



DEPARTMENT OF FISH AND GAME

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March 29, 2005

Mr. Eric L. Gillies, Project Manager
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

Subject: Comments on the Disposition of Offshore Cooling Water Conduits,
San Onofre Nuclear Generating Station Unit 1, Draft
Environmental Impact Report

Dear Mr. Gillies:

Department of Fish and Game (Department) personnel have reviewed the State Lands Commission's (SLC) Draft Environmental Impact Report (DEIR) for the Disposition of Offshore Cooling Water Conduits, San Onofre Nuclear Generating Station (SONGS) Unit 1, located offshore of Camp Pendleton in the Pacific Ocean, San Diego County (SCH 2004061092), applicant Southern California Edison (SCE). SONGS Unit 1 is being decommissioned. This DEIR discusses the disposition of the conduits (the onshore components are the subject of another environmental document). SONGS Unit 1 has a 7.5-acre lease with the SLC for nearshore and offshore waters that extends southwest from the Mean Lower Low Water (MLLW) line to approximately 3,200 feet offshore. The lease provides a 100 foot-wide right-of-way for the Unit's cooling water intake and discharge conduits. The two conduits are comprised of 12-foot diameter steel reinforced concrete pipe and are 20 feet apart. The intake conduit extends 3,200 feet offshore while the discharge conduit extends 2,600 feet offshore. The offshore portion of each conduit is buried under 4 feet of sand. A terminal structure exists at the west end of each conduit. The terminal structures extend 30 feet below the ocean bottom and are covered by 4 feet of rock. The intake terminal structure (in waters 27 feet deep) rises vertically to 11 feet below the ocean's surface while the discharge terminal structure (in waters 25 feet deep) rises to 14 feet below the ocean's surface. Both are marked with buoys. Manhole risers are located every 500 feet along the intake and discharge conduits.

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The proposed project would remove the vertical terminal structures above the ocean floor at the intake and discharge conduits and the associated marker buoys. It would also remove the five (5) manhole risers on the intake conduit and the four (4) risers on the discharge conduit. The conduits would remain buried beneath the ocean floor. Barriers would be installed in the terminal structure and manhole riser openings to prevent entry by humans and marine mammals (the conduits would continue to function as habitat until they backfill with sediment). A plug of concrete would be installed between the MLLW boundary and the onshore portion of the conduits to the existing tsunami gates. Finally, a new lease termination/abandonment agreement between the SLC and SCE would be initiated. The DEIR also describes a complete removal alternative, a nearshore removal alternative, an artificial reef alternative, and a crush conduits alternative.

The Department has reviewed the DEIR subject to our requirements under the California Environmental Quality Act, the California Endangered Species Act, and other provisions of the California Fish and Game Code that afford protection to the State's fish and wildlife public trust resources. Our primary objective for reviewing environmental documents is to be able to provide the project sponsor and Lead Agency with recommendations for avoiding or minimizing negative impacts to fish and wildlife.

3.2.1 { The Department's main concern with the proposed project involves impacts to sensitive marine habitat (e.g., hard bottom communities, surfgrass habitat) from construction activities associated with removal of the terminal structures and manhole risers (e.g., anchoring). Section 4.1.6 describes the potential biological impacts associated with the preferred project and includes mitigation measures to eliminate and/or reduce these impacts. The Department concurs with these measures. However, we suggest the description for mitigation measure WAT-1d, minimize anchor dragging (described on page 4.3-18), be expanded to specifically mention the anchoring plan and the pre-construction dive survey described on page 4.1-42. Additionally, it should be noted that anchoring plan detailed in Appendix D does not include the anchor pre-plot drawing which depicts the proposed anchorages and anchor locations. This should be included in the final environmental document.

3.2.2 { The Department concurs that the complete removal project alternative, the removal of nearshore portion of conduits alternative, and the crush conduits and remove terminal structures alternative would have significant environmental impacts on biological resources. Because of these impacts we would be opposed to adoption of these project alternatives. Conversely, we find that the artificial reef alternative would have similar impacts as those described for the proposed project.

3.2.3 { Overall, the Department believes that the DEIR is adequate in its portrayal of impacts to fish and wildlife resources and habitats associated with the proposed project and project alternatives. We believe adoption of the proposed

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project would not have a significant adverse effect on existing marine resources and habitats within the area provided the proposed mitigation measures, as described in the DEIR and with incorporation of our above-mentioned comment, are implemented.

As always, Department personnel are available to discuss our comments, concerns, and recommendations in greater detail. To arrange for a discussion please contact Ms. Marilyn Fluharty, Environmental Scientist, California Department of Fish and Game, 4949 Viewridge Avenue, San Diego, CA 92123, telephone (858) 467-4231.

Sincerely,



Eric J. Larson
Ecosystem Coordinator
Marine Region

cc: State Clearinghouse, Sacramento (original sent to Lead Agency)
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1 **3.2 California Department of Fish and Game, March 29, 2005**

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3 3.2.1 The Anchoring Plan and Pre-construction Dive Survey are components of the
4 Proposed Project and are distinct from mitigation measures such as WAT-1d that
5 are recommended as a consequence of the impact analysis. As stated in lines
6 19-22 at page 4.0-3, "... . . measures incorporated into the project design have
7 the same status as any 'applicant proposed measures.' The CSLC's practice is to
8 include all measures to eliminate or reduce the environmental impacts of a
9 Proposed Project, whether Applicant proposed or recommended mitigation, in
10 the MMP."

11 The anchor drawing has been added to Appendix D, following page 92, as
12 suggested.

13 3.2.2 The Department's comments are acknowledged.

14 3.2.3 Comments noted.

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