



Bill Brand
Mayor

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May 8, 2018

West Basin Municipal Water District

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Eric Zigas, Project Director
Tom Barnes, Project Manager

The Mayor and City Council of the City of Redondo Beach appreciate the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Ocean Water Desalination Project. Official comments on the DEIR are attached to this letter. In addition to approving submittal of official comments, the City Council authorized the submission of this letter at a public meeting held on May 8, 2018.

The City of Redondo Beach (City) understands the importance of water reliability and has worked cooperatively with West Basin in testing and developing new technologies such as the full scale pilot desalination facility located at Sea Lab in Redondo Beach. While we understand that West Basin provides critically important water supplies to the area, we are not convinced that the development of a full scale production facility at either the El Segundo site or the Redondo Beach site is warranted at this time.

Specifically, it is our opinion that desalination is an energy intensive process with a significant carbon footprint and other marine life impacts. As such, it should only be utilized when other options for water reclamation, recycling, storm water capture, infiltration and conservation have been exhausted.

The City values the use and availability of reclaimed and recycled water and is often frustrated by the lack of available connections to the system. The significant upfront costs to end users except those of highest use volume is a substantial deterrent to broader usage. It is our belief that West Basin should provide recycled water to every business and residence in Redondo Beach, and the service area along with funding additional significant water conservation programs before embarking on a full scale desalination operations.

While it is easy to say that avenues for recycling and conservation are largely exhausted through your current efforts that recycle and distribute approximately 40 MGD of Hyperion water for golf courses, cooling towers and refineries, this ignores plentiful supplies of over 250 MGD of nearby discharge water that could be put to beneficial use.

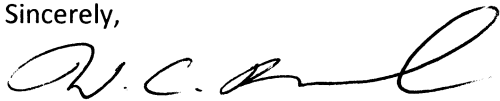
There are also opportunities to change laws, ordinances, regulations and standards to not only allow, but to require direct use of recycled water for all non-potable uses. We believe that residents and businesses in the South Bay would broadly support new rules and legislation to advance sustainability goals.

Further, we find the consideration of an alternative facility at the AES Generating Station in Redondo Beach to be contrary to all current efforts underway to deindustrialize the City's Waterfront and develop parkland and other coastal commercial resident and visitor serving uses. The existing facility is currently being offered for sale by AES for nonindustrial development, and the City is working to participate in the sale and development process by offering to purchase some or all of the site. The City has been successful in supporting legislation that would provide funding for parkland development, and has begun the process of forming an Enhanced Infrastructure Finance District (EFID) in cooperation with the County of Los Angeles to provide ongoing funding to improve and transform this blighted industrial facility.

Due to all the concerns noted above, and after considering all of the facts and information in the record, the City of Redondo Beach opposes the construction of desalination facilities at both the El Segundo and the Redondo Beach locations.

We look forward to your consideration and response to our comments on the DEIR attached hereto as Exhibit A.

Sincerely,

A handwritten signature in black ink, appearing to read 'W.C. Brand', written in a cursive style.

William C. Brand

CC: City Council
Joe Hoefgen, City Manager

Exhibit "A"

Official City Comments on West Basin Ocean Water Desalination Facility Draft Environmental Impact Report

The City of Redondo Beach appreciates the opportunity to comment on Draft Environmental Impact Report (DEIR) (SCH XXXXXXXXX) for the Ocean Water Desalination Project. After reviewing the project and the alternatives studied in the DEIR, the City respectfully submits the following comments:

1. The DEIR fails to adequately study the potential for conservation, expanded wastewater recycling, storm water capture, infiltration and brackish groundwater desalting to reduce or eliminate the need for the proposed facility. An analysis of the potential for these alternatives to reduce or eliminate the need for the project should be included in the DEIR. Page 2-17 discusses the need for the project and states that expansion of reclaimed water from 40 MGD to 70 MGD is being considered. This, and further expansion should be required prior to any desalination facility construction.
2. With respect to Mitigation Measure BIO-M-2, the impacts of the project on marine life through entrainment, turbidity, thermal change and other factors should be addressed with more specific mitigation measures where they are known to exist and can be feasibly implemented. For example, the Marine Research Center in Redondo Beach continues to replenish White Sea Bass and other species as they have done for years. This facility and its operations were initially developed as a mitigation measure for the San Onofre Nuclear Generating Station (SONGS), and the existing or expanded facility has the potential to provide additional mitigation for this project. Second, the California Coastal Commission has specified that almost 6 acres of wetlands need to be restored at the AES Generating Station. Specific mitigation contributions to these two efforts in proportion to the identified impacts should be considered and required.
3. Page 4-5- The related project No. 22 should be corrected to specify that the Waterfront project was approved by the City Council and is currently pending before the California Coastal Commission. The construction date would be 2019-2021.
4. Page 4-6- The related projects list No. 23 should be corrected to specify that the South Bay Galleria project was approved by the Planning Commission on April 19, 2018 and is on appeal to the City Council with 300 residential apartment units. The construction date would be 2020-2023.
5. Page 4-6-The related projects list No. 24 should specify the 1700 PCH project as 115 units. Construction would begin in 2019.

6. Page 4-6- The related project list No. 25 should be revised to show that the project is under construction.
7. Figure 3-5 shows a new conveyance feeder pipeline to be constructed within the Inglewood Avenue right of way from Marine Avenue to Manhattan Beach Boulevard. Within the City of Redondo Beach, this is the most heavily traveled and congested street segment in the community. Plans are currently underway to improve traffic conditions in coordination with the City of Lawndale. Any pipeline installation must be coordinated with this street improvement project.
8. The AES Redondo Beach Generating Station site is not a feasible alternative for study in the DEIR. The consideration of an alternative facility at this location is contrary to all current efforts underway to deindustrialize the City's Waterfront and develop parkland and other coastal commercial resident and visitor serving uses. The existing facility is currently being offered for sale by AES for nonindustrial development, and the City is working to participate in the sale and development process by offering to purchase some or all of the facility. The City has been successful in supporting legislation that would provide funding for parkland development, and has begun the process of forming an Enhanced Infrastructure Finance District (EFID) in cooperation with the County of Los Angeles to provide ongoing funding to improve and transform this blighted industrial facility. The City's General Plan contains clear policies to plan for the reuse of the site for nonindustrial purposes at the end of the useful life of the Generating Station.

Thank you again for the consideration of our comments.