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RECIP. NAME RECIPIENT AFFILIATION

REGAN, W.H. \*\*\*ENVIR. PROJECT BRANCH 2

SUBJECT: Review of draft environ impact statement. Comments cover recreational & cultural resources impacts. Recommends applicant take historic & Native American cultural resources into account.

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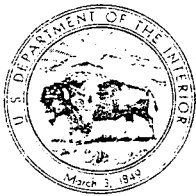
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# United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

JAN 18 1979

In Reply Refer To:  
ER 78/1161

Mr. William H. Regan, Jr.  
Chief, Environmental Projects Branch 2  
Division of Site Safety and  
Environmental Analysis  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Regan:

The Department of the Interior has completed its review of the draft environmental statement for San Onofre Nuclear Generating Station Units 2 and 3. We have comments in only two areas of our jurisdictional concern as set forth below.

## Recreation Resources

The discussion of recreation impacts states that restrictive use of the beach area was unanticipated at the time issuance of the construction permit was being considered. Since no explanation is given, it is unclear to us how such a significant impact, the loss of recreational and scenic open space, could have been overlooked during the earlier planning stages. The final statement should disclose the reasons which now require restrictions upon beach use.

Although there is now recognition of the impact, we see no attempt being made by the applicant to mitigate the loss of recreation space and opportunity. With respect to the scenic quality of the area, we find the intended plan to construct an eight foot chain-link fence extending over three-fourths of a mile along the beach quite objectionable. Design of the walkway deserves much more attention. Given the fact that this stretch of beach is rather removed from the developed portions of the state park units and therefore receives minimal use and given the scenic nature of the beach area and bluffs it would certainly seem more preferable and perhaps sufficient to consider posting the area as to its restrictive use. If a barrier is still needed, a more aesthetically sensitive, light railing may best fulfill the need to restrict access.

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Cultural Resources

We are pleased that the NRC staff has directed the applicant to consider historic, archeological, and Native American cultural resources in its planning process. We understand that existing and possible new transmission corridors will be surveyed for such resources. However, we strongly urge that the applicant allow enough flexibility in its planning to actually take the results of these surveys into account in its final placement of tower bases, access roads, and proposed substations. This would include allowing the State Historic Preservation Officer enough time to properly evaluate the surveys results and make appropriate recommendations. In addition, any new land used for material storage or other project activities outside the transmission corridors should also be checked for cultural resources.

We hope these comments will assist your efforts in preparing the final environmental statement.

Sincerely,

  
Larry E. Meierotto  
SECRETARY

Deputy Assistant