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 AUTH. NAME AUTHOR AFFILIATION  
 GALLER, S.R. Commerce, Dept. of  
 RECIP. NAME RECIPIENT AFFILIATION  
 Division of Site Safety & Environmental Analysis

SUBJECT: Comments on draft EIS. Final version should mention  
 relationship of fish species to help habitat & potential  
 addl cost of compensating for loss of biological resources  
 due to operation of plant.

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UNITED STATES DEPARTMENT OF COMMERCE  
The Assistant Secretary for Science and Technology  
Washington, D.C. 20230  
(202) 377-3444 4335

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362

January 22, 1979

Director, Division of Site Safety  
and Environmental Analysis  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555


Dear Sir:

This is in reference to your draft environmental impact statement entitled "San Onofre Nuclear Generating Station, Units 2 and 3, Southern California Edison Company, San Diego Gas & Electric Company." The enclosed comments from the National Oceanic and Atmospheric Administration are forwarded for your consideration.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you.

We would appreciate receiving 10 copies of the final statement.

Sincerely,

  
Sidney R. Galler  
Deputy Assistant Secretary  
for Environmental Affairs

Enclosures from: Gordon G. Lill--National Ocean Survey  
Gerald V. Howard--National Marine Fisheries Serv

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UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL OCEAN SURVEY  
Rockville, Md. 20852

OA/C52x6

JAN 10 1979

TO: PP - Richard L. Lehman  
FROM: OA/Cx1 - *Gordon G. Lill*  
SUBJECT: DEIS #7812.06 - San Onofre Nuclear Generating Station,  
Units 2 and 3

The subject statement has been reviewed within the areas of NOS responsibility and expertise, and in terms of the impact of the proposed action on NOS activities and projects.

The following comments are offered for your consideration.

Section 2.3.1, Surface-water hydrology, has been found to be very adequate for the purposes intended. The authors are to be commended for the thorough bibliography on the subject.

NOS concurs with and encourages the oceanographic monitoring program described in Section 6.2.2. We feel this program will ensure environmental protection and help allay public concern.



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
National Marine Fisheries Service  
Southwest Region  
300 South Ferry Street  
Terminal Island, California 90731

Date : January 8, 1979

FSW33/JJS

To : EC, Office of Ecology and Conservation

*ES* R. L. Schueler

Thru : F7, Kenneth R. Roberts, Acting Director, Office of Habitat Protection

From *for Gerald V. Howard* FSW, Gerald V. Howard, Regional Director, Southwest Region

Subject: Review of DEIS No. 7812.06 - San Onofre Nuclear Generating Station, Units 2 and 3 (NRC)

The subject DEIS which accompanied your memorandum of December 8, 1978, has been reviewed by the National Marine Fisheries Service. The following comments are offered for your consideration:

Specific Comments

5. Environmental Effects of Station Operation

5.4 Environmental Impacts

5.4.2 Impacts on the aquatic environment

Page 5-26, paragraph 7, Kelp

In paragraph 7 little information is included documenting the importance of kelp to coastal commercial fish species. Information available in the California Department of Fish and Game Fish Bulletin 139 (Quast, 1968) provides some insight in that regard.

Data developed by Jay Quast of the then U.S. Bureau of Commercial Fisheries, and included in that publication, indicate that in his studies he found more than twenty commercially important fish species occurring in the kelp beds off southern California. According to those studies the relationship of many of those species to the kelp habitat was more extensive than indicated by the final sentence of the subject paragraph. This should be reflected in the text of the final EIS.

6. Environmental Monitoring

6.3 Operational Monitoring Programs

### 6.3.3 Aquatic biological monitoring

#### Page 6-7, paragraph 1

The concept of continuing a kelp study program into the operational stage of SONGS is a good one. However, should those studies determine that significant harm is occurring to that resource, then some method of compensation satisfactory to the National Marine Fisheries Service would need to be developed. This should also apply to the studies being conducted on fish impingement at SONGS 2 and 3.

If such measures are not adopted and adverse impacts do appear the monitoring program may be merely documenting the demise of a valuable coastal resource.

### 10. Benefit-Cost Summary

#### 10.7 Summary of Benefit-Cost

#### Page 10-3, paragraph 3

The potential additional cost of compensating for loss of biological resources due to the operation of SONGS 2 and 3 should be addressed.

#### LITERATURE CITED

Quast, Jay C. 1968. 8. Observations on the food of the kelp-bed fishes.  
In: California Department of Fish and Game, Fish Bulletin 139.  
Pp 109-142.