

13 3.9.5 Comment noted. We believe the objectives of the Proposed Project are
14 adequately stated on pages 1-1 and 1-2 of the DEIR.

15

16 3.9.6 See Response 3.9.1.

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18 3.9.7 The text of the EIR at the cited location has been revised appropriately.

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20 3.9.8 The text of the EIR at the cited location has been revised appropriately.

21

22 3.9.9 See response 3.9.2 above.

23

24 3.9.10 The text of the EIR at the cited location has been revised appropriately.

25

26 3.9.11 The text of the EIR has been revised as suggested in response to this
27 comment.

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29 3.9.12 Comment noted. See Response 3.9.1.

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31 3.9.13 Comment noted. See Response 3.9.1.

32

33 3.9.14 The text of the EIR at the cited location has been revised appropriately.

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35 3.9.15 The text of the EIR at the cited location has been revised appropriately.

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37 3. 9.16 The text of the EIR at the cited location has been revised appropriately.

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