

CALIFORNIA COASTAL COMMISSION

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October 24, 2001

Dr. David Kay
Southern California Edison Company
P.O. Box 800
Rosemead, CA 91770

Re: Compliance with Condition B of the SONGS Permit No. 6-81-330-A: SCE's 2000 Annual Marine Environmental Analysis Report

Dear David:

On October 12, 2000, the California Coastal Commission concurred with the Executive Director's determination regarding the fish behavioral barriers required by Condition B of the coastal development permit for the San Onofre Nuclear Generating Station Units 2 and 3 (No. 6-81-330-A, formerly 183-73). (See staff report entitled *Executive Director's Determination that Fish Behavioral Barriers Tested at SONGS are Ineffective*, dated September 22, 2000.) As part of that permit compliance action, the Executive Director specified continuing monitoring requirements, which included submission of a written report of the Fish Chase procedure used at the plant.

As required, on July 31, 2001, SCE submitted the 2000 Annual Marine Environmental Analysis Report for the San Onofre Nuclear Generating Station. Chapter 4 of the report contains an assessment of in-plant fish, which includes data and analysis of the Fish Chase procedure.

The results of Chapter 4 indicate that the operation of the Fish Chase procedure during 2000 was consistent with the requirements enumerated in the Executive Director's determination. Specifically we note the following:

- (1) The impingement for the year was about 28,652 kg, more than the long-term average of about 22,500 kg but within the normal range.
- (2) The Fish Chase procedure resulted in 4,318 kg of fish returned live to the ocean. The long-term mean is 4,300 kg.
- (3) For the year 2000 the Fish Chase effectiveness relative to impingement was 15% (4,318/28,652), a value greater than the 10% mark that is the target.
- (4) There was a clear discussion concerning methods, results and any unusual events (of which there was one that probably resulted in an underestimate of the effectiveness of the Fish Chase procedure).

We also make the following recommendations for subsequent reports:

- (1) Document impingement or return of species of special interest (e.g., Giant Sea Bass, turtles, mammals, etc.) if this is not covered elsewhere in the submission to the Commission.
- (2) Include a figure that shows annual fish return (biomass) from the Fish Chase procedure/ annual impingement (biomass) x 100 vs. year. This would allow evaluation of the temporal success of the procedure. For example, this year it was about 15%; putting data from subsequent years on the figure would allow direct evaluation of trends.


Finally, in reviewing the report with respect to the monitoring requirements contained in the Executive Director's determination, we realized a mistake was made in the language defining mortality rate (footnote 5, p. 12 of the September 22, 2000 staff report, which states in part: "Mortality rate is defined here as the proportion of fish killed during a heat treatment relative to the number of entrained (fish impinged plus fish returned alive via the FRS)." This footnote was in reference to reporting on unusual events, such as higher than normal mortality. The monitoring provision clearly was meant to refer to biomass, not abundance. Thus, the footnote should be corrected to read:

Mortality rate is defined here as the biomass of fish killed during a heat treatment divided by the biomass of fish entrained (fish impinged plus fish returned alive via the FRS). Higher than normal mortality is defined as (1) a sequence of three or more heat treatments where the mortality rate exceeds 50%, (2) more than 50% of heat treatments in a given year have more than a 50% mortality rate, or (3) mortality rate for the year exceeds 50%.

We plan to report this change to the Commission as an action by the Executive Director at the earliest possible time. Please let me know if you have any concerns about modifying the language in the footnote.

I hope our recommendations for future reports on the Fish Chase procedure will be helpful to you. Thank you for your continuing cooperation with the Commission staff in addressing the Commission's behavioral barriers permit condition.

Sincerely,


Susan M. Hansch
Chief Deputy Director

cc: H. W. Newton
K. T. Herbinson
Samir Tanious