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Staff:	T. Luster-SF
Staff Report:	May 24, 2013
Hearing Date:	June 12, 2013

STAFF REPORT:
COASTAL DEVELOPMENT PERMIT

Application No.:	**E-13-003**
Applicant:	**Southern California Edison**
Location:	San Onofre Nuclear Generating Station (SONGS) 5000 Pacific Coast Highway San Clemente, CA (APN #101-520-12)
Project Description:	Construct and install security upgrades, including walls, fences, barriers, various sensors, and replace an existing temporary building with a new security building at the SONGS facility, San Diego County.
Staff Recommendation:	Approval with Conditions

SUMMARY OF STAFF RECOMMENDATION

Project Description: The proposed project involves constructing and installing several security improvements at the San Onofre Nuclear Generating Station (SONGS), located adjacent to the Pacific Ocean shoreline on a leased site within Marine Base Camp Pendleton in northern San Diego County. Southern California Edison (SCE) has proposed the improvements in response to Nuclear Regulatory Commission (NRC) requirements, which apply to the facility both when it is operating and for as long as it has nuclear materials at the site.

The main project activities include replacing existing security fences with new walls and fences around much of the facility's Owner Controlled Area (OCA), which includes the components of the facility with the highest security requirements, as determined by the Nuclear Regulatory Commission (NRC). The project also includes replacing vehicle barriers at either end of the facility's existing public walkway adjacent to the beach, replacing an existing temporary building at the site with a new permanent structure, and installing various security devices around the facility.

Project activities will occur on already developed parts of the site. SCE has included mitigation measures in its project that avoid or reduce potential adverse effects to water quality, public access, visual resources, and potential archaeological resources. Some activities will take place adjacent to areas of the SONGS site that the Commission has previously determined to be environmentally sensitive habitat areas (ESHA). SCE has modified its initially proposed project so that it now avoids direct adverse effects to ESHA and has included a number of mitigation measures that avoid and reduce most potential indirect adverse effects. To further reduce potential impacts, staff is recommending the Commission impose **Special Condition 1**, which will ensure protection of breeding and nesting bird species known to be dependent on ESHA in the area of the facility.

Recommendation: The Commission staff believes the proposed project, as conditioned, would conform to applicable Coastal Act policies, and therefore recommends **approval** of coastal development permit application E-13-003.

> ***Note:*** Federal law pre-empts the state from imposing requirements related to nuclear safety or radiation hazards. These Findings therefore evaluate only those issues necessary to determine conformity to policies of Chapter 3 of the Coastal Act and do not address the issues pre-empted by federal law.

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EXHIBITS

I. MOTION & RESOLUTION

Motion:

*I move that the Commission **approve** Coastal Development Permit No. E-13-003 pursuant to the staff recommendation.*

Staff recommends a **YES** vote on the foregoing motion. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution:

The Commission hereby approves the coastal development permit and adopts the findings set forth below on grounds that the development, as conditioned, will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment.

II. STANDARD CONDITIONS

This permit is subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment**. The permit is not valid and development shall not commence until a copy of the permit, signed by the Permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration**. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation**. Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment**. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land**. These terms and conditions shall be perpetual, and it is the intention of the Commission and the Permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITION

1. **Protection of Biological Resources.** Prior to any project construction or installation activities proposed to occur from February 1 to August 31 and within 100 feet of the environmentally sensitive habitat area (ESHA) located in the facility's Southeast Bluff area, the Permittee shall provide the following for Executive Director review and approval:
   - Results of a nesting survey conducted no more than 14 days before the proposed start of activities. The survey shall be conducted by a biologist qualified to identify the nests and breeding behavior of birds protected by the Migratory Bird Treaty Act and by state and/or federal Endangered Species listings. Results shall show the location of all nests identified within this ESHA.
   - Reasons the proposed activities must occur during the February 1 to August 31 period.
   - A description of all measures that will be implemented to avoid and minimize potential adverse effects on breeding or nesting birds, including imposition of a minimum 50-foot buffer between any nests and project activities, and documentation that noise levels from equipment to be used during these activities will not exceed 62 decibels at any nest locations.

   The Permittee shall not conduct these activities without the Executive Director's written approval of the above-submitted information.

IV. FINDINGS & DECLARATIONS

A. PROJECT DESCRIPTION

The proposed project involves constructing and installing several security improvements at the San Onofre Nuclear Generating Station (SONGS), located adjacent to the Pacific Ocean in northern San Diego County (see Exhibit 1 – Location Map). SCE is proposing the project to enhance security features at the SONGS facility, pursuant to Nuclear Regulatory Commission (NRC) requirements at 10 CFR 73 *et seq.*, which require that nuclear power plant operators establish and maintain a physical security system to protect nuclear materials. NRC requirements will apply to the facility both when it is operating and for as long as SCE has nuclear fuel or other materials at the site.

The facility site is within an approximately 200-acre area leased from Marine Base Camp Pendleton that extends about a mile along the Pacific Ocean shoreline**.** Most of the site is developed as part of the SONGS facility, though it also includes areas of sensitive habitat and provides public access and recreational opportunities at the adjacent beach and coastal waters. SONGS is owned by Southern California Edison (approximately 78%), San Diego Gas & Electric Company (approximately 20%), and the City of Riverside (approximately 2%).

Proposed Project Activities

Project components would be constructed or installed on already developed areas around most of the Owner Controlled Area (OCA) and the Protected Area (PA) at SONGS, which are the areas of the facility that contain the reactors and spent fuel storage areas and that have the most stringent security requirements. These areas are located between the shoreline and Interstate 5 (see Exhibit 2 – Site Plan). The proposed project includes the following main features:

- **Replacing an existing security fence with a new security wall and fencing:** The facility's current security boundary includes chain-link fencing and concrete block wall barriers. SCE would remove most of this existing fencing and barrier system and replace it at the outer boundary of the facility's OCA with new fencing and what is known as a Metalith wall (see Exhibit 3 – Metalith Wall Diagrams). The Metalith wall consists of two courses of connected prefabricated steel panels filled with sand or gravel. The wall would be about eight feet wide with a 16-foot vertical section topped with a four-foot domed cap or security wire. This type of wall is used in various types of military and high-security settings and provides strong blast-resistance and vehicle deterrence.

  SCE would construct the wall in three locations – a section about 3,650 feet long along the eastern OCA boundary, a 430-foot section on the northern boundary, and a 490-foot section on the western boundary. These sections would be connected with new security fences similar to the existing chain-link fences around the site. The wall would be built on relatively level parts of the site, with fences constructed on sloped areas.

- **Replacing removable steel-reinforced concrete block barriers with slightly smaller barriers:** SCE would replace existing vehicle barriers located at the northwest SONGS boundary and at the south end of the shoreside public access walkway with slightly smaller but similar barriers set in a different configuration. The new barriers would be placed in a pattern that would slow or prevent vehicle access but would still allow the current level of pedestrian access.

- **Replacing an existing single-story temporary building with a new single-story permanent building:** SCE would remove a temporary, single-story building in the facility's Parking Lot 4 and replace it with a 14-foot high permanent, single-story building that would be used for security and personnel screening purposes. It would use the site's existing water, sewer, and electrical facilities.

- **Installing cameras and other detection systems on the new security wall and on existing security barriers:** SCE will install additional security cameras and sensors on and near the new security wall and fences and on other existing structures.

Project timing, staging, and work effort

SCE expects to start project activities during the summer of 2013 and complete them about 14 months later in time for a scheduled NRC security inspection in 2014. Work will occur on weekdays between 7 am and 5 pm. For Metalith wall construction, SCE will work from inside the OCA to the extent practicable and will stage the excavators, compactors, graders, and similar types of heavy equipment on already developed areas of the facility. Wall construction will

require delivery of about 3,000 truckloads of materials to the site over the 14-month period, or an average of about ten trucks per day. SCE provided a noise analysis showing that noise levels from project equipment would generally be at or below ambient noise levels at nearby public access locations, such as the beach adjacent to SONGS. SCE also provided an air quality analysis showing that construction-related greenhouse gas emissions expected from the project would be less than 2,000 metric tonnes, which is well below the state's current interim threshold of significance of 10,000 tonnes of CO_2 equivalents (CO_2e) for proposed projects.

B. COMMISSION JURISDICTION

The proposed development is within the Commission's permit jurisdiction and the standard of review is Chapter 3 of the Coastal Act.

> ***Note:*** Federal law pre-empts the state from imposing requirements related to nuclear safety or radiation hazards. These Findings therefore evaluate only those issues necessary to determine conformity to policies of Chapter 3 of the Coastal Act and do not address the issues pre-empted by federal law.

C. ENVIRONMENTALLY SENSITIVE HABITAT AREAS

Coastal Act Section 30240 states:

> *a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
>
> *b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

Some locations within the SONGS site include areas of coastal sage scrub habitat that the Commission has identified as environmentally sensitive habitat areas (ESHAs). These and other nearby areas are known to provide habitat for several listed sensitive species, including the coastal California gnatcatcher (*Polioptila california californa*), Pacific pocket mouse (*Perognatus longimembris pacificus*), and numerous plant species.

SCE's initial proposal for this project would have placed part of the new Metalith wall on about 0.5 acres of coastal sage scrub ESHA at the site. This area, known as the Southeast Bluff at the SONGS site, is on a mesa and shallow gully about one hundred feet wide and one thousand feet long between the top of the coastal bluff and the main developed part of the SONGS facility. Previous Commission approvals have allowed limited development within this area, including construction of the existing OCA perimeter fence and a concrete swale within the gully, along with maintenance in the form of ongoing vegetation removal within a six-foot wide strip along the existing fence; however, other parts of this area retain ESHA characteristics.

After its initial CDP application submittal, SCE conducted an assessment of possible alternatives that might avoid or reduce project effects on ESHA. Based on that assessment, SCE recently modified the proposed project so that the new Metalith wall is no longer proposed within the ESHA footprint and no project activities would occur in ESHA. SCE will now completely avoid direct adverse effects to ESHA by instead installing security structures and additional sensors on already developed areas and existing structures in or near this part of the facility site.

While this modification results in avoidance of direct effects on ESHA, the proposed activities could indirectly affect ESHA and its dependent species. SCE has proposed several mitigation measures to ensure potential effects are avoided or minimized. As part of its CDP application, SCE provided the results of several surveys conducted to determine whether listed species were present within or near the initially proposed impact area. Surveys conducted in the summer and fall of 2012 showed no presence of either the coastal California gnatcatcher or Pacific pocket mouse and did not identify listed plant species within the initially proposed project footprint. Nonetheless, SCE will avoid potential impacts by conducting all installation and worker activities on already developed portions in this area of the facility, such as the six-foot wide vegetation maintenance area adjacent to the security fence and the concrete swale that were installed pursuant to previous Commission approvals. SCE will also have a biological monitor onsite in this area to ensure project activities do not damage native vegetation. SCE will conduct all work in this area using hand tools and will bag and remove any debris generated during installation at the end of each work day. To avoid potential impacts to sensitive bird species, SCE has proposed scheduling activities in this area outside the breeding and nesting season that runs from February 1 to August 31 each year. Should SCE determine installation is needed during the breeding and nesting season, it has proposed conducting nesting surveys to identify whether active nests are present, and if so, to apply appropriate buffers between the nest(s) and work areas as determined by a qualified biologist.

To ensure this work is more fully protective of ESHA and the species that rely on it, **Special Condition 1** requires that SCE, prior to conducting work near this area during the identified breeding and nesting season, provide for Executive Director review and approval results of a nest survey conducted by a qualified biologist, documentation of the need to conduct activities during this period, and identification of all mitigation measures SCE will implement to avoid and minimize potential adverse effects to these species. These measures are to include a buffer between nests and project activities and documentation that noise levels at the nests from project equipment will be no greater than nearby measured ambient noise levels.

Conclusion

The project, as modified with the above-described design change and mitigation measures, and with **Special Condition 1**, will avoid direct adverse effects to ESHA and will minimize potential indirect effects so that the project will not significantly degrade adjacent ESHA. For the reasons described above, the Commission therefore finds that the proposed project, as conditioned, will be carried out in a manner that is protective of environmentally sensitive habitat areas and is therefore consistent with Coastal Act Section 30240.

D. WATER QUALITY PROTECTION AND SPILL PREVENTION AND RESPONSE

Coastal Act Section 30230 states:

> *Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*

Coastal Act Section 30231 states:

> *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

Coastal Act Section 30232 states:

> *Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.*

These Coastal Act policies generally require that development protect coastal waters and not result in adverse effects to those waters and their associated coastal resources. They also require protection against spills of hazardous substances and effective management of spills should they occur. Because the SONGS site is immediately adjacent to the Pacific Ocean, spills or other incidents could quickly affect water quality in nearby coastal waters. However, and as noted previously, the proposed project activities will occur within already developed parts of the SONGS facility, which is subject to existing water quality, stormwater management, and spill prevention plans and their associated Best Management Practices (BMPs). Because the project activities are similar to those already occurring at the site – e.g., truck traffic, heavy equipment operation, etc. – the existing plans and BMPs provide appropriate controls to avoid and minimize potential adverse water quality effects. For example, the SONGS Spill Prevention, Control and Countermeasures (SPCC) Plan mandates the procedures and equipment availability needed to prevent and control any spills of oil or fuel from project equipment to nearby storm drains. Similarly, the facility's Storm Water Pollution Prevention Plan (SWPPP) includes procedures regarding dust control and debris cleanup that apply to the types of equipment to be used and

activities to be conducted during the project. SCE will also stage all project-related machinery and heavy equipment within the developed OCA boundary where the necessary spill prevention controls are already in place, and will fuel vehicles as needed within already authorized areas.

Conclusion

For the reasons described above, the Commission finds that the proposed project, as conditioned, will be carried out in a manner that is protective of coastal waters and will prevent or respond to potential spills and is therefore consistent with Coastal Act Sections 30230-30232.

E. PUBLIC ACCESS

Coastal Act Section 30210 states:

> *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

Coastal Act Section 30211 states:

> *Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

Coastal Act Section 30212 states, in relevant part:

> *(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or (3) agriculture would be adversely affected...*

Most of the proposed project activities are not expected to affect the existing public access provided in and near the SONGS site, as they will largely occur some distance from areas where access is provided. As noted above, truck trips for the project will average about ten per weekday and noise levels from equipment operation are expected to be at or below ambient noise levels in those areas with public access, including the nearby beach and campgrounds.

Part of the project will take place on the walkway that provides public access to the beach adjacent to the SONGS complex. The walkway currently includes barriers at either end that allow pedestrian access but prevent vehicular access. SCE is proposing to remove the existing steel and concrete vehicle barriers at each end of the walkway and replace them with five similar, but slightly smaller, barriers set in a pattern that will result in a curved path through the walkway. This will allow the same level of pedestrian access as is currently provided but will impede possible vehicular access.

To avoid or minimize potential effects on public access, SCE will place the new barriers to provide at least three feet of distance between each barrier. The removal and installation will take about one workday at each end of the walkway; however, SCE will maintain public access during those workdays except during brief periods when equipment is being moved. SCE will also post advance notice at both ends of the walkway at least two weeks before conducting the work and will have personnel on site during the work to ensure safe passage along the walkway.

Conclusion

The proposed activities, as designed and with the included mitigation measures, are expected to have no more than a *de minimis* effect on public access. The Commission therefore finds that the proposed project is consistent with the above-referenced Coastal Act public access policies.

F. VISUAL RESOURCES

Coastal Act Section 30251 states:

> *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

The existing SONGS facility asserts a strong visual presence along this stretch of the Pacific Ocean shoreline, with its two containment domes rising more than 200 feet above the beach. Portions of the power plant complex are visible from the shoreline as well as from the nearest public road, although the facility's location at the top of a coastal bluff limits the views of power plant structures and equipment from the nearest beach areas.

The security wall will introduce a solid structure about 20 feet high around much of the site's perimeter, but its visual effects on views to and along the shoreline will be relatively small. SCE provided photographs showing existing conditions and visual simulations of the wall from five observation points around the facility – one each from the beach north and south of SONGS, and three from the nearby highway. From those locations, the wall creates no more than a *de minimis* effect on views to and along the shoreline, primarily because it is visually subservient to the existing structures at the site. The wall would not be seen at all from the south beach view, as it will be blocked by the coastal bluff. The wall would be visible from the north beach view, but will have very little visual impact because it will be in front of much larger existing structures. Exhibits 4a and 4b provide a comparison of an existing north beach view with a simulated view from the same location that includes the proposed wall. SCE will further reduce potential visual impacts by finishing the wall in a neutral color that blends with its surroundings.

Visual impacts during construction are not expected to be substantially greater than those created by the existing facility. Work will occur during daytime only and will require only minor lighting associated with construction equipment. The equipment will also be similar to that already operating at the site.

Conclusion
Based on the above, the Commission finds that the proposed project is consistent with the Coastal Act's visual resource policies of Section 30251.

G. ARCHAEOLOGICAL RESOURCES

Coastal Act Section 30244 states:

> *Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.*

The site of the SONGS complex was known to be the home of the Juaneno or *Acagchemem* people, who lived in what is now coastal northern San Diego and southern Orange Counties. The area was also part of the Mexican land grant, San Onofre y Santa Margarita, established in 1841, and became part of Marine Base Camp Pendleton in 1942. The site could contain artifacts or remains from any of these periods.

SCE's initial project proposal included disturbance of about 0.5 acres of the site that could have resulted in exposure of cultural resources. SCE provided a cultural resource assessment with its CDP application that included results of a May 2012 field survey of those undeveloped areas. The survey and an associated consultation with relevant sources and data bases showed no evidence or records of onsite cultural resources. The assessment notes that previous disturbances in these areas reduce, but do not eliminate, the potential that project activities will expose cultural resources. It recommends that further investigations may be warranted if cultural resources are encountered during the project and that SCE consult with an archaeologist should this occur. However, with SCE's recent project modification to eliminate disturbance to ESHA and to limit project activities to areas of the site that are already developed, the potential for exposure or disturbance of cultural resources is eliminated.

Conclusion
Based on the above, the Commission finds that the proposed project will be carried out in a manner that is protective of cultural resources and is therefore consistent with Coastal Act Section 30244.

H. PROJECT ALTERNATIVES

The NRC requires that operators of licensed nuclear facilities establish and maintain a security program that includes measures to detect, delay, and respond to threats against sensitive sites and materials. These programs are to include various types of physical barriers that can resist a number of specific kinds of potential attacks. Each facility may have different physical barriers, depending on its setting, terrain, layout, and other factors.

For this proposed project, SCE's objective was to enhance its existing security program by extending its required physical barriers to the outer boundary of its Owner Controlled Area (OCA). As noted above, SCE considered several alternative methods to meet relevant NRC security requirements, with each alternative evaluated against regulatory needs, personnel, operational, and spatial needs and constraints, effects on biological and visual resources, and other similar considerations. Other than the proposed project, the main two alternatives considered were:

- **No Project:** This would have maintained SCE's existing security program and physical barriers. However, SCE wishes to provide enhanced security at SONGS, and it proposes to address operational constraints caused by the existing program, which involves more sharing of facility resources between security and other plant operations than would the proposed project. Thus, although the existing program meets NRC requirements, it does not meet SCE's project purpose to enhance security at SONGS.

- **Multiple Barriers:** SCE also considered constructing a series of concentric fences and barriers around the facility – for example, a chain-link fence with barbed wire that would be separated by several feet from strands of concertina wire, which would be separated by several feet from a barricade of concrete blocks. This alternative would meet NRC requirements, but would require an overall greater area than the proposed Metalith wall alternative – i.e., a zone of up to about 200 feet wide with multiple barriers versus the eight-foot wide Metalith wall. This approach was found to be infeasible because many areas of the SONGS complex would not provide the available width necessary for this multiple barriers approach without significant reconfiguration of existing facilities. This approach would have also resulted in greater adverse coastal resource effects, since some of the security zones would have intruded into ESHA.

In summary, the "no project" alternative does not meet project objectives and the "multiple barriers" alternative would cause greater adverse effects. SCE's proposed Metalith/fencing hybrid approach, with its recent modification to avoid direct impacts to ESHA, results in an alternative that meets project objectives while avoiding and minimizing potential adverse effects on coastal resources. With **Special Condition 1**, the project's potential adverse effects are further reduced. The Commission therefore finds that the proposed Metalith/fencing hybrid, as modified and conditioned, is the least environmentally damaging and feasible alternative.

H. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 13096(a) of the Commission's administrative regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

Because the proposed project has the potential to result in significant adverse environmental impacts, the Commission has identified and adopted one special condition necessary to avoid, minimize, or mitigate these impacts. With the inclusion of this special condition, the Commission finds that, within the meaning of the California Environmental Quality Act of 1970, there are no further feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the proposed project may have on the environment. Therefore, the proposed project, as conditioned, has been adequately mitigated and is determined to be consistent with CEQA.

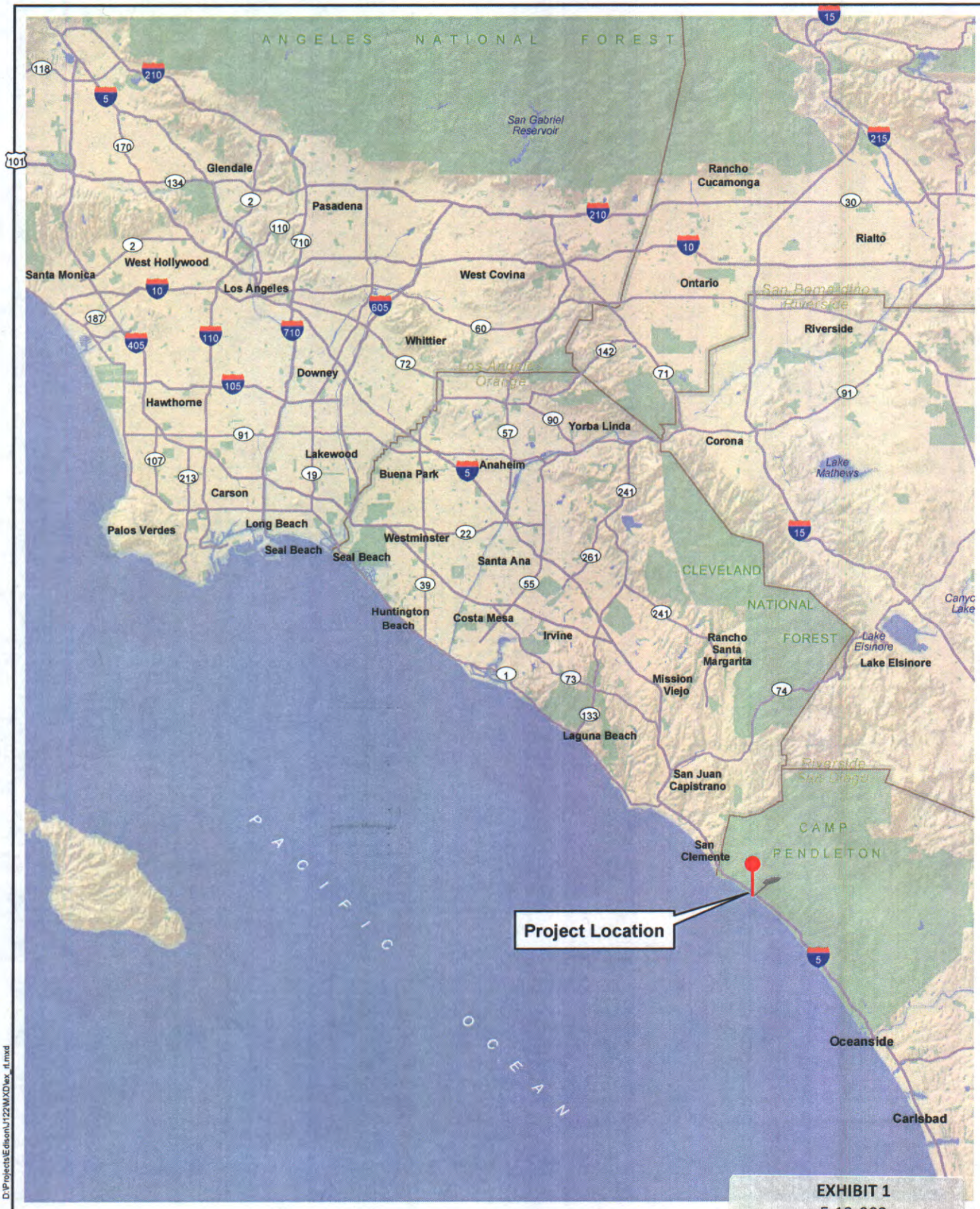

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EXHIBIT 1
E-13-003
SONGS Metalith Wall

Regional Location

Special Status Plant Surveys for the San Onofre Nuclear Generating Station Security Wall Project

N W E S

10 5 0 10
Miles

(Rev: 8-27-2012 MMD) Projects\Edison\J122\Graphics\PlantReport\Ex1_RL.pdf

LEGEND

- KOP Location
- Proposed Metalith Security Wall

1 inch = 400 feet

0 400

Feet

Source: Southern California Edison.

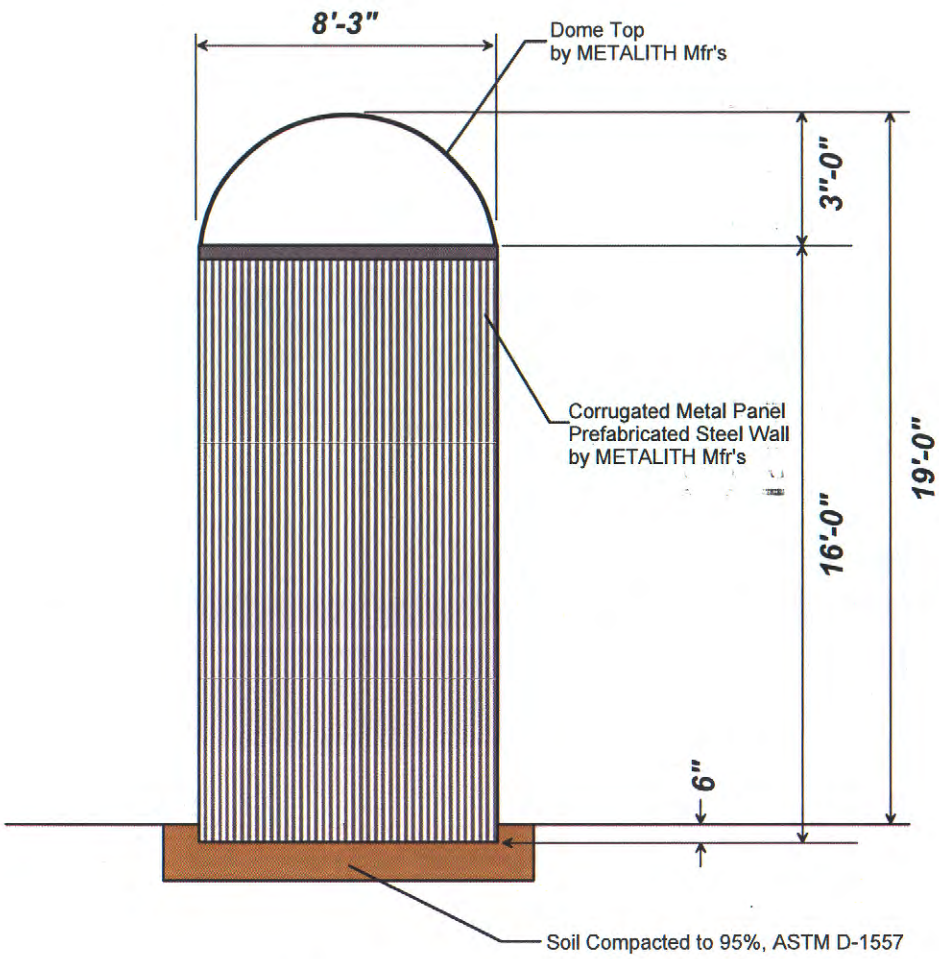
Image Source: ESRI, i-cubed, AEX.

San Onofre Nuclear Generating Station Security Wall	2012

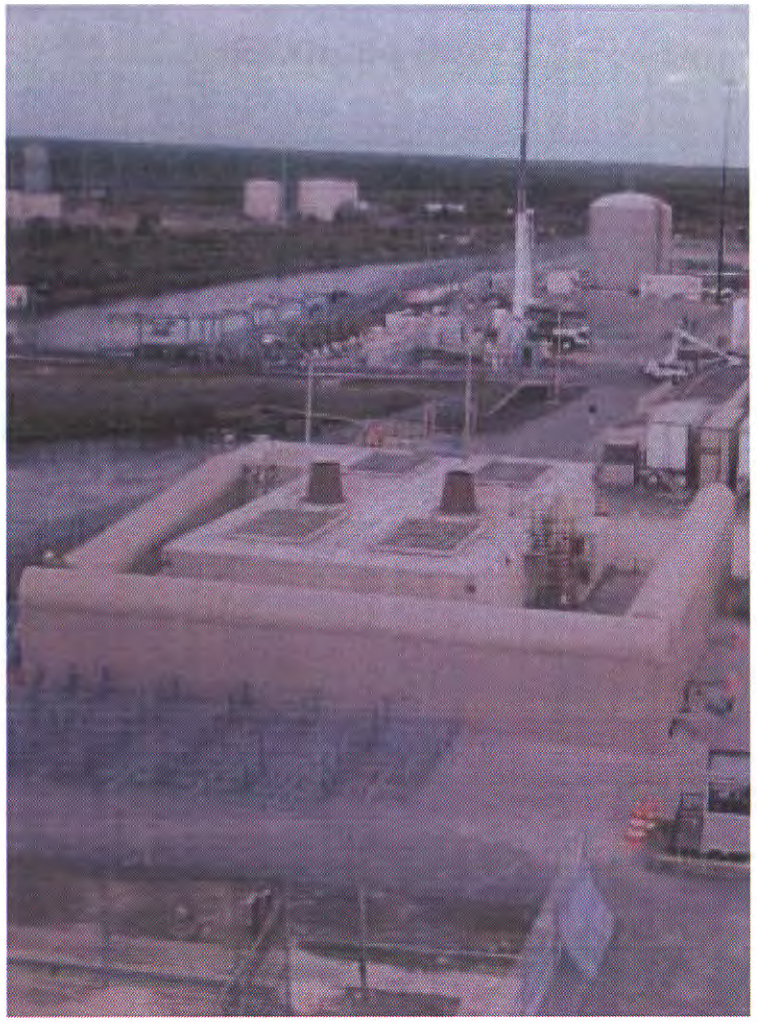
FIGURE 1

KOP LOCATION MAP
SAN ONOFRE
NUCLEAR GENERATING STATION
SECURITY WALL

EXHIBIT 2
E-13-003
SONGS Metalith Wall



Typical Side View



Example Photo

EXHIBIT 3
E-13-003
SONGS Metalith Wall

METALITH PERIMETER BARRIER WALL CONCEPTUAL CROSS SECTION

Project No.: 12023A	Date: JUL 2012	Project: SONGS Perimeter Barrier Wall	Fig 1

GeoPentech

EXHIBIT 4a
E-13-003
SONGS Metalith Wall

KOP 5 – Existing view of the proposed project looking southeast from the north beach.

	2012	San Onofre Nuclear Generating Station Security Wall	**Figure 6a** **KOP 5 – Existing View**	SOUTHERN CALIFORNIA EDISON An EDISON INTERNATIONAL Company

KOP 5 – Simulated view of proposed project looking southeast from the north beach.

EXHIBIT 4b
E-13-003
SONGS Metalith Wall

	2012	San Onofre Nuclear Generating Station Security Wall	**Figure 6b KOP 5 –Simulated View**	SOUTHERN CALIFORNIA EDISON